

April 15, 2004

Board of Directors  
Lower Colorado River Authority  
3700 Lake Austin Boulevard  
Austin, TX 78703

Re: Proposed Extension of LCRA water line on Hamilton Pool Road

Dear LCRA Board Members:

On behalf of Save Our Springs Alliance, I respectfully submit to you concerns we have about a proposal to extend LCRA water service out Hamilton Pool Road in Western Travis County through construction of a new water line to be paid for by private interests. Further, Save Our Springs Alliance would like to register with you our request that you **not** approve the proposed extension of water service.

Allow me to give you a little background about our organization and the unique - and fragile - resource we are working to protect, the Edwards Aquifer.

I would also like to welcome the new board members of LCRA. I hope that you get a chance to jump in Barton Springs when you are in Austin for board meetings, particularly during the hot summer months.

Save Our Springs Alliance has been in business since 1990, first working to pass and then defend Austin's Save Our Springs Ordinance, regulating water quality in Austin's jurisdiction of the Barton Springs Edwards Aquifer. Over the years, we have remained firm in our commitment to protecting water quality in the watersheds that contribute flows to the Edwards Aquifer, water that emerges in public drinking wells and at the Great Springs of Texas.

The task of protecting water quality in this limited area is made difficult by the very nature of the resource - a karst limestone aquifer. Karst is the name of a famous limestone region in Western Slovenia. The term now applies to limestone formations with similar characteristics: fractures, caves, sinkholes, open channels underground, and spring outlets.

Water enters the Edwards Aquifer through sinkholes in creeks like Barton and Onion Creeks or through caves and other surface exposures. Once in the aquifer, the water travels rapidly to spring outlets, like Barton, Comal, and San Marcos Springs. Because of the erosion of the limestone over the eons and the formation of underground

flow channels, the aquifer offers minimal to zero filtration of any pollutants that are created by urban development and carried into the aquifer by rainfall, such as sediment, heavy metals, oil, grease, fertilizers, and pesticides.

When you combine a highly fractured limestone aquifer with the thin to non-existent soils of the Hill Country, you' ve got a very fragile resource. When sources of pollution are introduced into the watersheds that feed the Edwards Aquifer, it is virtually impossible to prevent those pollutants from entering the aquifer, drinking wells, and the Great Springs.

The science on the direct relationship between increased development and increased levels of pollutants in the Edwards Aquifer is abundantly clear. Right now, the sediments that emerge at Barton Springs contain lead, mercury, arsenic, diazinon and carbaryl (pesticides), and polyaromatic hydrocarbons or PAHs from vehicle emissions. The water column itself has high levels of nitrates from sewage spills and fertilizers from lawns and golf courses. I have enclosed a Scientific Consensus paper, signed by over 35 leading Central Texas scientists specializing in water resources, geology, and aquatic ecosystems, which makes clear the need to prevent infrastructure expansion in the Barton Springs segment of the Edwards Aquifer.

One hundred years ago, Barton Springs was clear as crystal. Today, while still mostly clear and clean enough for swimming, the bottom of Barton Springs is covered in a layer of sediment and algae. The last thirty to forty years of increased urban and suburban development in the Barton Springs watershed are responsible for the increase in pollution, known as non-point source pollution.

Prior to these recent decades, there were two limiting factors that prevented urbanization in the Barton Springs watershed southwest of Austin: rugged limestone terrain and lack of centralized water infrastructure. Now, both of those limiting factors are being removed, the first literally removed by modern earth moving equipment that can blast, carve, cut, and fill Hill County terrain into parking lots, highways, and residential subdivisions bigger than many Texas towns.

The second limiting factor - lack of centralized water supplies - still exists in some rural parts of the Barton Springs watershed in far western Travis County and northwest Hays County. Closer to Austin, water and wastewater extensions by the City of Austin, Municipal Utility Districts, and the LCRA (with the U.S. 290 West water line to Dripping Springs) have made possible intense development that could not happen without centralized water. The result is thousands and thousands of miles of roads and sewer lines serving thousands of rooftops with thousands of cars driving over the most sensitive watershed in Texas.

Before you, the Board of Directors of the LCRA, is a proposal to enter into a contract with private development interests to construct a new water pipeline at their expense from the Village of Bee Cave out Hamilton Pool Road. The expressed purpose of this water line extension is to facilitate and enable large residential subdivisions along Hamilton Pool Road, with the first phase serving about 1,300 new homes.

