



Water Management Plan Update Process Participant comments received between Aug. 15 and Sept. 21, 2025

Comments received from:

- City of Austin
- Central Texas Water Coalition
- Highland Lakes Firm Water Customer Cooperative
- City of Lakeway
- Paul Roberts, City of Lago Vista council member
- Amanda Chavarria, CTWC member
- Jim Thornton, City of Lago Vista resident
- Ruth Knight, City of Lago Vista resident
- Sam Payne, City of Lago Vista resident



City of Austin

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

September 18, 2025

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

Re: Austin Water Comments on 2025 LCRA Water Management Plan Update

Dear John:

We write to provide comments following the August 26th Participant Meeting regarding LCRA's 2025 update to its Water Management Plan (WMP). As a firm water customer of LCRA, the City of Austin ("the City"), is committed to participating in updates to LCRA's WMP. Austin Water provided initial comments in a letter dated July 25, 2025 (attached). As the plan update process continues, Austin Water anticipates providing additional comments during future post-meeting comment periods.

Updates to the plan are essential to provide protection of firm water supply as key factors change over time, including firm demands, hydrological conditions, and others. 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 supports 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.

While during the meeting LCRA presented information related to responses to various participant comments, LCRA affirmed that the current WMP approach is unchanged since the approach presented at the June meeting (as summarized on Slide 25 of the meeting's presentation¹). Key points include the following:

1. Less Severe Drought trigger at 1.8 million acre-feet
2. Anytime cutoff at 1.1 million acre-feet
3. Minimum combined storage above 600,000 acre-feet
4. Firm customer drought contingency plan (DCP) savings not included in the modeling

Regarding items number 1 and 2, above, Austin Water strongly supports keeping these triggers unchanged. We are concerned that lowering the Less Severe Drought trigger below 1.8 million acre-feet or the anytime cutoff below 1.1 million acre-feet would result in increased risk to firm supply as the plan is implemented. We have these concerns even though modeling presented, which is based on a repeat of historical hydrology through 2023, indicates minimal impact to the combined minimum storage result. The key concern is that real world impacts moving forward could be substantial and result in acceleration of extremely low storage volumes in dry periods.

¹ <https://www.lcra.org/download/aug-26-participant-meeting-presentation/?wpdmdl=39433>



Regarding item 3, above, Austin Water's July 25, 2025 letter included comments regarding the minimum combined storage volume, please see attached letter. 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 that have eroded the protection afforded by the current framework's minimum combined storage.

Regarding item 4, above, Austin Water strongly supports firm customer DCP savings not being included in the modeling. By definition, in accordance with the Lakes Travis and Buchanan water right adjudication, interruptible releases shall be curtailed such that all firm customer needs are met without shortage through a repeat of the drought of record. Therefore, Austin Water fully concurs with LCRA continuing to not include firm customer drought contingency plan (DCP) savings in the WMP modeling.

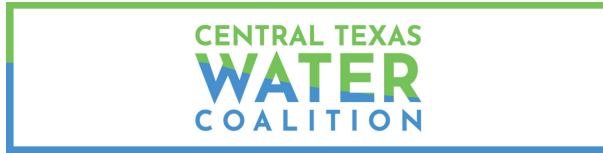
Austin Water looks forward to continuing its participation in the WMP update process. If you have any questions or would like additional information, please feel free to contact me at 512-972-0108 or shay.roalson@austintexas.gov.

Sincerely,



Shay Ralls Roalson, P.E.
Director, Austin Water

Attachment



Central Texas Water Coalition

PO Box 328
Spicewood, TX 78669

September 18, 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: Follow-Up Comments on 2025 Water Management Plan Update – Urgent Need for Stronger Protections for Firm Customers

Dear Mr. Hofmann and LCRA Staff,

On behalf of the Central Texas Water Coalition (CTWC), thank you for your responses to stakeholder comments received through August 15, 2025, and for sharing the results of your modeling exercises. We appreciate the time and effort LCRA staff has invested in this process.

