Water Management Plan Update Process
Participant comments received between May 22 and Aug. 15, 2025

Comments received from:

- City of Austin
- Central Texas Water Coalition
- Tom Harrison
- Highland Lakes Firm Water Customer Cooperative
- City of Lakeway
- Travis County WCID No. 17

City of Austin
Austin Water P.O. Box 1088 Austin, Texas 78767 (52) 972-0101

July 25, 2025

John Hofmann, Executive Vice President of Water
Lower Colorado River Authority (LCRA)
P.O. Box 220
Austin, TX 78767

Re: Initial Comments on 2025 LCRA Water Management Plan Update

Dear John:

We appreciate this opportunity to provide initial comments following the June 25th Participant Meeting regarding LCRA's 2025 update to its Water Management Plan (WMP). As a firm water customer of the LCRA, the City of Austin ("the City"), appreciates the opportunity to participate in updates to LCRA's WMP. This plan is essential in providing protection of firm water supply. As the plan update process continues, Austin Water anticipates providing additional comments during future post-meeting comment periods.

Updates of the plan are critical to provide protection of firm water supply as key factors change over time, including firm demands and hydrological conditions. The City appreciates LCRA's continued use of the WMP framework approved by the Texas Commission on Environmental Quality (TCEQ) in updating the plan. This framework includes adjustment of interruptible supply availability and curtailment to achieve preservation of a minimum combined storage volume during a repeat of drought of record conditions.

As demands increase and hydrology worsens, however, the amount of protection afforded by the framework's minimum combined storage volume erodes. Over time, as these trends continue, the City suggests that LCRA consider raising the minimum combined storage threshold used to determine interruptible supply availability. The City of Austin believes it is reasonable to raise the minimum combined storage volume used to determine interruptible supply availability over time to reflect increased risks to firm water supply from higher demands and worsened hydrology.

The City appreciates that LCRA is undertaking this update to the WMP at this time and has incorporated updated demands and hydrology into the modeling. The City also appreciates the transparency and ready sharing of modeling files, modeling results, and result summaries. We look forward to continuing to participate in this update process.

Again, we appreciate this opportunity to provide comments. If you have any questions, or need any additional information, I can be reached at 512-972-0191.

Sincerely,

Kevin Critendon, P.E., PMP, Assistant Director Austin Water

Austin Water

Central Texas Water Coalition
PO Box 328
Spicewood, TX 78669

July 25, 2025

VIA EMAIL TO LCRAWMP@lcra.org
LCRA Staff
Austin, Texas

Re: Comments and Questions Associated with LCRA's Update of its 2020 Water Management Plan; Comments from Participant Meeting on June 25, 2025

Dear LCRA Staff:

The Central Texas Water Coalition (CTWC) appreciates the opportunity to offer the following comments regarding the Lower Colorado River Authority's (LCRA) update of its 2020 Water Management Plan (WMP). These remarks reflect CTWC's participation in the June 25, 2025 WMP stakeholder meeting, as well as previous stakeholder meetings, and are informed by our continued review and analysis of the proposed changes.

We are grateful to LCRA staff for convening these stakeholder meetings, sharing detailed information, and responding to feedback as the update process progresses. After reviewing the materials presented and incorporating the proposed changes into our Water Availability Model (WAM), CTWC remains concerned that the plan, as currently drafted, does not provide sufficient protection for the long-term sustainability of our region's water supply.

The following document outlines our key concerns, supporting rationale, and recommendations to strengthen the WMP and ensure it better reflects the realities of a changing watershed and growing population.

Comment: CTWC Requests that LCRA Reconsider Raising the Minimum Combined Storage Threshold

CTWC respectfully requests that LCRA conduct additional Water Availability Model (WAM) runs to evaluate scenarios in which combined storage remains at or above 750,000 acre-feet. We further request that the results of these modeling runs be shared with all participants engaged in the Water Management Plan (WMP) update process.

