

Date: April 16, 2014

To: Todd Chenoweth  
Texas Water Development Board

From: Hill Country Alliance  
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Please consider the following comments related to the implementation of House Bill 4 and the rulemaking process for the State Water Implementation Fund for Texas.

We appreciate the progress that is being made to emphasize conservation in future state water planning efforts. Strategies such as smart fixtures, re-use, and rainwater harvesting are essential conservation measures. Proper land stewardship practices on watersheds (water catchments) and riparian management along creeks and rivers go hand-in-hand to provide clean water and more available stored water.

**If we are to reduce demand and increase supply, we need to change our water culture.** The Hill Country Alliance encourages the TWDB to continue to develop and support financial incentives for those who change the way they use their water.

**1. Moving Texans away from landscape practices that require excessive watering is the most direct path to reducing demand and creating additional supply.** As observed in the attached report from Native American Seed, New Braunfels was able to reduce consumption from 17 million gallons per day to 8 million gallons per day after drought response measures were established last summer. Reducing consumption is doable and affordable, particularly when it comes to landscape and outdoor watering. As stated in the attached Living Waters report, "It makes little sense to procure, treat and deliver high-quality drinking water to customers across a city only to have it evaporate immediately or disappear down a storm drain once we apply it inefficiently to our outdoor landscapes." **It is prudent to continue to pursue efforts begun in 2007 to determine the actual average per-person residential water used in 2014 and to strive to meet our state goal of reducing municipal water consumption to 140 gallons per person per day.**

**2. Rural programs are also essential,** and we encourage TWDB to go beyond the 10 percent minimum set aside to make sure that conservation is a priority in our rural communities as well as our growing cities. **One rural program that we would like to draw attention to is brush control.** Brush control for the purpose of increasing infiltration and benefitting the natural water cycle of the watershed can provide long-term benefits if properly carried out. However, **using SWIFT funds to do large-scale brush removal to INCREASE RUNOFF is ecologically treacherous.** Historical accounts indicate the Hill Country always had timbered riparian and canyon areas. When brush cover is removed from shallow stony soils on slopes in the Hill Country... soil erosion, flooding and floodwater damage is increased exponentially. Large-scale brush removal may lead to increased rates of siltation in downstream reservoirs, degrade creeks and rivers, decrease water quality, and damage aquatic habitat. Comprehensive brush removal programs should include restoring historical mosaics of diverse native savanna/grasslands to protect bare soils after brush clearing. Savanna-type grasslands provide capillary root mass that enhances soil absorption and water holding capacity. Equally important, re-

establishing native savanna grasslands can help prevent further spread of weedy alien plants such as Eurasian old world KR Bluestem and invading thistles.

3. **We encourage far more emphasis on Rainwater Harvesting** as a viable water supply strategy and conservation activity. This age-old strategy is proven, reliable, and far more affordable than pumping and piping water supplies.

4. **Finally, we encourage the highest possible priority given to conservation strategies, and confirmation that the 20 percent set aside is in fact only a minimum** or starting point from which we can realize a much higher percentage in the long run. We believe that a sensible conservation strategy can meet most of the future water needs of Texas. On the municipal side, successful programs in San Antonio and El Paso are positive examples where aggressive water conservation met the water needs for populations that doubled in size, while maintaining constant water use. Relying on a sensible conservation strategy to achieve Texas' future water needs will be significantly less harmful to the ecologies and economies of Texas' aquifer supplies, property values of private land owners, environmental in-flows, and bays and estuaries, when compared with reservoir and pipeline construction and inter-basin transfers.

#### ***HCA's Guiding Principles:***

The Hill Country Alliance is dedicated to ensuring for future generations an opportunity to enjoy the unique features of the Hill Country region, including the countless spring-fed streams, its multi-ethnic and agricultural heritage, and spectacular scenic beauty.

**Encourage** responsible water practices - The economy of the Hill Country and land values depend on balancing the water needs of today's current users (e.g. ranchers, development and the environment) in a way that does no harm to the streams and aquifers.

**Inform** the friends of the Hill Country - A key to solving our region's challenges is to work collaboratively with all interested stakeholders in order to make readily available honest and fair information, along with opportunities for meaningful participation in decisions.

**Nurture** unified support for innovative policy changes - While the actions needed to sustain the Hill Country's natural features vary across the region - from the rapidly urbanizing southern and eastern portions to the vast open spaces on the western and northern edges - there is a shared interest in respecting private property rights and encouraging locally grown solutions to complex issues.

**Support** economic development that is compatible with the Hill Country's unique features - A key to keeping our Hill Country a special place for generations to come is to promote sources of income for landowners and businesses so that ensuing generations are motivated to keep ranches intact and small towns functional.

Two helpful resources are attached: "Sprayed Away" by Texas Living Waters Project and "St. Augustine Fact Sheet" by Native American Seed.

[www.hillcountryalliance.org](http://www.hillcountryalliance.org)

Sincerely,



Christy Muse  
Executive Director  
Hill Country Alliance