



10

Public Participation and Adoption of Plan



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10 Public Participation and Adoption of Plan

10.1 Public Participation

The Brazos G Regional Water Planning Group (BGRWPG) provided considerable opportunity for the public to participate in the planning process. Notices and meeting agendas were posted prior to each meeting in accordance with State law, and these and other meeting materials were posted on the BGRWPG website (www.brazosgwater.org) as they became available prior to each meeting. The public was invited to speak during public comment periods during each planning group and committee meeting. In addition, stakeholders were often invited to participate in planning group and committee meetings (as formal items of the meeting agenda) to present information to the planning group that was pertinent to issues the planning group was considering.

The BGRWPG formally adopted its process for identifying, evaluating and selecting water management strategies on January 26, 2012 and included opportunities for public input during the development of the scope of work to develop the 2016 Plan.

The BGRWPG held three sub-regional meetings in March 2015 to solicit comments on the draft WUG and WWP plans prior to development of the Initially Prepared Plan. These meetings were held in Abilene on March 24, 2015 (Upper Subregion), in Waco on March 25, 2015 (Middle Subregion), and in College Station on March 26, 2015 (Lower Subregion).

As described below, the BGRWPG held a public hearing on June 23, 2015 to receive comments from the public on the Initially Prepared Plan.

10.2 Brazos G Regional Water Planning Group Website (www.brazosgwater.org)

The BGRWPG has directed the Brazos River Authority (BRA) to maintain a website where meeting notices, agendas, and presentation materials may be viewed by the public. In addition to meeting materials, the 2001, 2006 and 2011 Brazos G Regional Water Plans are posted for public viewing and download, as well as documents from planning process for the 2016 Plan. The website offers other features including member contact information, planning area maps, planning data, and audio transcripts of meetings.

10.3 Coordination with Water User Groups and Wholesale Water Providers

The BGRWPG coordinated with multiple water user groups, wholesale water providers, county judges, and councils of governments in the region regarding population and water demand projections developed by the Texas Water Development Board (TWDB), groundwater and surface water availability estimates, proposed water management strategies, and recommendations for sites uniquely suited for reservoir construction.

Representatives from the BGRWPG met with representatives from multiple entities in Williamson County on January 21, 2015 and March 16, 2015 to discuss options available to address large water needs in that county. At those meetings, various options were presented and the representatives prioritized those water management strategies they considered most desirable. The resulting plans for entities in Williamson County reflect the outcome from those meetings.

Surveys were disseminated to water user group and wholesale water providers to obtain input regarding draft population and water demand projections and current sources of supply (March/April 2013), draft water needs and strategies to supply those needs (October 2013), implementation of water management strategies recommended in the 2011 Brazos G Regional Water Plan (June 2015), and infrastructure financing recommendations for water management strategies recommended in the 2016 Plan (TBD).

The Brazos G technical consultant worked closely with 30 water user groups during May – July, 2013 to refine or correct information used by the TWDB to determine per capita water use (gpcd) values used to project municipal water demands.

Draft plans for each water user group and wholesale water provider were presented to water user groups and wholesale water providers at the three subregional meetings held in January. In addition, the Initially Prepared 2016 Plan was provided to county libraries and county clerks in all Brazos G counties, and posted on the Brazos G website for public review and comment.

10.4 Coordination with Other Planning Regions

Coordination with other planning regions was accomplished primarily through the technical consultants, who coordinated data and shared information that was later reported to the planning groups. Coordination was accomplished with the technical consultants from Regions B, C, F, H, K, L and O.

10.5 Brazos G Regional Water Planning Group Meetings

The BGRWPG held 51 public meetings (note: need BRA to confirm number) during the 2016 planning cycle, between March 1, 2011 and December 31, 2015, including regular meetings of the full planning group; periodic meetings of the Executive, Scope of Work, and Finance Committees; and periodic meetings of the Water Policy Workgroup.

10.6 Public Hearing and BGRWPG Responses to Public Comments on Initially Prepared Plan

The BGRWPG held a public hearing on June 23, 2015 to receive comments concerning the Initially Prepared 2016 Brazos G Regional Water Plan. The oral comments received can be heard from the audio transcripts on the BGRWPG website (www.brazosgwater.org), and a transcript of the public hearing can be viewed at the same location. At the public hearing, XX (note: need BRA to confirm number) members of the public provided oral comments and/or submitted written comments to the planning group concerning various aspects of the plan, predominantly focused on the

proposed Little River Off-Channel Reservoir. Written comments were received from several individuals that mirror or expand upon their oral comments.

Following the June 23, 2015 public hearing, written public comments were received by the planning group through August 24, 2015. Additional comments were received from the Texas Water Development Board and the Texas Parks and Wildlife Department. No comments were received from federal agencies.