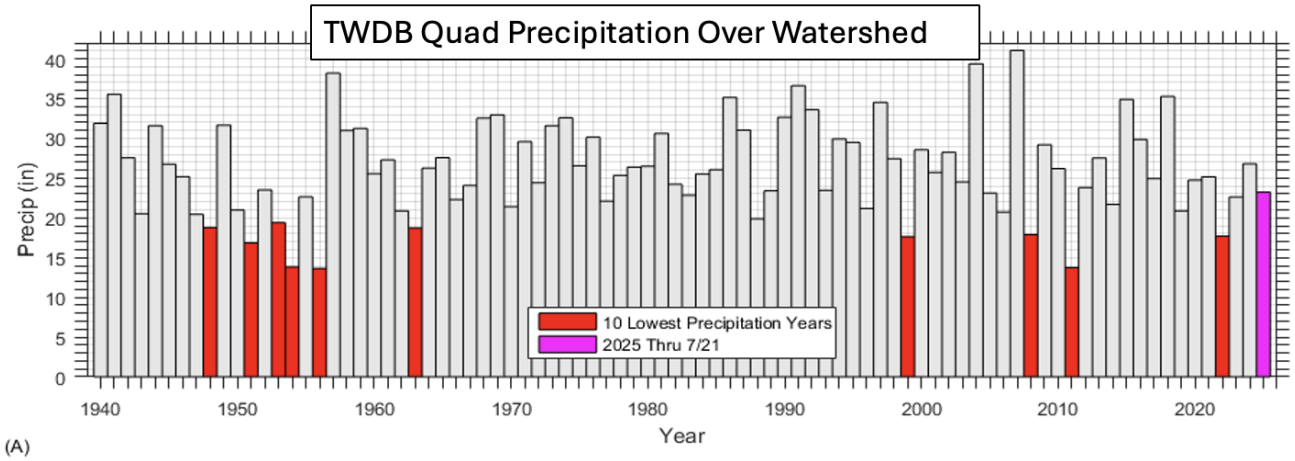
Concern:

CTWC is deeply concerned by LCRA's initial response that the minimum combined storage level may remain unchanged at 600,000 acre-feet in the revised WMP. There are compelling reasons to reconsider and raise this threshold:

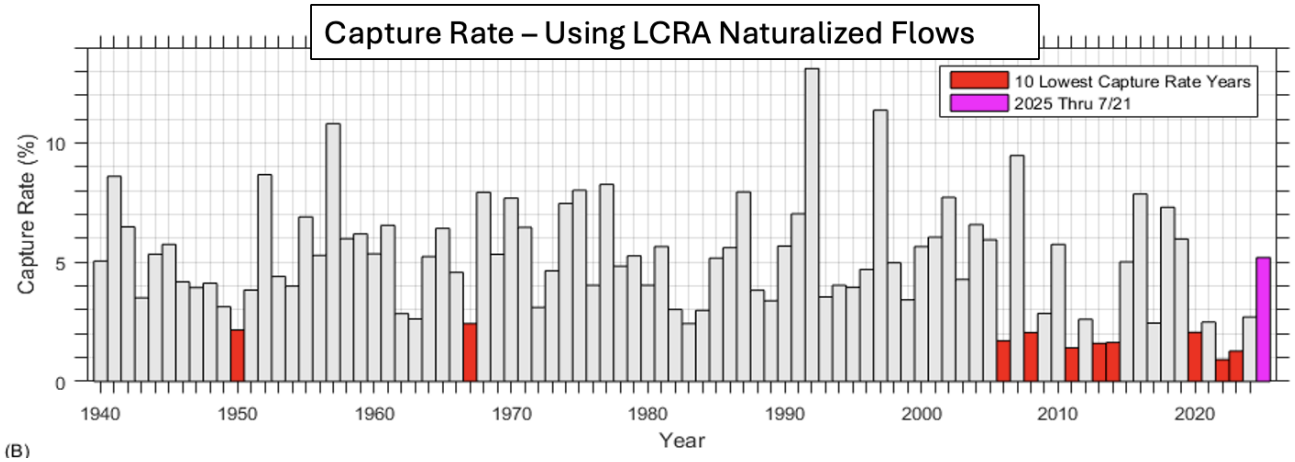
- **Outdated Basis:** The 600,000 acre-feet threshold appears to be based on a 1991 TCEQ Order that directed LCRA to propose conditions for declaring a Drought Worse than the Drought of Record. This number was subsequently adopted into the WMP framework through a TCEQ Order issued in December 1992. Our research indicates that this same number (less than 1/3 of the capacity of Lakes Buchanan and

Travis), which might have been reasonable 34 years ago, continues to be used in today's WMP. The enormous population growth and firm water in Central Texas (as well as other parts of the state) justify a critical look whether such a number should be part of this WMP.

