



10

Public Participation and
Adoption of Plan



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10.1 Public Participation

The Brazos G Regional Water Planning Group (BGRWPG) provided considerable opportunity for the public to participate in the planning process. Notices and meeting agendas were posted prior to each meeting in accordance with State law, and these and other meeting materials were posted on the BGRWPG website (www.brazosgwater.org) as they became available prior to each meeting. The public was invited to speak during public comment periods during each planning group and committee meeting. In addition, stakeholders were often invited to participate in planning group and committee meetings (as formal items of the meeting agenda) to present information to the planning group that was pertinent to issues the planning group was considering.

The BGRWPG formally adopted its process for identifying, evaluating and selecting water management strategies on February 7, 2018 and included opportunities for public input during the development of the scope of work to develop the 2021 Plan.

The BGRWPG held three sub-regional meetings in January 2020 to solicit comments on the draft WUG and WWP plans prior to development of the Initially Prepared Plan. These meetings were held in College Station on January 21, 2020 (Lower Subregion), in Waco on January 22, 2020 (Middle Subregion), and in Abilene on January 23, 2020 (Upper Subregion).

The BGRWPG held a public hearing on June 3, 2020 to receive comments from the public on the Initially Prepared Plan.

The BGRWPG complied with all Texas Open Meetings Act and Public Information Act requirements during the development of the 2021 Brazos G Regional Water Plan.

10.2 Brazos G Regional Water Planning Group Website (www.brazosgwater.org)

The BGRWPG has directed the Brazos River Authority (BRA) to maintain a website where meeting notices, agendas, and presentation materials may be viewed by the public. In addition to meeting materials, the 2001, 2006, 2011 and 2016 Brazos G Regional Water Plans are posted for public viewing and download, as well as documents from the planning process for the 2021 Plan. The website offers other features including member contact information, planning area maps, planning data, and audio transcripts of meetings.

10.3 Coordination with Water User Groups and Wholesale Water Providers

The BGRWPG coordinated with multiple water user groups, wholesale water providers, groundwater conservation districts, groundwater management areas, county judges, and councils of governments in the Brazos G Area regarding population and water demand projections developed by the Texas Water Development Board (TWDB), groundwater and

surface water availability estimates, proposed water management strategies, and recommendations for sites uniquely suited for reservoir construction.

A survey was disseminated in May 2017 to water user group, wholesale water providers, groundwater conservation districts, and county judges to obtain input regarding draft population and water demand projections and current sources of supply.

Draft plans for each water user group and wholesale water provider were presented to water user groups and wholesale water providers at the three subregional meetings held in January 2020. In addition, the Initially Prepared 2021 Brazos G Regional Water Plan will be provided to county libraries and county clerks in all Brazos G counties and posted on the Brazos G website for public review and comment.

10.4 Coordination with Other Planning Regions

Coordination with other planning regions was accomplished primarily through the technical consultants, who coordinated data and shared information that was later reported to the planning groups. Coordination was accomplished with the technical consultants from Regions B, C, F, H, K, L and O. Other coordination was accomplished through the participation of planning group members as liaisons with other planning groups.

10.5 Brazos G Regional Water Planning Group Meetings

The BGRWPG held 32 public meetings during the 2021 planning cycle, between April 4, 2016 and October 28, 2020, including regular meetings of the full planning group; three sub-regional meetings; periodic meetings of the Executive, Scope of Work, and Finance Committees; and periodic meetings of the Water Policy Workgroup.

10.6 Public Hearing and BGRWPG Responses to Public and Agency Comments on the Initially Prepared Plan

The BGRWPG held a public hearing on June 3, 2020 to receive comments from the public on the Initially Prepared Plan. In response to the COVID-19 pandemic, this public hearing was held via teleconference instead of in person, per the guidelines issued by the Governor of Texas. A total of 42 individuals, including individuals associated with Brazos G as planning group members, administrative staff and consultants, attended the hearing via telephone. No comments were offered from the public during the hearing.

Written comments were received from the public for 60 calendar days following the public hearing. Agency comments were received for 90 calendar days following the public hearing.

Following the June 3, 2020 public hearing, written public comments were received by the planning group through August 2, 2020. Agency comments were received through September 1, 2020. Written comments were received from the Texas Water Development Board, Texas State Soil and Water Conservation Board, Brazos River Authority, City of Cameron, and the Texas Parks and Wildlife Department. No comments were received from federal agencies.

The following section summarizes the public and agency comments received and the responses of the BGRWPG. TWDB comments are addressed in Section 10.7. Comments are summarized in *italics*, with the response from the BGRWPG following in regular type. The following section does not include the entirety of each written comment, but instead summarizes the key points for brevity. Copies of the written comments received are included in Appendix H.

Comments Received from the Brazos River Authority

1. *Subordination. The feasibility of several recommended water management strategies depends upon a subordination agreement with BRA. BRA reiterates their previous requests that the 2021 Plan include a caveat in the evaluation of each water management strategy that assumes a subordination agreement with BRA that clearly states that subordination may not be possible.*

The caveat will be added to those strategies that assume subordination of BRA rights.

2. *Lake Granger Augmentation. BRA has developed the first phase of the Lake Granger Augmentation Strategy, which has been a recommended water management strategy since the 2011 Plan. Due to TWDB regional water planning rules, in some cases viable water supply projects that produce actual supply and meet real demands cannot be recommended in the final Regional and State Water Plans. This results in those projects not being eligible for State Participation funding and highlights the disconnect between TWDB Regional Water Planning rules and reality. BRA notes that TWDB rules required a re-evaluation of the Lake Granger strategy because of rules on use of modeled available groundwater, but at the time of writing their comments had not been provided the opportunity to fully review the proposed re-evaluation of the Lake Granger Augmentation Strategy.*

The BGRWPG shares the BRA's concerns that certain TWDB Regional Water Planning rules will create situations where viable water supply projects will not be eligible for inclusion in the Regional and State Water Plans. Our technical consultant, HDR, has re-evaluated the strategy, which has resulted in Phase 1 being removed from the final plan, and a greatly reduced supply being developed by Phase 2. However, all individual components of the Phase 2 strategy remain in the plan, albeit with a greatly reduced supply and consequently a much larger annual unit cost of water.

3. *Volume I, Chapter 4, Table 4.6. Page 4-13, Water Needs Projected for Wholesale Water Providers: Footnote 2 of this table refers to the water available and contracted per HB 1437, not HB 1763.*

Corrected.