After reviewing your responses and modeling results, CTWC remains deeply concerned that the current draft Water Management Plan (WMP) does not provide sufficient protection for the more than two million Central Texans who rely on Lakes Buchanan and Travis as their primary source of drinking water. Please review and reconsider the comments and concerns reiterated or described below:

1. Prioritize Firm Customers and Raise Minimum Combined Storage to at least 675,000 Acre-Foot

Firm customers are the economic engine and public health backbone of the region. CTWC recognizes the importance of balancing agricultural, environmental, and firm needs, but firm customers cannot be treated as the drought reserve for other users. The risks to municipal water systems—particularly those in the upper Lake Travis area—are simply too great.

This Plan must reflect today’s hydrologic reality, not rely on historical flood cycles to refill the lakes. The next drought of record could be worse than the last one, and the WMP must prepare for that possibility.

The existing 600,000 acre-foot combined storage threshold is dangerously outdated. As we stated previously, this volume leaves many upper Lake Travis communities at or near intake failure, forcing utilities to chase falling lake levels at great expense, sometimes requiring emergency pumping solutions or capital projects that are not sustainable for small or rural water systems.

During extended periods of extreme drought, these communities face unacceptable risks to public health, firefighting capability, and basic water service. We can no longer plan based on the hope of a flood cycle arriving in time to refill the lakes.

As explained in prior comments, when LCRA relies on an 84-year data set of historical naturalized flows as the input for its water availability modeling, the recent proliferation of private ponds in the upper watersheds is largely overlooked. CTWC remains concerned that the use of this historical data set for naturalized flows, without adjustment, creates artificially higher results for water availability. Raising the minimum combined storage volume to 675,000 acre-feet could help in mitigating some of the risks presented by the naturalized flow data sets that are proposed for use in the water modeling for this WMP.

CTWC appreciates the fact that LCRA has calculated preliminary projected 2032 demands for Municipal and Manufacturing uses that are about 27% higher than the 2020 WMP (normal demand) and about 13% higher than the 2020 WMP (high demand). However, the recent news stories on the siting of Data Centers in the Central Texas area suggest that these projections may be too low. Please re-visit these projections using the latest information on the water uses and population increases associated with such facilities, so that the 2032 demands do not become a reality much sooner. We understand that the prospective Data Centers may use as much as 50,000 acre-feet/year – a significant number. If so, LCRA's goal to increase its water supply by 60,000 acre-feet/year by 2040 may not be sufficient if such businesses will be served by LCRA's customers. In addition, CTWC remains concerned about all demands along the I-35 corridor that could be sourced via the upcoming completion of the Brushy Creek pipeline project.

Recommendation:

CTWC continues to strongly urge LCRA to raise the minimum combined storage threshold to at least 675,000 acre-feet. We had previously advocated for a higher value of 750,000 acre-feet, but believe 675,000 is a reasonable compromise at this point to begin improving the safety factor. This updated number is essential to create a reasonable drought buffer and facilitate LCRA's legal obligations to ensure that firm demands are fulfilled without impairment. If LCRA declines to make this change, please explain how firm customers are protected from curtailment due to large interruptible agricultural releases.

2. Reduce Total Potential Volume of Agricultural Releases by an Additional 25%

LCRA's modeling continues to show that interruptible releases for lower basin agricultural customers are the primary driver of rapid storage depletion. The LCRA proposed reduction to 125,000 acre-feet for first crop is more than the second highest modeled total release volume, according to LCRA's presentation. Without a reduction, firm customers will once again face curtailment while large volumes have already been released downstream. The current practice of merely charging a "restocking fee" is no longer a viable option during the new normal of extended low inflow drought periods.

Recommendation:

Reduce the total potential volume of agricultural releases by an additional 25% for both first and second crops, include conveyance losses in the maximum interruptible supply quantities, and count all “ordered but not diverted” water against the allowable crop maximums. We also suggest that the interruptible supply be further reduced if the prior 3 months of inflows is below the 33rd percentile.

This action should significantly extend water availability during increasingly routine periods of extended drought, reduce the risk of emergency intake failures, and provide critical protection for the growing population of Central Texas. The request for conservation has become the new normal for Central Texans, we believe that interruptible customers should also share in conservation practices with us.

