

**ATTACHMENT 5**  
**RESPONSES TO AGENCY & PUBLIC COMMENTS**  
**ON INITIALLY PREPARED PLAN**

## **APPENDIX L COMMENTS ON THE INITIALLY PREPARED PLAN**

## L.1 Introduction

The Region F Regional Water Planning Group (RFRWPG) held a public hearing on the 2021 Region F Initially Prepared Plan (IPP) on April 16, 2020 and accepted any public written and oral comments. After the date of this public hearing, the RFRWPG accepted any written public comments for 60 days (until June 15, 2020) and state or federal agency comments for 90 days (until July 15, 2020). The RFRWPG received no public comments during the public hearing or during the 60-day period afterward. Written agency comments were received by the Texas Water Development Board (TWDB), Texas State and Soil Water Conservation Board (TSSWCB), and Texas Parks and Wildlife Department (TPWD). These comments and the RFRWPG's responses are included in this appendix.

In addition to formal, written comments, the RFRWPG coordinated with Major Water Providers (MWPs), Water User Groups (WUGs), and various other stakeholders in Region F after the submittal of the Initially Prepared Plan and received feedback on potential updates. These informal comments were primarily focused on requests to adjust Water Management Strategy (WMS) assumptions. Any formal and informal comments received on the Initially Prepared Plan were documented and used to develop the final 2021 Region F Water Plan.

Table L-1 outlines the major changes to Water Management Strategies in the final 2021 Region F Water Plan since the submission of the IPP.

**Table L-1**  
**Major Changes to WMS between the final 2021 Region F Plan and the Initially Prepared Plan**

WUG(s)	County	Response to Comment
Bangs	Brown	Removed the direct non-potable reuse WMS from the final 2021 Region F Plan since it was previously implemented.
Junction	Kimble	Revised the cost of the Dredging River Intake WMS costs in the 2021 Region F Plan to include necessary modification to the surface water intake structure. Revised the costs of the Develop Edwards-Trinity-Plateau Aquifer Supplies WMS, based on more detail from the City's engineering consultant.
Menard	Menard	Added a new recommended WMS to Develop Alluvial Aquifer Well Supplies in the final 2021 Region F Plan. The Direct Non-Potable Reuse WMS for irrigation of the City Farm was removed since it is no longer feasible. The Develop Hickory Well Field Supplies WMS was changed from recommended to alternative.

Midland, San Angelo	Multiple	Incorporated details of the recommended and alternative West Texas Water Partnership WMSs into the final 2021 Region F Plan.
Pecos City, Big Spring, Bronte, Odessa	Multiple	<p>Changed the online date of the following recommended WMS and projects from 2020 to 2030 since they are unlikely to be implemented prior to January 1, 2023:</p> <ul style="list-style-type: none"> <li>• Advanced Groundwater Treatment (Pecos City)</li> <li>• New Water Treatment Plant (Big Spring)</li> <li>• Rehabilitation of Oak Creek Pipeline (Bronte)</li> <li>• RO Treatment of Existing Supplies (Odessa)</li> <li>• Water Treatment Plant Expansion (Bronte)</li> </ul>

## L.2 Response to TWDB Comments

The TWDB sent a cover letter with a list of requirements that must be incorporated into final 2021 Region F Plan. In addition, TWDB included an attachment to their letter with specific comments on the Initially Prepared Plan submitted on March 3, 2020. Responses to specific comments are included below each comment within the TWDB attachment letter. The list of requirements in the TWDB Cover Letter and documentation that these requirements are met are shown below.

List of requirements specified in the TWDB Cover letter include:

- a) Completed results from the RWPG's infrastructure financing survey for sponsors of recommended projects with capital costs, including an electronic version of the survey spreadsheet; **The infrastructure financing survey is discussed in Chapter 9 and the survey spreadsheet is included in Appendix K.**
- b) Completed results from the implementation survey, including an electronic version of the survey spreadsheet; **The implementation survey is included in Appendix J.**
- c) Documentation that comments received on the IPP were considered in the development of the final plan; **All formal and informal comments received were considered in the development of the final plan. Documentation of responses to the comments is included in this appendix, Appendix L.**
- d) Evidence, such as a certification in the form of a cover letter, that the final, adopted regional water plan is complete and adopted by the RWPG. **A cover letter certifying the adoption of the final plan accompanied the submittal to the TWDB on November 5, 2020.**
- e) Ensure that the final plan includes updated State Water Planning Database (DB22) reports, and that the numerical values presented in the tables throughout the final, adopted regional water plan are consistent with the data provided in DB22. **The DB22 reports are included in Appendix I. The data are consistent between the DB22 reports and the plan.**

In addition, the following items must accompany the submission of the final, adopted regional water plan:

1. The prioritized list of all recommended projects in the regional water plan, including an electronic version of the prioritization spreadsheet;
2. All hydrologic modeling files and GIS files, 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.

**The final deliverables of the 2021 Region F Water Plan included the written plan and all electronic files as required by the TWDB. A separate submittal of the prioritization of the recommended projects in the Region F Water Planning Area was included with the submittal to the TWDB on November 5, 2020.**

# Texas Water Development Board

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Mr. John Grant, Chair  
c/o Colorado River Municipal Water District  
P.O. Box 869  
Big Spring, Texas 79721

Mr. Kevin Krueger  
Colorado River Municipal Water District  
P.O. Box 869  
Big Spring, Texas 79721

Re: Texas Water Development Board Comments for the Region F Regional Water Planning Group Initially Prepared Plan, Contract No. 1548301834

Dear Mr. Grant and Mr. Krueger:

Texas Water Development Board (TWDB) staff have completed their review of the Initially Prepared Plan (IPP) submitted by March 3, 2020 on behalf of the Region F 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 rule references are based on recent revisions to 31 Texas Administrative Code (TAC) Chapter 357, adopted by the TWDB Board on June 4, 2020. 31 TAC § 357.50(f) requires the RWPG to consider timely agency and public comment. Section 357.50(g) 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 must be included in the final, adopted regional water plan (*Contract Exhibit C, Section 13.1.2*).

