

General comments from Planning Group Members:

- Why is affordability more important than sustainability of supply in SAWS plan update? Concern that there is a fundamental flaw in a long-term plan that does not place sustainability as a primary criterion over affordability.
- From a long-term planning prospective, sustainability of supply is what “it is all about.”
- Affordability, while important and a laudable goal, may not be the long term arbiter of availability.
- San Antonio tends to want to do everything on the cheap and that may not be realistic in the long term if we want a sustainable water supply.
- SAWS needs to define what it means to be a “Regional Provider” and in particular how are others going to have a voice in decisions to be made by SAWS?
- Referencing the need for additional supply from the Edwards, the SAWS plan states that additional supplies are needed to supplement short term supply needs and facilitate better management of Edwards Aquifer. How does SAWS expanding of Edwards rights facilitate better management? By SAWS seizing control of a larger portion of the aquifer, that supply is no longer available to other smaller entities that do not have the means to development projects. It is concerning to have SAWS in that position especially in the way they define the region.
- In addition to increasing reliance on the Edwards, the issues of transferring water rights from the western counties to pump in Bexar County will pull water levels down in Medina, Bexar, Hays and Comal counties and put them in critical periods more often and for longer periods of time.
- The Edwards Aquifer Authority needs to now take a harder look at transfer rules because SAWS has changed its use of those transferred rights. Initially, SAWS stated to the Edward Aquifer Authority board that additional Edwards supplies were short term leases to make up the difference between permits and maximum use and to provide a cushion for critical period until other projects could be developed. The Edwards Aquifer Authority accepted that justification and developed rules based on what they were told. The SAWS plan update proposes a huge departure from that previous approach and the Edwards Aquifer Authority board will be made aware and will have to review the transfer rules to respond accordingly.
- Edwards Aquifer Authority also needs to look at mitigation rules to address draw down effects in light of this new, aggressive Edwards Aquifer acquisition program from SAWS.

- Did SAWS look at impact of the additional pumping on groundwater levels in Uvalde and Medina counties including how often those counties will be put in critical period management?
- The future demands for Uvalde, Castroville and Hondo were to be satisfied through future purchases of Edwards water, with SAWS going in and acquiring rights, and driving up prices, these communities will no longer have the supply and will not be able to afford the supply.
- Getting a little nervous about SAWS desire to “control the Edwards.” We had reached a point when SAWS neighbors were looking to SAWS to be a better neighbor than you used to be. We had meetings with Chairman Mayor to that effect who told us that it was a primary goal for SAWS to be a good neighbor. Now we see a plan with Scenario 2 that looks like a “power grab” with a rush to get 35,000 acre feet of Edwards, with the potential of the Western Water project on top of that. Try to convince me that you SAWS still has a good neighbor policy.
- The Regional Planning group objects to contention that SAWS is making it seem that they are paying for all projects in the regional plan, that is simply not true. No one has asked SAWS to pay for water for others—all purveyors understand that they have to pay its own way and were not relying on SAWS to pay for their way..
- Concern was expressed regarding escalating the use of Edwards Aquifer supplies. By 2020, SAWS supply will be 70% Edwards supplies and 30% non-Edwards. Some of us want to see the non-Edwards supplies come sooner rather than later because who knows when the next drought will come.
- Concern was expressed regarding the use of something other than the drought of record as SAWS’ basic planning criteria. Some of us have a hard time with basic policy issue of San Antonio, the eighth largest city, using something other than the accepted planning criteria that the rest of the state has to follow. This is a basic policy shift that this planning group cannot ignore and we should get the Texas Water Development Board to opine on. A plan predicated on something less than the drought of record is concerning because of its consequences to the Edwards Aquifer.
- Until the Edwards Aquifer Authority goes through the Habitat Conservation Plan process the limits on the aquifer will not be known and to plan for something less than the drought of record is a major policy issue that this planning group has to address.
- Texas Water Development requires drought of record for the planning process or in the case of the Edwards Aquifer pumping the agreed upon 340,000 acre feet.
- What is the liability SAWS will incur relating to issuing bonds to finance projects if drought of record or a firm yield calculation is not used?

- For years Nueces Basin thought the 1950s drought was the drought of record and we were awakened abruptly in the 1990s that the 1990s is the drought of records. So, if we are not using 1950s drought of record, we could come to find out that the next drought could be even worse than we are thinking.
- The amount of Edwards supplies available in a repeat of a 1950s drought of record is 6% less or 20,000 acre feet as compared to supplies that would be available in a repeat of the 1984 drought used by SAWS.
- Support for exploring seawater desalination sooner was expressed as an alternative to increasing use of Edwards and other groundwater supplies.
- Eastern counties expressed concern about increased reliance on the Edwards due to impact on springflows. If no water is available from Canyon Reservoir and no spring flow, the flow in the Guadalupe would have severely impacted with effects all the way down to Victoria.
- The lower Guadalupe basin is concerned about protecting groundwater for the use of downstream residents especially during drought which the SAWS update addressed by recommending to withdraw from the Lower Guadalupe Water Supply Project, but there is also a huge concern regarding protection of spring flow. The SAWS plan update is a step back into a greater reliance on the Edwards and a step away from regional focus to one that is focused only on affordability.
- The SAWS plan update proposed increased yield from the Carrizo project as compared to the Region L plan and entities other than SAWS are also planning on getting supplies from this aquifer. The regional planning groups should serve as an arbiter in reconciling these differences and assessing the cumulative impact of these projects.
- The SAWS plan update acknowledges concerns of groundwater conservation districts in Bastrop County and Gonzalez County relating to the availability of groundwater supply for the Simsboro Project and the Regional Carrizo Project, respectively; however the plan does not recognize the position of the Evergreen Groundwater Conservation District regarding the lack of availability of 11,000 acre feet of groundwater in Wilson County for the Regional Carrizo Project.
- Concerns were expressed that SAWS Scenario 2 is imposing its conservation criteria on others, although it is an admirable goal it could be unattainable. With 116 gallons per person per day targeted usage, San Antonio would have the lowest per capita water use of any large city in the United States by a significant margin.
- An alternative to SAWS approach to the “regional wholesale provider” as presented in the Scenario 2 was presented that would have all water purveyors in the region participating in a partnership that allowed for each to have a decision share in a

collaborative, non-competitive approach. SAWS' proposal has SAWS making all the decisions and other can choose to join or not effectively setting up a perception that SAWS is trying to control the market for water. Other purveyors in the region will not want to join because they yield their sovereign decisions regarding their water future.

- SAWS needs to consider bring everyone together to make good collective decisions and pursue projects that make sense for everybody and do it in a way that gives us the most efficient development of new supplies rather than the “every man for himself” approach we will have if SAWS is not successful in pulling all the others into their program.
- SAWS is setting themselves up to be perceived as controlling water supply in this county and region representing a huge policy shift for SAWS. The plan takes on a lot of risk for SAWS. If SAWS makes a mistake, or gets it wrong, and doesn't have enough water in a time of drought, the result will adversely impact everyone in the region, not just SAWS.