Water Management Plan Update Process
Participant comments through April 11, 2025, and LCRA responses

Comments related to the update process

From CTWC: At the participant meeting on March 27th, LCRA indicated that these topics may be eligible for change in the next WMP: 1) amounts of water available for interruptible agriculture and the environment; 2) curtailment triggers; and 3) how LCRA provides water for environmental flows in the river and bay. CTWC encourages LCRA to make substantial changes in all three of these categories (and more), so that LCRA can satisfy its obligations to meet firm demands without shortage. We believe the trends toward drier and hotter conditions in this basin, along with the dramatic declines in watershed productivity and inflows to the water supply lakes, necessitate significant adjustments to the WMP.

From Phillip Spenrath, Wharton County judge: THE PLAN WORKS!!! We do not always agree with certain decisions… but it works …PLEASE DO NOT MAKE DRASTIC CHANGES!!

From CTWC: At the initial participant meeting in March, LCRA emphasized the fact that water planning is a dynamic process. We agree with that assessment, as supported by the significant population growth in this region and the variable nature of LCRA's water supplies. Given these conditions, and LCRA's interest in developing the best WMP possible, using the best available science and data, LCRA should expect to update its WMPs on a more frequent and well-defined basis.

More specifically, we suggest the inclusion of specific conditions that require LCRA to either update or modify the WMP, such as: specific language requiring annual updates of the naturalized flows, followed by inputting that data into the WMP's water availability models and adjusting the WMP to its outcomes; specific language requiring updated water modeling when Combined Storage levels drop below a specified volume (such as 750,000 acre-feet); and specific language requiring an immediate triggering of WMP updates if water used by LCRA's customers or commitments exceeds 90% of LCRA's Projected Normal Use in 2032.

Updating and inputting new data into the Water Availability Model is important, as CTWC's running of the WAM with the updated naturalized flow data through 2023 indicated that by the end of 2023, the Combined Storage would have dropped to 125,000 acre-feet (*see attached graphic).* If the hydrology were extended into 2024, it appears likely to show that the current drought would become the controlling drought. And the "decent" inflows received in 2024 would not end the controlling drought. As such, updates of the hydrology are needed to follow this evolving condition.

We are aware that the TCEQ Order approving the 2020 WMP included provisions specifying when LCRA would initiate a process to update the WMP, and we note that CTWC and elected officials requested LCRA's initiation of that process on several occasions in recent years.

However, those provisions and those requests were apparently insufficient for LCRA's commencement of this important work. As a result, the 2020 WMP, based on a hydrologic period that ended in 2016, will continue to govern the operation of Lakes Buchanan and Travis for several more years. With water supply reservoirs holding only 49% of their capacity today, we urge LCRA to ensure that its next WMP will be much more adaptive and responsive to current conditions. By any objective reasoning, a period of time exceeding five years is far too long to wait between the effective date of the WMPs.

LCRA's response to process-related comments:
In the revision process, LCRA staff intends to make incremental changes as necessary to adjust to increasing firm demands, while operating within the framework from recent LCRA water management plans. LCRA will begin presenting potential changes at the June participant meeting.

The timeline for updating the WMP in the future will be discussed near the end of this participant process.

<u>Comments related to naturalized flows</u>
From CTWC: Data on inflows to the lakes in recent years reveals significant declines in those numbers, and CTWC is concerned about developing the next WMP using data that lacks a fair representation of current conditions. Extending the hydrology for the next WMP to include 2024 should improve the predictability of LCRA's water availability modeling results, in case the drought that this area is currently experiencing proves to be the new drought of record.

Will LCRA agree to extend the hydrology to include 2024?

From CTWC: Will LCRA use the results of its studies on reservoir evaporation to better quantify the surface water evaporation assumptions used in its water availability modeling?

LCRA's response to naturalized flow-related comments:
In order to update the WMP now, LCRA intends to use the naturalized flows through 2023, as approved by TCEQ. The modeling results will show how the WMP would operate during varied hydrology from the 84-year period of record that includes multiple drought periods.

The naturalized flows use Texas Water Development Board data. The data from recent evaporation studies has not been adopted by TCEQ for use in naturalized flows and WAM modeling. It is important to use the same dataset for both naturalized flows and WAM modeling.

Comments related to firm customer demands

From Tom Harrison: Can you give us a percentage of what each firm contract is currently being consumed.

LCRA's response to the firm customer demands comment:
See Table 1 for this information for LCRA's 20 largest firm water contracts.

Comments related to City of Austin water demands

From CTWC*:* In the table entitled "LCRA Proposed 2032 WMP Demands Compared to the 2020 WMP Demands" please explain why the estimated High Demands of the City of Austin for the year 2032 are lower than the High Demands for the City of Austin that were used in the 2020 WMP. It appears that the footnotes to the table may give clues to this answer, but a more detailed explanation would be appreciated.

