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July 20, 2010

Mr. James M. Parks
RCWPG Chairman/Administrator
c/o NTMWD
P.O. Box 2408
Wylie, Texas 75098-2408

Re: 2010 Region C Initially Prepared Regional Water Plan

Dear Mr. Parks:

Thank you for seeking review and comment from the Texas Parks and Wildlife Department ("TPWD") on the 2010 Initially Prepared Regional Water Plan for Region C (IPP).

As you may know, the Texas Parks and Wildlife Commission recently issued a new and updated Land and Water Resources Conservation and Recreation Plan. One of the cornerstones of the Land and Water Plan calls for TPWD to promote and protect healthy aquatic ecosystems, including the establishment of cooperative strategies to incorporate long-term plant, fish and wildlife needs in all statewide, regional and local watershed planning, management and permitting processes. As you will see in this letter, TPWD has some serious questions about the IPP and in particular, new reservoirs that are under active consideration.

TPWD understands that regional water planning groups are required by TAC §357.7(a)(8)(A) to perform quantitative reporting of environmental factors including effects on environmental water needs, wildlife habitat, cultural resources, and effects of upstream development on bays, estuaries and arms of the Gulf of Mexico when evaluating water management strategies. TPWD believes this quantification is a critical step in the process of attempting to plan for future water needs while at the same time, providing adequate protection of environmental resources, including fresh water inflows to current reservoirs and to the Gulf of Mexico. Accordingly, TPWD staff reviewed the IPP with a focus on the following questions:

- Does the IPP include a quantitative reporting of environmental factors including the effects on environmental water needs and habitat?
- Does the IPP include a description of natural resources and threats to natural resources due to water quantity or quality problems?
- Does the IPP discuss how these threats will be addressed?
- Does the IPP describe how it is consistent with long-term protection of natural resources?
- Does the IPP include water conservation as a water management strategy? Reuse?
- Does the IPP recommend any stream segments be nominated as ecologically unique?
- If the IPP includes strategies identified in the 2006 regional water plan, does it address concerns raised by TPWD in connection with the 2006 Water Plan.

Some amount of quantitative reporting of impacts to environmental factors for the major water management strategies is included in the plan. However, it appears the quantitative reporting has changed little from the 2006 plan. TPWD recognizes that this is likely due to different priorities and funding allocations during this planning cycle. Nevertheless, in the future, there is a need to update the quantitative reporting in the plan by incorporating available environmental data for each water management strategy. The Ralph Hall Reservoir and the Lower Bois d'Arc Creek Reservoir are both in the permitting phase of development. When environmental data becomes available for these projects it should be included in the quantitative analysis. This may include detailed biological and habitat information, as well as changes to water quantity and water quality.

The plan describes the natural resources in the region and briefly discusses threats to those resources from water management strategies in Chapters 1, 5, and 7. No detailed information is provided on how these threats will be addressed. Even though many of the threats will likely not be addressed until the permitting processes. However, there is a need to understand the threats to natural resources prior to the permitting process in order to better evaluate which water management strategies to include in the plan.

The transport of invasive species and toxic algae through interbasin transfers is not included as a threat to natural resources. Golden alga (*Prymnesium parvum*) and zebra mussels (*Dreissana polymorpha*) are both found in Lake Texoma. Zebra mussels have already been identified in West Prong Sister Grove Creek upstream of Lake Lavon due to an interbasin transfer from Lake Texoma. Fish kills from golden alga toxin are increasing throughout the Brazos River Basin and portions of Lake Texoma in the Red River Basin. For this reason, the importation of invasive species and toxic algae through interbasin transfers should be included as threats to natural resources. There is also a need to develop strategies for minimizing the impacts associated with transporting water from areas that are known to have invasive species or toxic algal species.

Marvin Nichols Reservoir is a recommended Water Management Strategy, but it covers a slightly different footprint than in the 2006 Regional Water Plan. This new footprint is qualitatively described as causing fewer impacts to bottomland hardwoods (page 4D.8). However, the new footprint does not appear to be reflected in the map (Figure 4D.1) or the quantification of inundated acreage on page 4D.8 (both of which are identical to the 2006 plan). TPWD supports the avoidance of bottomland hardwoods, but, pending additional details on the new footprint, continues to have significant concerns regarding the impacts to fish and wildlife posed by Marvin Nichols Reservoir.

Much of this planning cycle was devoted to advancing water conservation in Region C. TPWD is pleased to see Region C play an active role in the Water Conservation Advisory Council, funding water conservation awareness campaigns, and implementing the water conservation strategies in the 2006 plan. It is even more encouraging to see that the basic and expanded water conservation packages have been enhanced for the 2011 plan and the region continues to plan to meet the 140 gpcd goal (with reuse) by 2020.

With Region C projected to have 29% of the state's population by 2060 and the majority of water being used is for municipal supply, the region has a great opportunity to

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conserve water beyond the planned 135 gpcd by 2060. TPWD staff encourages the region to continue to pursue advanced strategies to conserve water.


Tables 4B.3 and 6.7 project the total Region C demands at 2,924,157 acre-feet per year in 2060 which differs from the total demand of 3,273,461 acre-feet per year listed in Chapter 2. The 2,924,157 acre-feet per year appears to only be the 2060 municipal demand as shown in Table 2.3. You may wish to rectify this discrepancy in the final water plan.

TPWD staff appreciates the time the planning group gave to evaluating whether to recommend stream segments as ecologically unique. Although TPWD would have preferred to see stream segments be recommended as unique segments, it supports the planning group's legislative recommendation to form a working group comprised of representatives of TWDB, TPWD, TCEQ, and the sixteen water planning regions to bring clarity, purpose, and direction to designating streams as ecologically unique.

The plan calls for an approximate 25% surplus of water supply above the projected demand of 3.3 million acre-feet per year for 2060. This amount of surplus (about 840,000 acre-feet per year) represents significant potential oversupply with corresponding significant potential impacts to natural resources.

TPWD hopes the Region C Regional Water Planning Group will consider and address our questions and concerns before finalizing the IPP. While we value and appreciate the need to meet future water supply demands, we must do so in a thoughtful and sound manner that ensures the ecological health of our state's aquatic and natural resources. We look forward to hearing from you. If you have any questions, or if we can be of any assistance, please feel to contact Cindy Loeffler at 512-389-8715. Thank you.

Sincerely,



Ross Melinchuk
Deputy Executive Director, Natural Resources

RM:CL:ch

Enclosure