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Chair, Evelyn Bonavita
Region L Planning Group
By e-mail to bonavita@swbell.net

Dear Chairman Bonavita and Region L Board Members:

Thank you for considering our comments on the 2006 Water Plan for our region, and the many hours you have devoted to the plan.

NWF STUDY: We also appreciate that you have voted to allow the Texas Living Waters Project engineer from National Wildlife Federation to do an environmental impact study of the water plan. \$15,000 is a lot of money for a nonprofit group to donate to the water plan study, but it is essential that the public know the impacts of this plan on the environment to understand the possible economic impact. Please release the entire study they do, to the public, as part of your plan.

WATER CONSERVATION: Thank you for emphasizing water conservation. It should be mandatory that all communities, cities, river authorities and water suppliers use advanced conservation as the main tool to provide water supplies for the future. There should not be areas that continue to water lawns and golf courses during drought, or waste water in our region where water is so precious. (The Sierra Club report on Alternative Water Strategies for Region L is one that we would like to see you use as the basis for your plan, and it is available on the Lone Star Sierra Club website.) Until such time as the San Antonio Water System estimates of nearly 30% of potable water supplies used to water lawns and landscaping in the San Antonio area can be reduced to a more reasonable amount, the Region L Planning Group should put plans to secure additional water supplies, especially those plans involving the Carrizo aquifer, on hold. We further recommend the elimination of the planned withdrawal of water from aquifers in the rural counties of Region L to supply San Antonio's future water needs until such time as San Antonio can demonstrate a radical reduction of withdrawal from the Edwards for non potable uses through the implementation of water conservation measures.

LAND STEWARDSHIP: The most up to date land stewardship practices for water conservation and recharge enhancement should be included, and prominently featured, in the Region L Plans.

DROUGHT MANAGEMENT: Drought management plans for pumping both surface and ground water are tools that we believe are essential to every city, community, river authority and water supplier on every project. This region has extremes of rainfall, both low and high, and some areas are growing beyond the ability of our water resources to support that growth. If drought management is not done, then even the springs, rivers, creeks of other areas will be damaged to supply ours, if we are piping in water, for long distances to reach our population centers. That would not be a good plan for anyone.

LEARN FROM MISTAKES: It goes without saying that without strict drought management plans in every part of our region, that our own springs, rivers, and creeks will be doomed as well as the aquatic life and riparian habitat they support. In California, the Los Angeles area has damaged not only its own resources, even causing saltwater intrusion into its groundwater stores, but also severely damaging communities and regions of many states surrounding them. Texas can learn from others and try not to make the same mistakes. We need to limit non-essential water use during drought.

We believe that SUSTAINABILITY is the #1 concept that our water plans should be built on. Groundwater must be preserved in sufficient amounts to keep springs flowing throughout our region and our neighboring regions. The rich and diverse ecology of the hill country is highly dependent on the water in, and the riparian habitats associated with the streams of the hill country. The coastal areas have evolved to depend on this steady spring flow even during droughts, and to wipe out springs will mean wiping out large segments of our natural world. Groundwater districts should be listened to when they try to preserve the sustainability of their district's groundwater supplies.

REPRESENT ALL AREAS FAIRLY: Our good quality water resources currently make our region economically viable and provide good quality of life for all of us. It is necessary to preserve sufficient groundwater from pumping or shipping away, to keep the hill country springs flowing. Coastal regions have springs as well that feed their creeks, which are essential to the estuaries, like the Mission River for instance. We expect any water plan that represents all the counties of the region fairly, to spell out sustainability of both ground and surface water clearly and make it the cornerstone of the plan and every project, including those from other regions.

REGION K PLANS: We are concerned about the Region K plans associated with our region, first because it is NOT clear that serious environmental damage can be avoided by piping their water to our area. We know that reservoirs are planned, capturing Colorado River water during high flow periods and supplementing it with pumped groundwater. In general, reservoirs can cause great damage and need to be evaluated carefully to avoid that damage. The impact of taking water that formerly went to the Colorado's coastal estuaries also must be evaluated carefully, (just as the Lower Guadalupe diversion project should be).

HILL COUNTRY CONCERNS: We also are very concerned that the Region K water to San Antonio may be piped from the Highland Lakes, in order to make a second use of the pipeline by crossing the Hill Country with it, to provide new development with water in those areas where water has not been plentiful naturally. This will certainly damage the recharge zone of the Edwards Aquifer, which is so important to the springs and their continued flow. It will speed up development in environmentally sensitive areas, as well.