LCRA's response to the City of Austin demands comment:
In the 2020 WMP, City of Austin demands included its wholesale customers. For this WMP update, the demands associated with wholesale customers are no longer grouped with Austin's demands and are instead in the Firm Other category. Additionally, the gallons per capita per day used for determining Austin's demands changed with this update. The 2020 WMP used the very high 2011 GPCD. For this update, the demand is based on the average of the three highest GPCD years since 2011.

Comments related to City of Cedar Park water demands

From CTWC: In the table entitled "LCRA Projected Firm Demands and Recent LCRA Firm Customer Use" please explain why the City of Cedar Park's Projected Demands for 2032 are only slightly higher than Cedar Park's actual water use in 2023. As we understand it, Cedar Park is a fast-growing city with increasing water needs, and it holds an LCRA Firm contract for 23,000 acre-feet of municipal use in Williamson County. Please provide the basis for LCRA's Projected Demands for this city**.**

LCRA's response to the City of Cedar Park demand comment:
The initial table reported Cedar Park demands without including certain

wholesale customers that are within their service area. Those demands had been included in the Firm Other category. Additionally, Cedar Park's boundaries are constrained, and its population is expected to plateau. Updated demand values for Cedar Park are shown in Table 2 at the end of this document.

Comments related to Brazos River Authority and Brushy Creek Regional Utility Authority demands

From CTWC: Also, in the table providing LCRA's Projected Firm Demands and Recent Customer uses, please explain the basis for the numbers used as Projected Demands for the Brazos River Authority. As written, the table indicates that the Brazos River Authority's actual 2023 water use was 4,844 acre-feet, and the High Projected use is 8,800 acre-feet. Do these numbers include water going to the Brushy Creek Regional Utility Authority through the high capacity pipeline from Lake Travis?

Please explain the impact of the City of Georgetown's water purchases on LCRA's supplies and firm commitments. Is Georgetown able to receive water via the pipeline Brushy Creek Regional Utility Authority?

Please provide information on the various customers, water uses, and volumes of water are being pumped (and will be pumped) from Lake Travis to the Brushy Creek Regional Utility Authority, including information on the Projected Demands of that entity.

LCRA's response to the BRA and BCRUA-related comments:
Brazos River Authority's contract with LCRA currently supplies water to the cities of Round Rock, Liberty Hill and Georgetown. Brushy Creek Regional Utility Authority operates facilities to divert water from Lake Travis and supply that water into Williamson County. However, BCRUA does not have a water contract from LCRA. Instead, BCRUA has agreements with Cedar Park, Leander and Round Rock to divert and distribute LCRA-supplied water to those entities. See Table 2 which presents recent use and projected year 2032 demands for BRA, Cedar Park and Leander.

Comments related to environmental flows

From CTWC: At the participant meeting in March, LCRA indicated that "how" LCRA provides water for environmental flows is subject to change. Please provide more information on what LCRA is considering in this regard. As you are aware, the Colorado River basin conditions are very different from the past, when river flows were abundant, and water supplies seemed sufficient for every purpose. The hydrologic differences in the hundreds of miles above and below Mansfield Dam are more pronounced, and the

upper and lower reaches of the river experience markedly different amounts of rain and consequent river flows.

Under the current WMP, environmental release obligations resulted in very large releases of stored water in 2020, which contributed to rapid depletion and threatened to lower the lakes down to a Combined Storage of 600,000 acre-feet. CTWC requests an adjustment in the next WMP to mitigate the risk of rapidly depleting stored water by lowering the current expectations on the percentage of inflows that must be released from upper basin lake storage for environmental purposes. During periods of low inflows, there is simply not enough water to release 50-60% of it from the upper to the lower basin for downstream environmental purposes. Such an adjustment is clearly justified by the observed declines in inflows and watershed productivity. A lower release rate at higher Combined Storage levels would prolong the period when environmental flows can be released.

In the upper basin, CTWC's research is showing a significant decline in the productivity of the watershed that once supplied much higher inflows to the Highland Lakes. The WMP should establish a more measured process for assessing and delivering water for downstream environmental needs. Such a determination should start with an assessment of water supply needs associated with the upper basin customers and should incorporate an evaluation of rainfall and river flows in the lower reaches of the river. Reductions in environmental flows to the Threshold Level should be implemented when Combined Storage falls to 1.3 million acre-feet and below, as that provision was shown to be effective during the current drought to avoid dropping to 600,000 acre-feet in Combined Storage.

We understand that the blue sucker is a fish that LCRA seeks to protect with its environmental flows. CTWC respectfully requests that LCRA revisit the proposed releases from lake storage to meet the needs of this state-threatened species. According to the Texas Parks & Wildlife Department's information on the presence of this species in the Lower Colorado River, it is only found in Bastrop County. This species also exists in five more Texas counties – all outside the Colorado River basin. To the extent that the LCRA proposes to provide environmental releases specifically for the blue sucker, please confirm that all such releases are appropriate for its current regulatory status and range of habitat. When run-of-river flows are sufficient to meet environmental needs for Matagorda Bay, please confirm that those flows are sufficient for the well-being of the blue sucker in this specific reach of the Colorado River.

LCRA's response to the environmental flow-related comments:
LCRA will present potential changes to how it helps meet environmental flow criteria at the June participant meeting.