3. Adjust Maximum Releases for Matagorda Bay at Higher Lake Levels to Reduce Rapid Depletion

While the current draft WMP includes higher drought triggers than in previous Plans, and CTWC supports the choice of higher trigger numbers and criteria as proposed, the modeling still shows combined storage dropping to dangerously low levels within three to four years of drought conditions -- mirroring the depletion patterns of the drought years from 2011 through 2015.

Recommendation:

Further adjust environmental flow targets when reservoir lakes are at higher levels to better reflect and align with actual inflow conditions and preserve water needed for firm customers. This will help reduce the rapid rate of depletion of combined storage during periods of low inflows. CTWC suggests reducing the environmental flow releases for Matagorda Bay to 25% of storable inflows when prior 3-month inflows are less than the 33rd percentile.

4. Incorporate a Fixed Schedule for Updating the Next WMP to Reflect the Dynamic Environment of our Region

As CTWC has stated in both our current and prior comments, we remain deeply concerned that changing weather patterns, prolonged droughts, declining watershed productivity, growing water demands, and significant reductions in inflows to the Highland Lakes pose a serious and escalating risk to our region’s water supply. These conditions warrant a much higher level of scrutiny and a more proactive approach to reservoir management. The Water Management Plan must provide the flexibility to adjust operations in a timely and responsive manner, rather than requiring our communities to wait years for the next WMP to be developed, reviewed, and approved by TCEQ. The stakes are simply too high to rely on a static plan when conditions on the ground are changing so rapidly.

Recommendation:

As part of this WMP Application, we urge LCRA to propose specific dates for the initiation of its next public input process, with a commitment to submit its next WMP application within four (4) years from the issuance of the WMP that will be submitted to the TCEQ for approval in mid-2026.

Conclusion

These changes will help ensure that the Highland Lakes remain a reliable water source for the more than 2 million people, businesses, schools, and hospitals that depend on them—today and in the future.

Thank you for your careful consideration of these urgent recommendations. As we continue our research, CTWC remains ready to collaborate and provide data and modeling support to ensure the final WMP truly protects firm customers.

Respectfully,

Shannon Hamilton

Shannon Hamilton
Executive Director, CTWC

Dave Stauch

Dave Stauch
President, CTWC

Dave Lindsay

Dave Lindsay
Vice President, Technical Research, CTWC

Jordan Furnans

Jordan Furnans, PhD, PE, PG
LRE Water, LLC - A Spheros Environmental Company

HIGHLAND LAKES FIRM WATER CUSTOMER COOPERATIVE



September 19, 2025

Via Email to: LCRAWMP@lcra.org

John Hofmann, Executive Vice President of Water
Lower Colorado River Authority
3700 Lake Austin Blvd
Austin TX 78703

Re: Additional Comments on 2025 LCRA Water Management Plan Update

Dear Mr. Hofmann:

Thank you for the continuing opportunity to participate in the Lower Colorado River Authority's (LCRA's) 2025 Water Management Plan (WMP) Update process. These additional comments are submitted on behalf of the Highland Lakes Firm Water Customer Cooperative (HLFWCC), whose 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. As you know, 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.

Drought Contingency Plan

HLFWCC appreciates LCRA's affirmative response to the comments made in HLFWCC's August 12, 2025 letter urging LCRA not to include firm customer DCP savings in the WMP modeling or process. HLFWCC supports LCRA's decision not to include firm customer DCP savings in the WMP modeling or update process.

Combined Storage Volume Threshold

As expressed in HLFWCC's August 12, 2025 letter (and in comments during past WMP update processes), HLFWCC continues to urge LCRA to increase the 600,000 acre-foot combined storage volume threshold for determining availability of interruptible water supply. It is by chance that we are not currently experiencing a drought worse than the drought of record and that Lakes Buchanan and Travis are fuller than we have seen in many years. HLFWCC is uncomfortable relying on chance and catastrophic flooding events. LCRA is legally responsible for developing and implementing a WMP the purpose of which is to satisfy 100% of the demands of firm water customers through a repeat of the drought of record. Weather forecasters are predicting extended dry conditions, especially in the Highland Lakes area, well into the future. Dry conditions coupled with growing urbanized areas around the Highland Lakes make the

combined storage volume threshold critical to the success of the WMP. Therefore, HLFWCC continues to urge LCRA to be proactive and raise the combined storage volume threshold above 600,000 acre-feet.

