

August 18, 2010

Mr. Ron Ellis, MC 160
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Dear Mr. Ellis:

Please consider our comments regarding the development of a rule regarding environmental flow standards, since we were unable to attend the meeting on August 12. The City of Weatherford (City) embraces and supports providing water to “support a sound ecological environment.” The establishment of environmental flow standards must be based on sound science and technology, balancing allocation of water between environmental flows and water needs determined by the regional water supply planning process and applying an “adaptive management process that considers and addresses local issues.”

As acknowledged in the legislation, it is vitally important that the rulemaking process take into account the specific characteristics and differences between the various river basins and areas across the state. The legislature recognizes the importance of taking into account the water needs identified by the regional water planning in establishing environmental flow standards. The legislature states that one of the important priorities is “specifying in clear delegation of authority how environmental flow standards will be integrated into the regional water planning and water permitting process.”

The City is located within Region C and, based on the Initially Prepared Plan (IPP) for this region, more than 1,750,000 acre-feet per year of additional water are needed to meet the demands for domestic and municipal uses and for agricultural and industrial uses. Of that total for Region C, the City will need 10,741 acre-feet per year of water in the Year 2060, much of which is dependent upon the Tarrant Regional Water District (TRWD) providing additional supply. The proposed major water management strategies in the Region C IPP that involve TRWD to meet these needs include:

| Strategy | Quantity (ac-ft/yr) |
|--------------------------|----------------------------|
| Toledo Bend Reservoir | 200,000 |
| Marvin Nichols Reservoir | 280,000 |
| TRWD Integrated Pipeline | 179,000 |
| Oklahoma Water | 50,000 |
| TRWD Wetlands | 105,500 |

The City of Weatherford requests that Texas Commission of Environmental Quality (TCEQ) strongly consider planned water management strategies for the region in the rulemaking process. Additionally, the City requests that Region C has opportunities to provide input into the rulemaking process, into the development of a work plan to further develop science and technology to support an adaptive management process for the region, and into the development of implementation procedures for integrating environmental flow standards into regional water supply planning.

Thank you for your consideration of these requests.

Sincerely



Dr. Paul Phillips,
Delegate Member Region C Planning Group



Sharon Hayes, ACM City of Weatherford
Alternate Delegate, Member Region C Planning Group