



TECHNICAL CONSULTANT PRESENTATION

PLATEAU WATER PLANNING GROUP MEETING – AUG. 13, 2025

XI

Update on Regional Water Planning Schedule

Agenda Item #11

Task for Today

- Review of TWDB Formal Comments on IPP & Responses
- Review of TPWD Comments on IPP & Responses
- Update on Other Regional Planning Efforts



2026 Plateau (Region J) Water Plan

Prepared By: The Plateau Water Planning Group

With administration by the Upper Guadalupe River Authority

Prepared For: Texas Water Development Board

October 20, 2025

With assistance from:



XII

TWDB – Comments & Responses

Agenda Item #12

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

CH 2	CH 3	CH 5	CH 6	CH 7	CH 9	GIS
1	2	23	2	2	1	3

**Total
of 34**

Level 2 – Comments and suggestions for consideration that may improve the regional water plan.

ES	CH 2	CH 3	CH 5	CH 7	CH 9	CH 10
1	3	9	1	1	4	1

**Total
of 20**

Chapter 2, Section 2.2.2, Table 2-4

Municipal (and county-other) water demand in the Plateau Region is projected to increase from **32,738** acre-feet in 2030 to **35,234** acre-feet by 2080 (Table 2-4). Because municipal water demand is directly related to population, Val Verde County has the highest demand in the Region.

**Table 2-4. Municipal and County-Other Water Demand Projections
(Acre-Feet per Year)**

County	2030	2040	2050	2060	2070	2080
Bandera	2,702	2,744	2,799	2,856	2,912	2,970
Edwards	233	186	149	126	105	82
Kerr	11,631	12,122	12,497	13,094	13,698	14,275
Kinney	1,323	1,251	1,206	1,177	1,150	1,121
Real	503	425	363	315	268	219
Val Verde	16,346	16,376	16,439	16,481	16,524	16,567
County Total Demand	32,738	33,104	33,453	34,049	34,657	35,234

Chapter 3, Section 3.4

3.4 WATER REUSE

While recycling is a term generally applied to aluminum cans, glass bottles, and newspapers, water can be recycled as well. Water recycling is reusing treated wastewater for beneficial purposes such as agricultural and landscape irrigation, industrial processes, toilet flushing, and replenishing a groundwater aquifer (referred to as groundwater recharge or ASR). Reuse water can be broadly characterized as one of two types: (1) direct reuse, or wastewater that is reused without first being discharged into a stream or watercourse, and (2) indirect reuse, in which wastewater is discharged to a stream or other watercourse prior to being diverted for use. Currently, there are no existing or future indirect reuse supply projects within the Region.

A common type of recycled water is water that has been reclaimed from municipal wastewater, or sewage. The term "water recycling" is generally used synonymously with water reclamation and water reuse. As noted by the Texas Water Reuse Association, recycled water has increasingly become an effective alternative solution to a multitude of water management challenges in Texas. The reuse water supplies available to the individual water user groups described below and listed on Table 3-1 were determined through an extensive survey process, where entities were asked not only to provide population growth patterns, but also water use and water supply. Each WUG was asked to identify their water supply source and supply volume. The paragraph below explains in detail the information provided to the PWPG collected from the survey responses, plus all the information gathered in several follow-up phone calls.