Less Severe Drought Trigger

HLFWCC supports and appreciates LCRA's current approach to set the Less Severe Drought trigger at 1.8 million acre-feet, and to decline to reduce it below that amount. Although information presented by LCRA during the August 26, 2025 WMP participant meeting indicated that a reduction from 1.8 million acre-feet to 1.725 million acre-feet would have no impact on minimum combined storage, our calculations show that the reduction in combined storage would be close to 30,000 acre-feet. HLFWCC does not believe such a reduction is equivalent to "no impact."

Anytime Cutoff Trigger

HLFWCC supports and appreciates LCRA's current approach to set the anytime cutoff trigger at 1.1 million acre-feet, and to decline to reduce it below that amount.

Thank you for the opportunity to provide 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

From:
Sent: Friday, September 19, 2025 3:55 PM
To: LCRAWMP
Cc: Tom Kilgore (External)
Subject: Comments on the Water Management Plan

CAUTION - EXTERNAL EMAIL
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LCRA:

Please see the City of Lakeway's latest comments on the plan:

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 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.

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.

We again request that the LCRA prioritize firm customers & raise combined storage

The current minimum storage threshold of 600,000 acre-feet is dangerously outdated. Lakeway repeats its request to raise the minimum combined storage. We believe that a minimum level of at least 675,000 acre-feet to protect firm customers and avoid intake failures for communities like Spicewood, Lago Vista, Jonestown, and Lakeway during extended drought is within your capabilities. 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 LCRA must commit to more frequent WMP updates.

With changing weather patterns, declining inflows, and rising demand, Lakeway urges LCRA to update the WMP every four years rather than waiting nearly a decade between revisions.

These actions are essential to ensure firm customers are not forced into curtailment while large volumes of water continue to be released downstream. Our communities can no longer plan based on the hope that a flood cycle will arrive in time to refill the lakes.

Thomas G. Kilgore
Mayor
Lakeway, Texas 78734

September 21, 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: Comments on Draft 2025 Water Management Plan – Need for Stronger Protections for Firm Customers

Dear Mr. Hofmann and LCRA Staff,

I am writing in my capacity as a resident and elected City Council Member of Lago Vista. While these comments are my own and not submitted on behalf of the City Council, I believe they reflect urgent concerns shared by many upper-basin communities whose drinking water security depends directly on Lakes Buchanan and Travis.

Raise the Minimum Combined Storage Threshold

The current 600,000 acre-foot combined storage trigger is inadequate for today's hydrologic conditions and puts Lago Vista and similar communities at unacceptable risk of intake failure. Our municipal utility is not in a position to chase falling lake levels with costly emergency pumping projects. I strongly support raising the combined storage threshold to **at least 675,000 acre-feet** to create a realistic drought buffer and safeguard firm customers.

Reduce Interruptible Agricultural Releases

Interruptible releases for lower-basin agriculture continue to be the largest driver of rapid lake depletion. It is not reasonable for firm customers—households, schools, hospitals, and businesses—to face curtailments while large volumes of water flow downstream. I urge LCRA to reduce the total potential release volume by **at least 25%**, count conveyance losses, and ensure that “ordered but not diverted” water is deducted from allowable crop allocations.

Adjust Environmental Flow Releases

I support higher drought triggers in the draft plan, but additional refinements are needed. Specifically, I encourage LCRA to align environmental flow releases with actual inflow conditions and reduce Matagorda Bay releases to **25% of storable inflows when 3-month**

inflows fall below the 33rd percentile. This adjustment will help slow the rate of lake depletion during extended droughts.

Commit to More Frequent WMP Updates

Central Texas is experiencing rapid population growth, new industrial demands such as data centers, and worsening inflow declines. Waiting nearly a decade between Water Management Plan updates is no longer viable. I urge LCRA to commit to a **fixed four-year update cycle**, ensuring the plan remains responsive to dynamic conditions.

