The following are the responses to TPWD comments on the *2026 IPP Plateau Water Plan*:

1. 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.

   PWPG – The recommendation has been added to Chapter 8 Section 8.3. The effort to incorporate watershed-scale assessments is quite extensive and is currently not covered with the designated TWDB funds, nor does it lie within the contract's scope-of-work.

2. TPWD – Recommends that the PWPG 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.

   PWPG – All analyses of Water Management Strategies using surface water and/or reuse sources are based on use of the State's official Water Availability Models (WAMs) for each river basin. The WAMs for river basins located in the Plateau region each include the instream flow standards that have been adopted for these river basins at their adopted priority date. Planned surface water strategies to store, take, or divert water are modeled junior to these adopted instream flow standards. The adoption of these environmental flow standards was intended to maintain a sound ecological environment for these basins and complies with State water policy goals.

3. TPWD – Recommends using the most recent TPWD database, *Rare, Threatened, and Endangered Species of Texas* (updated January 15, 2025).

   PWPG – An updated hyperlink to the TPWD's *Rare, Threatened, and Endangered Species of Texas* (updated January 15, 2025) site has been provided within Chapter 1, Page 1-23 of the final, adopted regional water plan.

4. TPWD – Recommends including aquatic invaders such as zebra mussels (*Dreissena polymorpha)* within the Plan to complete the discussion on treatment of invasive species. 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.

   PWPG – The *Plan* mentions specific invasive species where treatment can document a firm yield under drought-of-record conditions as part of the water management strategy evaluation and recommendation process. Drought mitigation measures such as vegetative management are an effective water conservation practice that can reduce water scarcity and improve soil moisture, which reduces the impact of drought. Although the treatment of aquatic invaders might provide an enhanced regional water plan, removal of these invasive species does not meet rule requirements where recommended strategies need to document a firm yield under drought-of-record conditions. However, a link has been provided in Chapter 1 Section 1.2.7 to the TPWD Invasive Database providing more information.

5. TPWD – Recommends expanding monitoring networks and correlating groundwater data with spring discharge. This is critical to verifying the efficacy of conservation programs and protecting groundwater dependent biological communities. Current monitoring is limited, with only a single continuous well tracking aquifer levels in key regions such as the Upper Guadalupe River Basin.

   PWPG – The recommendation has been added to Chapter 8 Section 8.4.5.

6. TPWD – Recommends the consideration of designating Ecologically Unique Stream Segments in the Plateau Water Plan.

   PWPG – Designation of Ecologically Unique Stream Segments has historically been declined due to concerns about property rights and uncertainty about regulatory consequences (see Chapter 8 Section 8.5). The PWPG will consider future discussions with the TPWD staff and appreciates their assistance.