

January 8, 2024

Mr. Tim Andruss  
Chair  
South Central Texas (Region L) Regional Water Planning Group  
c/o San Antonio River Authority  
100 East Guenther Street  
San Antonio, TX 78204

Dear Mr. Andruss:

I have reviewed your request dated November 15, 2023, for approval of alternative water supply assumptions to be used in determining existing and future surface water availability. This letter confirms that the TWDB approves the following assumptions that require a variance:

1. Use of the Region L Guadalupe-San Antonio Water Availability Model (i.e., "Region L WAM") to evaluate existing supply for Canyon Reservoir, and for the power plant reservoirs Braunig Lake, Calaveras Lake, and Coletto Creek Reservoir. The Region L WAM includes the following:
  - a. Simulates Federal Energy Regulatory Commission (FERC) requirements, a drought contingency trigger at the Spring Branch stream gauge, an agreement with Guadalupe Trout Unlimited, and various water rights, including special conditions, and daily operations dependent on Canyon Reservoir.
  - b. Uses of a daily timestep simulation with no use of effluent or other changes to water rights.
  - c. Reflects the operation of the power plant reservoirs as being subject to authorized consumptive uses, with makeup diversions as needed to maintain full conservation storage to the extent possible, subject to senior water rights, instream flow considerations, and/or applicable contractual provisions. Add return flows to the Region L WAM and the TCEQ Guadalupe/San Antonio WAM Run 3 in the evaluation of existing supply when specifically required by a surface water right.
2. Add return flows to the TCEQ Guadalupe/San Antonio WAM Run 3 in the evaluation of water management strategies if an entity requests inclusion of a project that includes an indirect reuse permit. The source water available for reuse will be:

- a. Estimated as the amount of water returned to a utility's wastewater treatment plant for each decade, less the amount of reuse water already utilized as existing supply.
  - b. Where the upper limit of source water available for reuse water management strategies will be based on the amount of water returned to a utility's wastewater treatment plants, estimated at 50% of the utility's projected water demands and adjusted for water conservation and drought management strategies, unless site specific information is available.
3. Add return flows to the TCEQ Nueces WAM for the evaluation of strategy supplies if an entity requests inclusion of a project that includes an indirect reuse permit. The source water available for reuse will be:
- a. Estimated as the amount of water returned to a utility's wastewater treatment plant for each decade, less the amount of reuse water already utilized as existing supply.
  - b. Where the upper limit of source water available for reuse water management strategies will be based on the amount of water returned to a utility's wastewater treatment plants, estimated at 50% of the utility's projected water demands and adjusted for water conservation and drought management strategies, unless site specific information is available.
4. Use of the Flow Regime Application Tool (FRAT), with the relevant TCEQ WAM Run 3, to evaluate environmental flows for new surface water management strategies.

For the purpose of evaluating potentially feasible water management strategies not included in the above list, the TCEQ WAM Run 3 is to be used.

While the TWDB authorizes these modifications to evaluate existing and future water supplies for development of the 2026 Region L South Central Texas RWP, it is the responsibility of the RWPG to ensure that the resulting estimates of water availability are reasonable for drought planning purposes and will reflect conditions expected in the event of actual drought conditions; and in all other regards will be evaluated in accordance with the most recent version of regional water planning contract Exhibit C, *General Guidelines for Development of the 2026 Regional Water Plans*.

Please do not hesitate to contact Michele Foss of our Regional Water Planning staff at 512-463-9225 or [mfoss@twdb.texas.gov](mailto:mfoss@twdb.texas.gov) if you have any questions.

Sincerely,

Matt Nelson  
Deputy Executive Administrator

Mr. Tim Andruss

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