- **Increased Risk to Firm Customers:** At today's usage levels, the existing threshold leaves firm customers—especially those in the upper Lake Travis area —at significant risk. Many large communities rely on lake levels that must remain high enough for their intakes to function. Without an increased storage buffer, these communities face a growing threat of water supply interruption if we experience conditions that are worse than the recognized 2008-2015 Drought of Record.
- **Worsening Hydrologic Trends:** Inflows to the Highland Lakes have shown a long-term decline since 2006, driven by more than just drought. The continued proliferation of private "amenity" ponds (theoretically, private permit exempt ponds), higher temperatures, greater evaporation rates, and overall climate variability have permanently altered the productivity of the watershed. These private ponds intercept runoff that may otherwise reach the lakes, reducing inflows and increasing drought vulnerability.
- **Need to Prepare for More Severe Droughts:** While the 2008–2015 drought currently serves as the Drought of Record, historical data shows that rainfall during the 1950s drought was significantly lower. That lower historical rainfall also resulted in higher inflows in the 1950s than is currently produced by the watershed under similar rainfall conditions. This phenomenon is vividly illustrated in the graphic below.



(A)



(B)

With today's diminished watershed productivity, according to CTWC research, a repeat of 1950s rainfall conditions coupled with today's watershed productivity would likely result in a critical water supply shortage. Raising the minimum storage threshold (from 600,000 acre-feet to 750,000 acre-feet) is a key step toward protecting against this valid and increasingly threatening concern.

Recommendation:

CTWC recommends that LCRA raise the **minimum combined storage threshold to at least 750,000 acre-feet**. This adjustment is essential to reflect population growth, increased business demand, reduced watershed productivity, and low rainfall of the 1950's drought. It will reduce risk to firm water customers and provide a more reasonable protective buffer against droughts that may exceed the 2008–2015 drought of record, thereby improving the long-term sustainability of our region's water supply.

Comment: CTWC requests that LCRA make more significant efforts to Slow the Rate of Depletion of Storage within the Highland Lakes

CTWC urges LCRA to take additional steps in the updated Water Management Plan (WMP) to slow the rate at which water is depleted from storage in the Highland Lakes, especially during prolonged drought conditions. As droughts become more frequent and severe, preserving combined storage over time is critical to sustaining the region's long-term water supply.

Concern:

While CTWC appreciates the adjustments to certain drought triggers presented at the June 25, 2025 WMP participant meeting, we remain concerned that the proposed plan still allows for rapid depletion of stored water.

- **Rapid Drawdowns in Modeling:** Our analysis of the WAM outputs based on LCRA's proposed parameters suggests that combined storage can again drop to critically low levels within just 3–4 years. This is particularly alarming when storage dips below 1 million acre-feet, as a repeat of low inflows—such as those experienced in 2022–2023—could leave the system highly vulnerable. According to CTWC WAM runs, the pattern of rapid depletion closely mirrors the risk experienced during the most recent drought cycle (Figure 1a). In fact, modeled combined storage would be lower at the end of 2023 than observed during the current and ongoing drought period (Figure 1b)
- **Inadequate Protection Despite Higher Firm Demand:** Although the updated model incorporates increased firm water demands projected through 2032, it does not appear to adequately adjust for the added risk associated with rapidly depleting storage. CTWC views this as an unacceptably risky strategy, particularly under the new normal of sustained low inflows, increased variabilities, and extended periods of drought.