4. *Volume I, Chapter 5, Section 5.7.5, Page 5.7-7, City of Gatesville: BRA recommends deletion of the text "The contracted supply volume is for 5,898 acft/yr; however, this contract is projected to be prorated and only provide a maximum of 4,902 acft/yr during the planning period." BRA water supply agreements are firm commitments.*

Supplies available to surface water rights are based on projected reservoir sedimentation and specific application of the TCEQ WAMs according to TWDB Regional Water Planning rules. The analyses indicate that not all BRA rights are firm in the Little River System, and consequently cannot supply the entire contracted supply. The supplies from the Little River System to BRA's customers are prorated, based on full contract amounts. The language is included in the plan to explain why supplies from BRA contracts are not shown at the full contract amounts. Brazos G recognizes that BRA intends to supply the full contract amounts to BRA's customers

and is taking steps to have the necessary supplies available in advance of customer demands.

5. Volume I, Chapter 5, Section 5.17.5, Page 5.17-4, City of Cleburne: BRA recommends deletion of the following text in the second sentence in this section, "...and a contract with BRA that ranges from 2,971 acft/yr to 885 acft/yr at 2020 to 2070, respectively." BRA water supply agreements are firm commitments.

Please refer to our previous comment.

6. Volume I, Chapter 5, Section 5.24.20, Page 5.24-15, City of McGregor: BRA recommends removing the following text from the first sentence... and BRA from 518 to 473 acft/yr from 2020 to 2070, respectively." BRA water supply agreements are firm commitments.

Please refer to our previous comment.

7. Volume I, Chapter 5, Section 5.18.5 - City of Stamford, Pg. 5.18-2: Recommended removing the text and BRA at 809 to 1,209acft/yr." The City has a contract with the BRA to compensate BRA for the reduction in yield of its System as the result of the City's upstream diversion. BRA does not supply water to the City.

Corrected.

8. Volume I, Chapter 5, Section 5.38, Various locations: References of the BRA System Rate at \$76.50/acft is incorrect. The BRA System Rate for FY2020 is \$79.00/acft.

Costing in the 2021 Plan is based on September 2018 prices, not the most current costs. The BRA's System Rate in September 2018 was \$76.50/acft.

9. Page 5.38-18: Unit Cost needs to be updated in the following locations: 5.38.14 West Central Texas Municipal Water District, Water Supply Plan, a. BRA Systems Operation Supply, Unit Cost: \$79.00/acft, and in Table 5.38-19.

Please refer to our previous comment.

10. Volume I, Executive Summary, Page ES-13, and Volume II, Section 10.3: "Lake Whitney Hydropower Reallocation" should be renamed "Lake Whitney Reallocation" to be consistent with nomenclature in other references to Lake Whitney Reallocation Volume I.

Corrected.

11. Volume I, Chapter 5, Section 5.38.13, Page 5.38-16 — Upper Leon River Municipal Water District: Second sentence under Description of Supply, the reference to WSD should be changed to MWD.

Corrected.

12. Volume II, Section 9.5.2, Page 9.5-3, Lake Belton to Lake Stillhouse Hollow Pipeline: The last sentence in the first paragraph under "Available Yield" states that, The supply for this project is authorized under the existing BRA water right for Lake Belton and from the recently approved System Operation Permit." BRA recommends to remove "...and from the recently approved System Operation Permit." The Lake Belton to Lake Stillhouse Hollow Pipeline is authorized under BRA's reservoir water rights at Lakes Belton and Stillhouse Hollow not the System Operation Permit.

Corrected.

Comments Received from the Texas State Soil and Water Conservation Board

1. *The letter received from the TSSWCB describes the agency's role in water conservation as the lead agency for planning, implementing, and managing coordinated natural resource conservation programs that lead to protection of water quality and more efficient use of water for agricultural and sivicultural purposes.*

Brazos G appreciates the long-standing tradition of leadership from the TSSWCB in providing resources for private landowners to protect Texas's natural resources.

2. *Page ES-4, Table ES-1 and Page 1-5, Table 1-1. Under Interest Group, under Non-Voting Member, include Texas State Soil and Water Conservation Board (TSSWCB), Rusty Ray.*

The non-voting members who have contributed to the 2021 Plan will be acknowledged in the final plan in the tables located in the Executive Summary and Chapter 1.

Comment Received from the City of Cameron

1. *The City of Cameron has identified the need to relocate its surface water intake and pump station to address channel migration concerns and requests inclusion of the Little River Pump Station in the plan and in the project prioritization process.*

The Cameron Little River Intake will be added to the plan as a recommended water management strategy project using the technical information you provided.

Comments Received from the Texas Parks and Wildlife Department

1. *Requests that all WMS evaluations be updated to the March 30, 2020 updates of state-listed species, including review and amendment of all tables listing Endangered, Threatened, Candidate, and Species of Concern for each WMS in Volume II.*

The listings of species in the tables are based on the best available information at the time the documents were developed, many more than a year prior to the March 2020 update. This list maintained by TPWD is dynamic and is updated regularly. We will remove the tables in the strategy evaluations and provide a reference link to the TPWD website where these data are available on an up-to-date basis, so that the information in the plan does not become outdated. In lieu of the tables, the plan will direct the reader to the following link:

<https://tpwd.texas.gov/gis/rtest/>

2. *Notes that several tables have species listed in areas they are not known to occur, misspellings, or missing habitat descriptions.*

Please see our previous response.

3. *Requests inclusion of additional information regarding springs located in Brazos G, specifically with regard to occurrence and their importance to wildlife.*

The description of springs as resources described in Chapter 1 (pages 1-17, 1-18 and 1-38) accurately characterizes the occurrence and importance of springs in the Brazos G Area. The text on page 1-38 does note the importance of springflows to maintaining vegetation and wildlife habitat. No changes will be made.

4. *Water Management Strategies. TPWD cites the general nature of environmental impacts of the various water management strategies, and states that this lack of specificity underrepresents the threats to fish and wildlife.*

a. *The methodology used to determine levels of impacts are not described.*

A table has been added to the text of the plan summarizing the numerical values upon which the rating system is based.

b. *Summaries of impacts change little between project descriptions seemingly not taking into account site-specific considerations.*

The purpose of the environmental assessments of water management strategies in the regional water planning process is not to be an exhaustive, detailed evaluation of each project, just as the supply analyses and costing analyses both do not provide the detail necessary for a project sponsor to devote considerable resources to a project's development without further study. The environmental assessments in the regional water planning process are intended to be a screening mechanism, which identifies in a general sense the impacts of a proposed strategy that is consistent with the level of detail of the other analyses conducted during the evaluation. The local, state, and federal permitting processes are the venues in which additional detailed environmental impact information will be developed and assessed for a given project.

c. *TPWD identifies specific water management strategies for which more site-specific information is requested to be provided.*

Wastewater Reuse. *TPWD states that wastewater discharges often produce a consistent supply of instream flows and direct reuse projects will reduce these flows by diverting water that would have otherwise been discharged to a water course.*

While holders of wastewater discharge permits are typically not required to continue discharging effluent, i.e., they are free to reuse the effluent in lieu of discharging the flows if they obtain additional authorizations, it is generally recognized that discharge of effluent provides a consistent source of base and subsistence flows, particularly during dry periods when naturally occurring flows may be limited. Table 3.2-2 notes this impact of wastewater reuse on Environmental Water Needs / Instream Flows: "Possible low impact on in-stream flows due to decreased effluent return flows; possible increased water quality to remaining stream flows."