Chapter 5, Section 5.3.4, Table 5-2 & 5-6

Table 5-10. Conservation Water Management Strategies

County	Water User Group	Source Basin	Strategy	Strategy ID
Bandera	City of Bandera	San Antonio	Water loss audit and main-line repair	J-1
	Bandera County FWSD #1	San Antonio	Public conservation education	J-7
	Bandera County Other Bridlegate Subdivision	San Antonio	Water loss audit and main-line repair	J-9
	Bandera County Other Flying L Ranch PUD	San Antonio	Water loss audit and main-line repair	J-10
	Bandera County Other	San Antonio	Drought management	J-12
		Nueces	Drought management	J-15
Bandera County Irrigation	San Antonio	Irrigation scheduling	J-16	
Edwards	City of Rocksprings	Nueces	Public conservation education	J-20
			Water loss audit and main-line repair	J-21
	Edwards County Irrigation	Rio Grande	Irrigation scheduling	J-25
	Edwards County Mining	Nueces	Mining Conservation - On-site reuse	J-27
Kerr	City of Kerrville	Guadalupe	Water loss audit and main-line repair	J-30
	Kerr County Other (Community Water Group WSC)	Nueces	Water loss audit and main-line repair	J-37
	Kerr County Irrigation	Colorado	Irrigation scheduling	J-40
		San Antonio	Irrigation scheduling	J-41
Kerr County Mining	Guadalupe	Mining conservation - On-site reuse	J-46	
Real	City of Camp Wood	Nueces	Public conservation education	J-53
	City of Leakey	Nueces	Public conservation education	J-55
	Real County Other (Real WSC)	Nueces	Water loss audit and main-line repair	J-58
	Real County Manufacturing	Nueces	Manufacturing Conservation	J-61
Val Verde	City of Del Rio	Rio Grande	Water loss audit and main-line repair	J-62
	Val Verde County Other	Rio Grande	Water loss audit and main-line repair for San Pedro Canyon Subdivision (Upper)	J-66
			Water loss audit and main-line repair for Tierra Del Lago	J-67
Val Verde County Mining	Rio Grande	Mining conservation - On-site reuse	J-69	

UPDATE: Chapter 5, Section 5.2.8, Table 5-4

Table 5-4. Recommended Vegetative / Brush Water Management Strategies

County	Water User Group	Source Basin	Strategy	Strategy ID	Strategy Supply (Acre-Feet per Year)					
					2030	2040	2050	2060	2070	2080
Bandera	County-Other	San Antonio	Vegetative Management	J-13	1,388	1,388	1,388	1,388	1,388	1,388
Edwards	County-Other	Nueces	Vegetative Management	J-24	87	87	87	87	87	87
Kerr	County-Other	Guadalupe	Vegetative Management	J-39	131	131	131	131	131	131
Kinney	County-Other	Nueces	Vegetative Management	J-51	87	87	87	87	87	87
	County-Other	Rio Grande	Vegetative Management	J-52	87	87	87	87	87	87
Real	County-Other	Nueces	Vegetative Management	J-60	87	87	87	87	87	87
Val Verde	County-Other	Rio Grande	Vegetative Management	J-68	87	87	87	87	87	87

The Texas State Soil and Water Conservation Board (TSSWCB) published a report on [Brush Control Planning, Assessment, and Feasibility Study for the Nueces River Watershed](#). The study focused on economic aspects and potential changes in water availability related to brush management. The study area consisted of portions of Edwards, Real, and Kinney Counties. The costs associated with brush management depend on brush type, density, control methods and the added water yield. Section 7.2 of the TSSWCB Report describes the various treatments and costs obtained from meetings with landowners and range specialists of the Texas Agriculture Experiment Station and Extension Service, and USDA-NRCS with brush control experience in the project areas. The information collected helped to formulate an average cost for the various treatments for each brush type-density category presented in [Tables 5-5 and 5-6 below](#). [Table 5-5](#) presents the cost of water yield brush control programs by type and density within the northern portion of the Nueces River Watershed. [Table 5-6](#) presents the costs within the southern portion of the Nueces River Watershed. The costs in the northern portion of the Nueces River Watershed range from \$170.42 per acre for root plowing with predozing for control of heavy mesquite or mixed brush, to \$83.99 per acre for moderate mesquite or mixed brush that can be initially controlled with herbicide treatments. Similar information is presented in [Table 5-6](#) for the southern portion of the Nueces River Watershed. Costs range from \$140.42 per acre for rootplowing with predozing for control of heavy mesquite or mixed brush, to \$76.64 per acre for moderate mesquite that can be initially controlled with herbicide treatments. Costs do vary by watershed and sub-basin, but on average, most watersheds range from \$40 to \$100 per acre-foot.