Standard to all planning groups is the need to include certain content in the final regional water plans that was not yet available at the time that IPPs were prepared and submitted. In your final regional water plan, please be sure to also incorporate the following:

- a) Completed results from the RWPG's infrastructure financing survey for sponsors of recommended projects with capital costs, including an electronic version of the survey spreadsheet [31 TAC § 357.44];

## Our Mission

To provide leadership, information, education, and support for planning, financial assistance, and outreach for the conservation and responsible development of water for Texas

## Board Members

Peter M. Lake, Chairman | Kathleen Jackson, Board Member | Brooke T. Paup, Board Member  
Jeff Walker, Executive Administrator

- b) Completed results from the implementation survey, including an electronic version of the survey spreadsheet [31 TAC § 357.45(a)];
- c) Documentation that comments received on the IPP were considered in the development of the final plan [31 TAC § 357.50(f)]; and
- d) Evidence, such as a certification in the form of a cover letter, that the final, adopted regional water plan is complete and adopted by the RWPG [31 TAC § 357.50(h)(1)].

Please ensure that the final plan includes updated State Water Planning Database (DB22) reports, and that the numerical values presented in the tables throughout the final, adopted regional water plan are consistent with the data provided in DB22. For the purpose of development of the 2022 State Water Plan, water management strategy and other data entered by the RWPG in DB22 shall take precedence over any conflicting data presented in the final regional water plan [Contract Exhibit C, Sections 13.1.3 and 13.2.2].

Additionally, subsequent review of DB22 data is being performed. If issues arise during our 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.

The provision of certain content in an electronic-only form is permissible as follows: Internet links are permissible as a method for including model conservation and drought contingency plans within the final regional water plan; hydrologic modeling files may be submitted as electronic appendices, however all other regional water plan appendices should also be incorporated in hard copy format within each plan [31 TAC § 357.50(g)(2)(C), Contract Exhibit C, Section 13.1.2 and 13.2.1].

The following items must accompany the submission of the final, adopted regional water plan:

- 1. The prioritized list of all recommended projects in the regional water plan, including an electronic version of the prioritization spreadsheet [31 TAC § 357.46]; and,
- 2. All hydrologic modeling files and GIS files, 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 13.1.2, and 13.2.1].

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

- 1. Regional water plans must not include any recommended strategies or project costs that are associated with simply maintaining existing water supplies or replacing existing infrastructure. Plans may include only infrastructure costs that are associated with volumetric increases of treated water supplies delivered to water user groups or that result in more efficient use of existing supplies [31 TAC § 357.10(39), § 357.34(e)(3)(A), Contract Exhibit C, Sections 5.5.2 and 5.5.3]; and,

2. Regional water plans must not include the costs of any retail distribution lines or other infrastructure costs that are not directly associated with the development of additional supply volumes (e.g., via treatment) other than those line replacement costs related to projects that are for the primary purpose of achieving conservation savings via water loss reduction [*§ 357.34(e)(3)(A), Contract Exhibit C, Section 5.5.3*].

Please provide the TWDB with information on how you intend to address all Level 1 comments well in advance of your adoption the regional water plan to ensure that the response is adequate for the Executive Administrator to recommend the plan to the TWDB Board for consideration in a timely and efficient manner. Your TWDB project manager 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 comment may result in the delay of the TWDB Board approval of your final regional water plan.

As a reminder, the deadline to submit the final, adopted regional water plan and associated material to the TWDB is **October 14, 2020**. Any remaining data revisions to DB22 must be communicated to Sabrina Anderson at [Sabrina.Anderson@twdb.texas.gov](mailto:Sabrina.Anderson@twdb.texas.gov) by **September 14, 2020**.

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 Elizabeth McCoy at (512) 475-1852 or [Elizabeth.McCoy@twdb.texas.gov](mailto:Elizabeth.McCoy@twdb.texas.gov). TWDB staff will be available to assist you in any way possible to ensure successful completion of your final regional water plan.

Sincerely,

Jessica Zuba  
Deputy Executive Administrator  
Water Supply and Infrastructure

Date: 6/15/2020

Attachment

c w/att.: Ms. Simone Kiel, Freese & Nichols, Inc.

## TWDB comments on the Initially Prepared 2021 Region F Regional Water Plan.

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

1. Chapter 5 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): 15 *groundwater wells & other*, one *indirect reuse*, four *other direct reuse*, two *other strategies*, and 12 *other surface water*. **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]

**Response:** *The timing of WMSs in Region F plan are based on the timing of the need, discussions with the entity about when they intend to develop the WMS, and the reasonableness of implementation by the given date. Region F consultants updated the online decade for some WMS in the final regional water plan and DB22, based on discussions with the WMS sponsors after the submittal of the Initially Prepared Plan. All remaining WMSs shown to be online in 2020 could feasibly be implemented by January 5, 2023. The online dates for the following strategies were modified to 2030:*

- Advance Groundwater Treatment – Pecos City
- New Water Treatment Plan – Big Spring
- Rehabilitation of Oak Creek Pipeline – Bronte
- RO Treatment of Existing Supplies – Odessa
- Water Treatment Plant Expansion – Bronte

*The other surface water WMSs in Region F are associated with the subordination strategy, which is a change in modeling assumptions to reflect the current actual operation of the upper and lower Colorado River Basins. Since this strategy operates currently, there are no concerns with the WMS delivering water prior to January 5, 2023.*

- b) 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]

**Response:** *Adjustments made to the implementation decade of WMSs did not result in any increases in near-term unmet water needs for entities. As a result, 'demand management' was not included as a recommended WMS in the final plan.*

- c) **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. *[Texas Water Code § 16.053(h)(10); 31 TAC § 357.12(b)]*