Reservoirs. *TPWD states that reservoir projects have the potential to further fragment streams and alter hydrology and water quality, which can impact fish and wildlife resources. TPWD then offers mitigation measures include equipping new reservoirs with fish passage structures and outlet works that can release from different reservoir levels to mitigate temperature and water quality issues. Specific issues addressed by TPWD include include:*

Freshwater inflows to the Brazos River Estuary. *The cumulative effects analysis presented in Chapter 6 includes the Brazos River at Richmond as its lowest control point, which fails to include inflows to the Brazos River Estuary.*

Graphics documenting flow changes at the furthest downstream primary control point have been added to Chapter 6 to address changes in freshwater flows to the Gulf of Mexico.

South Bend Reservoir. *TPWD express concerns that the impacts of the proposed South Bend Reservoir are not documented or discussed as fully as they should be.*

Language has been added that the proposed South Bend Reservoir would inundate habitat critical to the Smalleye Shiner and Sharpnosed Shiner and would further fragment the Brazos River channel upstream of Possum Kingdom Reservoir.

Note that the South Bend Reservoir is not a recommended or alternative water management strategy in the 2021 Brazos G Regional Water Plan.

Cedar Ridge Reservoir. TPWD expresses concern that the habitat within the proposed Cedar Ridge Reservoir will not support populations of the Brazos Water Snake.

The evaluation of the proposed Cedar Ridge Reservoir includes information provided by the project sponsor related to the Brazos River Water Snake and other environmental considerations. Per Brazos G's earlier comment, the evaluations of the potential environmental impacts of water management strategies are not intended to be detailed, exhaustive analyses, but are to be considered screening level evaluations. More detailed evaluations of the environmental impacts and mitigation measures for specific water management strategies are more appropriately pursued during the state and federal permitting processes for the projects.

South Bend Reservoir and Cedar Ridge Reservoir. TPWD expressed concern for the cumulative impacts of the two projects to increase the chance for golden algae blooms and to increase salinities downstream, which would increase treatment for public water supplies.

Given that the South Bend Reservoir is only considered to be potentially feasible and is not a recommended or alternative water management strategy, concern for the cumulative impacts of the two projects is overstated.

While increases in salinity and increased risk of golden algae blooms downstream from the proposed Cedar Ridge Reservoir are possible, evaluations of those potential impacts are beyond the scope of the regional water planning process.

Chloride Control Projects. The IPP should acknowledge potential impacts of these strategies to the State Threatened Red River Pupfish as well as to the federal and state-listed Endangered Smalleye Shiner and Sharpnose Shiner and the designated Critical Habitat for these shiners. Other fishes emblematic of the upper Brazos River prairie stream ecosystem could also be impacted including State Threatened Chub Shiner.

These potential impacts to the smalleye and sharpnose shiners are discussed on Volume II, page 11-37 of the plan. Reference has been added to the red river pupfish and chub shiner as requested.

5. ***Invasive and Exotic Species.*** Zebra mussels should be identified as an issue affecting water supply and water quality in the Brazos G Area.

The introduction of zebra mussels has been added to section 1.10 Threats and Constraints to Water Supply, and a link to the TPWD website listing occurrences has been provided, in addition to listing those reservoirs currently "infested" or "positive" in the Brazos G Area.

6. ***Aquatic Resource Relocation Plans.*** The need for Aquatic Resource Relocation Plan and a relocation permit should be identified in the list of state and federal permits potentially required to construct certain water management strategies.

The information has been added where appropriate to the water management strategy evaluations.

7. ***Ecologically Unique Stream Segments.*** TPWD supports regional water planning groups in recommending ecologically unique river and stream segments. The nomination of stream segments is an opportunity to demonstrate a regional commitment towards the long-term protection of natural resources. TPWD offers to support an update if Brazos G would find it beneficial in deciding to recommend a river or stream segment as unique.

Brazos G thanks the TPWD for the offer to support identifying and recommending unique stream segments. We acknowledge the support of TPWD in previous planning cycles. For the 2021 Plan, the BGRWPG has opted not to offer a recommendation. However, we will revisit this issue during the next planning cycle.

8. *Please change the non-voting representative from Dan Opdyke to Jennifer Bronson Warren and add David Young as an alternative non-voting representative for TPWD.*

Mr. Opdyke is not identified in the Initially Prepared 2021 Plan because the list of non-voting members was omitted. However, the list of non-voting members will be added to the final plan and Ms. Bronson Warren will be included in the list, as she was included in the 2016 Plan. We will not add Mr. Young, as alternates are not listed, only actual voting and non-voting members.

10.7 TWDB Comments on the Initially Prepared Plan and BGRWPG Responses

The following section summarizes the comments received from the TWDB and the responses of the BGRWPG. Level 1 comments are required to be addressed in order to meet statutory, agency rule, and/or contract requirements. Level 2 comments and suggestions are suggested for consideration to clarify or enhance the plan.

10.7.1 Level 1 TWDB Comments

1. *Volume II and the State Water Planning Database (DB22). The plan includes the following recommended water management strategies (WMS) by WMS type, providing supply in 2020 (not including demand management): 18 groundwater wells & other, two aquifer storage and recovery, 13 other direct reuse, six new major reservoir, two conjunctive use, and 24 other surface water, including the Groesbeck minor reservoir. **Strategy supply with an online decade of 2020 must be constructed and delivering water by January 5, 2023.***
 - a) *Please confirm that all strategies shown as providing supply in 2020 are expected to be providing water supply by January 5, 2023. [31 § TAC 357.10(21); Contract Exhibit C, Section 5.2]*
 - b) *Please provide the specific basis on which the planning group anticipates that it is feasible that the two aquifer storage and recovery, six new major reservoir, two conjunctive use, and 24 other surface water WMSs will all actually be online and providing water supply by January 5, 2023. For example, provide information on actions taken by sponsors and anticipated future project milestones that demonstrate sufficient progress toward implementation. [31 § TAC 357.10(21); Contract Exhibit C, Section 5.2]*
 - c) *In the event that the resulting adjustment of the timing of WMSs in the plan results in an increase in near-term unmet water needs, please update the related portions of the plan and DB22 accordingly, and also indicate whether 'demand management' will be the WMS used in the event of drought to address such water supply shortfalls or if the plan will show these as simply 'unmet'. If municipal shortages are left 'unmet' and without a 'demand management' strategy to meet the shortage, please also ensure that adequate justification is included in accordance with 31 TAC § 357.50(j). [TWC § 16.051(a); 31 § TAC 357.50(j); [31 TAC § 357.34(i)(2); Contract Exhibit C, Section 5.2]*
 - d) ***Please be advised that, in accordance with Senate Bill 1511, 85th Texas Legislature, the planning group will be expected to rely on its next***



planning cycle budget to amend its 2021 Regional Water Plan during development of the 2026 Regional Water Plan, if recommended WMSs or projects become infeasible, for example, due to timing of projects coming online. Infeasible WMSs include those WMSs where proposed sponsors have not taken an affirmative vote or other action to make expenditures necessary to construct or file applications for permits required in connection with implementation of the WMS on a schedule in order for the WMS to be completed by the time the WMS is needed to address drought in the plan. [TWC § 16.053(h)(10); 31 TAC § 357.12(b)]

