Comments from Lost Pines Groundwater Conservation District to the 2011 Region L IPP

At this time, Groundwater Management Area 12 (GMA 12), in which Lost Pines Groundwater Conservation District (LPGCD) is located, is at the end of the DFC planning process. The GAM model runs are complete, and each district has voted on preliminary DFCs which were presented to the GMA 12 Stakeholders and Board in May 2010, when the GMA 12 Board voted to approve the proposed DFCs for the Queen City, Sparta, Carrizo, Calvert Bluff, Simsboro, and Hooper aquifers. In the current model runs, Region L's desired 30,000 ac-ft/yr from Bastrop County and 26,000 ac-ft/yr from Lee County, known as the GBRA Simsboro Project in the Region L IPP, were *not* included in the basis for establishing DFCs in GMA 12.

It is regrettable that Region L did not provide timely notice of its desired needs to our planning regions, K and G, or to GMA 12. LPGCD received a copy of the Region L notice of intent to include the 50,000 ac-ft/yr from LPGCD on February 2, 2010. Had sufficient notice been provided, LPGCD would have had an opportunity to investigate Region L's 2011 IPP before the Region L meeting held on February 4, 2010, when the draft IPP had to be reviewed, edited, and approved.

Nonetheless, LPGCD firmly believes that there are both more economical and practical water management strategies to provide water for the anticipated growth in Region L than the identified groundwater from LPGCD. In section 4.B.1.1 of the Region L IPP, it is stated that "water management strategies that simultaneously develop groundwater supplies and limit depletion of storage in regional aquifers [in Region L] comprise about 29.5 percent of recommended new supplies" and include the GBRA Simsboro Project. While the implementation of the GBRA Simsboro Project would clearly limit impact on aquifers in Region L, it is yet to be determined by Region L, LPGCD, or GMA 12 the impact the GBRA Simsboro Project will have on the aquifers in regions K and G. While the exact impact has yet to be quantified, it can be stated with assurance that groundwater production in excess of recharge, such as is proposed by the GBRA Simsboro Project, would have a depletion effect on storage in LPGCD and in GMA 12.

Furthermore, as stated in Region L's Executive Summary, all water management strategies recommended to meet projected needs could produce new supplies in excess of 766,700 ac-ft/yr in 2060. In contrast, the projected need of Region L in 2060 (as defined in the Executive Summary as drought demand minus current supply) is only 438,650 ac-ft/yr. Clearly, this water from LPGCD is not *needed*. There are two recommended strategies in the Region L IPP: GBRA Mid-Basin (Surface Water) which would produce 25,000 ac-ft/yr (section 4B.1.2.19) and the Hays/Caldwell PUA Project which would produce 35,000 ac-ft/yr (section 4B.1.2.23) and two alternative strategies: GBRA Mid-Basin (Conjunctive Use) which would provide 25,000 ac-ft/yr (section 4B.1.2.20) and Regional Carrizo for Guadalupe Basin which would provide 25,000 ac-ft/yr (section 4B.1.2.21), that LPGCD strongly urges Region L to consider these recommended or alternative strategies in place of the proposed GBRA Simsboro project. Any of these proposed strategies would provide a minimum of 25,000 ac-ft/yr to the same counties with projected

shortfalls in water, Hays and Caldwell primarily. A combination of any of these strategies including moving the above suggested alternative strategies to recommended strategies would more than cover the projected deficits in Hays, Caldwell, as well as other Region L counties with long term water supply deficits.