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June 30, 2025

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Mr. Jonathan Letz, Regional Planning Group Chair
Region J Regional Water Planning Group
c/o Kerr County Commissioners Court
700 Main Street, Suite 101
Kerrville, Texas 78028

Re: 2026 Region J Initially Prepared Regional Water Plan

Dear Mr. Letz:

The Texas Parks and Wildlife Department (TPWD) has reviewed the 2026 Initially Prepared Regional Water Plan for Region J (IPP) and appreciate the opportunity to provide comments. Water impacts every aspect of TPWD's mission to manage and conserve the natural and cultural resources of Texas. TPWD is the agency charged with primary responsibility for protecting the state's fish and wildlife resources (Parks and Wildlife Code (PWC) Section (§) 12.0011). To that end, TPWD offers these comments intended to help avoid or minimize impacts to state fish and wildlife resources.

TPWD understands that regional water planning groups are guided by 31 Texas Administrative Code (TAC) Chapter 357 when preparing regional water plans. These water planning rules spell out requirements related to natural resources and environmental protection. Accordingly, TPWD staff reviewed the IPP with a focus on the following questions:

- Does the IPP include quantitative reporting of environmental factors relevant to the effects on environmental water needs and habitat?
- Does the IPP include a description of natural resources and threats to natural resources due to water quantity or quality problems?
- Does the IPP discuss how these threats will be addressed?
- Does the IPP describe how it is consistent with long-term protection of natural resources?
- Does the IPP include water conservation as a water management strategy?
- Does the IPP include Drought Contingency Plans?
- Does the IPP recommend any stream segments be nominated as ecologically unique?

- Does the IPP address concerns raised by TPWD in connection with the 2021 Water Plan?

Population Growth and Water Needs

Region J is expected to experience modest but steady population growth over the planning horizon, primarily driven by increasing municipal and rural residential development. This growth is projected to result in corresponding increases in water demand, particularly within the municipal, irrigation, and livestock sectors. The IPP identifies anticipated water shortages across multiple user groups under drought-of-record (DOR) conditions, highlighting the need for strategic interventions to maintain water security.

To address these projected shortages, the Plan recommends 65 Water Management Strategies (WMSs) and 5 alternative strategies. These strategies span a broad array of supply and demand-side measures, including municipal conservation, agricultural efficiency improvements, brush control, reuse, groundwater development, and interbasin transfers. While the Plan does not delineate specific percentages for each WMS type's contribution to meeting needs, it clearly positions water conservation and water loss mitigation as foundational approaches, applicable across sectors and prioritized where shortages are most acute.

Natural Resources and Environmental Impacts

The IPP provides a comprehensive overview of the Plateau Region's natural resources, emphasizing the ecological importance of spring-fed river systems, riparian corridors, public conservation lands, and biologically diverse habitats. These resources are intricately linked to hydrological regimes and are highly sensitive to changes in water availability and quality. The Plan uses a standardized 1–5 scoring system to quantitatively assess environmental impacts for each WMS across categories such as environmental water needs, wildlife habitat, water quality, cultural resources, and recreation.

While this approach offers valuable insight into potential localized effects of individual strategies, the Plan does not include a regional cumulative impact assessment. This omission is notable, especially given that multiple WMSs may be implemented concurrently in shared watersheds or aquifers. The lack of cumulative analysis limits the ability to understand additive, synergistic, or compounding effects on critical ecosystems. TPWD recommends that future planning efforts incorporate watershed-scale assessments that aggregate the environmental effects of all recommended strategies to ensure they remain within ecologically sustainable thresholds.

Instream Flow and Freshwater Inflows

The IPP acknowledges the central role of instream flows and freshwater inflows in sustaining ecological health, recreational value, and downstream water rights. This is particularly important in spring-fed systems such as the Devils River, San Felipe Springs, and Independence Creek, which support high biodiversity and public conservation lands. The Plan incorporates environmental flow considerations into the evaluation of WMSs, and it aims to avoid groundwater development that would significantly deplete surface water contributions beyond natural drought levels.

However, the Plan does not clearly demonstrate whether full implementation of all recommended WMSs will maintain instream flows above established environmental flow standards. This creates uncertainty about the cumulative hydrological impacts, especially in highly interconnected aquifer–spring systems. TPWD recommends that the Region J Planning Group conduct more explicit modeling or flow budget analyses that compare projected withdrawals against established environmental flow benchmarks, as these benchmarks are vital to safeguarding sensitive aquatic ecosystems and complying with state water policy goals.

Impacts on Listed Species

The IPP references resources from TPWD that identify the presence and habitat needs of federally listed Threatened and Endangered (TE) species as well as State Species of Greatest Conservation Need (SGCN) within the region. Specific areas of ecological concern such as Devil’s River State Natural Area, Dolan Falls Preserve, and riparian zones of the Pecos River—are noted as requiring reliable water inputs to sustain native species and ecosystem function.