**Response:** *Region F acknowledges this comment.*

2. Section 3.1.17, page 3-24. It is not clear from the plan which of the alternative methodologies described on page 3-24 were applied to each of the non-relevant aquifers listed in Table 3-3. Please specify the methodologies used to estimate availability of each non-relevant aquifer in the final, adopted regional water plan. *[Contract Exhibit C, Section 3.5.2]*

**Response:** *Table 3-3 was updated to include a 'Methodology' column.*

3. Section 3.2.3, page 3-37. Please confirm whether the local supply estimates listed in Table 3-9 are firm supply during drought conditions and document this information in the final, adopted regional water plan. *[31 TAC § 357.32(a); Contract Exhibit C, Sections 3.2 and 3.7]*

**Response:** *The discussion in Section 3.2.3 was updated to include the following clarifying sentence: "The local supply availability estimates are known historical quantities, which represent firm supply during drought conditions for planning purposes."*

4. Appendix B. Table 2 includes a 2020 projected capacity for Red Bluff Reservoir (279,212 acre-feet) which is higher than the 2013 surveyed capacity (268,993 acre-feet). Please document why the 2020 projected capacity for Red Bluff Reservoir is greater than the TWDB 2013 surveyed capacity, in the final, adopted regional water plan. *[Contract Exhibit C, Section 3.2]*

**Response:** *In 2011, the TWDB conducted a volumetric survey of the Red Bluff Reservoir. However, due to the low water levels, an area-capacity-elevation curve all the way to the conservation storage was not calculated. Please see pages 9-10 "TWDB did not compute an elevation-area-capacity table for the section of lake surveyed... In 2012, HDR Engineering, Inc. estimated Red Bluff Reservoir has a capacity of 151,110 acre-feet at elevation 2,827.4 feet (Table 2) using survey data collected in this study below elevation 2795.46 feet. Differences in past and present survey methodologies make direct comparison of volumetric surveys difficult and potentially unreliable."*

*Because of this, FNI used the published sedimentation rate in the 2011 TWDB survey (published in 2013) and the 1986 survey, to update the 2020 and 2070 sediment conditions from the 2016 RWP. FNI previously reached out to TWDB staff about the approach to use for the 2021 Region F Plan for Red Bluff Reservoir and received confirmation of their consensus via email from Thomas Barnett (former TWDB Region F PM) on February 16, 2018.*

5. Appendix C, Table C-1 and Chapter 5, Table 5B-1. Table C-1 appears to report 2020 and 2030 municipal conservation strategy supplies for Winters that are inconsistent with DB22. For example, 2020 municipal conservation strategy supplies are reported as 8 acre-feet per year in Table C-1 and 17 acre-feet per year in DB22. Additionally, it is not clear from the plan if Table C-1 and Table 5B-1 present whole WUG municipal conservation strategy supplies or region split WUG supplies for Coleman County SUD and North Runnels WSC, which are split region WUGs. Please reconcile the information presented for Winters in Table C-1 and clarify in the plan if municipal conservation strategy supplies presented in Table C-1 and Table 5B-1 for Coleman County SUD and North Runnels WSC represent whole WUG or Region F WUG split municipal conservation strategy supplies in the final, adopted regional water plan. [31 TAC § 357.35(g)(1)]

**Response:** *Table C-1 was updated to show the correct values for Winters' conservation strategy and now matches both Table 5B-1 and DB22. Additionally, footnotes were added to denote when a WUG supply is split between multiple regions and to clarify that the numbers in the table represent the whole WUG supply.*

6. Chapter 5, Table 5B-3 and Appendix C, Table C-3 and Table C-4. Table C-4 appears to report capital costs for Millersview-Doole WSC, Sonora, and total water audit and leak repair strategy capital costs that are inconsistent with capital costs presented in Table 5B-3 and DB22. Additionally, it is not clear from the plan if Table 5B-3 and Table C-3 present whole WUG water audit and leak repair strategy supplies or region split WUG supplies for Brookesmith SUD, which is a split region WUG. Please reconcile the capital costs presented for Millersview-Doole WSC, Sonora, and Total in Table C-4 and clarify in the plan if water audit and leak repair strategy supplies presented in Table 5B-3 and Table C-3 for Brookesmith SUD represent whole WUG or Region F WUG split strategy supplies in the final, adopted regional water plan. [31 TAC § 357.35(g)(1)]

**Response:** *Capital costs for Millersview-Doole WSC and Sonora were updated in Table C-4 to be consistent with Table 5B-3 and DB22. Additionally, a footnote was added to Tables 5-3 and C-3 to denote when a WUG supply is split between multiple regions and to clarify that the numbers in the table represent the whole WUG supply (e.g. Brookesmith SUD).*

7. Pages 5D-15, C-50, D-36. Annual costs and strategy supplies for the Advanced Treatment (RO) of Paul Davis Well Field Supplies - Midland strategy appear to be inconsistently presented in the plan and DB22. Please reconcile as necessary in the final, adopted regional water plan. [31 TAC § 357.35(g)(1)]

**Response:** *Chapter 5D and Appendices C and D were updated to reflect the correct WMS supplies for the Advanced Treatment (RO) of Paul Davis Well Field Supplies – Midland. The unit costs in DB22 were also updated.*

8. Section 5B, Pages 5B-13 and 5B-14. It is not clear if the plan considered conservation plan(s) when recommending WMSs for water providers with irrigation needs. Please describe how conservation plans were considered when recommending WMSs to meet irrigation needs in the final, adopted regional water plan. [31 TAC § 357.34(i)]

**Response:** Chapter 5B, Section 5B.5 was updated to include the following clarifying sentence “All publicly available conservation plans were considered to develop the conservation strategies described in this subchapter.” This includes the development of conservation strategies to meet irrigation needs.

9. Chapter 5. 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]

**Response:** The Region F RWPG used a process to identify potentially feasible WMSs and it was presented to the RWPG at a public meeting and adopted in accordance with 31 TAC § 357.21(b). A memorandum documenting this process was added to the final plan as Appendix M. This appendix is referenced in Chapter 5A.

