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June 23, 2025

Jonathan Letz
Region J Chair
c/o Upper Guadalupe River Authority
125 Lehmann Dr, #100
Kerrville, TX 78028

Tara Bushnoe
General Manager
Upper Guadalupe River Authority
125 Lehmann Dr, #100
Kerrville, TX 78028

Re: Texas Water Development Board Comments for the Plateau Regional Water Planning Group (Region J) Initially Prepared Plan, Contract No. 2148302562

Dear Mr. Letz and Ms. Bushnoe:

Texas Water Development Board (TWDB) staff have completed their review of the Initially Prepared Plan (IPP) submitted by March 3, 2025 on behalf of the Region J Regional Water Planning Group (RWPG). The attached comments follow this format:

- **Level 1:** Comments, questions, and data revisions that must be satisfactorily addressed in order to meet statutory, agency rule, and/or contract requirements; and,
- **Level 2:** Comments and suggestions for consideration that may improve the readability and overall understanding of the regional water plan.

Please note that 31 Texas Administrative Code (TAC) § 357.50(f) requires the RWPG to consider timely agency and public comment. Section 357.50(g)(1)(D) requires the final adopted plan include summaries of all timely written and oral comments received, along with a response explaining any resulting revisions or why changes are not warranted. Copies of TWDB’s Level 1 and 2 written comments and the region’s responses to each comment must be included in the final, adopted regional water plan (Contract Exhibit C, Section 2.12.2).

Standard to all planning groups is the necessity to include certain content in the final regional water plans that was not yet available at the time that IPPs were prepared and submitted. Accordingly, the final regional water plans must incorporate the following:

1. An analysis of socioeconomic impacts of not meeting the region’s identified needs (31 TAC § 357.40(a)). TWDB will provide a socioeconomic impact analysis report for

each region by July 2025 for inclusion in the final regional water plan. Relevant sections in the plan must be updated accordingly.

2. Completed results from the 2021 Regional Water Plan implementation survey must be presented in the plan, as well as submitting an electronic version of the survey spreadsheet (31 TAC § 357.45(a)).
3. Documentation that comments received on the IPP, including but not limited to TWDB's, were considered in the development of the final plan (31 TAC § 357.50(f)).
4. Certification, in the form of a cover letter from the planning group Chair or Sponsor to the TWDB, that the final, regional water plan is complete and adopted by the RWPG (31 TAC § 357.50(h)(1)).

The following provisions apply to finalizing regional water planning data:

1. If the IPP included PDF copies of the State Water Planning Database (DB27) reports, a final, updated version of all these reports, as appropriate, must be included in the final plan. TWDB *anticipates* final versions of the reports will be available in the Secure Agency Reporting Application by **September 24, 2025**.
2. Continued review of DB27 data is still being performed. If issues arise during staff's ongoing data review, they will be communicated promptly to the planning group to resolve. Please anticipate the need to respond to additional comments regarding data integrity, including any source overallocations, prior to the adoption of the final regional water plans.
3. Please ensure that all numerical values presented in region developed tables throughout the final, adopted regional water plan are consistent with the data reported in DB27.
4. For the purpose of development and adoption of the 2027 State Water Plan, water management strategy and other data entered by the RWPG in DB27 will take precedence over any data discrepancies presented in the final regional water plan (Contract Exhibit C, Section 2.13.1).
5. Any remaining data revisions to DB27 must be communicated to rwpdataentry@twdb.texas.gov no later than **September 22, 2025**.

Additionally, the following final electronic files must be submitted alongside the final regional plan deliverable, including any remaining files that may not have been provided at the time of the submission of the IPP but that were used in developing the final plan (31 TAC § 357.50(g)(2)(C), Contract Exhibit C, Section 2.12.2):

1. All hydrologic model input/output or other model files used in determining water availability.
2. Geographic Information System data deliverables in accordance with Contract Exhibit D, Section 2.5.
3. All other files on which the plan is based (e.g. spreadsheets, maps, etc).