**Table 5-5. Cost of Water Yield Brush Control Programs by Type/Density Category
(Northern Portion of Nueces River Watershed)**

Year	Treatment	Treatment Cost (\$/acre)	Present Value (\$/acre)
<i>Heavy Mesquite - Chemical Herbicide ¹</i>			
0	Chemical Herbicide	45.00	45.00
4	Chemical Herbicide	40.00	29.40
7	Choice IPT or <u>Burn</u>	25.00	14.59
Total			88.99
<i>Heavy Mesquite - <u>Rootplow</u> ²</i>			
0	<u>Rootplow</u>	110	110
5	Choice IPT or <u>Burn</u>	30	20.42
Total			130.42
<i>Extra Heavy Mesquite - <u>Rootplow</u> with Pre-Doze ³</i>			
0	Pre-doze and <u>Rootplow</u>	150.00	150.00
5	Choice IPT or <u>Burn</u>	30.00	20.42
Total			170.42
<i>Heavy Mixed Brush - Chemical Herbicide ⁴</i>			
0	Chemical Herbicide	90.00	90.00
5	Choice IPT or <u>Burn</u>	35.00	23.82
Total			113.82

Chapter 5, Section 5.3.6 – Livestock WMSs

5.3.6 Irrigation Conservation

Agricultural water shortages include shortages for livestock and irrigation. Most of the livestock demand in the Plateau Water Planning Area is for free-range livestock. The PWPG encourages individual ranchers to adopt practices that prevent the waste of water for livestock. However, the savings from these practices will be small and difficult to quantify. Therefore, livestock water conservation is not considered as a recommended strategy in this Plan.

Irrigated agriculture is the biggest user of water in Texas. Approximately 7.5 million acre-feet was represented within the 2020 planning decade of the 2022 State Water Plan. Irrigation water use represents 45 percent of total water use in the State. This is 10 percent greater than municipal water use, which ranks as the second largest use of water Statewide.

REVISED WMS for City of Del Rio

J-64 Water Treatment Plant Expansion

The City of Del Rio uses a membrane treatment facility, which treats water pumped from San Felipe Springs. The treatment plant is approximately 20-years old and **is expected to reach its end of life within the next 5 years**. This strategy assumes costs associated with the **installation of new** water treatment skids, replacement of manifolds, pipes and valves **at the San Felipe Springs Water Treatment Plant**. In addition, this strategy assumes the cost of installing 2 M GST Clearwell Tanks and two additional high service distribution pumps. **This strategy is designed to restore the treated water supply volume lost due to the end of life of the existing water treatment plant and ultimately increase the treated water supply volume.** The project is anticipated to come on-line by 2030.

Quantity, Reliability, and Cost – It is expected that this project will supply an additional **4,035** acre-feet per year. The total capital cost for this project is approximately **\$16,643,000** with an estimated annual cost of **\$8,512,000**. **The reliability of this supply is high.**

UPDATE: New WMS for Kerrville South Water

5A 3.2 WATER MANAGEMENT STRATEGIES FOR KERRVILLE SOUTH WATER

Kerrville South Water has a projected water-supply deficit beginning in 2030 of 70 acre-feet per year, increasing to 173 acre-feet per year by 2080.

The following water management strategy is recommended to enhance the reliability of the future water-supply availability for Kerrville South Water.

- (J-71) Public conservation education
- (J-33) Additional groundwater wells

J-71 Public Conservation Education

Kerrville South Water is encouraged to emphasize conservation through public information programs. A total of one percent reduction in demand is anticipated, which will result in a water savings of approximately six acre-feet per year. The annual cost of this project in 2030 is estimated to be \$2,206, increasing to \$2,295 by 2080. The reliability of the supply is expected to be low/variable, reliant upon acceptance.

Chapter 5, Section 5.3.9 – GPCD Goals

The PWPG established 140 GPCD as a goal, not a requirement for all municipal WUGs. This target was selected to coincide with prior recommendations of the [Texas Water Conservation Implementation Task Force](#). In the report, the Task Force adopted recommended GPCD targets and goals that should be considered by retail public water supplies when they develop water conservation plans. These goals should consider: (1) a minimum annual reduction of one percent in total GPCD, based upon a five-year rolling average, until such time as the entity achieves a total GPCD of 140 or less, (2) a Statewide goal to reduce total Statewide water demand to an average of 140 GPCD, and (3) any guidelines that may be adopted by the SB-1 Regional Water Planning Group in which the entity developing the Municipal Water Conservation Plan is located.

Appendix 5A, City of Brackettville – Increase Storage Facility (J-50)

TWDB Req: The types of facilities and associated capital or other costs that may be included in a regional water plan must be directly associated with the 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.