10. Chapter 5. Please clarify whether potentially feasible WMS were evaluated under drought of record conditions and document this information in the final, adopted regional water plan. [31 TAC § 357.35(a)]

**Response:** Chapter 5A Section 5A.1.2 was updated to include the following clarifying sentence “All potentially feasible strategies were evaluated under drought of record conditions.”

11. Chapter 5. Please include documentation of why aquifer storage and recovery was evaluated but not recommended for the Town of Pecos City. Additionally, 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)]

**Response:** Chapter 5E was updated to include an explanation of why aquifer storage and recovery was ultimately not recommended for the Town of Pecos City. “ASR is a future option for Pecos City if rapid population growth continues and it is needed. However, at this time, there are more cost-effective options available to meet the City’s needs and thus, ASR is not recommended.”

Chapter 5A Section 5A.1.1 was updated to include an explanation of why seawater desalination was not considered feasible (or selected as a recommended WMS) in Region F. “Seawater desalination was not deemed a feasible strategy type for Region F due to the long transmission distance and considerable cost.”

Brackish groundwater desalination was selected as recommended WMS in the Region F plan for Midland, Advanced RO Treatment and Expanded Use of Paul Davis Well Field, the Town of Pecos City, Advanced Groundwater Treatment. Brackish groundwater desalination is an Alternative WMS for BCWID #1, Odessa, and San Angelo. In each case brackish groundwater desalination was not selected, the entity has more cost-effective solutions available to meet their water

*needs. Discussion in Chapter 5D in each MWP's section was updated to specifically address why brackish groundwater desalination was not selected.*

12. Appendix C, pages C-23 to C-29. It is not clear in the plan if or how environmental flow standards were taken into account in calculation of yield for the Subordination of Downstream Water Rights WMS. Please clarify whether any projects related to the subordination strategy that would require environmental flow criteria being taken into account and document this information in the final, adopted regional water plan. [31 TAC § 357.34(e)(3)(B); 31 TAC § 358.3(22); 31 TAC § 358.3(23)]

**Response:** *Appendix C was revised to include the following sentence in the Subordination Technical Memorandum “No new water rights are required for implementation of the Subordination of Downstream Water Rights WMS and therefore environmental flow standards are not applicable and were not applied when calculating the yield available under the subordination strategy.”*

13. Appendix C, pages C-31 and C-38. The plan in some instances appears to include infrastructure components that are not required to increase the volume of supply for the WUG. For example, direct non-potable reuse strategy evaluations for Bangs and Pecos appear to include costs for an internal distribution network. Please document that the final, adopted regional water plan does not include reuse distribution lines directly to residences or commercial businesses. [Contract Exhibit C, Section 5.5.3]

**Response:** *The Pecos City direct reuse project will supply direct non-potable reuse water for irrigation at planned new development that would otherwise be supplied by potable supplies by the City. The project involves pipeline to the development but does not include internal distribution within the development. The development is considered the end user. This project does increase the volume of the supply to the WUG as shown in Table 5E-58; all infrastructure is required; and there are no internal distribution networks included. Appendix C was updated to document this.*

*The Bangs direct reuse project also did not include any cost for an internal distribution network. However, Bangs has implemented this project, so it has been removed as a WMS in the Final Region F Plan. Chapter 11 has been updated accordingly.*

14. Appendix C, page C-60. The evaluation for the CRMWD - Ward County Well Replacement project appears to include rehabilitation or replacement of existing water wells and pipeline. Please document that the final, adopted regional water plan does not include any strategies or costs that are associated with maintenance of infrastructure or that consist of upgrades to existing equipment that do not directly increase the volumetric water supply. [Contract Exhibit C, Section 5.5.3]

**Response:** *Appendix C was updated to add the following clarifying information: “A detailed hydraulic model and study of the well-field by Daniel B. Stephens quantified the expected decline in supply available from the Ward County Well Field with no action. As the volume available declines, new infrastructure will be necessary to increase the volumetric supply from the project.”*

15. Appendix C, page C-94. The Develop Pecos Valley Aquifer Supplies from Roark Ranch in Winkler Co - Midland County-Other WMS has an online decade of 2020 however, the associated WMS

project in DB22 indicates an online decade of 2030. Please reconcile the online decades for this WMS and associated project and ensure that projects necessary to implement strategies are online prior to or in concurrence with the WMS supply online decade in the final, adopted regional water plan. [31 TAC § 357.10(21); Contract Exhibit C, Section 5.2]

**Response:** Appendix C was updated to show a revised online decade of 2030 for the Develop Pecos Valley Aquifer Supplies from Roark Ranch in Winkler Co- Midland County Other WMS.

16. Appendix C, page C-115. Appendix C provides a placeholder evaluation for the West Texas Water Partnership strategy being developed by Midland, San Angelo, and Abilene. The plan notes that a study is being conducted to determine the most feasible strategy for the Partnership and notes that details of quantity, reliability, and cost are not currently available but are anticipated to be available prior to publication of the final plan. Please include quantitative results of the strategy evaluation in the final, adopted regional water plan and report the results in DB22. [31 TAC § 357.34(e)(3)(A)]

**Response:** Appendix C was updated to provide a quantitative description results of the West Texas Water Partnership WMS evaluation. This update was also carried forward throughout the final plan.

17. Appendix C, Appendix F Table F-2. Please enter complete data for all alternative WMSs and projects into DB22 and include all completed DB22 reports in the final, adopted regional water plan. [31 TAC § 357.35(g)(3); Contract Exhibit C, Section 5.7; Contract Scope of Work, Task 5A, 21e]

**Response:** All alternative WMSs and projects were entered into the DB22 and the DB22 reports were added to Appendix I.