The following standard requirements that apply to recommended water management strategies must also be adhered to in all final regional water plans:

1. Regional water plans may include:
 - a. the development of additional water supply sources and supply volumes,

- b. the conveyance and delivery of additional supply volumes to a point intake at a water user group,
 - c. the treatment of additional supply volumes at the front end of a water user group's retail system,
 - d. additional treatment and related eligible components that are directly related to additional supplies provided through direct reuse, and
 - e. infrastructure costs that are associated with development of additional water supplies from new water sources or additional supplies from more efficient use of existing supplies, or volumetric increases to existing water supplies beyond the existing capacity of current facilities.
2. Regional water plan may not include:
- a. any recommended strategies, projects, or costs that are associated with replacing, rehabilitating, or maintaining water supply infrastructure that already exists, or
 - b. the costs of any retail distribution lines or other distribution network infrastructure costs with the narrow exception for those strategies directly associated with replacement costs that are for the primary purpose of achieving conservation savings via water loss reduction (§ 357.34(e)(3)(A), Contract Exhibit C, Sections 2.5.2.14 and 2.5.2.15).

As a reminder, the deadline to submit the final, adopted regional water plan and associated material to the TWDB is **October 20, 2025**. It is imperative that you provide the TWDB with information on how you intend to address all TWDB comments well in advance of adoption of the final regional water plan to ensure that all the Level 1 responses are sufficiently responsive for the TWDB Executive Administrator to recommend that the TWDB Board consider approval of your plan in a timely and efficient manner. Your TWDB Regional Water Planner will review and provide feedback to ensure all IPP comments and associated plan revisions have been addressed adequately. Failure to adequately address any Level 1 comments may result in the delay of the TWDB Board approval of your final regional water plan.

Additionally, if the region includes new strategies, or makes significant revisions to its strategy evaluations based on the public comment period, please ensure those significant revisions are pointed out and provided to your TWDB Regional Water Planner to preview in advance of adopting the final regional water plan to ensure that those too will meet all requirements.

Note that the electronic copy of a final report(s) or other deliverable(s) must comply with the requirements and standards specified in 1 Texas Administrative Code (TAC) Chapters 206 and 213 (related to Accessibility and Usability of State Web Sites). Web Content Accessibility Guidelines (WCAG) 2.1 Level AA Standard – WCAG 2.1 Quick Reference can be found at: <https://www.w3.org/WAI/WCAG21/quickref/>.

If you have any questions regarding these comments or would like to discuss your approach to addressing any of these comments, please do not hesitate to contact Lann Bookout of our Regional Water Planning staff at (512) 936-9439 or Lann.Bookout@twdb.texas.gov.

Jonathan Letz, Region J Chair
Tara Bushnoe, General Manager
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TWDB staff will be available to assist you in any way possible to ensure successful completion of your final regional water plan.

Thank you for all the time and effort that the RWPG members, the Sponsor, and your consultants have put into developing your draft regional water plan and for the additional effort that will still be required to obtain TWDB Board approval. We look forward to celebrating another successful regional water planning cycle!

Sincerely,

Temple McKinnon
Temple McKinnon (Jun 23, 2025 13:26 CDT)

Matt Nelson
Deputy Executive Administrator of Planning

Attachment

c w/att.: Jennifer Jackson, Carollo Engineers
Reem Zoun, TWDB Office of Planning
Temple McKinnon, TWDB Water Supply Planning
Sarah Lee, TWDB Water Supply Planning
Kevin Smith, TWDB Water Supply Planning
Lann Bookout, TWDB Water Supply Planning

Texas Water Development Board (TWDB) comments on the Initially Prepared 2026 Plateau (Region J) Regional Water Plan

Level 1: Comments, questions, and data revisions that must be satisfactorily addressed to meet statutory, agency rule, and/or contract requirements.

