

From: Sarah Baker <sarah@sosalliance.org>
To: <bill.roberts@twdb.state.tx.us>
Date: 10/6/2006 10:26:35 AM
Subject: draft water plan comments

>Dear Mr. Roberts,

Please accept the attached comments on the state draft water plan from SOS Alliance. If there are any problems please call me at 477-2320 or reply to this email.

Sarah Baker

Sarah Baker
SOS Alliance
(512) 477-2320



October 6, 2006

Mr. Bill Roberts
Texas Water Development Board
P. O. Box 13231
Austin, TX 78711-3231

VIA E-MAIL

Dear Mr. Roberts,

Please accept these comments on behalf of Save Our Springs Alliance ("SOS Alliance") on the draft 2007 state water plan.

SOS Alliance is a non-profit environmental public interest group in Austin, Texas. The mission of SOS Alliance is to protect the Edwards Aquifer, its springs and contributing streams, and the natural and cultural heritage of our Hill Country watersheds, with special emphasis on Barton Springs. The Barton Springs segment of the Edwards Aquifer is located in regions K and L.

Our main concerns regarding the draft state water plan include environmental flows as a water demand and increased utilization of water conservation and efficiency in the plan.

Environmental flows as a water demand provides: protection of habitat for the many endangered, threatened, and recreationally and economically significant species in our state's streams, streambanks, springs, and aquifers; instream flows for recreational use; and sustainable groundwater pumping.

In order to meet the needs of our urban developments, ranchers and farmers, and environmental flows, the draft state water plan should much more aggressively utilize water conservation and efficiency as water supply strategies. Large reservoirs and expensive infrastructure bring only environmental and financial detriment to Texas.

Municipal water conservation efforts have proven to work in this state: San Antonio has achieved significant reductions in per capita water use over a 20-year period. That city

uses the same amount of water as it did twenty years ago despite having doubled in population. Other major cities in Texas could achieve similar results, obviating the need for expensive infrastructure and interbasin transfers of water, and preserving environmental flows.

Interbasin transfers should only be considered where the water users requesting the transfer have demonstrated the "highest practicable level of water conservation and efficiency achievable" as required by state law. Respecting this mandate and using interbasin transfer after conservation and efficiency have been rigorously pursued will save our state money and our water resources for environmental and recreational use---which also means economic prosperity and high quality of life for Texans.

Limiting non-essential water use during drought should also be aggressively implemented. Serious water shortages can be addressed either through developing expensive new water supply sources to meet non-essential water demands for short periods of time, or by limiting those non-essential uses. Major water rights holders are required to develop drought management plans. These plans should be taken at face value in the state water plan and incorporated into the state water plan as water management strategies.

Many of the regions within the state water plan are over-supplied in the draft plan, including region K (2060 water supply exceeds water need by 303, 619 acre-feet). Barton Springs, in Austin and within region K, has recently seen its lowest average water levels in decades, and a Critical Stage drought was declared for the first time in September 2006. Barton Springs is the only habitat of the federally listed as endangered Barton Springs salamander. The salamander is very much threatened by reduced flows. The groundwater availability model for this segment of the Edwards assumes sustainable flow at Barton Springs of 1 cubic foot per second. At this level of flow the endangered Barton Springs salamander could not survive. Water availability modeled on this assumption is flawed.

Because of the cultural, recreational, and economic significance of Barton Springs this segment of the Edwards Aquifer cannot sustain any increase in pumping, and current pumping levels need to be severely limited in times of drought. Temporary overdrafting of this Aquifer will cause the irreversible extinction of federally protected species, significant detriment to the aquifer ecosystem, and loss of a culturally significant resource.

The additional water needs of Region K can be met through conservation, efficiency, and planning to meet real water demand rather than over-supply and non-essential water use during drought. The Region K plan assumes 1% savings through water conservation from municipal water users. Much more water could be conserved than 1% reducing the desire to mine the Edwards Aquifer for non-essential water needs.

In 2007 Texans cannot proceed with a frontier mentality that there is enough of everything and we can build our way out of anything. Our population is expected to

double in the next fifty years, and in order to preserve any quality of life we must focus on sustainable use of our existing water resources. The financial and environmental costs of building our way to unlimited water use are too high for this state---it will cost us our tax dollars and our natural heritage. It is time for the state water plan to reflect the realities of Texas today, our public waters are being polluted and wasted, to the detriment of wildlife and humans. Aggressive water conservation will protect the quantity and quality of our public waters and should be the priority strategy in our 2007 state water plan.

Thank you very much for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "SBaker", with a stylized, flowing script.

Sarah Baker
Staff Attorney
SOS Alliance