Water Management Plan Update Process
Participant comments and information requests received between Oct. 19 and Dec. 19, 2025, and LCRA responses

Comments and information requests are summarized, followed by LCRA's responses. Written comments submitted during this period are included in their entirety at the end of this document.

Comments regarding environmental flow terminology and reductions in flows during pro rata curtailment

The National Wildlife Federation (NWF) requested changing the term "special subsistence" to "reduced subsistence" to characterize flow levels lower than the monthly-varying subsistence levels. NWF and Texas Parks and Wildlife Department (TPWD) also suggested flexibility across and within months when providing a set amount of water for environmental flows during firm customer pro-rata curtailment. This would not increase the total quantity of water provided for the environment.

LCRA's response:

LCRA will revisit the terminology pertaining to special subsistence and will incorporate language that provides flexibility on the allocation of reductions during pro rata curtailment.

Comments regarding flow obligation at the Columbus gage and changes to the maximum releases for Matagorda Bay inflows

TPWD expressed concern with the addition of special subsistence at the Columbus gage, noting lower flows could lead to higher water temperatures that could affect freshwater mussels. Also, for bay releases, TPWD suggested maintaining the 15,000 acre-feet per month supply before applying the bay release percentage limits and noted concern with attainment frequencies for MBHE-3 and MBHE-4.

LCRA's response:

LCRA will continue to monitor water temperature throughout the basin to further develop data relating to river flow and water temperatures. The additional flow level under the proposed WMP maintains criteria for each month to be at or above the August subsistence level, which is the minimum of the monthly varying subsistence levels. As seen in the model output, attainment of environmental flow levels higher than the specific criteria is expected due to releases of water for customers and unanticipated flows entering the river below Austin.

For bay releases, the adjustment to the specific release quantity before applying the bay release percentage limit was part of the overall package of adjustments to water supplied for interruptible agricultural customers and the environment which provides a balanced approach to cutting back those supplies as needed for

LCRA to continue to meet firm customer demands, which are increasing in this WMP update. Additionally, the attainment of MBHE-4 was corrected between the model output presented in June and in November, with the correct value being 38% for all three scenarios presented: 2020 WMP with 2032 conditions; 2032 WMP initial approach (introduced in June); and 2032 WMP revised approach (presented in November)

Comments regarding the anytime cut-off level and less severe drought conditions

Judge Spenrath recommended that the anytime cut-off level be set at 1.0 million acre-feet of combined storage and that the Less Severe Drought low inflows entrance trigger be set at 1.7 million acre-feet. CTWC and the Highland Lakes Firm Water Customer Cooperative (HLFWCC), recommended the anytime cut-off level be set at 1.1 million acre-feet. CTWC recommended the Less Severe Drought entrance trigger be set at 1.8 million acre-feet.

LCRA's response:

LCRA's staff recommendation of a combined storage of 1.1 million acre-feet for the anytime cut-off and 1.7 million acre-feet for entrance into Less Severe Drought conditions will be presented to the LCRA Board of Directors in January. The recommendations are consistent with the TCEQ WMP framework.

Comments related to flood planning in the Colorado River basin

Judge Spenrath asked that the WMP consider modeling of large storm events when the lakes are near the storage levels in the proposed WMP. He asked for evaluation of pre-storm releases. And he noted the importance of agriculture, wetlands and bays in absorbing water and reducing flood impacts. commented if the Highland Lakes are near full, it can put downstream communities at risk.

LCRA's response:

The naturalized flow dataset used in the WMP modeling includes historic floods throughout the period of record. Flood planning modeling assumes lakes Buchanan and Travis are at full water supply storage levels (combined storage at 2.0 million acre-feet) prior to a flood event. Lake Travis includes a flood pool of about 776,000 acre-feet above its conservation pool (681 feet above mean sea level). Flood operations at Mansfield Dam are performed in accordance with Army Corps of Engineers protocols. The protocols specify flood releases at various levels with consideration for downstream flow conditions when Lake Travis is in the flood pool.

Comment regarding the criteria for entering Extraordinary Drought
Judge Spenrath recommended that the trigger for entering Extraordinary Drought be modified from 18 months to 16 months have passed since the combined storage was 98% full or more.