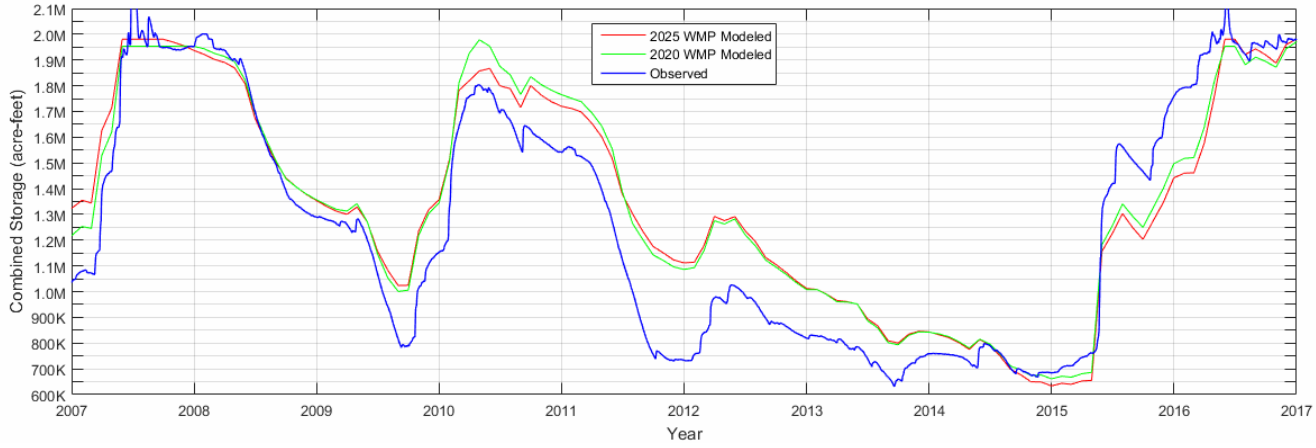


Figure 1a: Depletion of WAM-Modeled Combined Storage (2020 WMP & 2025 WMP) compared to actual observed storage from *2007-2017*

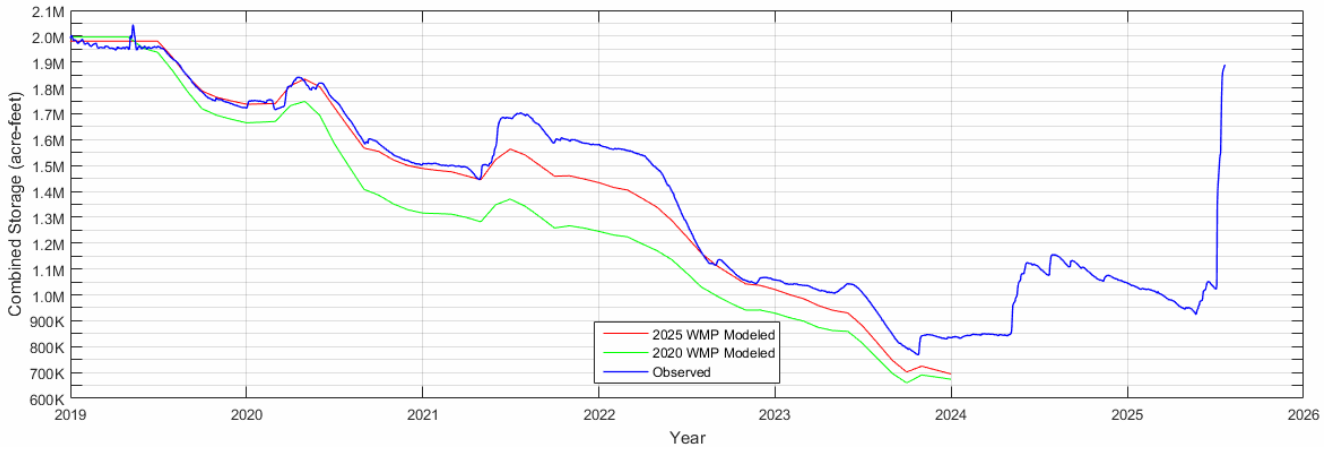


Figure 1b: Depletion of WAM-Modeled Combined Storage (2020 WMP & 2025 WMP) compared to actual observed storage from *2019-2023*, with Observed Combined Storage through Present.

Recommendations:

1. Raise Triggers and Limit Releases to Interruptible Customers

To avoid rapid storage drawdowns, CTWC strongly recommends that LCRA:

- Increase the release triggers and adopt more conservative thresholds for interruptible (non-firm) customers—especially during early drought recovery phases.
- Implement early and sustained curtailments of large releases to extend the lifespan of storage during dry periods and improve drought resilience.

2. Align Environmental Flow Releases with Current Watershed Conditions

Environmental flow requirements must be responsive to today's hydrologic realities:

- Adjust Matagorda Bay releases to reflect actual inflows into the Highland Lakes, ensuring releases are based on what the system can sustainably support.
- Incorporate the long-term trend of declining inflows into environmental flow planning to better balance ecological needs with the firm water supply.

Comment: CTWC requests that LCRA Protect Water Supplies Against Future Uncertainties and Overcommitment

CTWC strongly encourages LCRA to adopt a more resilient approach based upon the latest available science in this Water Management Plan (WMP) update to reflect the growing uncertainty and risk posed by declining watershed productivity. As previously noted, watershed conditions in the upper reaches of the Colorado River basin have changed significantly, raising concerns about continued reliance on traditional modeling assumptions.

CTWC research indicates that historical hydrology and naturalized flow data before the 2006-2008 period are no longer representative in Water Availability Modeling (WAM) without appropriate adjustments. These adjustments are needed to account for changes in the watershed, such as the large number of small private

ponds that have been constructed since those historical naturalized flows were developed. An LCRA study reported that the total small ponds count had grown to 43,946 as of May 2023. Therefore, use of those historical naturalized flows in WAM modeling without further adjustment to account for small pond development will result in the continued overstatement of the water supply.