- a. The timing of the strategies in question have been adjusted so that all start in 2030 and not 2020.
 - b. The timing of the strategies in question have been adjusted so that all start in 2030 and not 2020.
 - c. In several cases, municipal needs will remain unmet in 2020. Language has been added to the plans for those WUGs noting that those needs will occur during a drought equivalent to the drought of record and demand management will be required to reduce demands prior to the recommended strategies coming online.
 - d. We stand advised.
2. *Section 2.3.9, Table 2.13. Major Water Provider (MWP) demands presented in Table 2.13 are not presented by category of use. Please report demands for MWPs by decade and category of use in the final, adopted regional water plan. [31 TAC § 357.31(b); 31 TAC § 357.31(f)]*

The final 2021 Plan will include a table showing the demands for MWPs presented by decade and category of use.

3. *Section 3.4, page 3-63. Table 3.9 represents groundwater availability, however values in Table 3.9 for most counties does not represent modeled available groundwater (MAG) volumes. For example, the MAG for the Trinity Aquifer, Bell County ranges from 9,267 ac-ft/yr in 2020 to 9,241 ac-ft/yr in 2070 and is presented as 3,984 ac-ft/yr in 2020 to 4,270 ac-ft/yr in 2070, in Table 3.9. In some cases, aquifers are listed for counties where those aquifers do not exist. Please update Table 3.9 with the correct MAG volumes for all counties and verify that aquifers exist where they are listed in the final, adopted regional water plan. [31 TAC § 357.32(d)]*

Table 3.9 has been corrected.

4. *Section 3.4.1, page 3-61, second paragraph and Table 3.9. The plan discusses the use of an approved MAG Peak Factor for the Carrizo-Wilcox aquifer in Brazos County; however, the values in Table 3.9 for the Carrizo-Wilcox Aquifer in Brazos County are not equal to MAG volumes with the MAG Peak Factor applied. Please update Table 3.9 with the correct MAG Peak Factor volumes for the Carrizo-Wilcox Aquifer in Brazos County. [31 TAC § 357.32(d)(3)]*

Table 3.9 has been corrected.

5. *Section 3.4, Table 3.9, pages 3-63 to 3-66. The groundwater availability values listed in Table 3.9 for the Carrizo-Wilcox Aquifer in Brazos County represent neither the unmodified MAG nor the availability with the MAG Peak Factor applied. Please update Table 3.9 to represent groundwater availability for the Carrizo-Wilcox Aquifer in Brazos*

County with the MAG Peak Factor applied, and also report the unmodified MAG volumes, in the final, adopted regional water plan. [Contract Exhibit C, Section 3.6.1]

Table 3.9 has been corrected.

- 6. Chapter 3, Table 3.9, pages 3-63 to 3-66, and Appendix B. The groundwater availability for aquifer areas with no desired future conditions (DFC) appear to be inconsistent with the source availability values presented in DB22. Additionally, some non-MAG volumes appear to be missing from Table 3.9, for example, the Brazos River Alluvium Aquifer in Bosque County. Please update Table 3.9 with groundwater availability consistent with DB22 in the final, adopted regional water plan. [Contract Exhibit C, Section 3.5.2]*

Table 3.9 and Appendix B have been corrected.

- 7. Chapter 3, Table 3.9, pages 3-63 to 3-66, and Appendix B. It is not clear what groundwater availability methodologies have been utilized for aquifers with no DFCs. For example, Appendix B (page B-4) states availability for aquifers with no DFC "are based on results from groundwater modeling during the development of the MAGs for other aquifers", suggesting that the values of "not-relevant DFC compatible availability" from the MAG run were used. However, the availability values with Table 3.9 do not support confirmation of these methodologies. Please clarify the methodologies utilized for aquifer areas with no DFCs in the final, adopted regional water plan. [Contract Exhibit C, Section 3.5.2]*

The following text has been added to both Chapter 3 and Appendix B.

"For aquifers without an adopted MAG, the TWDB provided "total availability" estimates that are based on results from groundwater modeling during the development of the MAGs for other aquifers. For other aquifers, Brazos G utilized the groundwater availability estimate carried forward from the 2016 Brazos G Regional Water Plan; these were determined based on a variety of sources, predominately information from historical TWDB groundwater reports and the TWDB groundwater database. The Brazos G technical consultant requested specific groundwater availability estimates based on the above information, and coordinated closely with the TWDB staff to finalize the non-MAG groundwater availability estimates for aquifers in counties and river basins for which an official MAG has not been adopted."

This is identical to the description provided in the Technical Memorandum submitted and approved by the TWDB September 2018. The final non-MAG groundwater availability estimates were determined through close coordination with TWDB staff in 2018. No changes to those non-MAG groundwater availability estimates have been made since those values were coordinated with TWDB.

- 8. Chapter 3. The plan does not appear to include the evaluation results of existing supplies for MWP. Please report existing supplies for MWP by decade and category of use in the final, adopted regional water plan. [31 TAC § 357.32(g)]*

A table presenting existing supplies for MWPs by decade and category of use will be included in the final plan.

9. *Chapter 3. Please include the methodology used to determine local surface water supplies and clarify whether the local surface water supplies are firm supplies under drought of record conditions in the final, adopted regional water plan. [Contract Exhibit C, Section 3.2 and Section 3.7]*

The following clarification text has been added to Chapter 3 in the final plan.

"These supplies are firm and would be available through a drought of record given that they are supported by local, shallow groundwater sources when groundwater-based, and when surface water-based are reflected in the State's water availability models through the underlying streamflow gage data upon which the naturalized streamflows are based."

10. *Chapter 3 and Chapter 5 (Sections 5.13, 5.19, 5.22). Please provide justification for setting existing water supplies equal to demands during the planning period, for example Manufacturing, Hamilton County, County-Other, Kent County, and Aqua WSC, Lee County in the final, adopted regional water plan. [Contract Exhibit C, Section 3.7 item 4]*

The notes in the summary tables do not imply that demand was set equal to supply. The notes state that the supplies evaluated happen to equal the demands for those specific WUGs. This could be based on any number of factors including well capacities, or contractual purchases whereby the seller agrees to meet the buyers demands. The notes in the final plan have been changed to "No projected surplus or shortage."