LCRA's response:
LCRA modeled using a trigger of 16 months for entering Extraordinary Drought and found that the intended goals of the request were not achieved. LCRA modeling discovered that 15 months or less are necessary to generate an increase in combined storage and reduce the number of years of partial curtailment. The LCRA staff recommendation of 14 months was shared at the Nov. 20 participant meeting.

Comment regarding minimum combined storage and intake locations in determining firm water availability
The HLFWCC expressed concerns over the use of a minimum combined storage of 600,000 acre-feet and its relation to lake levels and water intakes. HLFWCC recognized the impact of increasing the minimum combined storage amount on LCRA's interruptible customers and requested "at a minimum" that LCRA include a schedule for raising the combined storage volume threshold over time. CTWC also recommended consideration of lake elevations and intake locations.

LCRA's response:
LCRA's staff recommendation for the 2032 WMP update continues under the TCEQ framework with a minimum combined storage of 600,000 acre-feet over a repeat of historic hydrology. The modeled minimum combined storage is about 640,000 acre-feet during a repeat of the drought of record, above the 600,000 acre-foot level for declaring a potential drought worse than drought of record

In addition, LCRA staff also performed a modeling exercise to evaluate the potential impact of firm customer drought contingency plan (DCP) water savings. The modeling suggested that over the critical drought period, DCP savings could increase the minimum combined storage by about 50,000 acre-feet. However, LCRA staff did not include the DCP savings when evaluating the necessary reductions in supply to agriculture and environmental flows while maintaining storage at or above 600,000 acre-feet.

LCRA does not guarantee water will be made available at specific elevations in lakes Buchanan or Travis. It is the customer's responsibility to access the water as lake levels vary. LCRA will continue to manage the water supply efficiently, retaining water within the lakes. In addition to LCRA's operational approach to

curtailing supply for interruptible agricultural customers and environmental flows, LCRA will continue to provide customer grants and rebates to reduce firm water usage to help minimize the impacts of customer growth on the combined storage in the lakes. Also, LCRA reviews new and existing customer raw water contract application amounts to verify that the amount requested is appropriate, further helping to manage demand growth.

Comment regarding the WMP process and the next WMP

CTWC requested that the 2032 WMP includes reopener provisions in the event of low inflows, rapid regional growth (higher water demands), or other conditions that affect the WMP.

LCRA's response:

As was the case for the 2020 WMP, LCRA will work with TCEQ to develop criteria for initiating the next planning process. The expected criteria would again include triggers based on water use as well as a date certain.

Water Management Plan Update Process
Participant comments received between Oct. 19 and Dec. 19, 2025

Comments received from:

- National Wildlife Federation
- Texas Parks and Wildlife Department
- Phillip Spenrath, Wharton County Judge
- Central Texas Water Coalition
- Highland Lakes Firm Water Customer Cooperative

November 5, 2025

John Hofmann
Executive Vice-President of Water
Lower Colorado River Authority
P.O. Box 220
Austin, Texas 78767

Submitted via email to LCRAWMP@lcra.org

Re: Revisions to LCRA Water Management Plan

Dear Mr. Hofmann and LCRA Staff:

These comments are submitted on behalf of the National Wildlife Federation (NWF). NWF appreciates the opportunity to participate in the revision process for the Water Management Plan (WMP). NWF is concerned with the reduced levels of attainment of environmental flow protections in the revised WMP but also recognizes the reality of growing demands on limited water supply sources. As LCRA considers additional water supply sources, NWF urges the incorporation of measures to support flow levels adequate to maintain healthy fish and wildlife resources throughout the watershed, including Matagorda Bay, and recreational and business activities that rely on those resources. As reflected in the modeling results previously shared by LCRA, the amount of water available to help meet environmental flow needs continues to decline. For the current revision process, NWF offers comments on two specific issues.

First, as noted during previous discussions, NWF has concerns with the term "special subsistence," which currently is used in referring to flow levels in effect when flow protections are reduced below the previously identified subsistence flow values because of low lake levels. NWF suggests the substitution of the term "reduced subsistence" because it more accurately characterizes the reality that flow levels lower than the subsistence levels, previously determined to be adequate to ensure aquatic resources can subsist, will be in effect during certain conditions.

