



CITY OF SAN ANTONIO

**RON NIRENBERG
MAYOR**

September 1, 2017

Robert R. Puente
President / CEO
San Antonio Water System
2800 U.S. Hwy 281 North
San Antonio, Texas 78212

Re: Draft 2017 Water Management Plan

Dear Robert:

You are aware of my strong commitment to long-term water security. It directly affects the strength of our economy and vibrancy of our community. This is why the Water Management Plan (“WMP”) is so important to me and the City Council. Your August 2nd briefing to City Council at the B-Session was helpful in addressing our questions, and I trust your team is working to address our concerns. The purpose of this letter is to reiterate my comments regarding the WMP and urge you to incorporate the following feedback as you finalize the WMP.

Below are my comments regarding the draft WMP:

- **Data** - It is clear that many assumptions were made in order to create the WMP. In order to fully understand the rationale behind the recommendations in the plan, it is imperative those assumptions and data are included, perhaps as an appendix or through footnotes. This will not only add another level of transparency, but allow us to make adjustments, where necessary. It is important that we include the most up-to-date information, including 2016 data when available, to project our demand and supply models over the next 50 years.
- **Culture of Conservation** - The draft water management plan outlines several strategies for decreasing gallons per capita per day rates (GPCD), but maintains that residential per capita usage ‘does not require radical modifications to lifestyle by San Antonio citizens¹.’ Instead, the plan focuses on landscaping modifications that people can make, along with a few useful household improvements. We need to incent lifestyle changes that would have more dramatic impacts on the GPCD reductions. It is important that we build a culture of conservation to decrease the GPCD and build this into the WMP.

¹ Page 26, Chapter 5: Demand Projections

- **Water Restrictions** - You mentioned at the B-Session that the “vast majority” of the WMP assumes Stage 1 drought restrictions are in effect, because the City is under the restrictions most of the year. Since we already spend the majority of the year under Stage 1 drought restrictions, SAWS should formally adopt those Stage 1 restrictions as a year-round policy in order to regulate and stabilize water usage. The WMP also notes Stage 2 drought restrictions will reduce GPCD, but projections for using Stage 3 and Stage 4 restrictions need to be included.
- **Current Water Supply Portfolio & Vista Ridge** - Using computer modeling software, Groundwater Conservation Districts work with Groundwater Management Areas (“GMAs”) to determine groundwater availability (“Modeled Available Groundwater” or “MAG”). According to the WMP, the current water plan for Burleson County, coupled with the groundwater availability projections, do not ‘fully support the full yield of the [Vista Ridge] project².’ This section of the report also concludes that the existing projections - which do not support Vista Ridge Pipeline yields for Modeled Available Groundwater in the area - are a ‘manageable risk’ that may change with future modeling projections and will continue to be evaluated.

As your team mentioned at the B-Session, the current model is being recalibrated and it is anticipated that the water development board to come out with a revised model that will favor the Vista Ridge project demand. Please brief the SAWS Board and advise the City on the outcome of the recalibration and the impacts on the Vista Ridge project, and reconsider the impacts on our water supply portfolio should the full yield of the Vista Ridge project cannot be guaranteed. It is important for me to understand what adjustments would need to be made and what policies would need to be implemented to ensure long-term water security for our community. This should be presented before the WMP is approved in final form.

- **Technology** – SAWS should continue exploring how the use of innovative technologies can prepare us for our current and future needs. It is important to ensure we aren’t foregoing any new technologies or innovative solutions as they arise.

In addition to my comments above, please consider the feedback of District 7 Councilwoman Ana Sandoval, below:

- **Context for the Plan** - The WMP does a good job of highlighting the utility’s many initiatives and progress made. However, without introducing the purpose of the plan, or its context in the regulatory framework, it is unclear how to use or evaluate the WMP. She suggests including text explaining the (a) purpose and history of the WMP; (b) the regulatory framework of the WMP; (c) how the WMP will be used by the SAWS board, SAWS staff, the City of San Antonio, and the public; (d) a summary of the prior WMP plan, its status and relation to the 2017 WMP; and (e) how the WMP aligns with efforts of partner water management agencies such as the

² Page 20, Chapter 3: Current Water Supply Portfolio

Edwards Aquifer Authority and San Antonio River Authority. Additionally, she'd like SAWS to explicitly state what this document is not, as that has been a point of confusion, and to explain where other such information or policies can be found. Further, an explanation of the process for developing the 2017 WMP would also assist in establishing the context and implications of the plan.

- **Projection and Demand Assumptions** - Water demand is clearly a major component of this document. For policymakers to support this proposed document with confidence, they must have the opportunity to understand the basis of the forecasted demand.

While the WMP has language detailing the forecast of population growth, the link between population projections to per capita demand is not sufficiently established. Further, the document does not differentiate among residential, commercial, and industrial growth and demand. Seeing demand projections by sector would allow us a better understanding of total demand and help us understand conservation possibilities, especially as rate schedules differ by sector. More detail regarding how each sector's demand is measured (industry models, past records, etc.) would further inform understanding of the document.

- **Nonrevenue Water Program** - Present authorized uses separately from real or apparent losses. Authorized nonrevenue use is a legitimate need, while losses represent accounting or water shortcomings. While all of these represent nonrevenue uses, they are two very different types of usage that must be managed differently. Presenting them separately would allow us to make informed assessments of efforts to reduce nonrevenue usage.
- **Conservation** - The SAWS April 2017 newsletter, *Waternews*³, identifies conservation as the first of four guiding principles of the WMP update process. Yet, there is no section in the current draft of the WMP dedicated to a summary and evaluation of current and proposed conservation efforts. While we are aware of a separate conservation planning process, without a significant section dedicated to conservation, this document seems incomplete.

To encourage a comprehensive WMP, dedicate a section to current and proposed conservation efforts in all sectors. This section could include a summary and explanation of the 2014 Conservation Ordinance update⁴, and the analysis and planning that underpinned that update, indicating any changes in water demand or updates to conservation plans that have occurred since the update's enactment in May 2014.

Furthermore, the input you received from our community needs to be incorporated. I know you've received great comments from many individuals and organizations that merit consideration. In particular, the WMP would benefit from the suggestions submitted by the Greater Edwards Aquifer

³ www.saws.org/waternews

⁴ www.saws.org/conservation/ordinance

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Alliance on August 15, 2017 regarding aligning the WMP with the City's SA Tomorrow Plan and the need to address water quality in the WMP.

I appreciate the work you and your team has put into the draft WMP thus far, and look forward to the final WMP. I ask that you address the concerns outlined in this letter prior to the SAWS Board Meeting that will consider the final WMP.

Sincerely,



Ron Nirenberg
MAYOR

cc: San Antonio City Council
Jaime Castillo, Chief Strategy Officer/Chief of Staff, SAWS
Gavino Ramos, Vice President of Communications & External Affairs, SAWS