Concern:

Overreliance on Historical Hydrology: Current modeling protocols depend heavily on past hydrology to assess water availability. However, sustained changes—including prolonged periods of low inflows, increased evaporation, climate variability, and widespread construction of small ponds—have substantially altered how water moves through the watershed.

CTWC research indicates that historical hydrology/naturalized flows before the 2006-2008 timeframe are no longer representative in Water Availability Modeling without adjustments. These adjustments are needed to account for the significant changes in the watershed, such as the large number of private ponds that have been constructed since those historical naturalized flows were developed. As such, use of those flows without adjustment will result in the overstatement of the water supply. This makes past hydrology an unreliable predictor of future conditions.

- **Underestimated Risk from Oversold Firm Yield:** Under LCRA's current firm yield methodology, nearly all available water is committed based on the 2008–2015 drought of record. This leaves no effective buffer or reserve inventory LCRA should not plan for, or expect to, sell all available water until the inventory drops to zero in Lakes Buchanan and Travis. If more severe meteorological drought conditions—such as those experienced in the 1950s—recur, the region could face dire water shortages due to over-allocation and depleted watershed productivity.
- **Use of Available Data:** The Texas Water Code calls for consideration of hydrology, meteorology, and watershed conditions in drought planning. However, the current WMP appears to rely primarily on historical hydrology. A broader and more integrated scientific approach is needed to protect firm customers. This approach should consider how the current watershed would translate historical rainfall into streamflow and inflows to the Highland Lakes.

Recommendations:

1. **CTWC requests that LCRA Reconsider the Establishment of a Safe Yield**

- Adopt a more conservative safe yield approach that reflects today's reduced inflows, declining watershed productivity, and the possibility of droughts more severe than the 2008–2015 drought of record.
- CTWC research indicates that firm yield could be as low as 234,000 acre-feet if the exceptionally low rainfall of the 1950s drought were to recur under current watershed conditions. This estimate is based on adjusted naturalized flows that incorporate historical rainfall from the 1950s and apply modern assessments of watershed productivity to reflect present-day realities (Figure 2).

CTWC/LRE Water WAM Modeling Applying Current Capture Rate/Run-Off Ratio Adjustments with Historical Rainfall

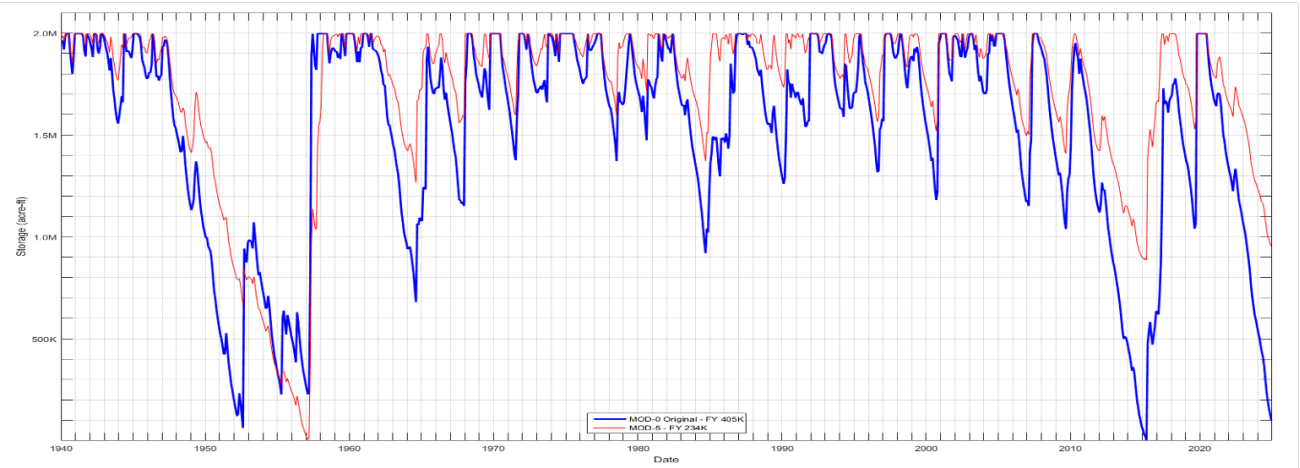


Figure 2: 1950s Drought becomes controlling with naturalized flow adjustment based on capture rate – Estimated Adjusted Firm Yield = 234,000 acre-ft/year

2. Incorporate the Best Available Data

- Integrate historical meteorological data, land use changes, and watershed condition assessments into the Water Availability Model (WAM) process.
- Regularly/annually update the hydrologic dataset to reflect current inflow trends and changing climate conditions. This would improve future water management plan updates so they can be timelier and more adaptive, and thus be more relevant.