The following section summarizes the public comments received and the responses of the BGRWPG. Comments are summarized in *italics*, with the response from the BGRWPG following in regular type. Copies of written comments received and a transcript of the public hearing are included in Appendix I. When duplicate written information was provided by different parties in support of written comments, only one copy of the duplicate document is included in the appendix.

Comments Received Opposing Inclusion of the Little River Off-Channel Reservoir in the 2016 Brazos G Regional Water Plan (oral and written comments)

Numerous comments were received in opposition to the Little River Off-Channel Reservoir. Those providing comments in opposition to the proposed reservoir are listed below. This list was compiled from signatories of hard copy and email comments received by the Brazos River Authority, and from the record of those making oral comments at the June 23, 2015 public hearing in the Initially Prepared Plan. In addition, opponents presented the results of a hard copy petition and a petition on the Change.org website, with a combined total of 2,442 signatures reported by the organizers.

Note to Brazos G members: this list does not include all of the people making oral comments at the public hearing on June 23. I am waiting for the transcript from BRA to make sure this list reflects all of the oral commenters.

- Milam County Commissioners Court
- Gause Independent School District Board
- Milano City Council
- 22 Hills Homeowners' Association Architectural Control Committee, Gause, TX
- Patsy Alford, Gause, TX
- Elaine Shafer Baumann, Gause, TX
- Eugene and Elaine Baumann, Gause, TX
- Curtis Chubb, Ph.D., Milam County, TX
- Joyce and Mike Conner, Gause, TX – written comments
- Cindy and James Delulio, Calvert, TX
- Dan Fischer, Gause, TX
- Sherry Hughes Garner
- Don & Lynn Hagan, Gause, TX
- Tommi Ivey
- Steven Gonzales, Executive Director, El Camino Real de los Tejas National Historic Trail Association
- Robert W. Knight, Ph.D., Texas A&M University

Gary, Lisa, Sara and Scott Kornegay
Julie Kornegay
Mary Lou Kornegay
Michael Wayne Kornegay, Gause, TX
Steve and Cathy Lazarus, Calvert, TX
Judy Marks, Gause, TX
Allison Shafer Riherd
Reece Riherd
Parker Riherd
Deborah, Jerrod, Graham and Sean Russell, Tomball, TX
Norma Schroeder Schendel, Yorktown, TX
Arlene Schroeder, Yorktown, TX
Clay Shafer
Frank A. Shafer, Franklin, TX
Harold C. and Susan Shafer
Kyle Shafer
Philip Shafer
Watson Hubert & Opal Shafer, Gause, TX
William Shafer
Melissa Shehane, College Station, TX
Amanda and John Sulzbach, The Woodlands, TX
Colby Theis, Robertson County, TX
Cathy Tooley
Marion Brewer Travis, Cameron, TX
Kathy and V.V. Turner, Gause, TX
James and Mary Waldson
Carl and Stephanie Wall
Frank Louis Wall II
Irma Andrea Wall
Maria Elizabeth Wall
Stephanie Wall
Melvin F. Wall, Gause, TX
Gary Westbrook, General Manager, Post Oak Savannah GCD, Milano, TX
Benjamin Whittington
Jacob Whittington
Jerald Wise P.E. (Ret), Cameron, TX

1. *Each commenter identified above requested removal of the Little River Off-Channel Reservoir from the 2016 Brazos G Regional Water Plan as a recommended water management strategy.*

Response Option 1. The project has been removed from the 2016 Plan and is no longer a recommended water management strategy.

Note to Brazos G Planning Group members. If option 1 is selected by the planning group, then a response to the various individual comments is not necessary and the rest of this section can be omitted from the final plan. However, if the planning group opts to retain the Little River OCR in the plan (Response Option 2), then the following will be necessary to include in the text of the plan.

Response Option 2. The Brazos G Regional Water Planning Group understands the concerns voiced regarding the Little River Off-Channel Reservoir. However, at this time, the planning group believes it is prudent to continue the project as a recommended water management strategy in the 2016 Brazos G Regional Water Plan. Many of the issues put forth by opponents of the project are more appropriately dealt with during state and federal permitting processes and not during the regional water planning process. At this time, no entity has been identified as wishing to pursue the project, but if that should happen, environmental, cultural resource and technical issues will need to be addressed in much greater depth than is done during the regional water planning process. Retaining the project in the plan facilitates the opportunity to receive state funding to study the project further and provide greater definition of the impact of the issues identified by the project's opponents. If the project is not a recommended water management strategy in the plan, then state funding for those studies will not be available. These further studies will determine with greater certainty whether the project is, in actuality, feasible to develop or not. If the project is removed from the regional water plan, there is no certainty that it won't be recommended in some future regional water planning cycle. By allowing the project to remain as a recommended water management strategy in the 2016 Plan, the opportunity will remain for any entity wishing to pursue the project to obtain state funding for the in-depth technical studies necessary to determine the actual viability of the project. These studies would include a more detailed alternative siting analysis, where sites other than the one identified in the plan would be investigated more fully.