~~J-50 — Increase Storage Facility~~

~~The Fort Clark Springs MUD (District) currently has 989 connections, an average daily usage of 0.5 mgd with 660,000 gallons of total storage and a well production capacity of 2 mgd. Additional supply is needed to ensure availability during drought-of-record conditions and to meet peak demands. While the District has the minimum amount of storage available, additional storage will provide the needed water supply. To achieve this goal, a 500,000-gallon ground storage tank will provide access to the new supply.~~

~~**Quantity, Reliability, and Cost**—This strategy is assumed to provide an additional 620 acre-feet per year of water, beginning in 2040. The total estimated capital cost for this project is approximately \$2,499,000. The reliability of this strategy is high.~~

Chapter 5, Section 5.2.7 – Unqualified WMSs

5.2.7 Unqualified Strategies

The TWDB requires that water management strategies listed in regional water plans develop “new” water supplies to be eligible for SWIFT funding. **The type of facilities and associated capital or other costs that may be included in a regional water plan must be directly associated with the 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.** Projects that involve items such as replacing and/or repairing old infrastructure, **maintenance of storage facilities**, and wastewater collection and treatment do not qualify. However, the TWDB offers many other types of financing options. Additional details pertaining to the different types of grants and loans offered can be accessed on the TWDB’s [Financial Assistance](#) webpage. **Table 5-3** presents unqualified water management strategies removed from the recommended and alternate **Table 5-7**.

UPDATE: NEW Table 5-3. Unqualified WMSs

Table 5-3. Unqualified Water Management Strategies

County	Water User Group	Strategy Source Basin	Strategy	Strategy ID	Strategy Supply (Acre-Feet per Year)					
					2030	2040	2050	2060	2070	2080
Bandera	Bandera County-Other (Volunteer fire Dept.)	San Antonio	Additional Groundwater Wells to Provide Emergency Supply (Alternate)	J-14	189	189	189	189	189	189
	Bandera County Livestock	Nueces	Livestock Conservation	J-18	13	13	13	13	13	13
Edwards	Edwards County Livestock	Nueces	Livestock Conservation	J-26	51	51	51	51	51	51
	Edwards County Mining	Nueces	Mining Conservation	J-27	2	2	2	2	2	2
Kerr	Kerr County Livestock	Colorado	Livestock Conservation	J-42	6	6	6	6	6	6
	Kerr County Livestock	San Antonio	Livestock Conservation	J-44	9	9	9	9	9	9
	Kerr County Mining	Guadalupe	Mining Conservation	J-46	30	30	30	30	30	30
Kinney	City of Brackettville	Rio Grande	Increase Storage Facility	J-49	0	3	3	3	3	3
	Fort Clark Springs MUD		Increase Storage Facility	J-50	0	620	620	620	620	620
Real	Real County Manufacturing	Nueces	Manufacturing Conservation	J-61	1	1	1	1	1	1
Val Verde	Val Verde County Mining	Rio Grande	Mining Conservation	J-69	15	16	17	18	19	21

Chapter 5, Section 5.3.3.6 – Rainwater Harvesting

The TWDB has a rainwater harvesting webpage that focuses on rainwater projects, training, the [Texas Rain Catcher Award and FAQs](#).

The PWPG supports and encourages the application of rainwater harvesting systems where applicable within the Region. In fact, large scale rainwater harvesting systems have been built at Texas Public Schools. In 2013, Bandera High School was the recipient of the TWDB’s Texas Rain Catcher Award. This program is established to promote technology, educate the public, and to recognize excellence in the application of rainwater harvesting systems in Texas. In 2014, the Hill Country Alliance partially funded a project conducted by Bandera HS titled, “[Large-Scale Rainwater Harvesting at Texas Public Schools](#)”.

To calculate the potential supply yield for rainwater harvesting, the study recommends the consideration of rainfall, catchment area, and collection efficiency. The general formula is rainfall (in inches) x catchment area (in square feet) x runoff coefficient = total rainwater volume (in gallons). Different surfaces have different runoff coefficients. For example, metal roofs (95% runoff), shingles (85% runoff), and tile roofs (80% runoff). These various roof types will impact how efficient water is collected.

Chapter 5, Appendix 5C – Public Conservation Education Costing Sheets

Introduction

Public education may be one of the most productive actions that can result in the greatest amount of water savings. Most citizens are willing to actively do their part to conserve water once the need is communicated and how to accomplish the most benefit is explained. Numerous state, county, and academic agencies provide educational material and demonstrations. Groundwater conservation districts also provide water conservation activities.