3. Strengthen Protections for Firm Customers

- The foremost priority must be safeguarding the people and communities that rely on the Highland Lakes for their drinking water.
- The updated Water Management Plan must reduce risk and enhance long-term reliability and security for firm customers, especially as population growth accelerates and watershed productivity continues to decline.

CTWC appreciates LCRA's decision not to count potential Drought Contingency Plan (DCP) savings in this WMP update. While DCPs are vital conservation tools, their actual impacts remain uncertain and should not be relied upon in water availability calculations.

Conclusion

These proposed updates reflect CTWC's commitment to helping ensure that the Highland Lakes system continues to serve as a sustainable and dependable water source for more than two million Central Texans. As growth continues and watershed conditions evolve, the Water Management Plan must adapt to address increasing demands, persistent drought, and reduced inflows. We believe that incorporating a more conservative and more current science-driven approach—focused on risk reduction and long-term planning—will strengthen the region's water security. We appreciate LCRA's efforts to expand supply options and support a sustainable future for Central Texas.

Sincerely,

Shannon Hamilton

Shannon Hamilton
Executive Director, CTWC

Dave Stauch

Dave Stauch
President, CTWC

Dave Lindsay

Dave Lindsay
Vice President, Technical Research

From: tom harrison
Sent: Wednesday, July 23, 2025 4:09 PM
To: LCRAWMP
Subject: WMP comments

Will LCRA be changing the criteria for entering or exiting a drought? (Ie. The drought is over when the lakes fill to 98%)

It would allow some recovery when we experience low storage levels and low inflows if pass through or ROR water % would be on a sliding scale. Example, storage below 1 million AF and Inflows below 10% of average should result in 10% inflows passed through for the bay. Subsistence flows could usually be met from water/inflows below Mansfield.
Some formula to help sustain and recover storage during a drought.

Did LCRA run any WAMs at a higher storage level to signal a DWDOR? Ie, 700,000 or 750,000 in combined storage.

HIGHLAND LAKES FIRM WATER CUSTOMER COOPERATIVE

August 12, 2025

Via Email to: ***LCRAWMP@lcra.org***
John Hofmann, Executive Vice President of Water
Lower Colorado River Authority
P.O. Box 220
Austin TX 78767

Re: Initial Comments on 2025 LCRA Water Management Plan Update

Dear Mr. Hofman:

Thank you for the opportunity to participate in the Lower Colorado River Authority's (LCRA's) 2025 Water Management Plan (WMP) Update process. The Highland Lakes Firm Water Customer Cooperative (HLFWCC) members include: the Cities of Cedar Park, Pflugerville, Leander, Burnet, Lago Vista and Marble Falls; Lakeway MUD; Travis County WCID #17; and the West Travis County Public Utility Agency. Collectively, HLFWCC members hold firm water contracts for 121,919 acre-feet/year out of the Highland Lakes and are major stakeholders in the 2025 WMP Update process. Based on the information we have reviewed to date, we offer the following comments.

Combined Storage Volume

From HLFWCC's perspective the heart of the WMP is LCRA's policy decision to use a minimum combined storage volume in Lakes Buchanan and Travis as a threshold to determine interruptible water supply availability after meeting 100% of firm water customer demands through a repeat of the drought of record. It is our understanding that LCRA is proposing to leave the combined storage volume threshold at 600,000 acre-feet in the 2025 WMP Update. However, based on the data LCRA has made available for public review, that threshold is demonstrably less protective of firm water customers than in the past. LCRA's modeling using the 600,000 acre feet combined storage volume threshold shows that the minimum combined storage volume was modeled at 661,879 acre-feet using data from 1940-2016 (the period used in the 2020 WMP). Even after limiting releases for interruptible customers more than was done in the 2020 WMP, the modeled combined storage volume for the proposed 2025 WMP only reaches 633,755 acre-feet.[1] The proposed 2025 WMP seems demonstrably less protective of firm water customers, which is contrary to the applicable court order and certificate of adjudication.

