



Alamo Group of the Lone Star Chapter

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Steven J. Raabe
Administrative Agent for Region L San Antonio River Authority
P.O. Box 839980
San Antonio, Texas 78283-3692

Emailed to: Cole Ruiz <cruiz@sara-tx.org>

RE: Comments from the Alamo Sierra Club on the Region L Water Plan draft

Dear Mr. Raabe:

Please accept these comments on the Region L Plan from the Alamo Group of the Lone Star Chapter Sierra Club. Due to limited time, we include more problems and fewer promises in the SCTRWP. Some assumptions and the lack of sufficient studies and innovation in the evaluation of alternatives are at the root of the problems. Also, as a partner of the Hill Country Alliance, we fully support the more detailed comments the HCA submitted.

Thank you for the opportunity to submit these comments on behalf of the Alamo Group.

Sincerely,

Margaret Day
Executive Committee Co-Chair

SCTRW P assumptions and recommendations with problems:

1. Accepting a 75% increase in regional population in just 50 years is unsustainable. Since the major regional city, San Antonio, and its water utility SAWS have committed to “sustainable” planning, then understanding and addressing the forces driving this unsustainable growth is a must. This current water planning focus is too narrow to effectively manage for a steady state. A set of sustainable principles and criteria are needed to keep recommendations on track to achieve this goal.
2. The recommended water projects are too many and not compared studiously or by broader risks and benefits. Also, while it is important to build in some redundancies, this level of over supply will be more costly, fuel population growth, and will undermine efforts to conserve and use water more equitably and efficiently. A guiding principle of net zero water would be ideal.
3. More conservation efforts could help the region reduce water needs by far more than the 22% goal. The recommended guidelines (8.5.1) to reach 140 gpcd followed by a .25% reduction per year seem lax and already greatly exceeded by SAWS since 2011.
4. We question the yield distribution of new sources and the limited study and innovation that went into these recommendations. As examples, 23% is expected from seawater desal. Were the required resources, energy, CO₂, and many other impacts incorporated into the comparative analysis? Might increasing reuse, greywater, stormwater and rainwater catchment more sustainably meet needs? 15% is expected from surface reservoirs, yet surface sources are already over allocated and evaporation is a serious and growing issue. It is claimed (6.7) seawater desal is more desirable than surface water, but the claim appears anecdotal, when it should be data driven.
5. The recommendations for groundwater sustainability (8.3.2) are insufficient. They only call for monitoring, protecting and enhancing recharge, and conservation, which are insufficient to prevent drawdown exceeding recharge, or the continued mining and eventual depletion of Texas aquifers. Also, the interconnectivity of surface and groundwater as a system ought to be another guiding principle.

6. The plans, unfortunately, do not resolve conflicts between the rule of capture (and its own internal conflicts) and GCD powers, in fact they allow the problems of over allocation, over use, and water wars to magnify. First, section 8.9.3 allows for “flexibility” with rules to allow increased water use for rapid population/economic activity, such as fracking, instead of designing water controls as a needed constraint on boom and bust economics. Then groundwater management (8.3.1) increases potential problems with rule of capture vs GCD DFCs by (8.3.1 #5) allowing permit holders to pump in excess of DFCs and (#6) allowing GCDs to the issue more permits and pumping in excess of their modeled available groundwater (MAG). Also, draft participants may be unaware of recent state legislative changes in MAG guidelines, a sleight-of-hand calculation that greatly increases available groundwater without scientific agreement, which is predicted to increase drawdowns.
7. The scope of the Environmental Benefits and Concerns (6.7) is too limited and anecdotal, requiring more expansive analysis of costs and benefits.
8. A recommendation for sharing groundwater resources among regions (8.3.3) includes notification of those districts and provision of reports--an economic analysis of the impact to communities, instream flows, and bay and estuary systems incurred by movement of the groundwater. Two controversial WMSs, Vista Ridge and Forestar, are interbasin groundwater export projects, and we know from experience that current provisions are inadequate to address the conflicts. The types of studies now recommended have not been provided, but even if they were, more should be required, such as public hearings.
9. Voluntary Redistribution of Water From Rural and Agricultural Areas (6.4) only requires that sellers are compensated and transfers are voluntary, but ignores that in many cases, such as the Vista Ridge pipeline, only a minute percent of landowners volunteered and are compensated, while all other landowners did not volunteer and are not compensated, yet their water will be lost to them and they bear the impact.
10. SAWS’ Vista Ridge partnership is a Region L recommended WMS, listed as drawing 34,894 acfty, one of 7 regional water transfer projects totaling 107,632 acfty. Section 6.4 admits 3rd party negative economic impacts will occur, but these are not evaluated or addressed in the plan. Vista Ridge partners own water leases for about 70,000 acfty, with a SAWS contract to deliver 50,000 acfty, so according to

recommendations under 8.3, they will be able to pump and export more if the GCD issues them more permits, and they intend to go to the courts and to the state legislature to insure this, to protect their investment, if they are not permitted, according to FOI-obtained documents.

11. There is evidence throughout the SCTRWP that environmental needs are not well addressed and not going to be met. Specific cases are found in concerns identified by the Texas Living Waters Project.

SCTRWP recommendations we support:

1. Recommendation 8.10.4. Counties desperately need more authority for land use planning and for regulation of development based on water availability and protection of water resources and need education to enable them to make sustainable choices.
2. Recommendation 8.7.5. More environmental studies on impacts to water and ecosystems are needed. However some holistic studies are also needed, otherwise studies may be too narrow to capture all the elements and dynamics of creating a sustainable regional economy.