The WMP update process will include adjustments to the supply of water to help meet agricultural demands and environmental flows as necessary to continue meeting firm customer demands through a repeat of the drought of record. In the modeling for the WMP, and in operations under the current WMP, environmental flows criteria (and agricultural demands) are first met to the extent possible using flows from the lower river.

Beginning with the 2015 WMP, the environmental flow criteria does not have a specific designated release for the Blue Sucker fish. The needs of that fish were considered along with habitat needs for other species in the development of the monthly-varying criteria.

When considering releases for environmental flows, LCRA looks at both inflow needs for Matagorda Bay and instream flow needs. When LCRA makes releases specifically to meet bay needs, those releases, if high enough, can also satisfy instream flow criteria such that additional releases for instream flows are not made.

Table 1: LCRA Customer Contract Amount, 2023 Actual Water Use and Percent Usage of Contract

Customer name	Contract Amount (MAQ)	2023 Actual Water Use	% Usage of Contract Amount
	a-f/year	a-f	
City of Austin Municipal	325,000	174,060	54%
South Texas Nuclear Project, Consumptive Use	40,000	38,765	97%
LCRA Generation	23,000	10,667	46%
City of Leander	31,000	12,349	40%
City of Cedar Park	23,000	16,517	72%
City of Pflugerville	24,000	7,110	30%
HIF	12,642	0	0%
Travis County WCID 17	11,300	8,945	79%
Austin Energy at FPP	7,500	5,434	72%
OQ Chemicals Corp	8,748	4,917	56%
West Travis County PUA	13,950	6,644	48%
Underground Services Markham, LP	11,621	5,362	46%
Brazos River Authority	25,000	4,844	19%
Domestic Use, Landscape Irrigation and Temporary Use	6,000	4,791	80%
City of Marble Falls	7,000	1,799	26%
Travis County MUD 4	4,316	3,255	75%
Lakeway MUD	3,069	2,389	78%
City of Horseshoe Bay	4,450	2,315	52%
City of Lago Vista	4,500	1,600	36%
Bastrop Energy Partners, LP	3,220	2,246	70%

Table 2: LCRA Projected Firm Demands and Recent LCRA Firm Customer Use

	Customer name	High Projected Use 2032	Normal Projection Use 2032	2022 Actual Water Use	2023 Actual Water Use
		a-f	a-f	a-f	a-f
1	City of Austin Municipal [a,b,c]	207,051	183,241	175,431	174,060
2	South Texas Nuclear Project, Consumptive Use[b]	39,400	39,400	38,991	38,765
3	LCRA Generation[b]	19,700	14,400	13,426	10,667
4	City of Leander	18,665	15,625	11,932	12,349
5	City of Cedar Park	19,479	18,619	16,304	16,517
6	City of Pflugerville	14,939	13,019	8,897	7,110
7	HIF	11,264	11,264	0	0
8	Travis County WCID 17	10,800	9,558	9,326	8,945
9	Austin Energy at FPP [b,c,d]	10,300	7,300	7,138	5,434
10	OQ Chemicals Corp	10,600	8,872	7,054	4,917
11	West Travis County PUA	9,808	9,376	8,548	6,644
12	Underground Services Markham, LP	9,300	7,784	7,156	5,362
13	Brazos River Authority	8,800	7,788	3,214	4,844
14	Domestic Use, Landscape Irrigation and Temporary Use	6,000	5,022	4,395	4,791
15	City of Dripping Springs[e]	3,914	3,276		
16	City of Marble Falls	3,301	2,921	1,827	1,799
17	Travis County MUD 4	3,958	3,321	3,236	3,255
18	Lakeway MUD	2,822	2,405	2,718	2,389
19	Travis County WCID 10[a]	2,616	2,315		
20	City of Horseshoe Bay	2,586	2,033	2,620	2,315
21	Wells Branch MUD[a]	2,558	2,144		
22	City of Lago Vista	2,496	2,209	1,708	1,600
23	Bastrop Energy Partners, LP	2,300	2,300	2,153	2,246
24	Firm Other [a, f]	38,701	31,454	18,492	9,087
	Total	461,358	405,646	344,566	323,096
	Total Non Austin MUN & IND Only Total	182,607	159,005	107,427	91,924

a. Some City of Austin wholesale demands are expected to transition to raw water contracts with LCRA. These demands are reflected in "Firm Other" for 2032.
b. Natural lake evaporation from STP, LCRA and Austin reservoirs is modeled as an additional demand, except for Lake Fayette where natural evaporation is included in the reported demand.
c. There are additional 2032 demands for City of Austin Municipal (2,900 a-f/year) and Sand Hill Energy Center (1,250 a-f/year) that are met by direct reuse.
d. Decker Power Plant no longer has steam-electric cooling, therefore Decker water use for year 2022 and 2023 is not reported here for a better comparison to projected 2032 demands.
e. City of Dripping Springs was included in "Firm Other" for 2022 and 2023 Actual Water Use.
f. Customers with demands less than 2,300 a-f/year are included in "Firm Other".