1. Section 2.2.2. The water demand for Edwards County listed in Table 2-4 is inconsistent with TWDB Board-adopted projections. The municipal water demand for Edwards County goes from 233 acre-feet/year in 2030 to 82 acre-feet/year in 2080. The incorrect demand for Edwards County also affects the total demand in this table, for example, the 2030 municipal (and county-other) water demand in 2030 is 32,738 acre-feet/year, not 32,731 acre-feet/year. Additionally, the 2080 water demand is 35,234 acre-feet/year, not 35,232 acre-feet/year. Please correct these values in Table 2-4 and the text on page 2-14 presented in the table so they are consistent with Board-adopted projections in the final, adopted regional water plan. [31 Texas Administrative Code (TAC) § 357.31(a);31 TAC § 357.31(f)]
2. Chapter 3. The plan does not appear to include a copy of the region's hydrologic variance request for alternative surface water availability assumptions or TWDB's approval letter. Please include a copy of the region's request and TWDB's approval letter for alternative surface water hydrologic assumptions in the final, adopted regional water plan. [Contract Exhibit C, Section 2.3.5.1]
3. Section 3.4 and Table 3-1. The plan does not appear to document how population and water demands were used to determine the expected amount of available reuse supplies. Please clarify how projected population and water demands were considered in the determination of available reuse supplies in the final, adopted regional water plan. [Contract Exhibit C, Section 2.3.6]
4. Section 5.3.4, Table 5-2, and Table 5-6. The plan includes vegetative management (brush management) in the "Regional Conservation Water Management Strategies Section". For planning purposes, brush management is not considered demand reduction and must be presented separately from conservation. In addition, these water management strategy (WMS) types are reported separately as an availability increase strategy in the state water planning database (DB27). Please remove the vegetative management recommendations from the conservation strategies section and remove from Table 5-6. Additionally, the label demand reduction must be removed from Vegetative Management in Table 5-2 in the final, adopted regional water plan. [31 TAC § 357.34(c)]
5. Table 5-2. The plan categorizes WMS J-3 (Rainwater Harvesting) as demand reduction. For regional planning purposes, rainwater harvesting is not considered demand reduction and must be presented separately from conservation. In addition, these strategy types are reported separately as an availability increase strategy in DB27. Please update all relevant tables to remove the label demand reduction from rainwater harvesting in the final, adopted regional water plan. [31 TAC § 357.34(c); Contract Exhibit C, Section 5.10]

6. Section 5A. J-61. The evaluation for manufacturing conservation appears to include rainwater harvesting as a best management practice. For regional planning purposes, rainwater harvesting is not considered demand reduction and must be presented separately from conservation. In addition, these strategy types are reported separately as an availability increase strategy in DB27. Please update the costs and savings for manufacturing conservation to remove any costs and savings related to rainwater harvesting in the final, adopted regional water plan, and update DB27 as appropriate. [31 TAC § 357.34(c)]
7. Section 5.2 and Table 5-2. The reliability assessment for recommended strategies as described in Table 5B-1 and on page 5-19 indicates that only strategies ranked as 1 (sustainable) meet the criteria of supplies being available during a repeat of the drought of record. The results of the reliability evaluation presented in Table 5-2 appear to indicate that the region has recommended multiple strategies that are based on interruptible supplies—including strategies J-3, J-6, J-23, J-32, J-54, and J-56—and also includes alternative strategies that do not appear to have a firm supply during a repeat of the drought of record. Please either remove these as recommended and alternative strategies as presented since they do not appear to meet the requirement in 31 § TAC 357.34(b), or modify the strategies to ensure that they would provide a firm water supply throughout drought of record conditions. Please present the reliable yield and unit cost along with calculations showing the basis for the reliable yield calculation in the final, adopted regional water plan. In the event that the resulting adjustment of strategy recommendations in the plan results in an increase in near-term unmet please update the related portions of the plan accordingly. [31 TAC § 357.34(b); 31 TAC § 357.34(e)(3)(A)]
8. Appendix 5A and Table 5-2. The plan does not appear to include a quantitative reporting of reliability for all evaluated water management strategies. Table 5-2 presents demand reduction strategies as not applicable for reliability. Please provide a quantitative reporting of reliability for all evaluated water management strategies in the final, adopted regional water plan. [31 TAC § 357.34(e)(3)(A)]
9. Chapter 5 and Appendix 5A. Please clarify the quantified methodologies and strategy evaluations for livestock conservation. Based on recent published studies^{1,2}, advanced paddock-based grazing systems result in reduced runoff and increased percolation, which would result in the reduction of possible storage in stock ponds rather than contribute to supply. Please either remove this as a recommended water management strategy from the final, adopted regional water plan, or provide a new, detailed methodology that appropriately quantifies the savings and also includes costs for implementation, for example fencing and new water outlets for paddocks. [31 TAC § 357.34(e)(3)(A), Contract Exhibit C, Section 2.5.2]