18. Appendix C and Appendix F Table F-2. Please consistently present quantified information, including removal of "NA", for alternative WMSs in the final, adopted regional water plan and DB22. For example, in Appendix C (C-55), the implementation decade year for the Robert Lee Repair and Expand Water Treatment Plant WMS is presented as "NA", however Table F-2 presents supply for this WMS online in 2020; therefore, 2020 should be included in Appendix C rather than NA. [31 TAC § 357.35(g)(3)]

**Response:** Alternative WMSs are designated as 'Alternative' because they are not planned for implementation at this time. Thus, an online date is not entirely applicable. However, Appendix C and Appendix F Table F-2 have been updated to remove "NA" and add an online date that is feasible if the WMS were to become Recommended due to changed circumstances.

19. Appendix D. The plan does not appear to include costing tool output reports for the following WMSs: Additional Water Treatment - Mason, Develop Pecos Valley Aquifer Supplies - Grandfalls, and Develop Groundwater Supplies from Brown County - BCWID. Please submit the costing tool's standardized cost output report or present capital cost estimates for each project component for these WMS evaluations in the final, adopted regional water plan. [Contract Exhibit C, Section 5.5.1]

**Response:** Appendix D was updated to include costing reports for Additional Water Treatment - Mason, Develop Pecos Valley Aquifer Supplies - Grandfalls, and Develop Groundwater Supplies from Brown County – BCWID.

20. Section 6.8, page 6-14. The plan does not appear to provide an explanation as to whether there may be occasion prior to the development of the next IPP to amend the regional water plan to address all or a portion of the unmet municipal needs. Please provide an explanation as to whether there may be an occasion (e.g., anticipated modification of MAGs) to amend the plan to address unmet municipal needs in the final, adopted regional water plan. [31 TAC § 357.50(j)(3); Contract Exhibit C, Section 6.3]

**Response:** Chapter 6, Section 6.8 was updated to include the following clarifying discussion: “The Region F RWPG is unaware of any plans to amend the plan to address these unmet municipal needs. However, conditions may change and cause an entity to request such a change or the entity may choose to wait to incorporate any new information (such as modification of the MAGs) in the 2026 Regional Water Plans.”

21. Page 6-14, Table 6-5. The regional totals of unmet municipal needs presented in Table 6-5 for decades 2030 through 2070 appear to be inconsistent with the total unmet municipal needs reported in DB22 for these decades. Please reconcile as necessary in the final, adopted regional water plan. [31 TAC § 357.50(j)(3); Contract Exhibit C, Section 6.3]

**Response:** The regional totals of unmet municipal needs in Table 6-5 were updated to be consistent with the individual numbers above and DB22.

22. Chapter 7. The plan does not appear to include a discussion of whether drought contingency measures have been recently implemented (for example, since adoption of the last regional water plan) in response to drought conditions. Please describe this in the final, adopted regional water plan. [Contract Scope of Work, Task 7, subtask 3]

**Response:** Chapter 7 has been revised to include a new Section 7.2.2, ‘Recent Implementation of Drought Contingency Measures in Region F’ which includes this discussion.

23. Sections 7.5.3 and 7.7, pages 7-18 and 7-19. The plan notes that Region F developed model drought contingency plans (DCP) for municipal, irrigation, and industrial users and provides a web link to the model DCPs. At the time of plan review it does not appear that the model DCP for industrial users is available at the link provided. Please ensure all model plans are accessible if they are to be included only by online reference. [31 TAC § 357.42(j)]

**Response:** Section 7.5.3 was revised to only reference model drought contingency plans for municipal and irrigation uses. Both model DCPs are available at the link provided.

24. Appendix G, page G-16. Table G-3 lists Champion Creek Reservoir as a water source but does not identify any drought triggers or actions for managers or users of this source. Please clarify and include drought triggers and actions information for this source in the final, adopted regional water plan. [31 TAC § 357.42(c)(1)]

**Response:** Appendix G was updated to include generalized drought triggers and actions for managers or uses of Champion Creek Reservoir.

25. Chapter 10, Section 10.2. The plan notes that all meetings were held in accordance with the Texas Open Meetings Act but does not discuss compliance with the Texas Public Information Act. Please address how the planning group complied with the Texas Public Information Act in the final, adopted regional water plan. [31 TAC §357.21; 31 TAC § 357.50(f)]

**Response:** Chapter 10 was revised to include the following clarifying statement “Materials are also available for public request in accordance with TWDB rules and the Texas Public Information Act.”

26. 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)]

**Response:** Chapter 11, Section 11.2.6 was revised to clarify that the section includes a summary of changes to both Water Management Strategies and Water Management Strategy Projects.

<b>Level 2: Comments and suggestions for consideration that may improve the readability and overall understanding of the regional water plan.</b>
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1. Section 1.3.2, page 1-33, second column, first paragraph refers to Figure 1-16. Please update text to refer to Figure 1-18.

**Response:** Text was revised to refer to Figure 1-18.

2. Please consider adding a page number to page 3-4.

**Response:** A page number has been added to page 3-4.

3. Pages 3-6 to 3-8. Figure headers reference Figure 3-5, 3-6, and 3-7; however, figure legends note Figure 3-6, 3-7, and 3-8, respectively. Please consider revising figure headers and legends for consistency.

**Response:** Figure legends have been updated for Figures 3-6 to 3-8 to match the Figure headers.

4. Page 3-21. Table 3-1 contains a misspelling of Borden County. Please consider revising.

**Response:** The spelling of Borden County was revised in Table 3-1.

5. Page 3-36, Table 3-7. Please consider adding a footnote for Lake Balmorhea to clarify that the firm yield and safe yield values are based on minimum annual supply and are not derived from a WAM run.

