



**Comments of National Wildlife Federation and Sierra Club, Lone Star Chapter  
On LCRA Staff Recommendation for Consideration at November 19, 2013 Meeting**

The National Wildlife Federation and Sierra Club, Lone Star Chapter strongly support the LCRA staff recommendation to implement reasonable limits on lawn watering. Lawn watering represents a large portion of municipal water demands. Indeed, we believe that requirement should be strengthened to include a limitation on lawn watering of no more than once every two weeks beginning at combined storage levels much higher than 600,000 acre-feet. To be effective, lawn watering limitations need to be in effect well before the end of summer and well before high lawn watering use has pushed lake levels down. Studies conducted for the San Antonio Water System and the Turfgrass Producers of Texas indicate that lawns along the IH 35 corridor can survive with watering as infrequent as once every four weeks. With only the rarest exceptions, lawn watering at a frequency to keep lawns green, especially during drought conditions, is a non-essential water use and unrelated to meeting public health and safety needs.

On a longer term basis, we urge LCRA to work on strengthening elements of its ongoing water conservation programs to move its customers to no more than twice-per-week lawn watering, or an equivalent level of use reduction, at any time, regardless of lake levels. In addition, lawn watering should not ever occur during the heat of the day, when much of the water will simply evaporate. That should be a basic premise of efficient use of water, regardless of whether the area is experiencing drought conditions.

The National Wildlife Federation and Sierra Club appreciate the recommendation of LCRA staff not to seek, at least for now, to suspend pass-throughs of water for environmental purposes that are met with firm water. However, it is important to recognize that the proposed cessation of interruptible water releases if storage levels are below 1.1 million acre-feet, for all users except the Garwood Irrigation Division, also results in a very substantial reduction of environmental flows. Because the amounts of firm water available to help meet environmental needs are severely limited under the Water Management Plan (“WMP”)—for example, only a maximum of 5,944 acre-feet would be available for supplementing Matagorda Bay inflows in 2014 for the entire year compared to a minimum needed inflow of 14,260 acre-feet each month—the absence of significant interruptible water releases means the river and the bay will not receive adequate flows to remain ecologically healthy, unless there are persistent rains in the lower basin.

The amounts of firm water allocated for environmental flow protection in the current WMP were designed to be minimally adequate to supplement interruptible water based on the availability curves

used in developing the WMP. That is, the combination of interruptible water available under those curves with the allocated amounts of firm water was designed to be adequate to maintain reasonably acceptable conditions in the river and to maintain a small sanctuary area in the bay during a repeat of the drought of record. However, the number of years when interruptible water is being made available to help meet those needs has already been greatly reduced through previous emergency orders from the levels assumed in developing the WMP. As a result, the amount of firm water allocated to support environmental protection is falling seriously short of what is needed to protect the river and Matagorda Bay. Releases of interruptible stored water benefit the environment regardless of whether it is released specifically to help meet environmental needs or whether it is released for downstream irrigation and only indirectly provides environmental benefits.

Our organizations do not support the staff recommendation to cut off all interruptible water, other than for the Garwood Irrigation Division, when combined storage levels on March 1 are less than 1.1 million acre-feet. Environmental protections and other water users would suffer seriously under such a scenario, which seems unnecessarily severe particularly if implemented without consideration of then current climate conditions. We certainly agree that limitations on interruptible water availability beyond those included in the currently effective WMP are needed to address this serious drought situation. However, those new limitations must reflect reasonable probabilities of future inflow scenarios, which, we agree, should include reasonable worst-case scenarios, based on consideration of then current climate conditions.

Without question, the drought is frighteningly severe. Commercial fisherman, marina owners, farmers, agricultural support businesses, hunting and fishing guides, motel and restaurant owners, and many others already have suffered major economic losses. The challenge now is to identify a reasonable path forward that minimizes additional losses on all sides; protects firm water supplies and public health and safety; and avoids pushing the river, the bay, or the lakes over the edge to the point that the ecosystems can't recover in a timely manner when the drought ends. That is a challenging task. A reasonable emergency order is needed in order to restrict interruptible water supplies below the levels provided for in the currently effective WMP. However, the emergency order should not restrict those supplies as severely as recommended by LCRA staff.

Your consideration of these comments is greatly appreciated. The National Wildlife Federation and Sierra Club stand ready to work with LCRA to find a reasonable middle ground.

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