¹ Kim, J., Ale, S., Teague, W.R., Wang, T., (2022). Evaluating hydrological components and streamflow characteristics under conventional and adaptive multi-paddock grazing management. *River Research and Applications*. 38, 776–787. <https://onlinelibrary.wiley.com/doi/10.1002/rra.3948>

² Park, J., Ale, S., Teague, W.R., Jeong, J. (2017). Evaluating the ranch and watershed scale impacts of using traditional and adaptive multi-paddock grazing on runoff, sediment and nutrient losses in North Texas, USA. *Agriculture, Ecosystems and Environment*. 240, 32-44. <https://doi.org/10.1016/j.agee.2017.02.004>

10. Section 5A, Strategy J-64. The strategy description for the Del Rio Water Treatment Plant Expansion appears to be the same text as in the 2021 Regional Water Plan. Based on recent water supply funding applications submitted by Del Rio to the TWDB, it appears that the concept of this strategy has evolved since the version described in the 2021 Regional Water Plan. Please ensure that the planning group has coordinated with Del Rio on updating their strategy information for the current plan and reconcile this information as necessary in the plan and DB27 in the final, adopted regional water plan. [31 TAC § 357.34(f)]
11. Chapter 5, Appendix 5A Section J-34, and DB27. The Eastern Kerr County Regional Water Supply Project—Construction of Off-Channel Surface Water Storage—strategy is currently entered into DB27 as an "Other Surface Water" strategy type, however this strategy should be classified as a "New Reservoir" for water supply planning purposes. Please coordinate with TWDB's Water Supply and Strategy Analysis team to update the strategy type in DB27. This will trigger the requirement for Region J to provide the implementation status for certain large projects in accordance with 31 TAC § 357.34(g). In the final, adopted regional water plan, please add a new subsection on the implementation status of large projects in the region. This subsection must include a table of key milestones (including clarifying whether this project will require or has received a federal 404 permit), utilizing the TWDB template table provided in Exhibit C, Section 2.5.2.7, and a graphic of the timeline and any key milestones. [31 TAC § 357.34(g); Contract Scope of Work, Task 5B; Contract Exhibit C, Section 2.5.2.7]
12. Section 5A (J-6, J-32, and J-34) and DB27. It is unclear in the plan whether strategy water supply volumes represented for several aquifer storage and recovery (ASR) projects have been reduced to reflect the expected percent of actual water supply recovery from the aquifer, including 1) Bandera Surface Water and ASR (WMSId 3368), 2) Kerrville Water Treatment and ASR Capacity (WMSId 3286), and 3) Eastern Kerr County Regional Project – ASR (WMSId 5359). Please clearly state the expected percent of recovery (i.e., less than 100 percent) for each project and, as appropriate, report the lesser volumes as the net water supply yields for these strategies. If the strategy supply volumes do not reflect the lesser, expected percent of recovery, please modify the supply volumes as appropriate in the final, adopted regional water plan and in DB27. [Contract Exhibit C, Section 2.5.2.4]
13. Chapter 5 and DB27. Kerrville South Water is reported to have a water need beginning in 2030, however conservation is not included as a recommended strategy for this water user group (WUG). Please include documentation as to why conservation was not recommended to meet this need in the final, adopted regional water plan. [31 TAC § 357.34(j)(2)(B)]
14. Appendix 5A, Section J-37 and DB27. Based on data entered into DB27, the demand reduction volumes appear to be equivalent to over 40 percent of total demands for the County-Other, Kerr County WUG in at least one planning decade. Additionally, in decades 2030 through 2050, demand reduction equate to 100 percent of the demand for this WUG. As this volume is impractically high, please modify, as appropriate, and add discussion to support the magnitude of the demand