11. *Appendix B, MAG tables. In some cases for counties which are split between more than one basin, the MAG totals in the MAG tables include the total for only one basin. In addition, for some aquifers, for example the Marble Falls and the Woodbine aquifers, the MAG totals appear to be incorrect. Please review the tables in Appendix B for each aquifer and county, verify the data presented, and update as necessary in the final, adopted regional water plan. [31 TAC § 357.32(d)]*

Appendix B has been corrected.

12. *Chapter 4. The plan does not appear to include identified water need volumes for MWPs reported by category of use including municipal, mining, manufacturing, irrigation, steam electric, mining, and livestock. Please report the results of the needs analysis for MWPs by categories of use as applicable in the region in the final, adopted regional water plan. [31 TAC § 357.33(b)]*

A table presenting needs for MWPs by decade and category of use will be included in the final plan.

13. *Chapter 4. While the results of the secondary needs analysis is presented in Appendix A for WUGs, please add a discussion of this needs analysis to Chapter 4 or reference the current location in the final, adopted regional water plan. [31 TAC § 357.33(e)]*

Agreed. A reference to the secondary needs presented in the appendix will be included in Chapter 4.

14. *Chapter 4. The plan does not appear to include a secondary needs analysis for MWPs Please present the results of the secondary needs analysis by decade for MWPs in the final, adopted regional water plan. [31 TAC § 357.33(e)]*

A table presenting the secondary needs analyses for MWP by decade will be included in the final plan.

15. *Chapter 5. The plan does not appear to discuss the region's assessment of significant water needs relating to the assessment of aquifer storage and recovery potential for meeting the identified significant water needs. Please include at a minimum, how the region determined the threshold of significant water needs for this requirement in the final, adopted regional water plan. [TWC § 16.053(e)(10); 31 TAC § 357.34(h)]*

On August 12, 2020, the BGRWPG identified the threshold of significant water needs for consideration of aquifer storage and recovery projects to be 10,000 acre-feet per year or greater. A section has been added to the final plan Volume 2, Chapter 1 describing how aquifer storage and recovery was considered for each of the 15 water user groups having needs exceeding this threshold. Aquifer storage and recovery is identified as a recommended water management strategy for seven of those, either specifically or as a strategy for a wholesale water provider that provides supply.

16. *Volume II, Chapter 3. The plan in some instances appears to include infrastructure components that are not required to increase the volume of supply for the WUG but are associated with internal distribution systems, which are ineligible per contract Exhibit C, Section 5.5.3. For example, but not limited to, page 3.3-5 states the North Reuse Project will include branch pipelines and page 3.7-2 states that Cleburne Reuse Project will serve future commercial developments. Please make clear in the plan that evaluations for all Reuse WMSs does not include reuse distribution lines directly to residences or commercial businesses in the final, adopted regional water plan. [Contract Exhibit C, Section 5.5.3]*

Specific branch components of the reuse strategies related to direct sales have been removed for the City of Cleburne. The reuse strategy for the City of College Station has been removed. The Miramont Reuse strategy for the City of Bryan has been removed. The remainder of the components for the reuse strategies and projects recommended in the 2021 Brazos G Regional Water Plan are not related to direct retail or commercial use and include no internal distribution of reuse.

Brazos G recommends that the TWDB reconsider this interpretation of the rules disallowing “internal distribution” components for direct reuse projects. Typically, direct reuse supplies are delivered directly from the wastewater treatment facility to the end use and are by TWDB definition “distributing” the reuse supplies. However, that reuse supply would not be made available without the so-called “distribution” components, because those components comprise the entirety of the reuse project. Continuation of this interpretation related to direct reuse has the potential to eliminate multiple viable reuse projects from consideration, such as was required for the strategy recommended for College Station.

17. *Volume II, Section 9.5. Table 9.5-2 presents the available project yield for the Lake Belton to Lake Stillhouse Hollow Pipeline WMS as 30,000 ac-ft/yr, however the yield reported in DB22 is zero ac-ft/yr in all decades. The WMS appears to move existing supply to areas of need more efficiently and does not appear to make new supply available to any WUGs. Please clarify whether the WMS increases the volume of water supply delivered to WUGs. If so, the volume of water supply must be represented in DB22 in at least one planning decade. If not, the WMS must be removed as a*

recommended WMS from DB22, and the WMS evaluation must be presented in a separate section in the final, adopted regional water plan. [31 TAC § 357.34(d)]

The final plan and database entries have been modified so that the supply from the BRA Little River System is reduced by 5,000 acre-feet per year through an infrastructure constraint. This constraint is removed by construction of the Lake Belton to Lake Stillhouse Hollow Pipeline, which will now supply the constrained 5,000 acre-feet per year supply.

18. *Volume II, page 9.7-1 and DB22. The WMS evaluation for Somervell County Water Supply Projects, states that the strategy would be completed by 2035, yet supply in DB22 is shown online in 2030. Strategy supply must be assumed to come online and be providing water in or prior to the online decade year. Please reconcile all online decades accordingly in the final, adopted regional water plan. [31 TAC § 357.10(21); Contract Exhibit C, Section 5.2]*

The text in Volume II, Section 9.7 and the Somervell County Plan (Volume I, Section 5.30) have been corrected to state that the supply will be available in 2030.

19. *Volume II, Chapter 13. The plan does not include the WMS project costing tool's output report for any of the Miscellaneous WMSs in Chapter 13, or analogously present the capital cost for each project component. Please submit the costing tool's standardized cost output report or present capital cost estimates for each project component for each WMS evaluated in the final, adopted regional water plan. [31 TAC § 357.34(f); 31 TAC § 358.3(21); Contract Exhibit C, Section 5.5.1]*

The individual tables have been added to Volume II, Chapter 13.

20. *Volume II, Chapter 13. The plan does not appear to include technical evaluations for any of the WMS or projects presented in Chapter 13. Please include technical evaluations for each WMS evaluated in the final, adopted regional water plan. [31 TAC § 357.34(a); 31 TAC § 357.34(e); Contract Scope of Work, Task 5A]*

Volume II, Chapter 13, Section 13.2 includes a discussion of the evaluation given to each of the miscellaneous strategies. Because these miscellaneous strategies are limited to wells, pipelines and water treatment plants, the evaluation given to each is similar and is summarized in Section 13.2. Note that an appendix has been added to the plan containing a matrix summarizing the environmental considerations evaluated for each water management strategy, including the miscellaneous strategies as a group.

21. *Volume II and DB22. The plan includes WMS projects that appear to come online after the related WMS is initially online providing supply. For example, the Georgetown WTP Expansion WMS is reported to provide supply in 2020, however the related WMS project in DB22 on which it relies does not come online until 2030. For WMS projects that are the basis for a strategy to deliver water, please ensure that the project is associated with the initial decade, or earlier decade, that the dependent strategy is expected to deliver supply. In the event that the resulting adjustment of the timing of WMSs in the plan results in an increase in near-term unmet water needs, please update the related portions of the plan and DB22 accordingly. [31 TAC § 357.10(21); Contract Exhibit C, Section 5.2]*

The timing of the strategies has been corrected so that Volume II agrees with DB22 and the text in Chapter 5. Unmet water needs are also updated in the appropriate places.