The TWDB provides a significant amount of information and services pertaining to water conservation that can be accessed at: [TWDB Water Conservation](#).

Methodology

The process described below has been utilized in previous planning cycles and was formally adopted by the Plateau Water Planning Group (PWPG) for the purposes of this Plan.

Process 1: Collecting Data - No. of Connections

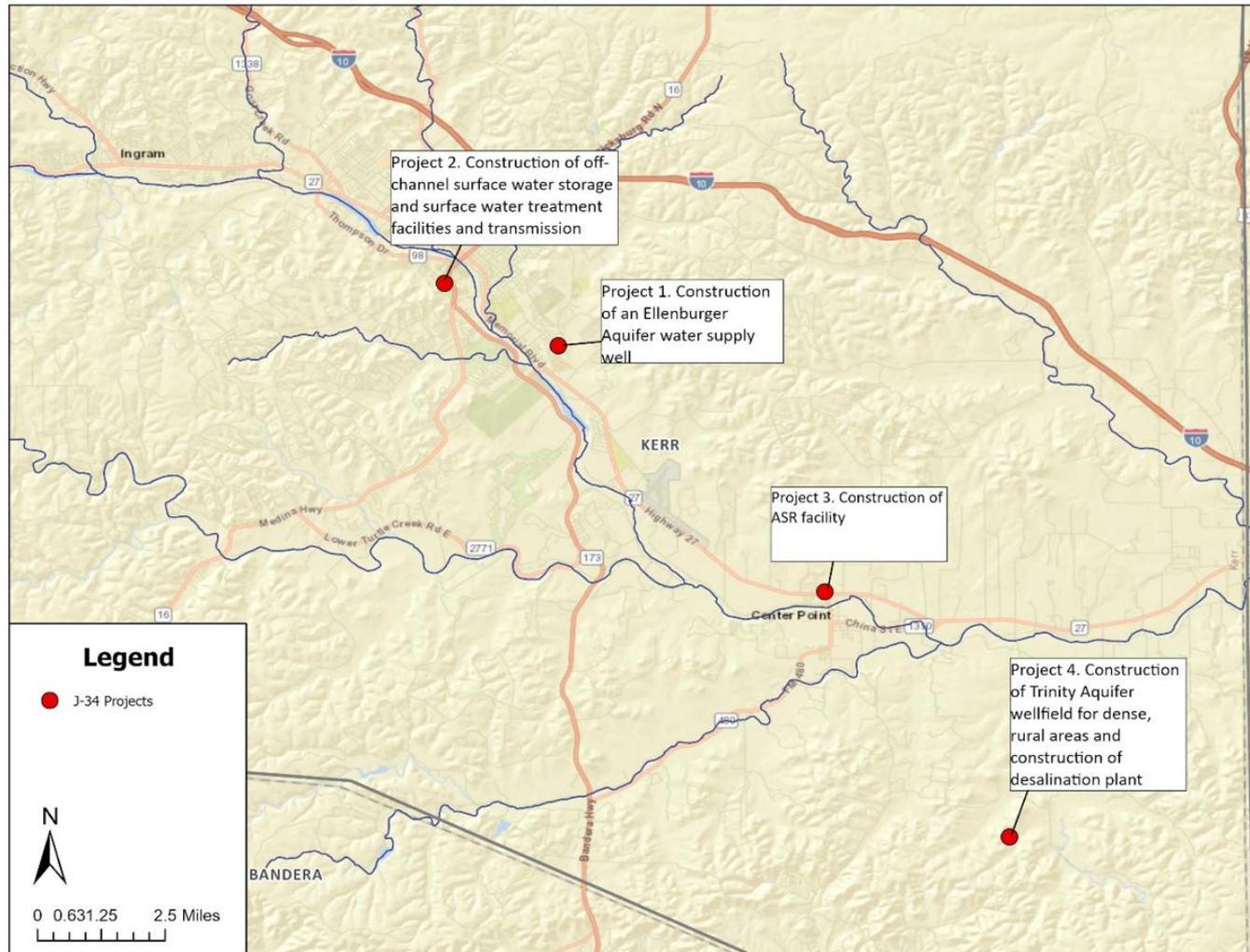
Steps

1. Go to the Texas Drinking Water Watch webpage. <https://dww2.tceq.texas.gov/DWW/>
2. Type in the name of the Public Water System (PWS) and hit "enter".
3. Click on the "Fact Sheet" hyperlink.
4. Log the "count" value into the table below.