Conclusion

Lago Vista sits at the upper end of Lake Travis and is especially vulnerable to intake disruptions if lake levels drop too far. On behalf of my constituents, neighbors, and fellow residents, I respectfully request that the LCRA revise the Water Management Plan to place greater emphasis on protecting firm customers first. These measures are necessary to ensure that our communities retain a reliable water supply for public health, safety, and economic stability.

Thank you for considering these comments.

Respectfully,

Paul Roberts
Council Member, Place 5
City of Lago Vista, Texas

From:
Sent: Saturday, September 20, 2025 4:06 PM
To: LCRAWMP
Subject: Comments on Draft 2025 WMP – Protect Firm Customers

CAUTION - EXTERNAL EMAIL
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Dear Mr. Hofmann and LCRA Staff,

As a resident who relies on the Highland Lakes for drinking water, I ask that the 2025 Water Management Plan be revised to put firm customers first and to better reflect today’s drought and growth realities.

Specifically, please:

Raise the minimum combined storage threshold to at least 675,000 acre-feet;

Reduce interruptible agricultural releases by 25% and count conveyance losses and “ordered but not diverted” volumes;

Align environmental flow releases with inflows (reduce Matagorda Bay releases when the prior 3-month inflows are below the 33rd percentile); and

Commit to updating the WMP every 4 years.

Thank you for considering these comments.

I and many additional residents are aware that the next meeting is scheduled this coming Wednesday, Sept 24th, 2025. Please respond to this email and indicate if this is a public or private meeting, and if public, the time and address of the meeting so that we can plan to attend accordingly.

Sincerely,

Amanda Chavarria
Member of Central Texas Water Coalition

From:
Sent: Sunday, September 21, 2025 11:05 AM
To: LCRAWMP
Cc: Wanda Jean Thornton
Subject: 2025 Water Management Plan Comments

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Dear Mr. Hofmann and LCRA Staff,

As a resident who relies on the Highland Lakes for drinking water, I ask that the 2025 Water Management Plan be revised to put firm customers first and to better reflect today's drought and growth realities.

Specifically, please:

Raise the minimum combined storage threshold to at least 675,000 acre-feet;

Reduce interruptible agricultural releases by 25% and count conveyance losses and "ordered but not diverted" volumes;

Align environmental flow releases with inflows (reduce Matagorda Bay releases when the prior 3-month inflows are below the 33rd percentile); and

Commit to updating the WMP every 4 years.

Thank you for considering these comments.

Sincerely,
Jimmy & Wanda Thornton

Sent from Gmail Mobile

From:
Sent: Sunday, September 21, 2025 10:18 AM
To: LCRAWMP
Subject: 2025 Water management plan

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Dear Mr. Hofmann and LCRA Staff,

As a resident who relies on the Highland Lakes for drinking water, I ask that the 2025 Water Management Plan be revised to put firm customers first and to better reflect today's drought and growth realities.

*Raise the minimum combined storage threshold to at least 675,000 acre-feet;

*Reduce interruptible agricultural releases by 25% and count conveyance losses and "ordered but not diverted" volumes;

*Align environmental flow releases with inflows (reduce Matagorda Bay releases when the prior 3 month inflows are below the 33rd percentile); and

*Commit to updating the WMP every 4 years.

Thank you for your consideration.

Sincerely, Ruth Knight

[Yahoo Mail: Search, Organize, Conquer](#)

From:
Sent: Saturday, September 20, 2025 8:16 AM
To: LCRAWMP
Subject: Comments on Draft 2025 WMP

CAUTION - EXTERNAL EMAIL
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Dear Mr. Hofmann and LCRA Staff,

As a resident who relies on the Highland Lakes for drinking water, I ask that the 2025 Water Management Plan be revised to put firm customers first and to better reflect today's drought and growth realities.

Specifically, please:

Raise the minimum combined storage threshold to at least 675,000 acre-feet;

Reduce interruptible agricultural releases by 25% and count conveyance losses and "ordered but not diverted" volumes;

Align environmental flow releases with inflows (reduce Matagorda Bay releases when the prior 3-month inflows are below the 33rd percentile); and

Commit to updating the WMP every 4 years.

Thank you for considering these comments.

Sincerely,
Sam Payne
Lago Vista, TX

Please excuse any iTypos
Sent from my iPad