22. *Volume II. The plan, in some instances, does not appear to include pipe diameters, or pipe length information in some strategy evaluations costing report tables for example, Bell County WCID No.1 North Reuse Project. Please provide this information, if known, or remove the zeros from the costing outputs in the final, adopted regional water plan. [Contract Exhibit C, Section 5.6]*

Those missing data resulted from an apparent bug in the Uniform Costing Model, which failed to include the pipe diameter or length information for several strategies in the final summary table. Those data have been manually entered into the tables in the final plan.

23. *Volume II. The plan does not clearly state if or how a quantitative analysis of environmental flow needs was taken into account in calculation of yield for the following WMSs: Coryell County OCR (Vol. II Section 4.4), Lake Aquilla Reallocation (Vol. II Section 10.1), and Millers Creek Reservoir Augmentation (Vol. II Section 10.5). Please include a statement regarding how environmental flow criteria were considered in these strategy evaluations in the final, adopted regional water plan. Additionally, the Red River OCR (Vol. II Section 4.8), evaluation states that it was modeled in accordance with TCEQ environmental flow requirements; however, there are no Chapter 298 requirements for the Red River Basin. Please ensure that the evaluation for Red River OCR addresses environmental flows using the consensus criteria in the final, adopted regional water plan. [31 TAC § 357.34(e)(3)(B); 31 TAC § 358.3(22); 31 TAC § 358.3(23)]*

For the strategies supplied from the Brazos River Basin, additional text has been added clarifying that environmental flow criteria were considered in the water availability modeling of the strategies.

For the Red River OCR, you are correct that no Chapter 298 requirements have been adopted for the Red River Basin. Because the diversion is directly from the Red River, and the flows in the Red River WAM include only flows from the Texas portion of the Basin, inclusion of environmental flow needs using the consensus criteria approach is not possible because the total flows are not available upon which to apply the criteria. However, the model does reflect the existing Red River Basin Interstate Compact, which dictates instream flow targets to be maintained. This is the same approach used in relation to this project by the Region C RWPG in that region's evaluation of the Red River OCR project for supplies in north Texas. The Brazos G evaluation of this project is consistent with the evaluation made by Region C. Language has been added to Volume II, Section 4.8.2 to clarify.

24. *Volume II. The plan does not appear to include quantitative evaluation of impacts for all environmental factors. For example, in Table 4.6-3. the Environmental Water Needs are reported as "Moderate impact". It is not clear what quantitative values are assigned for impacts to wildlife habitat, wetlands, threatened and endangered species, and cultural resources in this table. Additionally, not all of the "Environmental Issues" sections for each WMS appear to include a quantitative evaluation of all environmental factors, for example Table 9.2-1. Please include a quantitative reporting of*

environmental factors for all WMSs in the final, adopted regional water plan. [31 TAC § 357.34(e)(3)(B)]

A matrix has been prepared summarizing the quantitative assessments for the water management strategy evaluations, including defining quantitative values for descriptive assessments such as “Moderate impact.”

25. *Volume II. The plan, in some instances, does not appear to include a quantitative reporting of impacts to agricultural resources. For example, on page 4.11-20 of Volume II, in reference to the Turkey Peak Reservoir, the plan states, “some impacts are expected for agricultural land use” and in Table 4.11-3, Threats to Agricultural and Natural Resources are listed as “Low to None”. Please include quantitative reporting of impacts, including impacts considered negligible, to agricultural resources for all WMS evaluations in the final, adopted regional water plan. [31 TAC § 357.34(e)(3)(C)]*

Please refer to our response to comment 24.

26. *Volume II, Section 7.1. The representation of the Lake Granger Augmentation WMS phases and data structure as entered DB22 appears to be inconsistent with how the WMSs is described in the plan. Please reconcile how the WMS and projects are described in the final, adopted regional water plan and presented in DB22. The MAG volume for recommended WMSs in the plan and in DB22 may not be over-drafted in any decade year. At the time of review, there did not appear to be sufficient MAG availability in DB22 available for either phase of this WMS. Additionally, WMS supplies may not be presented as zero in all decades in the final, adopted regional water plan [31 § TAC 357.34(b); Contract Exhibit C, Section 3.5.4]*

The hydrologic analysis of the Lake Granger Augmentation WMS has been revised so that the single year maximum withdrawal from the Carrizo-Wilcox Aquifer does not violate the available MAG. This has drastically and artificially reduced the supply that can be developed by the project. Note that the long-term average withdrawal from the Carrizo-Wilcox Aquifer is within the available MAG and the maximum withdrawal in the original analysis occurs only in a few isolated years in the 57-year simulation. It is the opinion of the Brazos G RWPG that this project as originally formulated would maintain aquifer conditions within the Desired Future Conditions adopted by Groundwater Management Area 12 because the long-term withdrawal would be consistent with long-term MAG volumes. The BGRWPG would like to discuss a better approach for this important, innovative project during the 2026 planning cycle.

27. *Volume II, Section 7.2 The evaluation of the Oak Creek Reservoir WMS indicates that the MAG will be exceeded in multiple years but does not appear to include a supporting ‘peak factor’ analysis to support short-term overdrafts. Please reconcile how the WMS and projects are described in the plan and presented in DB22 in the final, adopted regional water plan. The MAG volume for recommended WMSs in the plan and in DB22 may not be over-drafted in any decade year. At the time of review, there did not appear to be sufficient MAG availability in DB22 available for this WMS. Additionally, please ensure that the region has coordinated with Region F on the volume of water available through the Region F Oak Creek Reservoir Subordination WMS. [31 § TAC 357.34(b); Contract Exhibit C, Section 3.5.4]*

The DB22 entries were incorrect and did not include both the Brazos Basin and Colorado Basin MAG volumes available to the project. When the Colorado Basin portion of the MAG is taken into consideration, no overdrafting will occur. Supplies made available by the project have been adjusted in the plan text and DB22.

The volume of water available through the Region F Oak Creek Reservoir Subordination WMS was provided by the Region F technical consultant.

28. *Volume II, Sections 4.2, 4.7, and 4.10. Brushy Creek, Lake Creek, and Throckmorton reservoirs are presented as new, proposed major reservoirs in the plan and DB22, and the evaluations indicate these reservoir WMSs have not been implemented. These reservoirs are also represented as providing existing supply in DB22 as early as 2020. Existing supply must be physically and legally available to the WUG. Please revise the existing supply data as necessary, in the final, adopted regional water plan, if the WUGs are not currently receiving water from these sources, or clarify in the evaluations whether the WMSs are to expand an existing reservoir. [Contract Exhibit C, Section 5.2.1]*

These two strategies have names similar to existing sources, i.e., “Throckmorton Lake/Reservoir” (Throckmorton County) and “Lake Creek Lake/Reservoir” (McLennan County). The names of the recommended strategies and sources have been changed to “New Throckmorton Reservoir” and “NCTMWA Lake Creek Reservoir”. The timing of these projects has been adjusted in the final plan and in DB22 so that they start after 2020.