The second issue relates to the recognition, at several places in the WMP, that during times of pro rata curtailment of firm supplies, environmental flow protections will be commensurately curtailed. Recognizing the circumstances under which that type of curtailment would occur, NWF acknowledges the logic of those reductions. NWF does suggest the addition of language to expressly recognize flexibility for LCRA to use that reduced amount of water for flow protection to achieve the greatest environmental benefit. For example, in times of extreme drought, it may make sense, especially if water is being released from storage, to concentrate releases somewhat to maximize environmental benefit instead of always releasing a specific fraction of subsistence flows or of reduced subsistence flows. Specifically, NWF suggests the addition of new sentences, shown below with underlining, after each of three statements about pro rata curtailments as they appear in the 2020 WMP and are expected to appear in the updated WMP. The intent is not to suggest that LCRA should provide more water, or less water, for environmental flow protection during those conditions than would otherwise be available. LCRA would still implement commensurate percentage reductions for flow protection but the potential for flexibility in using the same amount of water to maximize flow benefits under extreme circumstances would be specifically acknowledged.

The current language included in the 2020 WMP is shown in quotation marks, followed by the proposed additions shown with underlining.

Page 4-13: "In the event of a pro rata curtailment of Firm Water supplies, the applicable instream flow and bay and estuary freshwater inflow criteria will be subject to the same percentage reduction as is imposed on LCRA's Firm Water customers." <u>In achieving that percentage reduction, LCRA retains flexibility under extreme conditions to allocate reductions in flow across and within individual months for the specific purpose of maximizing environmental flow benefits from the available water.</u>

Page 4-14: "In the event of a pro rata curtailment of Firm Water supplies, the applicable instream flow criteria will be subject to the same percentage reduction as imposed on LCRA's Firm Water customers." <u>In achieving that percentage reduction, LCRA retains flexibility under extreme conditions to allocate reductions in flow across and within individual months for the specific purpose of maximizing environmental flow benefits from the available water.</u>

Page 4-16: "In the event of a pro rata curtailment of Firm Water supplies, the applicable freshwater inflow criteria (including the Threshold criteria) will be subject to the same percentage reduction as imposed on LCRA's Firm Water customers." In achieving that percentage reduction, LCRA retains flexibility under extreme conditions to allocate reductions in flow across and within individual months for the specific purpose of maximizing environmental flow benefits from the available water.

LCRA's consideration of these comments is appreciated.

Sincerely,

Jennifer Walker
Director, Texas Coast and Water Program
National Wildlife Federation
walkerj@nwf.org

Myron Hess
Tributary Consulting LLC

From: Marty Kelly
Sent: Monday, November 17, 2025 4:22 PM
To: LCRAWMP
Subject: TPWD Comments Re: 2025 Water Management Plan

CAUTION - EXTERNAL EMAIL
Phishing? **Click the fish** in Outlook

Dear Mr. Hoffman and LCRA,

TPWD appreciates the opportunity to review and provide comments related to the 2025 LCRA Water Management Plan updates and understands the difficult task of balancing the needs of humans and the environment.

Special Subsistence

TPWD is concerned with the addition of special subsistence flows at the Columbus gage. Lower flows, which typically occur in warmer months, may lead to higher water temperatures, lower dissolved oxygen, and higher concentrations of other constituents. Freshwater mussels are particularly sensitive to higher temperatures and lack the ability to seek refuge in cooler water. Freshwater mussels generally begin to experience thermal stress at around 30 degrees centigrade and temperatures above 32 degrees centigrade may be lethal. TPWD understands that the LCRA has been developing a network to monitor water temperatures and would encourage the LCRA to attempt to maintain water temperatures that stay below temperatures that are non-lethal to mussels.

Pro-rata Curtailment

TPWD recommends that the LCRA retains some flexibility when applying pro-rata curtailment to environmental flows across and within individual months. Maintaining this flexibility would allow the LCRA to achieve the needed percentage reductions and to provide some ecological benefit during periods of extreme low flows.

Bay Releases

TPWD is concerned with the proposed reductions related to maximum releases for Matagorda Bay health criteria, both in terms of the per acre-feet release per month and the bay release percentage. TPWD recommends maintaining the 15,000 acre-foot per month before applying the bay release percentage limits to ensure that the attainment frequencies for Matagorda Bay Health Evaluation (MBHE) regimes are maintained (2011 Colorado Lavaca Bays and Basin Expert Science Teams report). Based on the 2025 WAM projections attainment frequencies for MBHE-4 will only be met 25% as opposed to the recommended 35% and MBHE-3 will only be met 40% when the recommended attainment is 60%.

Thank you for your time and please feel free to contact me with any questions at the phone numbers below.