**Response:** Table 3-7 was revised to include the requested footnote.

6. Page 3-36. Please consider expanding Table 3-7 to include yield for other decades (i.e., 2070).

**Response:** Table 3-7 was revised to also include the yields in 2070.

7. Section 3.2. Please consider clarifying how the reservoir projected rating curves for 2070 are derived.

**Response:** Section 3.2 was modified to include the following discussion “Reservoirs lose

*capacity over time due to sedimentation. For this reason, it is important to update the elevation-area-capacity relationship of the reservoir to reflect future sedimentation prior to calculating the future yield of a reservoir. In Region F, elevation-area-capacity relationships were derived for 2020 and 2070 conditions based on historical sedimentation rates using the average end-area method.”*

8. Page 4-8. The text in Section 4.1.2 refers readers to Appendix J for TWDB first and second tier needs reports. Volume 2 of the plan includes these reports in Appendix I. Please consider revising this in the final plan.

**Response:** *The text in Section 4.1.2 was revised to reference Appendix I.*

9. Pages 5D-19 identifies two alternative WMSs for Odessa: Development of Brackish Groundwater in Ward County and Development of Groundwater Near Fort Stockton. The strategy evaluations and cost estimates presented on pages C-63, C-65, D-40, D- 42, and E-15 refer to these alternative strategies by other names. Please reconcile this information as necessary in the final plan.

**Response:** *The WMSs names were reconciled to use consistent naming throughout the plan.*

10. Page C-90, D-33, 5E-32. Page C-90 provides a strategy evaluation for Kimble County manufacturing named Develop Edwards-Trinity Aquifer Supplies. It appears this strategy is referred to as Develop Ellenburger-San Saba Aquifer Supplies in several instances in the report, such as pages 5E-32, D-33, and DB22. Please reconcile as necessary in the final plan.

**Response:** *The WMSs name was reconciled to use consistent naming throughout the plan.*

11. Page 6-6. The text in Section 6.3 refers readers to Appendix G for the TWDB socioeconomic impact analysis. Volume 2 of the plan includes the socioeconomic analysis in Appendix H. Please reconcile as appropriate in the final plan.

**Response:** *Section 6.3 was revised to reference Appendix H for the socioeconomic impact analysis.*

12. Page 6-11, Table 6-2. The table lists water user group names in the column 2020 unmet irrigation needs. It appears that unmet irrigation needs may be shifted by a decade. Please revise as necessary in the final plan.

**Response:** *Table 6-2 was revised to correct this error and show unmet irrigation needs from 2020-2070.*

13. Appendix A. Please consider updating the Consistency Matrix to reflect updated rule references, based on amendments to 31 TAC Chapter 357 adopted by the TWDB Board on June 4, 2020.

**Response:** *Appendix A (Consistency Matrix) was revised to reflect the updated rule references, based on the amendments to 31 TAC Chapter 357 adopted by the TWDB Board on June 4, 2020.*

Barry Mahler, Chairman  
Marty H. Graham, Vice Chairman  
Scott Buckles, Member  
José O. Dodier, Jr., Member



David Basinger, Member  
Tina Y. Buford, Member  
Carl Ray Polk, Jr., Member  
Rex Isom, Executive Director

## **TEXAS STATE SOIL AND WATER CONSERVATION BOARD**

*Protecting and Enhancing Natural Resources for Tomorrow*

### **Texas State Soil and Water Conservation Board Comments on the Region F Initially Prepared Plan**

June 18, 2020

Mr. John W. Grant  
Region F Chair

Dear Mr. Grant;

For the past 2 years the Texas State Soil and Water Conservation Board (TSSWCB) has been participating in the Texas Water Development Board's (TWDB) Regional Water Planning meetings as directed by Senate Bill 1511, passed in the 2017 legislative session. We appreciate being included in the process and offer these constructive comments to the regional water plans and ultimately the State water plan. Attached you will find some specific comments to the Region F water plan as they pertain to the TSSWCB.

As you may know 82% of Texas' land area is privately-owned and are working lands, involved in agricultural, timber, and wildlife operations. These lands are important as they provide substantial economic, environmental, and recreational resources that benefit both the landowners and public. They also provide ecosystem services that we all rely on for everyday necessities, such as air and water quality, carbon sequestration, and wildlife habitat.

With that said, these working lands are where the vast majority of our rain falls and ultimately supply the water for all of our needs, such as municipal, industrial, wildlife, and agricultural to name a few. Texas' private working lands are a valuable resource for all Texans.

Over the years, the private landowners of these working lands have been good stewards of their property. In an indirect way they have been assisting the 16 TWDB's Regional Water Planning Groups in achieving their goals through voluntary incentive-based land conservation practices.

It has been proven over time if a raindrop is controlled where it hits the ground there can be a benefit to both water quality and water quantity. Private landowners have been providing benefits to our water resources by implementing Best Management Practices (BMP) that slow water runoff and provide for soil stabilization, which also slows the sedimentation of our reservoirs and allows for more water infiltration into our aquifers.

Some common BMPs include brush management, prescribed grazing, fencing, grade stabilization, irrigation land leveling, terrace, contour farming, cover crop, residue and tillage management, and riparian herbaceous cover.

The TSSWCB has been active with agricultural producers since 1939 as the lead agency for planning, implementing, and managing coordinated natural resource conservation programs for preventing and abating agricultural and sivicultural nonpoint sources of water pollution.

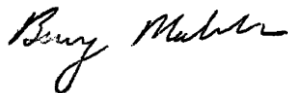
The TSSWCB also works to ensure that the State's network of over 2,000 flood control dams are protecting lives and property by providing operation, maintenance, and structural repair grants to local government sponsors.

The TSSWCB successfully delivers technical and financial assistance to private landowners of Texas through Texas' 216 local Soil and Water Conservation Districts (SWCD) which are led by 1,080 locally elected district directors who are active in agriculture. Through the TSSWCB Water Quality Management Plan Program (WQMP), farmers, ranchers, and silviculturalists receive technical and financial assistance to voluntarily conserve and protect our natural resources. Participants receive assistance with conservation practices, BMPs, that address water quality, water quantity, and soil erosion while promoting the productivity of agricultural lands. This efficient locally led conservation delivery system ensures that those most affected by conservation programs can make decisions on how and what programs will be implemented voluntarily on their private lands.