WUG Name	No. of Connections	2030	2040	2050	2060	2070	2080
Bandera County FWSD #1	438	438	446.400	446.627	446.837	446.662	446.494

Chapter 5, Appendix 5C – Project Maps

Figure 5C-5. J-34 Eastern Kerr County Regional Water Supply Project Map



Chapter 6 – Unmet Needs

The socioeconomic impact of not meeting water-supply needs within the Region is discussed in an analysis report prepared by the Texas Water Development Board (TWDB) and presented in Appendix 6A at the end of this Chapter. **The unmet needs identified for each water user group (WUG) in the Region are detailed in Chapter 5, Section 5.2.6, and shown in Table 6-1 below, which provides a list of all unmet needs by category of use after all recommended water management strategies have been implemented.** Based on projected water demands and existing water supplies, the Region identified water needs (potential shortages) that could occur under a repeat of the drought-of-record for 16 water user groups (Chapter 4 Table 4-1). The TWDB then estimated the annual socioeconomic impacts of those needs, if they are not met, for each water use category (municipal, irrigation, livestock, manufacturing, mining and steam-electric power), and as an aggregate for the Region.

The report describes that the Plateau Region generated more than \$3.9 billion in gross domestic product (2023 dollars) and supported roughly 60,000 jobs in 2021. It is estimated that not meeting the identified water needs in the Plateau Region would result in an annually combined lost income impact of approximately \$52 million in 2030, increasing to \$76 million in 2080. In 2030, the Region would lose approximately 578 jobs, and by 2080 job losses would increase to approximately 1,200 if anticipated needs are not mitigated.

**Table 6-1. Unmet Water Needs by Category of Use
(Acre-Feet per Year)**

Water User Group	WUG Unmet Needs (Acre-Feet per Year)					
	2030	2040	2050	2060	2070	2080
Bandera County Irrigation	(806)	(806)	(806)	(806)	(806)	(806)
Kerr County Mining Guadalupe RB	(27)	(27)	(27)	(27)	(27)	(27)
Real County Manufacturing	(2)	(2)	(2)	(2)	(2)	(2)

Socioeconomic Impacts of Projected Water Shortages for the Plateau (Region J) Regional Water Planning Area

Prepared in Support of the 2026 Region J Regional Water Plan



Dr. John R. Ellis

Projections & Socioeconomic Analysis,
Water Supply Planning
Texas Water Development Board

June 2025

Chapter 7 – Table 7-3. Emergency Responses

Table 7-4. Emergency Responses to Local Drought Conditions

Water User Group Name	Entity					Implementation Requirements									
	County	2024 Population Served by Water System (per TCEQ)	2024 Service Connections (per TCEQ)	2030 Projected Population	2030 Projected Water Demand (AF/year)	Drill additional groundwater wells	Brackish groundwater limited treatment	Brackish groundwater desalination	Emergency interconnect	Other named local supply	Trucked-in water	Type of infrastructure required	Entity providing supply	Other local entities required to participate/ coordinate	Emergency agreements/ arrangements already in place?
City of Bandera	Bandera	3,066	1,070	1,949	347	▪			▪		▪	Well	City	N/A	N/A
Bandera County FWSD #1	Bandera	1,092	438	1,074	342	▪			▪		▪	Well	District	N/A	N/A
City of Rocksprings	Edwards	1,857	574	666	175	▪			▪		▪	Well	City	N/A	N/A
City of Kerrville	Kerr	22,519	10,297	33,038	7,839	▪					▪	Well	City	N/A	N/A
Kerrville South Water	Kerr	No Data		3,600	457	▪					▪	Well	Aqua Texas	N/A	N/A
City of Brackettville	Kinney	2,420	831	1,077	528	▪					▪	Well		N/A	N/A
Fort Clark Springs MUD	Kinney	1,200	989	1,372	727	▪					▪	Well		N/A	N/A
City of Camp Wood	Real	1,380	460	339	147	▪			▪		▪	Well	City	N/A	N/A
City of Leakey	Real	1,758	586	210	143	▪			▪		▪	Well	City	N/A	N/A
Laughlin Air Force Base	Val Verde	4,010	497	1,640	969	▪			▪		▪	Well	City of Del Rio	N/A	N/A
County-Other															
Bandera River Ranch 1	Bandera	1,038	346	Data Not Provided		▪			▪		▪	Well	WSC	N/A	N/A
Blue Medina Water	Bandera	240	80			▪			▪		▪	Well		N/A	N/A
Medina WSC	Bandera	774	258			▪			▪		▪	Well		N/A	N/A
Medina Children's Home	Bandera	264	88			▪			▪		▪	Well		N/A	N/A
Flying L Ranch PUD	Bandera	987	329			▪			▪		▪	Well		N/A	N/A
Lake Medina Shores	Bandera	4,032	1,344			▪			▪		▪	Well		N/A	N/A
Enchanted River Estates	Bandera	471	157			▪			▪		▪	Well		N/A	N/A
Medina Highlands	Bandera	129	43			▪			▪		▪	Well		N/A	N/A
River Bend Estates	Bandera	552	184			▪			▪		▪	Well		N/A	N/A
Lakewood Water	Bandera	816	272			▪			▪		▪	Well		N/A	N/A
San Julian Creek Estates	Bandera	72	24			▪			▪		▪	Well		N/A	N/A
Elmwood Estates	Bandera	129	43			▪			▪		▪	Well		N/A	N/A