CHART: We enclose studies conducted by the US Geologic Survey that indicate that urbanization results in deterioration of surface and groundwater quality, most notably by increasing the percentage of impervious cover in the recharge zone over 10%. This causes less base flow to be available, less frequently, which reduces recharge. High stormwater flows occur when impervious cover increases, which pollute the streams with sediment, also damaging recharge features and lowering water quality in the aquifer. These damages should be prevented by strictly limiting the kinds, location and density of development allowed on the entire recharge zone. We are concerned that the pipeline to San Antonio may speed up the damage, since there are not regulations in place to govern the kind of development allowed once surface water is piped to the hill country.

GRID OF PIPELINES: River authorities and development interests would prefer a grid of pipes allowing full development of the recharge zone. This is causing a fantastic rise in land prices, which then impedes the many groups working on preserving some of the critical recharge zone features of the hill country. The Region K plan to provide water to Region L needs to be discussed openly and in public, if this "grid" plan for the hill country is involved in this project, and the damage must be considered since it can reduce the amount of water recharged in the aquifers our region depends on.

DEDICATE GROUNDWATER: We propose that any land that receives surface water via pipeline should have mandatory preservation and dedication of groundwater resources on that land to

preserve the springs of the area and base flows of the streams. If the object of the surface water suppliers is really to preserve the springs, as some water developers claim, then that should be easy for them to support, and they have several votes on the Region L board.

WASTEWATER RETURN FLOWS: We are also concerned that returns of clean treated wastewater are not always clearly defined in water planning projects. This is increasingly very important to the flows of rivers in the region, and must be discussed openly and amounts should be included in any discussion of a water development project from the very beginning. The proliferation of bed and banks permits will only serve to deteriorate water quality while reducing flows of the region's rivers, or flows in the regions near us who are included in our water plans.

OVER-APPROPRIATED RIVERS: Especially because the state is continuing to consider water right applications in over-appropriated areas, like the Canyon Regional water projects proposed recently for inclusion in the water plan, we are alarmed about the impact that granting such permits would have on river flows. Rivers must have adequate flows to dilute wastewater and other pollution, to remain of good quality for downstream communities and the fish and wildlife depending on this water.

ENVIRONMENT AS A USER: We are disappointed that the adequate flows needed in springs, rivers and to reach coastal estuaries is not considered a user group in the water plan. This would seem to be the most basic way that the economic future of many counties in the region could be protected. Continuing to parcel out water without setting a sensible amount aside for rivers to continue to flow to the coast is only asking for a sure disaster in the next drought. Already many aquifers in the region are known to have more wells drilled than can be supported in a record drought. Springs will be going dry, rivers and lakes will be drawn down to empty or near empty during drought, because of the growth this region has already absorbed. The rivers have been appropriated to an extent that if all the water rights are drawn out, as they will be during drought, the rivers and estuaries will go for an indefinite length of time without adequate fresh water flows. The coastal fishing, shrimping, and recreational industries, plus the economic viability of countless communities in the region, even in the hill country, will be decimated by the damage that we already know will occur. We cannot allow the damage to be compounded by continuing to ignore this "user group".

PUBLIC MUST HEAR: To continue down this road without letting the public know what is going to occur, and openly planning more consumptive water rights to be applied for in the Region L plan, is only going to make the eventual drought more economically devastating to the region. All user groups should be required to use advanced water conservation to plan for the drought, and serious discussion of what uses will be curtailed completely during drought must happen now. If there is not going to be sufficient water, now is the time for all to understand that---before more industries are given assurance that water is plentiful, and before more people are encouraged to move to this region. Making up plans that will only widen the circle of damage is not a viable option, though we know it is hard to face the seriousness of the situation publicly.

Thank you all for your service to the Region and future generations and please know that we wish to assist you in any way that we are capable. Water is the most critical issue facing us all, because without sufficient water we, and our regions fish and wildlife resources, cannot live. I hope that you are all thinking about what your grandchildren will think about the Texas that they live in, 50 years from now, and are moving forward to protect them.

Sincerely,

Annalisa Peace
Vice President
Aquifer Guardians in Urban Areas