Over time, lands change ownership and many larger tracts are broken up into smaller parcels. Most new landowners did not grow up on working lands and therefore may not have a knowledge of land management techniques. The TSSWCB is writing new WQMPs for these new landowners who are implementing BMPs on their land. Education and implementation of proper land management and BMPs continues to be essential. Voluntary incentive-based programs are essential to continue to address soil and water conservation in Texas.

These BMPs implemented for soil and water conservation provide benefits not only to the landowner but ultimately to all Texan's and our water supply.

Respectfully,



Barry Mahler  
Chairman



Rex Isom  
Executive Director

Attachment

### L.3 Response to Texas State and Soil and Water Conservation Board (TSSWCB) Comments

- Page 5A-5

*“The WSEP’s purpose is to increase available surface and groundwater supplies through the selective control of brush species that are detrimental to water conservation.”*

- Unfortunately, the Water Supply Enhancement Program is not a funded program at this time.

**Response:** *Language was added to the final plan acknowledging that the Water Supply Enhancement Program (WSEP) is not funded at this time. However, Brush control is still identified as a potentially feasible water management strategy and project in the 2021 Region F RWP.*

- Page 5C-6

*“In 2011, the 82nd Legislature replaced the Brush Control Program with the Water Supply Enhancement Program (WSEP).”*

- Unfortunately, the Water Supply Enhancement Program is not a funded program at this time.

**Response:** *Language was added to the final plan acknowledging that the Water Supply Enhancement Program (WSEP) is not funded at this time. However, Brush control is still identified as a potentially feasible water management strategy and project in the 2021 Region F RWP.*

- Page 10-2; Table 10-2, Non-Voting Members of the Region F Water Planning Group

- Include Texas State Soil and Water Conservation Board (TSSWCB), Rusty Ray

**Response:** *Table 10-2 was revised to show Rusty Ray as a Non-Voting Member of the Region F Water Planning Group.*



June 15, 2020

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Commissioners

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Arch "Beaver" Aplin, III  
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Houston

Carter P. Smith  
Executive Director

Mr. John W. Grant, Chairman  
Region F Regional Water Planning Group  
c/o Colorado River Municipal Water District  
P.O. Box 869  
400 E. 24<sup>th</sup> Street  
Big Spring, Texas 79721

Re: 2021 Region F Initially Prepared Regional Water Plan

Dear Mr. Grant:

The Texas Parks and Wildlife Department (TPWD) has reviewed the 2021 Initially Prepared Regional Water Plan for Region F (IPP) and appreciates the opportunity to provide comments. Water impacts every aspect of TPWD's mission to manage and conserve the natural and cultural resources of Texas. Although TPWD has limited regulatory authority over the use of state waters, we are the agency charged with primary responsibility for protecting the state's fish and wildlife resources. 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 TAC §357 when preparing regional water plans. These water planning rules spell out requirements related to natural resource and environmental protection. Accordingly, as in previous planning cycles, TPWD staff reviewed the IPP with a focus on the following questions:

- Does the IPP include a quantitative reporting of environmental factors including 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 2016 Water Plan?

Relative to the 2016 Region F Regional Water Plan, the 2021 IPP anticipates a 12.8 percent decrease in future water needs by 2070, resulting in the net decrease of 31 water management strategies. Of note is the projected seven percent decrease in municipal per capita water use over the planning period, culminating in a reduction of the per capita water use to 163 gallons by 2070. Manufacturing demands are projected to be around 70 percent less as compared to the 2016 Plan and steam electric power demands are also less due to the removal of more speculative future steam electric demands. Livestock demands are

projected to be 30 percent lower than in the 2016 Plan due to a revised methodology. In contrast, mining demands, which include oil and gas development in the Permian Basin, are projected to nearly double as compared to the 2016 Plan. Recent trends suggest this assumption may need to be revisited in the future.

Water conservation, the most environmentally benign water management strategy, is recommended for meeting 35 percent of the Region's water needs by 2070. Other strategies include new groundwater development including brackish groundwater desalination, water reuse and voluntary redistribution of water supplies. Water reuse can also be environmentally beneficial as long as reuse strategies do not further exacerbate streamflow deficits since return flows augment low flows during drought. TPWD concurs with the Region F IPP that disposal of brine concentrate from brackish water desalination discharged to surface water may have unacceptable environmental impacts in some cases. Disposal of concentrate by deep well injection is one preferred approach to minimize impacts to fish and wildlife resources. According to the Region F IPP, one of the most significant water management strategies continues to be subordination of senior water rights developed in conjunction with the Lower Colorado Region (Region K), which reserves over 52,000 acre-feet of surface water for use in Region F in 2070. As noted in Appendix E, the subordination of downstream water rights may have an environmental impact because water will be used upstream and will decrease the amount of water that is available downstream.

As in the 2016 Plan, Chapter 1 includes a description of natural resources in the region, recognizing the importance of natural resources, especially aquatic resources like springs and streams, as well as water-oriented recreation. The IPP identifies 14 major springs in the region that are important for water supply and natural resources protection. These major springs include: San Solomon, Giffin, Sandia, Comanche, Diamond Y, Spring Creek, Dove Creek, Rocky Creek, Anson, Lipan, Kickapoo, Clear Creek, San Saba Springs and Santa Rosa Springs. The IPP includes descriptions of these springs and acknowledges the importance of Diamond Y Springs and the Balmorhea Spring complex as important habitat for endangered species. The IPP also discusses the impacts groundwater development, brush infestation, and climatic conditions have had on springs, noting Comanche Springs now only flows occasionally. Table 1-12 lists federal and state threatened or endangered species that occur in Region F. As there have been recent updates (March 30, 2020) to the list of federal and state listed species we recommend table 1-12 be updated with the latest information that is available at:

[https://tpwd.texas.gov/huntwild/wild/wildlife\\_diversity/nongame/listed-species/](https://tpwd.texas.gov/huntwild/wild/wildlife_diversity/nongame/listed-species/).