Despite this acknowledgement, TE and SGCN species are not consistently or explicitly referenced in individual WMS descriptions, limiting the ability to track how water development projects might directly or indirectly affect critical habitats. While some strategies—such as brush management—may incidentally benefit both agriculture and wildlife, a more deliberate alignment of WMSs with species protection goals is warranted. Enhanced integration of ecological criteria and species distribution data into project design and siting would improve environmental accountability and foster a more proactive conservation approach. Additionally, the most recent TPWD database, *Rare, Threatened, and Endangered Species of Texas* (updated January 15, 2025; <https://tpwd.texas.gov/gis/rtest/>), was not used. Instead, the IPP relied on an earlier source TPWD’s *Listed Species* webpage: (<https://tpwd.texas.gov/wildlife/wildlife-diversity/nongame/listed-species/>), last updated in 2024, as cited on page 1-23 of the Plan. This limits the Plan’s ability to incorporate the most up-to-date spatial and ecological data on sensitive species distributions.

Invasive Species Management

The IPP identifies and addresses several invasive plant species that negatively impact water availability and ecosystem integrity, including *Arundo donax* and salt cedar. The Plan recommends a combination of mechanical, chemical, and biological control methods, and highlights support for TPWD-led brush management programs. These actions are framed as contributing both to water conservation and to the protection of native flora and fauna.

However, the Plan's treatment of invasive species is incomplete, as it fails to mention aquatic invaders such as zebra mussels (*Dreissena polymorpha*), which pose significant threats to both natural ecosystems and water infrastructure across Texas. These omissions represent a critical vulnerability, as zebra mussels are spreading rapidly and require regionally coordinated prevention and response. Inclusion of TPWD's zebra mussel monitoring maps and control guidelines—alongside contingency planning for aquatic invasive species—would greatly enhance the Plan's resilience and implementation readiness.

Water Conservation Emphasis

Water conservation is a cornerstone of Region J's IPP and is promoted as a long-term strategy to improve supply reliability, especially under DOR conditions. The Plan includes a diverse suite of conservation efforts, including municipal demand management, agricultural water use efficiency, brush management, riparian corridor restoration, and rainwater harvesting. These strategies are encouraged not only in areas with projected shortages but also where voluntary conservation can support future water security.

Nonetheless, the effectiveness of many conservation strategies hinges on a better understanding of groundwater–surface water interactions, particularly in spring-dependent ecosystems. Current monitoring is limited, with only a single continuous well tracking aquifer levels in key regions such as the Upper Guadalupe River Basin. This data gap inhibits the ability to link conservation actions with measurable ecological outcomes. Expanding monitoring networks and correlating groundwater data with spring discharge is critical to verifying the efficacy of conservation programs and protecting groundwater-dependent biological communities.

Response to TPWD Comments

The IPP reflects an awareness of TPWD's previous input, including consideration of riparian habitats, listed species, and the use of environmental impact rankings for each WMS. It also incorporates some aspects of TPWD's recommendation to consider ecologically significant areas in project planning.

TPWD notes that the planning group declined to recommend any new Ecologically Unique Stream Segments (EUSS). This decision was made based on concerns about property rights and uncertainty about regulatory consequences. TPWD has included

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in the 2024 Land and Water Plan a goal of updating the statewide assessment of ecologically significant stream segments by 2028. TPWD looks forward to assisting the Region J Planning Group in discussing concerns related to property rights and regulatory consequences with the goal of pursuing the designation of EUSSs in the Plateau Water Planning Area.

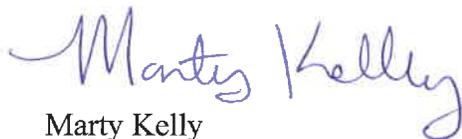
Region J Water Planning Efforts

TPWD extends sincere appreciation to the Plateau Region Water Planning Group (PRWPG) for producing a detailed, thoughtful, and forward-looking Initially Prepared Plan for the 2026 planning cycle. The Plan demonstrates commendable effort in addressing the region's complex hydrological challenges while incorporating multiple perspectives from municipal users, agricultural producers, conservationists, and scientists. The emphasis on conservation, stakeholder engagement, and ecological consideration reflects the group's commitment to building a water-secure and environmentally responsible future.

At the same time, TPWD encourages the PRWPG to continue strengthening the Plan by addressing identified data gaps, expanding invasive species coverage, enhancing environmental flow transparency, and incorporating a cumulative impact framework.

Thank you for your consideration of these comments. TPWD looks forward to continuing to work with the planning group to develop water supply strategies that not only meet the future water supply needs of the region but also preserve the ecological health of the region's aquatic resources. If you have any questions or comments, please do not hesitate to contact me by email at Marty.Kelly@TPWD.Texas.gov or by phone at (512) 389-8214.

Sincerely,



Marty Kelly
Water Resources

MK:mk

cc: Ms. Lindsey Elkins