



Water Management Plan Update Process Participant comments received between Oct. 19 and Nov. 18, 2025

Comments received from:

- National Wildlife Federation
- Texas Parks and Wildlife Department
- Phillip Spenrath, Wharton County Judge



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." 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.

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." 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.

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: Comments on the Draft 2032 WMP

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
Wharton County