reduction volume for this WUG in the final, adopted regional water plan. [31 TAC § 357.34(j)(2)(B)]

15. Section 5.3.8 and Table 5-7. The plan discusses the historical Gallons Per Capita Per Day (GPCD) (2010-2020) provided to the planning groups to identify base year GPCDs for demand projections purposes, but does not clearly indicate what GPCD goals were set by the planning group for WUGs in the region. The data in Table 5-7 appears to present the 2020 baseline GPCD with adjusted GPCDs and projected GPCD reductions. Please clarify and clearly indicate the GPCD goals established by the planning group in the final, adopted regional water plan [31 TAC § 357.34(j)(3)]
16. Appendix 5A, Section J-34. The evaluation for the Eastern Kerr County Regional Water Supply Project—Construction of Off-Channel Surface Water Storage—does not appear to separately present the estimated mitigation land acreage and associated estimate of acquisition cost. Please provide an estimated separate acreage and cost related to land acquisition (or range) for both the reservoir footprint and mitigation within the appropriate section of the plan or costing sheet, in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.12] [Contract Exhibit C, Section 2.5.2.12]
17. Chapter 5 and DB27. Unit costs have been entered into DB27 as \$0 for the recommended brush management and conservation strategies for the manufacturing, mining, and livestock WUGs. Please include non-zero unit costs for these strategies in DB27 and include assumptions used in the costing methodology utilized in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.12]
18. Section 5A 3.1, Strategy J-29: The information in the evaluation for the Kerrville - Increase Wastewater Reuse strategy appears to include a new retention pond but as a means of increasing the wastewater treatment plant (WWTP) capacity, with no additional infrastructure related improvements at the WWTP. Please confirm the existing WWTP has capacity to treat the additional stored water or include the related infrastructure improvements and costs as part of the strategy in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.14]
19. Section 5A, Strategy J-50. The evaluation for the Fort Clark Springs MUD - Increase Storage Facility appears to develop new storage facilities however, it does not appear to increase the volume of supply to the WUG. The types of facilities and associated capital or other costs that may be included in a regional water plan must be directly associated with development of additional supplies from new water sources or additional supplies from more efficient use of existing supplies, or volumetric increases to existing water supplies. Please provide additional clarification on how the supplies are being increased to justify the need for this additional storage project, or remove this as a recommended strategy, in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.15]
20. Section 5A, Strategy J-57. It is unclear from the strategy evaluation for Develop Interconnections between Wells within the City of Leakey, how simply interconnecting existing wells would increase the volumetric supply to Leakey. Additionally, interconnection of existing wells does not meet the planning definition of

conservation. Please provide additional clarification on how the supplies are being increased to justify the need for this additional storage project, or remove this as a recommended strategy, in the final, adopted regional water plan. In the event that the resulting adjustment of strategy recommendations in the plan results in an increase in near-term unmet needs, please update the related portions of the plan accordingly. Additionally, please clarify in the evaluation that this strategy is not considered conservation for the purpose of regional water planning. [Contract Exhibit C, Section 2.5.2.15]