Using 600,000 acre feet combined storage volume as the threshold for determining interruptible water availability is getting less and less defensible from policy, legal, and practical

[1] See "Water Availability Model Results Summary," 2020 WMP and June 25, 2025 WMP, prepared by LCRA, at https://www.lcra.org/water/water-supply-planning/water-management-plan-for-lower-colorado-river-basin/updating-the-water-management-plan/

perspectives as time goes on. Addressing just the last aspect, from a practical perspective, the combined storage volume directly affects lake levels, and lake levels directly affect raw water intake infrastructure and plant operations. Operationally, raw water intake structures must be continuously completely submerged, but cannot be so low that the pumps pull in equipment-damaging sediments. As lake levels go down and sedimentation increases, the window of operational flexibility gets more and more narrow, limiting options HLFWCC members have to respond to dropping water levels. To illustrate, based on information available in the TWDB's 2019 Volumetric and Sedimentation Survey of Lake Travis[2] , when the combined storage is 600,000 acre- feet, water levels in Lake Travis are at 615 msl. When combined storage is at 661,000 acre feet (similar to the 2020 WMP scenario), water levels in Lake Travis are at 619.3 msl. When combined storage is at 633,000 acre feet (similar to the June 2025 WMP scenario), water levels in Lake Travis are at 617.4 msl. Over 1/3 of all raw water intakes are above 615 msl. In response to sudden and dramatic drops in lake levels, our members have responded by investing large sums of money in projects to allow them to continue to divert their contracted water from a shrinking pool. For example, in response to the previous drought (2011-2015), Cedar Park and Leander collectively invested tens of millions of dollars in equipment, infrastructure, and easement rights enabling them to construct a new floating intake in a deeper area of the lake to keep the pumps from sucking sand. Each time a floating intake location is moved, significant costs are incurred. Since 2024, this work has cost Leander and Cedar Park an additional $5 Million. The cities of Leander and Cedar Park are also participants in the Brushy Creek Regional Water Authority project to build a fixed deep-water intake. Contracts for that project were let in 2022 and the project is scheduled for completion in 2027/2028. HLFWCC members are holding up their ends, but there is not much more to be gained via engineering and monetary investment. The lake bottom is a real barrier.

The decision to use 600,000 acre-foot combined storage as threshold for determining interruptible water availability is a policy decision. When the conditions giving rise to the problem that a policy is intended to address change, the policy should also change. Conditions have changed – population and economic growth have continued to rise, weather is consistently drier, firm water customers have made measurable operational changes resulting in significant conservation and infrastructure hardening. HLFWCC members have done their parts. HLFWCC is grateful that Mother Nature filled Lakes Buchanan and Travis to summer levels not seen in many years, but we are also fearful that we may be one heat dome away from conditions that lower those levels once again, making our ability to supply water to so many Texans and Texas businesses uncertain. LCRA's policy should be to keep firm water supply firm, not uncertain. Recognizing the impact of raising the 600,000 acre foot combined storage volume threshold on LCRA's interruptible customers, HLFWCC requests that, at a minimum, LCRA investigate raising the combined storage volume threshold over time to a more secure volume.

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[2] See "Volumetric and Sedimentation Survey of Lake Travis July-November 2019," prepared for LCRA by TWDB's Surface Water Division, at https://www.twdb.texas.gov/surfacewater/surveys/completed/files/travis/2019-11/travis2019_finalreport.pdf

Drought Contingency Plan

Some commenters have suggested that the savings produced by HLWFCC and other firm water customers in implementing their Drought Contingency Plans (DCPs) should be included in the WMP update. This would be a mistake, giving false comfort to its advocates. DCP savings are variable and not predictable, making efforts to model any resulting "extra" water an exercise in futility. Further, as HLWFCC has commented in the past, if reserved water conserved (not used) by firm customers it is not stored for the benefit of firm customers, but is added to the water available for release to interruptible customers, there is no economic or other incentive to conserve water. The policy should not be to discourage conservation, but to encourage it.

Thank you for awaiting these comments. Our members look forward to continued opportunity to participate in the 2025 WMP Update process and provide further comments as more information becomes available.

Very truly yours,
HIGHLAND LAKES FIRM WATER COOPERATIVE

By: 

Earl Foster, Chairperson

CC: HLFWCC Members

Lakeway™
TEXAS

July 25, 2025

To: Lower Colorado River Authority,

Re: Preliminary 2025 Water Management Plan Update

The Lower Colorado River Authority (LCRA) is currently updating the 2020 approved Water Management Plan. The LCRA has requested comments from Stakeholders. The City of Lakeway ("Lakeway") Texas, a Region K Stakeholder, respectfully submits the following comments:

1. Lakeway opposes the preliminary 2025 Water Management Plan ("Plan") and deems the 2025 Water Availability Model ("Model") Results unreliable.
2. The preliminary Plan increases the **RISK** to firm customers.
3. The Model appears unreliable, suffering from errors such as goal setting, methodology, and data integrity.