29. *Volume II. Table 1.1-1. The plan appears to identify West Central Brazos Water Distribution System as a potentially feasible WMS, however the WMS does not appear to have been evaluated. Please document why this WMSs indicated as potentially feasible was not evaluated in the final, adopted regional water plan. [31 TAC § 357.34(a); Contract Scope of Work, Task 5A]*

During the initial stages of the evaluation, the BGRWPG was requested to consider this strategy as a current supply by project sponsors, as they plan no further enhancements to increase supplies from the West Central Brazos Water Distribution System.

30. *Volume II. The plan does not appear to include the documented process used by the planning group to identify potentially feasible WMSs, as presented to the planning group in accordance with 31 TAC § 357.21(b). Please include this information in the final, adopted regional water plan. [Contract Exhibit C, Section 5.1]*

A description of the documented process used by the BGRWPG to identify potentially feasible WMSs and select recommended WMSs will be included in Volume II of the final plan.

31. *Volume II. The plan does not appear to include the process of selecting recommended WMSs and projects. Please include documentation of the process of selecting recommended WMSs and projects in the final, adopted regional water plan. [Contract Scope of Work, Task 5A subtask 5]*

A description of the documented process used by the BGRWPG to identify potentially feasible WMSs and select recommended WMSs will be included in Volume II of the final plan.

32. *Volume II. Please include documentation of why seawater desalination and brackish groundwater desalination were not selected as recommended WMSs in the final, adopted regional water plan. [TWC § 16.053(e)(5)(j); Contract Exhibit C, Section 5.2; 31 § TAC 357.34(g)]*

Text describing why seawater desalination wasn't considered potentially feasible will be included in Volume II of the final plan. It wasn't considered potentially feasible due to the distance of Brazos G from the Gulf of Mexico.

Text describing why brackish groundwater desalination wasn't considered potentially feasible will be included in Volume II of the final plan. Brackish groundwater desalination wasn't considered because it is considered part of the MAG, so brackish groundwater would have only been considered if it was cheaper than going to a freshwater portion of an aquifer.

33. *Chapter 6. Please include the TWDB Socioeconomic Impacts of Projected Water Shortages Report as an appendix to Chapter 6 rather than Chapter 4 in the final, adopted regional water plan. [31 TAC § 357.40(a)]*

The reference has been corrected from Chapter 4 to Chapter 6 in the final plan.

34. *Chapter 6. Please provide a description of the impacts of the regional water plan on navigation in the final, adopted regional water plan. [31 TAC § 357.40(b)(6)]*

The 2021 Brazos G Regional Water Plan will have no effects on navigation. That is stated in Volume I, Chapter 1, section 1.85 and has been restated in Chapter 6 of the final plan.

35. *Chapter 6. Please include a summary of unmet water needs identified in Chapter 6 rather than Chapter 4 of the final, adopted regional water plan. [31 TAC § 357.40(c)].*

The summary of unmet water needs has been moved from Chapter 4 to Chapter 6.

36. *Section 7.5.3, page 7-72. The plan refers to Appendix H for copies of the Waco and Thrall model drought contingency plans, however Appendix H appear to be a placeholder for comments on the IPP. Please ensure that copies of the model drought contingency plans are included, or operational links to the model plans are included if they are to be included only by online reference in the final, adopted regional water plan. [31 TAC § 357.42(j)]*

The appendix references have been corrected and the plans will be included directly or with operational links.

37. *Chapter 7. The plan does not appear to include discussion of unnecessary or counterproductive variations in drought response strategies that may impede drought response efforts. Please include discussion of any unnecessary or counterproductive variations in drought response strategies that were identified by the planning group in the final, adopted regional water plan. [TWC § 16.053(e)(3)(E); 31 TAC § 357.42(b)(2)]*

The Brazos G Scope of Work Committee was responsible for coordinating Chapter 7 of the plan. The committee identified that neighboring utilities using different triggers

to initiate drought responses when supplied by the same source, or using triggers not associated with the utility's actual source of supply, would be counterproductive, but is unwilling to identify those specific instances. The counterproductive situation will be discussed in general terms in the text of Chapter 7.

38. *Chapter 7. The plan does not appear to state how the region addressed recommendations from the Drought Preparedness Council, provided to planning groups on August 1, 2019. Please include a discussion on how the planning group considered the Drought Preparedness Council recommendations in the final, adopted regional water plan. [31 TAC § 357.42(h)]*

The final plan will include a discussion of how the BGRWPG considered the recommendations from the Drought Preparedness Council.

39. *Chapter 7. The plan does not appear to include a discussion of recommendations to the Drought Preparedness Council or recommendations regarding the State Drought Preparedness Plan. Please include any such recommendations in the final, adopted regional water plan. [31 TAC § 357.42(i)(3)]*

The BGRWPG offers no recommendations to the Drought Preparedness Council and this will be stated in the final plan.

40. *Section 8.2, pages 8-1 and 8-2. Please ensure that Section 8.2 is updated to clearly document which unique reservoir sites have been previously designated by the legislature; which are being recommended for designation by the RWPG; and whether the planning group is recommending that the legislature re-designate a previously designated unique reservoir site. [31 TAC § 357.43(c); Contract Exhibit C, Section 8.2]*

The final plan will clearly state that re-designation is recommended for Millers Creek Off-Channel Reservoir and Coryell County Off-Channel Reservoir.

The final plan will also include the following statement:

“Brazos G recommends no change in designation for the previously-designated sites for Cedar Ridge Reservoir, Turkey Peak Reservoir, and Brushy Creek Reservoir, as those designations have not terminated because sufficient action has been taken prior to September 1, 2015 regarding their development to meet the requirements of Texas Water Code 16.051(g-1).”

41. *Chapter 10. Please include a statement that indicates whether the planning group complied with all Texas Open Meetings Act and Public Information Act requirements in the final, adopted regional water plan. [31 TAC § 357.21; 31 TAC § 357.50(f)]*

The BGRWPG complied with all Texas Open Meetings Act and Public Information Act requirements during development of the 2021 Brazos G Regional Water Plan. The statement will be included in the final plan.

42. *Chapter 11. Please provide a brief summary of how the 2016 Plan differs from the 2021 Plan with regards to recommended and alternative WMS projects in the final, adopted regional water plan. [31 TAC § 357.45(c)(4)]*

The comparison in Chapter 11 has been clarified to be more specific that “projects” and not just “strategies” are being compared.