21. Chapter 5, Appendix 5A, Appendix 5C, Table 5-2, Table 5-3 and DB27. The plan indicates that the J-7, J-20, J-53, and J-55 Public Conservation Education water management strategies have associated capital cost projects. The projects associated with these strategies have been entered into DB27 however, there are no associated project costing sheets in Appendix 5C. Based on the project description, the cost appears to be associated with public information programs. Projects with capital costs must document necessary infrastructure related “construction” costs associated with the project. Public information programs do not generally require infrastructure. Please remove the capital cost information from these strategy evaluations and Tables 5-2 and 5-3 in the final, adopted regional water plan and remove the projects from DB27. [Contract Exhibit C, Section 2.5.2.12]
22. Chapter 5. The plan includes water treatment plant (WTP) expansion or other strategy types that include a WTP expansion as a project component. Any portion of strategies that replace portions of existing supply are prohibited from being included in the regional water plans. The types of facilities and associated capital or other costs that may be included in a regional water plan must be directly associated with development of additional supplies from new water sources or additional supplies from more efficient use of existing supplies, or volumetric increases to existing water supplies. Please confirm that only WTP facilities required to increase treated water supply volume (not to replace lost capacity) are included in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.15]
23. Section 5A 1.1, Strategy J-3. The strategy evaluation for rainwater harvesting does not appear to document the methodology for the strategy supply yield calculations. Please provide additional details on how the yield was determined and show how the quantified yield estimates for this strategy will be available throughout the full period of drought of record conditions in the final, adopted regional water. [31 TAC § 357.34(e)(3)(A), Contract Exhibit C, Section 2.5.2; Contract Scope of Work, Task 5B]
24. Appendix 5A. The plan does not include any project maps. Please include, at minimum, a map for each WMS meeting the criteria under 31 TAC § 357.34(g) in the final, adopted regional water plan. For Region J, the only strategy that will meet this criteria is the Eastern Kerr County Regional Water Supply Project—Construction of Off-Channel Surface Water Storage strategy (J-34). [Contract Scope of Work, Task 5B]
25. Section 5A 1.3, Strategy J-14. This alternative strategy appears to develop a new source of water specifically for the purpose of emergency firefighting. Regional water plans may not include strategies or projects for the sole purpose of existing or future fire protection. Please remove the strategy from the plan and DB27 since it clearly

does not meet the purpose of 31 TAC § 357.34(d). [31 TAC § 357.34(d); Contract Exhibit C, Section 2.5.2.15]

26. Chapter 5, Appendix 5A (J-6), and DB27. Strategy supplies associated with the City of Bandera - Surface Water Acquisition, Treatment and ASR (WMSId 3368) appear to be inconsistently reported between the plan and DB27. For example, in DB27 the supplies for this strategy is 1,500 acre-feet/ year in all decades, however the plan reports the yield ranging from 500 to 1,500 acre-feet/ year. Please review the water supplies for this strategy and revise as necessary to ensure that strategy supplies in DB27 are consistent with those presented in the final, adopted regional water plan. [31 TAC § 357.35(g)(1)]
27. Chapter 6. The unmet needs summary is currently presented in Chapter 5, Section 5.2.6, however, unmet needs is required to be presented as part of Chapter 6. Please include at minimum, a reference in Chapter 6 to where the summary is included within Chapter 5, in the final, adopted regional water plan. Additionally, the unmet needs presented in Section 5.2.6 are inconsistent with unmet needs reported in DB27. DB27 reports unmet needs for County-Other, Kerr County and Mining, Kerr County, however these are not reported in the plan. Please revise the data presented in Section 5.2.6 so that it is reported consistently with DB27, in the final, adopted regional water plan. [31 TAC § 357.40(c)]
28. Section 6.4. The plan states that there are no municipal unmet needs in the region, however, the County-Other, Kerr County shows unmet needs in all planning decades in DB27. Please reflect the unmet needs in the plan and provide adequate justification for this unmet municipal need in the final, adopted regional water plan, including: 1) documentation that all potentially feasible WMS were considered to meet the need, including drought management WMS; 2) explanations as to why additional conservation and/or drought management WMS were not recommended to address the need; 3) descriptions of how, in the event of a repeat of the drought of record, the WUG associated with the unmet need shall ensure the public health, safety, and welfare in each planning decade with an unmet need; and, 4) explanation as to whether there may be occasion, prior to the development of the next IPP, to amend the RWP to address all or a portion of the unmet municipal need. [31 TAC § 357.50(j)]
29. Section 7.5. Table 7-3 is missing emergency response information for several County-Other WUGs, including County-Other, Kinney; County-Other, Real; and County-Other, Val Verde. Additionally, while the region presents the information for several public water systems (PWS) that falls within the County-Other WUG for Bandera and Kerr counties, not all PWSs are presented. Please update Table 7-3 to include the emergency response information for at minimum, each County-Other county-wide WUG in the region in the final, adopted regional water plan. Alternatively, the region may add the information for all PWS that fall within County-Other for the 2026 regional water plan. [31 TAC § 357.42(g)]
30. Section 7.8.1. The plan lists the recommendations from the Drought Preparedness Council (DPC) that were provided for the 2026 Regional Water Plan, however the statement below the lists states how the planning group addressed the DPC recommendations that were provided for the 2021 Regional Water Plan. Please