The City of Lakeway opposes the Plan as presented strongly requests changes to the Plan due to the increased **RISK** transferred to firm customers from interruptible customers.

The current model drops the minimum combined storage level ("the MCSL") from 661.9 K ac-ft (2020 WMP) to 633.8 K ac-ft (Prelim 2025 WMP). **We believe this reduction is dangerous and increases the RISK to all firm customers**. The WMP methodology must be adjusted to achieve the 2020 level as the minimum level of storage, before downside stress testing is applied to the model.

The Plan creates unnecessary risk in that it maintains a MCSL target of 600,000 ac-ft for modeling purposes. The City of Lakeway recommends that the LCRA change the goal setting model parameters, requiring that at no time is the modeled MCSL less than the 661,000 ac-ft from the 2020 WMP model, while gradually increasing it to a standard of 750,000 ac-ft MCSL by 2030.

Additionally, the target MCSL should be set with consideration given to the significant population growth in the region and increased water demand. We suggest that the LCRA consult with the State's demographers to best adjust for growth in the model and increases in the MCSL.

The **Safety of and Risk to** the firm customers must be the policy and modeling priority.

Updating the targeted MCSL helps solve some of the Model's methodology errors. Other errors include methodology, and data integrity.

The City of Lakeway requests that the Plan and Model include an analysis of the declining "Capture Ratio" in the Highlands Lake area. The development of the hill country, the increasing subdivision of land with water right access is expanding and reducing inflows into the system. This factor should not be excluded from a plan and model that purports to be objective and using a sound methodology. If the increase in private ponds cannot be included in the model, we request that this factor be noted, and possible adjustments discussed with all Stakeholders.

The Plan and Model, as presented, do not meet data integrity standards. The City of Lakeway strongly requests that the data set for the Plan and Model include the data for the year 2024. Failing to include all available data is a material modeling error. We do not believe that the 2024 data require 18 months to process in this technology era. The inability to process data timely is simply a policy decision on priorities. Omitting data from one of the most recent, severe drought years only serves to open the LCRA and process, to political criticism.

The City of Lakeway requests that the LCRA explicitly state that the Drought Contingency Plan Irrigation Controls are not included in modeling or setting the 2025 WMP.

The City of Lakeway agrees that the Arbuckle Reservoir should be deferred from consideration in this Plan update. However, the city requests that LCRA specify that the Arbuckle Reservoir is designed to meet all downstream water requirements, or clarify what if any, possible shortfalls exist.

Respectfully submitted,

Original Signed

Thomas Kilgore
Mayor, Lakeway, Texas

To whom it may concern,

As the General Manager for Travis County WCID No. 17, I would like to submit the following comments on the WMP update:

- WCID No.17 would like to see the LCRA develop a methodology that can correlate the Pre-2001 inflow data with current inflow data. With the proliferation of private ponds post 2001, current annual naturalized flows account for the removal effect these ponds create each year, but we currently lack a process by which the pre -2001 data can be accurately compared to current naturalized flow data. This is vital information that needs to be considered when assessing the current strength of the watershed and how effectively water is captured and brought into the highland lakes system should a drought similar in length to the drought of the 1950's occur again. Without this correlation factor being applied to the majority of the watershed's history, we are extremely concerned the WAM data will produce inaccurate results.

- WCID No. 17 is very concerned that the LCRA may possibly move to include the effect of the Drought Contingency Plan's irrigation controls in the Water Management Plan(WMP). From our viewpoint this is the only safety margin that exists outside of the WMP and to include it in the WMP modeling will remove this vitally important safety margin.

- WCID No. 17 strongly recommends that the minimum combined storage level of 600,000 acre-feet be reviewed and updated to reflect the significant growth in population in our watershed. In addition the State demographer's predictions of continued growth in our region should also be included. With double digit increase to population and water demand, we find it troubling that a corresponding increase in the minimum combined storage level, which is designed to protect the water supply to that same population, would not receive a corresponding increase.

Thanks,

Jason F. Homan
CEO & General Manager
Water Control & Improvement District No. 17
3812 Eck Ln. Austin, TX 78734