The IPP includes a brief discussion of water-related threats to natural resources, noting that reservoir development and invasion by brush and giant reed have altered natural stream flow patterns in Region F. The IPP also acknowledges that spring flows in Region F have been greatly diminished or dried up due to groundwater development, the spread of high water use plant species, and the loss of native grasses and other plant cover. These threats have also combined to reduce reliable flows for many tributary streams. Reservoir development has altered natural hydrology by diminishing flood flows and capturing low flows. The IPP acknowledges that any future reservoir would be managed to provide instream flows. TPWD acknowledges Region F's environmental policy recommendations as discussed in Section 8.1 and concur with the Region's position that good stewardship of

land resources will also protect water resources and that water development must be balanced with protection of environmental values.

The IPP addresses consistency with protection of natural resources. According to the IPP, none of the recommended water management strategies are expected to impact threatened or endangered species but some strategies may require site-specific studies to verify that no impacts will occur. In addition, seven state parks (Lake Brownwood, Big Spring, Lake Colorado City, Monahans Sandhills, San Angelo, Balmorhea and South Llano River) and one state wildlife management area (Mason Mountain) located in Region F are not expected to be impacted by the recommended strategies and could possibly benefit from adequate water supplies. The RWPG recommends recycling water from oil and gas operations as a way to significantly reduce water usage.

Approximately 87 percent of the water used in Region F is supplied by groundwater. Irrigation is by far the largest groundwater user in the region. TWDB planning rules require that recommended water management strategies may not exceed the Modeled Available Groundwater (MAG) values that were determined to meet the desired future conditions (DFCs) of the groundwater source. By not exceeding the MAG, long-term effects on groundwater and surface water interrelationships were minimized since these complex relationships are considered by the Groundwater Management Area (GMA) when selecting the DFCs. While the Region F IPP does not include any as recommended any strategies that exceed the MAG, there are several listed as alternative water management strategies in counties without groundwater districts. One GMA in Region F has set a DFC that addresses maintenance of spring flows. In GMA7, average drawdown is projected to be 7 feet except within Kinney County GCD. Kinney County drawdown will be consistent with maintaining annual average flow of 23.9 cubic feet per second and median flow of 24.4 cubic feet per second at Los Moras Springs. Ultimately TPWD would like to see other GMAs adopt additional DFCs designed to protect other springs.

As in the past, the Region F IPP includes a description of natural resources and threats to natural resources due to water quantity or quality problems. Each of the water management strategies discussed in Chapter 5 has a short description of associated environmental issues. Potential impacts to sensitive environmental factors including wetland acres impacted, environmental water needs, threatened and endangered species, unique wildlife habitats, and cultural resources. According to the IPP, in most cases, a detailed evaluation could not be completed because previous studies have not been conducted or the specific location of the new source (such as a groundwater well field) was not identified. Therefore, a more detailed environmental assessment will be required before a strategy is implemented. Appendix E includes a Strategy Evaluation Matrix and Quantified Environmental Impact Matrix. Environmental categories including number of habitat acres impacted, environmental water needs, threatened and endangered species, water quality and cultural resources are quantitatively assessed and assigned a ranking from 1 to 5, with 1 being most impact and 5 being least or positive impact. All strategies achieved an overall score of either 3 or 4.

Model drought contingency plans (DCPs) identifying four drought stages (mild, moderate, severe and emergency) are included in the IPP as well as water-body specific DCPs for existing reservoirs, groundwater and run-of-river supplies. This planning cycle Region F

also addressed new recommendations from the Drought Preparedness Council advising region-specific drought contingency plans for all water use categories that account for more than 10 percent of water demands in any decade.

As in previous plans, the 2021 Region F IPP does not include recommendations for designation of ecologically unique stream segments due to concerns that there is some level of protection beyond prevention of reservoir development. Furthermore, the IPP states there will not be any nominations of stream segments as ecologically unique until TPWD completes comprehensive studies. TPWD looks forward to future discussions to explore the nature of these studies and appreciates the inclusion of this statement in the IPP:

*"The Region F Water Planning Group recognizes the ecological benefits of major springs, which are discussed in Chapter 1, and the benefits of possible protection for these important resources. Several of the potential ecologically significant streams identified by TPWD are springs or spring-fed streams. The list includes springs that provide water to water supply reservoirs and/or ecologically sensitive species. The South Llano River in Kimble County, which is spring-fed, is an important water supply source for the City of Junction and Kimble County water users and may warrant additional protections. Other important stream segments include the South Concho River and Dove Creek. Both are spring-fed streams that flow into Twin Buttes Reservoir, which is a major water source for the City of San Angelo. The Region F Water Planning Group will reconsider the possible designation of unique streams for the 2021 water plan."*

We appreciate the opportunity to provide these comments. While TPWD values and appreciates the need to meet future water supply demands, we must do so in a thoughtful and sound manner that ensures the ecological health of our state's aquatic and natural resources. If you have any questions, or if we can be of any assistance, please feel free to contact me at 512-389-8715 or [Cindy.Loeffler@TPWD.Texas.gov](mailto:Cindy.Loeffler@TPWD.Texas.gov).

Sincerely,

*Cindy Loeffler*

Cindy Loeffler  
Chief, Water Resources Branch

Cc: Craig Bonds, Division Director, Inland Fisheries Division, TPWD  
Clayton Wolf, Division Director, Wildlife Division, TPWD  
Nathan Rains, Wildlife Division, TPWD

## L.4 Response to Texas Parks and Wildlife Department (TPWD) Comments

- *"There have been recent updates (March 30, 2020) to the list of federal and state listed species we recommend table 1-15 be updated with the latest information."*

**Response:** *The list of threatened or endangered species in Table 1-12 was updated with the latest information published after the publication of the Initially Prepared Plan. In addition, the latest list of threatened and endangered species was incorporated into evaluating the scores for all water management strategies in the Environmental Impact Matrix (Appendix E).*