Marty Kelly

Water Resources Program Coordinator

PHILLIP S. SPENRATH
Wharton County Judge
309 E. Milam Street, Suite 600
Wharton, Texas 77488
Office: (979)532-4612 Fax: (979)532-1970

Joyce Ferrell
Administrative Assistant

Rosemary Rodriguez
Court Coordinator

November 17, 2025

Subject: <u>Comments on the Draft 2032 WMP</u>

LCRA Board and Staff,

Thank you for the work that has gone into the proposed 2032 Water Management Plan. We recognize the challenges of balancing firm water demands, lake operations, and the needs of all users throughout the basin. The plan has generally worked as intended, and we appreciate the data and communication provided over the past months.

I met this afternoon with County Judges from the Lower Basin, and we want to re-emphasize the following points ahead of Thursday's WMP meeting. Unfortunately, we will not be able to attend in person, as we are required to be at a continuing legal education conference in Galveston. However, these issues are important to our counties and we hope they will be given full consideration during the discussion.

We support the agriculture groups' overall goal: **working together to allow more releases when lake levels are high, in exchange for accepting reduced or no releases when lakes fall to lower levels.** With that in mind, we support the three related adjustments they have proposed:

i) **Move the anytime cut-off level back to 1.0 million acre-feet**, which matches the current WMP and does not alter modeled storage outcomes.
ii) **Lower the Less Severe Drought entrance trigger from 1.8 to 1.7 million acre-feet,** which modeling has shown does not affect minimum storage and simply shifts two past partial curtailment years into one full cut-off year—an impact agriculture is willing to absorb.
iii) **Reduce the Extraordinary Drought "time since last full" trigger from 18 to 16 months,** which strengthens minimum storage in the model and again places the burden only on agriculture.

These suggested changes stay within TCEQ's framework and do not reduce firm water reliability. They simply preserve some flexibility for downstream agriculture, wetlands, and habitat, all of which depend on seasonal water availability and have already shouldered nearly all curtailments under previous WMPs.

At the same time, **recent statewide flooding has raised major concerns in the lower basin.** The July 4th, 2025 event showed how quickly more than a million acre-feet can enter the system when soils are saturated and tributaries are full. With lakes held near the proposed 1.7 million acre-feet range and no agricultural releases occurring, there is very little room left for these kinds of inflows. Residents downstream are understandably worried about the potential for another catastrophic flood…especially during tropical storm and hurricane periods.

For that reason, we ask that the updated WMP include or at least consider:

- **Modeling of large storm events** when lakes are already near the proposed higher storage levels;
- **Evaluation of pre-storm releases** during periods of clear meteorological risk;
- Recognition that **downstream agriculture, wetlands, and bays** play a role in absorbing water and reducing flood impacts.

From the beginning, LCRA's mission…dating back to the 1930s…was built on flood control and water conservation, including securing water for agricultural needs in Austin and the lower basin. Those priorities remain just as important today. Water supply planning and flood protection cannot be separated, and this WMP update is an opportunity to make sure both are handled responsibly.

Thank you again for including all stakeholders and for your continued work on this important plan.

Sincerely,

Phillip Spenrath

Phillip Spenrath
Wharton County

Central Texas Water Coalition
P.O. Box 328
Spicewood, TX 78669

December 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

Dear Mr. Hofmann and LCRA Staff:

On behalf of the Central Texas Water Coalition (CTWC), thank you for the opportunity to provide additional comments on the staff's proposed 2032 Water Management Plan (WMP). These comments supplement our prior submissions dated April 11, 2025; May 21, 2025 (as revised June 6); July 25, 2025; September 18, 2025; and October 17, 2025. We respectfully request that LCRA continue to consider CTWC's input as development of the next WMP progresses.

As this phase concludes, CTWC offers the following key recommendations and requests:

1. Use the More Protective "Anytime Cutoff" and Associated Storage Values

CTWC supports LCRA's use of the 1.1 million acre-feet Combined Storage "Anytime Cutoff" for interruptible stored water releases. This number is an essential safeguard for firm water customers during dry conditions.

However, CTWC strongly encourages LCRA to adopt the more protective 1.8 million acre-feet reference point for determining when "Normal" conditions apply for interruptible supply. The proposed 1.7 million acre-feet value would provide less protection at a time when inflows and watershed productivity are all trending downward. A slightly more conservative threshold is warranted and appropriate to reflect current hydrologic realities.

