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Highlights from comments to Chiang, Patel, and Yerby on draft DWU water-supply recommendations, submitted by Dallas Group and Lone Star Chapter of Sierra Club, Texas Committee on Natural Resources (TCNR), and Sulphur River Oversight Society (SOS)

Sulphur Basin: CPY is recommending water from the Sulphur Basin in 2060. Their reluctance to name which source they recommend from the Sulphur Basin and their recommendation that Dallas join the watershed study proposed by the Corps of Engineers and several North Texas water purveyors is an obvious attempt to promote the proposed environmentally and economically destructive Marvin Nichols Reservoir while avoiding the huge controversy surrounding that new reservoir project by lumping it with relatively uncontroversial existing reservoirs. We oppose Dallas' participation in the watershed study if it includes any new reservoirs. We note that CPY is willing to recommend Fastrill Reservoir for 2040, a reservoir that has had no studies conducted, but is unwilling to recommend between two well-studied options in the Sulphur Basin: building Marvin Nichols or obtaining water from the existing reservoir Wright Patman.

Fastrill Reservoir: CPY is recommending building Fastrill Reservoir to be ready by 2040. Fastrill has not been studied and is not included for study by Region C WPG nor has it ever before been mentioned as a prospect for Dallas. In "reviewing" this option, CPY failed to discover that a national wildlife refuge is being developed that would have a substantial segment flooded by the reservoir (environmental assessment of refuge due at the end of this month), that the project would flood extremely high-quality forested wetlands, that the site is in the debris field for the spaceship Columbia and is being discussed as a memorial site, and that other environmental initiatives are underway that would conflict with the reservoir. We urge that the recommendation of Fastrill be removed from consideration.

10% Reserve Fund: CPY adds a 10% reserve capacity (above projected demand) to their statement of water "needs", even though the projected demand contains an adequate cushion for drought contingencies and interruptions of service. Inclusion of this unneeded capacity provides 85% of the "justification" for recommending water from the Sulphur Basin in 2060.

Conservation Plan: Consultant recommends only a 5% reduction in the first 5 years and an additional 5% in the following 50 years, which appears to fall far short of the environmental and cost benefits other Texas cities have achieved. We do not have the specific assumptions used for the conservation projection, making it difficult to comment meaningfully. Preliminary review suggests that these efficiency achievements are assumed only for the City of Dallas and not for customer cities.

Reuse: We commend the levels of direct and indirect reuse recommended for Dallas in 2020 and appreciate that these were chosen for near-term supply strategies before any new supplies.

Lake Texoma: CPY's numbers for Texoma are based on a scenario similar to the one DWU drafted in May that was debunked by TCONR in our presentation to the joint Council committees on May 24. CPY desalinates a much greater number of acre-feet than is necessary, then mixes the pure water coming from the reverse osmosis plant with untreated water, so that it has to be retreated. A scenario which uses blending first, then desalinates water only when the blended water exceeds drinking water targets, would have a lower cost than Fastrill, Sulphur Basin, or other options presented. CPY's complete failure to recommend use of any water from Texoma while recommending new reservoirs (with their attendant economic, environment, and social impacts) is unconscionable.