



The Farm and Ranch Freedom Alliance (FARFA) is a national organization, based in Texas, that supports independent family farmers and protects a healthy and productive food supply for American consumers. FARFA has the following concerns on **SB 1907/ HB 3298, relating to a study for the development of a market and conveyance network for water in the State.**

First, these bills assume that a statewide water market and water grid is the best plan for Texas, and focus entirely on questions of how to implement this approach. While there is a need for some water transfers, a massive statewide water market and transfer network is an expensive approach with multiple disadvantages.

Instead, the first step should be an analysis of all the options and approaches to water transfers, including local and regional approaches, and how water transfers fit within the broader range of options for addressing Texans' water needs.

Second, if the Legislature moves forward with this study, the following issues must be addressed to ensure the long-term viability of our economy and fairness for all Texans:

- Conservation must be the first priority for everyone. No transfers — whether local, regional, or statewide — should be allowed if the receiving area has not **first** implemented all possible conservation measures.
- Similarly, Texas cannot use transfers to disguise unsustainable practices to water usage. That doesn't solve the problem, it simply postpones the day of reckoning, and makes it likely that the reckoning will be even more painful. Every aspect of water planning must include planning for sustainability in perpetuity.
- There is no justification for destroying rural communities' futures. It will not be possible to expand or even maintain these communities if there is no water available. While some transfers to urban areas may be necessary and appropriate, they must include consideration of the **long-term** impacts on the areas from which they are taking water, not simply whether there is an excess supply at this specific time.

Finally, the inclusion of a 30-day public comment period at the end of the planning process is insufficient. How the study is structured, what facts and data are reviewed, and the process by which they are analyzed, are complicated questions that will significantly impact the results of the study. A group of stakeholders should be involved throughout the entire process. Rural interests and sustainable farmers should be recognized as stakeholders with unique interests that are not adequately represented by others.

At an absolute minimum, a much longer comment period is needed for public input, such as 120 days. This study has the potential to impact the daily life and business of every Texan for the next 100 years and beyond. Allowing a few months for the public to analyze, consider, and comment on the study is both appropriate and necessary.

Contact: Judith McGeary, Executive Director, Farm and Ranch Freedom Alliance
512-484-8821 or Judith@FarmAndRanchFreedom.org
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