Simply put, with a surface water line from LCRA, two landowners will be able to transform a mostly rural Hill Country corridor into typical suburban sprawl. Without a surface water line from LCRA, the two landowners requesting the water line will still be able to develop their property, but at much lower densities, while the possibility of acquisition for conservation purposes would still be viable.

Land in the Hamilton Pool Road corridor to be served by the proposed water line is mostly in the Little Barton Creek watershed, a major tributary of Barton Creek, which replenishes the Edwards Aquifer and Barton Springs.

If the water line is built and the area becomes suburbanized, the result will be an increase in pollution to Barton Springs. With an LCRA water line and new development made possible with LCRA water service, there will be thousands of additional vehicles driving over the Barton Springs watershed, emitting oil and grease onto roadways with no water quality controls. There would be, with the LCRA water line, millions of gallons of sewage generated that would be sprayed, dripped, or transported over the waterways that feed Barton Springs. And the rural character of the area, so beloved by residents, locals who swim in Hamilton Pool and the Pedernales River, and tourists would be lost forever.

LCRA' s stated mission is: "to provide reliable, low-cost utility and public services in partnership with our customers and communities and *to use our leadership and environmental authority to ensure the protection and constructive use of the area's natural resources* (emphasis added).

Making LCRA water available to the Hamilton Pool Road corridor would ensure the *pollution* of the area' s natural resources rather than *protection*. Our community has stated for the last thirty years that the Hill Country is not the appropriate place for infrastructure investments. The science is too strong: to protect the quality of water in the Edwards Aquifer, we must steer infrastructure downstream from the aquifer' s watersheds.

LCRA staff has claimed, "If LCRA doesn' t build the water line, service could be provided through groundwater or through another service provider bringing surface water to the area." Groundwater in the Hamilton Pool Road corridor comes from the Trinity Aquifer, which is very difficult to extract and is of poor quality. Existing development in the area using groundwater has been far less dense than the development proposed by the landowners requesting LCRA water, partly because of Travis County requirements for large lots when using well water. Further, lenders and financiers are reluctant to back large-scale development projects that depend on the unreliable Trinity Aquifer. The notable exception is the West Cypress Hills development, which is using well water for its initial phase but is expecting LCRA water to build out the development.

There are no other water service providers capable of extending surface water to the area who wouldn' t be getting their water from LCRA. Therefore, it is disingenuous to claim that without LCRA water service, another service provider would bring surface water to the area.

LCRA has no obligation to facilitate suburban sprawl in the Hill Country through infrastructure extensions using LCRA water. There has, as far as we can tell, been no consideration given to drastic effects that a water line extension will create, such as exponential increase in traffic on Hamilton Pool Road, the millions of gallons of wastewater that would be generated, the impact on local schools and taxes, and impact on water quality to Little Barton Creek.

We have heard the argument that LCRA should extend water service to Hamilton Pool Road because the landowners trying to develop have agreed to comply with the U.S. Fish and Wildlife Service's recommendations for water quality controls. Those recommendations do not consider wastewater pollution, off-site pollution from additional car traffic, nor do they claim to prevent degradation of water quality in Barton Springs.

Further, a new development west of Dripping Springs, known as Double L, received LCRA water despite failing to comply with the Fish and Wildlife guidelines. A group of downstream neighbors has filed a notice of intent to sue over this violation.

Given the certainty of increased pollution to Barton Creek and Barton Springs if LCRA water service is extended, we request that you turn down the landowners' request for a water line extension. Other landowners in the area are adamantly opposed to the plan. Further, LCRA has committed \$100,000 to a regional planning process to protect water quality in the Barton Springs watershed. Approving a water line extension in the Barton Springs watershed now would undermine the regional planning process.

LCRA staff's "Fact Sheet" about the Hamilton Pool Road water line states, "Landowners want to develop their property now and don't want to wait any longer for the development of a regional plan." LCRA is not obligated to cater to private development interests to the detriment of the public.

The "Fact Sheet" also claims that without an LCRA water line, the "result could be development of greater density than is currently planned and without water quality controls." The "Fact Sheet" does not mention that without an LCRA water line, development could be *significantly reduced from what is currently proposed*. Intense development is not a foregone conclusion. In fact, the single biggest factor determining when and if development takes place is the availability of LCRA water.

I thank you for your consideration of Save Our Springs Alliance's positions on this matter. Please postpone any consideration of the proposed Hamilton Pool Road water line extension, at the very least, until the regional planning process is complete.

Sincerely,

Stuart Henry  
Chairman of the Board of Directors  
Save Our Springs Alliance