document how the planning group considered the DPC recommendations for the 2026 plan, in the final, adopted regional water plan. [31 TAC § 357.42(h)]

31. Section 9.3.3. The plan appears to be missing a summary of changes to existing supplies between the 2021 and 2026 regional water plans. Page 9-12 references a table in the Executive Summary that is not included in the plan. Please include a description of the difference in existing supplies between the 2021 and 2026 plans, in the final, adopted regional water plan. [31 TAC § 357.45(c)(3)]
32. The Geographic Information System (GIS) files submitted do not include adequate metadata. Please include at a minimum, metadata about the data's projection or datum, with the final GIS data submitted. [Contract Exhibit D, Section 2.4.1]
33. GIS files do not adhere to the contractually required naming convention. The file name must include "WMSProject," Region letter, and geometry type with no spaces (EX: WMSProject_RegionJ_Point). Please rename the GIS files following the naming convention outlined in Exhibit D, Section 2.5.2.1 in the final GIS files submitted. [Contract Exhibit D, Section 2.5.2.1]
34. GIS data deliverables do not include all of the required attribute fields listed in Table 1 of Exhibit D, Section 2.5.2.1 Please include the following attribute fields in all submitted WMS project GIS data: numerical WMSProjectID, and ShapeDescription, with the final GIS files submitted. [Contract Exhibit D, Section 2.5.2.1]

<p>Level 2: Comments and suggestions for consideration that may improve the readability and overall understanding of the regional water plan.</p>

1. Section 2.1.1, page 2-2. Text in the second paragraph appears to incorrectly state that the individual WUGs in the 2021 Regional Water Plans were based on city limits rather than utility boundaries. Utility-based WUGs were introduced in the 2021 planning cycle. Please consider clarifying this statement in the final plan.
2. Section 2.1.1, page 2.3. Please consider adding the word "group" to the sentence "The TWDB did not approve this request due to the [group] quarter population for Laughlin Air Force Base being 1,574."
3. Section 2.2.2, page 2-15. The water use listed in Table 2-5 for some systems do not match what was reported by the system to the Water Use Survey. For example, Ingram Water Supply in Kerr County reports 373 acre-feet of water in 2015, not 480 acre-feet and Four Seasons in Kerr County reports 9 acre-feet of water in 2015 not 88 acre-feet. Please consider updating the water use for the county-other systems presented in this table.
4. Chapter 3. Please consider including the sedimentation rate of reservoirs in the region in the final plan.
5. Section 3.1.1. Please consider adding an entry to Table 3-4 for the "Edwards-Trinity (Plateau), Pecos Valley & Trinity Aquifer"" MAG value in Val Verde County. MAG

values do not require methodology explanations but adding this entry would improve consistency since the Region already included methodology explanations for all other MAG values in Table 3-4.