2. Recognize the Importance of Lake Elevations for Firm Customers and Intake Locations in Determining Firm Water Availability

Although we have heard LCRA's position that its firm customers bear the risks of having water intakes go dry when lake levels drop, CTWC feels this position tends to overlook LCRA's

overriding, general obligation to provide water to its firm customers. We understand that the elevations of Lakes Travis and Buchanan fluctuate, and that weather and watershed conditions influence the lake levels in ways that LCRA cannot control. At the same time, we believe that LCRA holds a responsibility to consider the elevation of firm water intakes when making decisions about the sufficiency of water available for firm customers. In other words, CTWC urges LCRA to take intake locations into account as part of its continuing obligation to provide reliable and un-interrupted firm water to the customers that divert LCRA water from Lakes Travis and Buchanan.

3. Include Reopener Provisions in the next WMP to Address Near-Term Uncertainties

Given the unprecedented challenges facing the basin including continuing drought, historically low inflows, rapid regional growth, and the introduction of new supply elements such as the Arbuckle Reservoir, CTWC recommends that the 2032 WMP include clear and actionable reopener provisions.

These provisions would allow for early reassessment and adjustment of the WMP if conditions or new learnings deviate from modeled assumptions or if operations (including Arbuckle) do not perform as expected. LCRA has already incorporated several forward-looking and conservative planning elements in the draft WMP, and adding reopener mechanisms would strengthen the plan's resilience and responsiveness.

Thank you for the extensive time and effort the LCRA staff has devoted to the public engagement process during this update cycle. CTWC appreciates your efforts to move quickly toward submitting the proposed WMP to TCEQ. We remain ready to assist as the work continues, and we wish you all the best in 2026.

Sincerely,

Shannon Hamilton

Shannon Hamilton

Executive Director, CTWC

HIGHLAND LAKES FIRM WATER CUSTOMER COOPERATIVE

December 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: Additional Comments on 2025 LCRA Water Management Plan Update (aka the "2032 WMP")

Dear Mr. Hofman:

Thank you for the opportunities to participate in the Lower Colorado River Authority's (LCRA's) 2025 Water Management Plan (WMP) Update process (now referred to as the "2032 WMP"). These additional comments are submitted by 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 WMP Update process. In addition to the two comment letters previously submitted on August 12, 2025 and September 19, 2025, HLWFCC submits following additional comments.

Combined Storage Volume Threshold

It is our understanding that, even after receiving multiple comments urging LCRA to increase the combined storage volume threshold, LCRA is proposing to leave it at 600,000 acre-feet. Even after the further adjustments to other WMP criteria that LCRA proposed at the November 20, 2025 WMP Participant Meeting,[1] minimum combined storage increased by only 5,000 acre-feet over LCRA's initial approach. However, based on the data LCRA has made available for public review, that threshold is 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

[1] Those changes were to the Extraordinary Drought Trigger, the Less Severe Drought Trigger, and the Base-Dry Inflow Criteria. *See* November 20, 2025 "Water Availability Model Results Summary," 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/

customers more than was done in the 2020 WMP, the modeled combined storage volume for the proposed 2032 WMP only reaches 639,000 acre-feet.[2]

HLFWCC reiterates its position that 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 perspectives as time goes on. As has been mentioned several times, 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.

Having modeling showing that the quantity of water needed to satisfy firm demand is allegedly sufficient, is meaningless if the water is not accessible due to physical and economic constraints. HLFWCC hereby incorporates and reiterates the comments made in its August 12, 2025 urging LCRA to account in the WMP for conditions that prevent firm water customers from accessing water stored in the Highland Lakes.

The decision to use 600,000 acre-foot combined storage as threshold for determining interruptible water availability is a <u>policy</u> 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. 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, <u>at a minimum</u>, LCRA include in the WMP a plan and schedule for raising the combined storage volume threshold over time to a more secure volume.

Anytime Cutoff

HLFWCC supports the change in the Anytime Cutoff Trigger increasing to 1.1 million acre-feet from the existing 1.0 million acre-feet cut-off. Thank you for looking at this factor and making this revision to better support firm water reliability.

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[2] *See generally*, November 20, 2025 "Water Availability Model Results Summary," 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/

Thank you for awaiting these comments. Our members look forward to continued opportunity to participate in the 2032 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