

From: "Bob Stokes" <bstokes@galvbay.org>
To: <bill.roberts@twdb.state.tx.us>
Date: 10/5/2006 4:48:41 PM
Subject: GBF comments on TWDB State Water Plan

Mr. Robert, enclosed are comments on behalf of the Galveston Bay Foundation. Thanks for the opportunity to submit these comments. Please let me know if you have any questions. Thank you.

Bob Stokes

President

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October 4, 2006

Mr. Bill Roberts
Texas Water Development Board
P.O. Box 3231
Austin, Texas 78711-3231

Re: 2007 Texas State Water Plan

Dear Mr. Roberts:

Please accept this letter as comments from the Galveston Bay Foundation regarding the 2007 State Water Plan. Our organization has carefully followed the water planning process even before the current configuration under the SB1 process. Our members have an interest in this process as it affects the health of Galveston Bay and its tributaries. We are pleased that the process has allowed our involvement throughout and we plan to continue our close participation.

While we recognize that much effort by both the regional groups and the Water Development Board was put into developing the document Water For Texas 2007, there are several aspects of the plan with which we take issue.

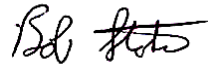
1. Designation of streams of unique ecological value should be done in its own right and not necessarily as mitigation for future reservoirs. No such provision was in the enabling legislation under SB1 or its enabling rules. Region H and Region E should be applauded for recommending streams for designation and the legislature should receive the Board's recommendation to designate those streams. (Page 14, Volume 1)
2. The plan seems to defer to the Legislature to act to approve the provisions of Article 1, House Committee Substitute Senate Bill 3, 79th Legislature. We feel that it is not necessary for the Board to defer its duty to act to protect environmental flows. This should be done forcefully in the 2007 water plan and it is potentially harmful to the environment to wait for legislation that may or may not come about. The Board has the legal obligation as of now to protect environmental flows. (Page 18, Volume 1)
3. We strongly believe that an expedited amendment process must only be used for minor amendments that affect a limited area, and these should be defined. Otherwise, amendments can be used to circumvent the planning process and public input. If amendments to the plan can be made outside of the normal planning process, there will be limited ability for the Board or a regional group to choose between alternate management strategies and compare the relative efficiencies, economy and environmental impacts. (page 22, Volume 1)
4. Region H proposes using alternate water management strategies in future plans in order to maintain flexibility. We strongly disagree with this proposal. This will make the planning process irrelevant by allowing a group to throw in every strategy including the proverbial kitchen sink. No longer will hard choices need to be made. No comparisons of differing strategies will be necessary. Implementation of this

proposal will effectively end the positive progress that has resulted from the regional planning process. (Page 58, volume II)

5. We commend Region H Water Planning Group for once again including the goals for freshwater inflows into our bays. (see Table E-12 of the Executive Summary of the 2006 Region H Water Plan) These goals and this table were the result of a lot of work and compromise by RHWPG and the Galveston Bay Inflows Group. They are not included in Water for Texas 2007. Inclusion of these goals was a fundamental keystone on which the rest of the Region H plan rests and omitting them from the state plan fails to recognize the necessity of resolving this critical outstanding issue.

We hope that the Board will take into consideration all of these comments. If you need any further information from us, do not hesitate to contact us.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Bob Stokes', with a stylized flourish at the end.

Bob Stokes
President, Galveston Bay Foundation

cc: Jeff Taylor, Chair Region H Water Planning Group