43. *Chapter 11. The plan does not appear to assess the progress of the regional water planning area in encouraging cooperation between water user groups for the purpose of achieving economies of scale and otherwise incentivizing strategies that benefit the entire region. Please provide a general assessment of these items in the final, adopted regional water plan. [TWC § 16.053(e)(12); 31 TAC § 357.45(c)]*

The requested assessment will be included in Chapter 11 of the final plan.

44. *Please remove use of the TWDB logo from the final, adopted regional water plan. In accordance with TWDB's Logo and Seal Policy, use of the TWDB logo requires an approved licensing agreement.*

The TWDB logo will be removed from the plan.

45. *The GIS files submitted did not appear to include the locations of every recommended and alternative WMS project. Please include the locations of every recommended and alternative WMS project listed in the final, adopted regional water plan with the final GIS data submitted. [Contract Exhibit C, Section 13.1.2]*

The GIS files will be updated to include all of the locations.

46. *The WMS Project vector data was submitted across more than one shapefile/feature class for the same feature type. The vector data must be divided into point, line, and polygon feature types across a maximum of three shapefiles in a single folder or three feature classes in a single file geodatabase (one for each feature type). Please combine all feature classes in the 'Brazos_G_2021' GBD into a single feature class or shapefile for each feature type in the final GIS data submitted. [Contract Exhibit D, Section 2.4.5]*

The final GIS data submitted to the TWDB will be corrected.

10.7.2 Level 2 TWDB Comments

1. *Section ES.5. The text refers the reader to Appendix L for details on Second-Tier needs, however Appendix L appears to include WAM files. Please correct the reference on page ES-14 as appropriate.*

Corrected.

2. *Table ES-2 refers to the DB17 Summary of Second-Tier Water Needs. Please ensure to refer readers to DB22 data. The DB22 Second-Tier Needs reports are currently included in the ES Appendix.*

Corrected.

3. *Section 1.12.1, page 1-50, first paragraph. The text appears to incorrectly reference Table 1-11. Please replace Table 1-11 reference with Table 1-12.*

Corrected.

4. *Section 1.12.1, page 1-50, second paragraph, last sentence. The text appears to incorrectly reference Table 1-12. Please replace Table 1-12 reference with Table 1-13.*

Corrected.

5. *Section 1.12.1, page 1-49, last paragraph discusses counties in Region G related to priority groundwater management areas that are in groundwater conservation districts. Please consider adding a reference to Figure 1-23: Groundwater Conservation Districts and Groundwater Management Areas Located Wholly or Partially within the Brazos G Area.*

The requested reference will be added to the text.

6. *Section 1.12.1, page 1-51. Please replace the outdated term Managed Available Groundwater with Modeled Available Groundwater throughout the plan.*

Corrected.

7. *Chapter 3. As reuse is considered a separate water source, please consider presenting reuse in a separate section within Chapter 3.*

Time and resources did not allow this change during preparation of the final plan.

8. *Section 3.2.3, page 3-43. To assist with TWDB's review of surface water data, please consider providing more information about reservoir sedimentation considerations, such as sediment rate, data source, and method(s) for determining projected rating curves in the final plan.*

Reservoir sedimentation analyses are utilized from the 2016 Brazos G Plan, except for a specific list of reservoirs for which updated sedimentation surveys are available. Volume I, Chapter 3 (section 3.2.3) has been updated to identify those reservoirs for which updated sedimentation data were available as of May 2018. There are numerous technical details that may be of interest to specific parties to include in the planning document, but the planning document needs to strike a balance on the level of technical information provided and the intended audience. Additional detailed discussion of the specific methods employed for applying the sedimentation estimates are beyond the technical detail necessary for the planning document. Those data are provided in the data deliverables that will accompany the regional water plan.

9. *Section 3.4.1, page 3-61, last paragraph. The text states that a reference for the source of groundwater availability estimates in Table 3.9 is included; however, no reference is listed. Please include the reference for the source of the groundwater availability estimates and consider including the MAG Peak Factor TWDB approval letter in the appendices of the final plan.*

The reference is corrected, and the MAG Peak Factor approval information will be included as an appendix in the final plan.

10. *Appendix B. Citations for the model (GAM) used to determine the MAG for the Carrizo-Wilcox, Queen City and Sparta aquifers are listed as Dutton and others, 2003. The reference should be Kelley and others, 2004. Please update the citations for the GAM. Also, please list each of the authors for Kelley and others in the list of references rather than just "Kelley and others".*

Corrected.

11. *Section 4.1. Please consider moving the discussion of water supply allocation to Chapter 3.*

The discussion of water supply allocation will be moved to Chapter 3.

12. *Page 4-3. Section 4.2 appears to refer to Appendix C for additional data on water needs, however Appendix C represents Water Rights data. Please correct the reference on page 4-3 as appropriate.*

Corrected.

13. *Consider reconciling the number of counties with projected irrigation needs presented in Volume II, Section 2.2.2 (20 counties) and Volume I, Section 4.2.5 (21 counties).*

Corrected.

14. *Volume II, Chapter 2 includes rainwater harvesting and reuse in the list of water conservation best practices measures. While the TWDB acknowledges that the municipal conservation best practices guide includes rainwater harvesting and reuse, for regional water planning purposes these practices are considered separate sources and should not be classified as conservation. Please consider clarifying this information within Volume II, Chapter 2 in the final, adopted regional water plan. [Contract Exhibit C, Section 5.6]*

The clarification will be made in the final plan.

15. *Volume II, Section 9.6. The header for the Lake Whitney Water Supply Project (Cleburne) includes an Error! message. Please update the header in the final plan.*

Corrected.

16. *Volume II, Chapter 12. Please consider clarifying more explicitly in the strategy evaluation for Brush Control, that it is not a recommended WMS, in the final, adopted regional water plan. [31 TAC § 357.34(d)]*

The text of the WMS evaluations in Volume II do not state if a strategy is recommended. That is because the evaluation is most often completed prior to a final decision regarding recommendation.

17. *The GIS files submitted for WMS projects do not adhere to the contractually required naming convention. Please rename the GIS files following the naming convention outlined in Exhibit D, Section 2.4.5 in the final GIS files submitted. [Contract Exhibit D, Section 2.4.5]*

We will correct the GIS file naming to adhere to the required naming convention.

18. *The GIS files submitted for WMS projects do not include minimum metadata requirements. Please include at a minimum, metadata about the data's projection, with the final GIS data submitted. [Contract Exhibit D, Section 2.4.1]*

We will correct the GIS file metadata as requested.

19. *Appendix K appears to be a blank placeholder for DB22 reports, however the DB22 reports are included as part of the Executive Summary. Please remove Appendix K, if necessary, in the final plan.*

Corrected.

10.8 Plan Adoption

The Brazos G Regional Water Planning Group formally adopted this 2021 Brazos G Regional Water Plan on October 28, 2020 and directed the BRA and HDR to submit the 2021 Plan to the TWDB on or before November 5, 2020.