Chapter 9, Sections 9.3.3 and 9.3.4

9.3.3 Source Water Availability

Total water supply from the source decreased from 196,946 acre-feet per year in the *2021 Plan* to 194,827 acre-feet per year in the *2026 Plan*, with groundwater and surface water volumes both decreasing slightly due to changes in the models. A Source Data Comparison table can be accessed on the [TWDB's Database Reports](#) application website.

9.3.4 Existing Water Supplies of Water User Groups (WUGs)

A WUG Data Comparison Table can be accessed on the [TWDB's Database Reports](#) application website which compares the *2021 Plan*, and *2026 Plan* water supplies available to cities and general water-use categories based on the current infrastructure ability of each to obtain water supplies. These abilities primarily include existing infrastructure, water-rights limitations, and groundwater conservation district (GCD) permit limitations. **Total existing water supply decreased from 61,578 acre-feet per year in the *2021 Plan* to 55,013 acre-feet per year in the *2026 Plan* beginning in 2030, decreasing to 54,986 acre-feet per year by 2080.**

XIII

TPWD – Comments & Responses

Agenda Item #13

RESPONSES TO TPWD COMMENTS

The Plateau Water Planning Group (PWPG) thanks the Texas Parks and Wildlife Department (TPWD) staff for their technical review and comments on the *2026 IPP Plateau Water Plan* and wish to express their appreciation for the agency's active role in the Plateau Regional Water Planning process. The PWPG would also like to thank the TPWD staff for recognizing the concerted effort that the Planning Group has made to include environmental needs in the development of this regional water plan as shown in the following key phrases contained in the agency's comments:

- *The PWPG clearly positions water conservation and water loss mitigation as foundational approaches, applicable across sectors and prioritized where shortages are most acute.*
- *The Plateau Region (Region J IPP) provides a comprehensive overview of the Region's natural resources, emphasizing the ecological importance of spring-fed river systems, riparian corridors, public conservation lands, and biologically diverse habitats.*
- *TPWD appreciates the PWPG's acknowledgement of the central role of instream flows and freshwater inflows in sustaining ecological health, recreational value, and downstream water rights.*
- *TPWD commends the PWPG in identifying the presence and habitat needs of Federally listed Threatened and Endangered species as well as State Species of Greatest Conservation Need within the Region.*
- *TPWD is sincerely appreciative to the PWPG for producing a detailed, thoughtful, and forward-looking IPP. 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.*

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.

**Video Recording of the July 23rd
Texas House of Representatives
Disaster Preparedness &
Flooding, Select Committee
Meeting at the Capital**

<https://house.texas.gov/videos/22380>

Kerr County Flood Relief Fund

Next Steps

**Feedback on
IPP Deadline
Aug. 27**

**RWPG
Adopt
Final RWP
Oct. 8**

**Oct. 20, 2025
Submit Final
RWP**

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