6. Section 3.1.9.8. In the first paragraph on page 3-21, please consider correcting the text which incorrectly states that the region used a different non-MAG RWPG-estimated groundwater availability (not the MAG value) for this split. Regions are required to use MAG volumes for groundwater availability for aquifer with a desired future condition, per 31 TAC § 357.32(d).
7. Section 3.1.9.8. In the first paragraph on page 3-21, please consider correcting the typo "DCFs".
8. Section 3.1.1, Table 3-4. Please consider citing the same methodology as the 2021 Plan for the Austin Chalk Aquifer split in Kinney County (Nueces Basin) since the value has not changed since last cycle. The current "Robert Bradley" citation in the IPP provided refers to an internal TWDB qualitative check for reasonableness of the 2021 plan value/methodology and does not represent a new quantitative analysis performed for the 2026 plan.
9. Section 3.1.1, Table 3-4. The availability values for the Austin Chalk Aquifer in Kinney County are lower than (~90% of) the availability value calculated using the cited 2021 methodology. Please consider providing more detail on the 2021 methodology to explain the difference if possible.
10. Section 3.1.1, Table 3-4. Please consider adding a note to the Ellenburger/San Saba Aquifer split in Kerr County explaining that the methodology is a placeholder that will be replaced by a MAG calculation in the upcoming joint planning cycle (essentially copying the explanation from the text on p 3-18). The provided methodology is reasonably conservative but, at the time of this review, TWDB cannot evaluate the potential effects of the proposed pumping in certain locations on the DFCs in neighboring Kendall County in a meaningful way until the new predictive MAG modeling scenario is developed for the upcoming joint planning cycle.
11. Section 3.1.1, Table 3-4. Non-MAG splits with no availability do not require methodology explanations but for clarity, please consider including a methodology for the Hickory Aquifer splits in Kerr County with zero availability. Please consider using "GMA9 Non-Relevant TWDB modeled run compatible with DFC which was provided to PWPG" to be consistent with other entries.
12. Chapter 3. The plan mentions existing direct reuse projects in Section 3.4 and Table 3-1, however the plan provides no explicit mention of indirect reuse projects, presumably because there are none in the Region. Please consider clarifying if there are indirect reuse projects in the region.
13. Section 5A. The project costing information for the Kerrville increased WTP and ASR (J-32) included costs for pumping energy and environmental/archeology studies and mitigation. Please consider also including these costing aspects for the Bandera SW WTP & ASR (J-6), and EKCRWSP ASR (J-34) projects, if appropriate.

14. Section 7.3.7. The requirement from House Bill 807 to identify unnecessary or counterproductive drought contingency plan measures was required in the 2021 regional water plans. Please consider updating the first paragraph of Section 7.3.7 to reflect this.
15. Section 9.1. Please consider revising the title of Table 9-1 to clarify that the data presented is an implementation survey of the 2021 Regional Water Plan.
16. Chapter 9. Section 9.2 and 9.4 both pertain to regionalization. Please consider combining them into one section in the final, adopted regional water plan.
17. Section 9.3.1. Tables 9-2 and 9-3 show a comparison between decades 2030-2080 for the 2021 and 2026 plan. However, the 2021 plan only covers decades 2020-2070. Please consider updating this table to reflect the appropriate decades that overlap the two planning cycles.
18. Section 9.3.3 and 9.3.4. Please consider clarifying that the tables referred to in the Executive Summary are accessible through the TWDB's Secure Agency Reporting Application (SARA), and that these are not standalone tables.
19. Executive Summary. Please consider presenting the instructions and link to access the DB27 data reports and list of the reports together in either the Executive Summary, or the Executive Summary Appendix.
20. Chapter 10. Please consider providing a list of rural entities that were not responsive to regional water planning group outreach efforts in the final plan.

Region J_2026 RWP_TWDB IPP Comment Letter

Final Audit Report

2025-06-23

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