Many of the comments opposing the reservoir focus on one or more common themes or technical arguments. Each of these is summarized below, followed by the BGRWPG's response. Note that numbers assigned to the comments are solely for organizational purposes.

2. Remove designation of the Little River Off-Channel Reservoir as a Unique Reservoir Site.

The Texas Legislature is responsible for designating Unique Reservoir Sites, and usually does so upon the recommendation of one or more regional water planning group and/or the Texas Water Development Board. The Brazos G Regional Water Planning Group has not recommended that the Little River Off-Channel Reservoir be designated as a Unique Reservoir Site. The Brazos G Regional Water Planning Group only recommends such designation when requested by a project sponsor. The Region H Water Planning Group has recommended that the project be designated as a Unique Reservoir Site in the 2011 Region H Plan and in the 2016 Initially Prepared Region H Plan. Requests to remove that designation should be made to the Region H Water Planning Group, the Texas Water Development Board, and the Texas Legislature.

3. Remove the Little River Off-Channel Reservoir from evaluation in future water plans.

The Brazos G Regional Water Planning group cannot guarantee that the project won't be evaluated in future regional water planning cycles. The Brazos G Regional Water Planning Group has no authority to prevent future members of the Brazos G Regional Water Planning Group from evaluating the project during future planning cycles or to prevent other regional water planning groups from evaluating the project.

4. *The proposed Little River Off-Channel Reservoir will inundate multiple cultural resources, including the Pin Oak Cemetery, designated an Historic Cemetery by the Texas Historical Commission, numerous family homesteads including Texas Department of Agriculture Family Land Heritage Program designations, Native American artifacts and a portion of the El Camino Real de los Tejas, a National Historic Trail.*

The BGRWPG recognizes that the proposed reservoir will inundate numerous areas with cultural and archeological significance. This is an unfortunate consequence of constructing almost any reservoir project, and was a consequence of constructing the numerous reservoirs upon which the citizens of Texas depend for water supply for municipal, manufacturing, energy production and agricultural purposes. Those issues are addressed fully during the federal permitting process and will require appropriate mitigation for the impacts of the proposed project. Many of the impacts identified by the commenters, i.e., the Pin Oak Cemetery, are identified in the technical evaluation of the project.

The portion of the El Camino Real de los Tejas within the area that would be inundated by the reservoir is largely on private property, and there is no public park system or other public access to view or otherwise visit this portion of the historic route.

5. *The proposed Little River Off-Channel Reservoir will inundate areas having substantial natural resource value, and this loss of habitat will negatively impact area wildlife as well as permanently destroy areas of natural beauty, such as dogwood forests and pristine streams. Maps do not show what land will be used for environmental mitigation.*

The BGRWPG recognizes that the proposed reservoir will inundate these areas and have these impacts to area wildlife. Similar to cultural resource impacts, this is an unfortunate consequence of reservoir construction. Those issues will be addressed fully during the federal permitting process and will require appropriate mitigation for those impacts. This mitigation will be provided on a greater than one-for-one basis (multiple acres of mitigation will be required for each acre impacted), and will provide for permanent, legacy protection of those mitigation areas. Those mitigation areas will be identified during the federal permitting process and may include established mitigation banks. Identification of those mitigation areas is outside the scope of the regional water planning process.

6. *The proposed Little River Off-Channel Reservoir is not needed to meet the needs of Williamson County – other water management strategies can be recommended to meet those demands, such as additional conservation, aquifer storage and recovery projects, groundwater development, more aggressive levels of wastewater reuse and ocean water desalination.*

The Brazos G Regional Water Planning Group coordinated with entities in Williamson County, who requested that the Little River Off-Channel Reservoir be recommended to meet future water needs for entities in Williamson County. This is not the only strategy recommended to meet water needs in Williamson County. Other strategies

recommended include developing water from the Highland Lakes, reuse, and aquifer storage and recovery associated with overdrafting of Lake Granger. Additional advanced conservation was also recommended for those entities having per capita water use rates greater than 120 gpcd to achieve that level within the planning horizon, while the target for the rest of the Brazos G Area is 140 gpcd. Only limited additional groundwater development can be recommended in the plan for any of the aquifer systems near Williamson County (including Milam County) because of limitations imposed by the estimates of the Managed Available Groundwater (MAG) for those aquifer systems.

- 7. The proposed Little River Off-Channel Reservoir would impart a large increase on the BRA's system rate, and would produce a large cost on users of the supply. The costs for the project are much more expensive than other alternatives, such as the Allens Creek Reservoir.*

The BRA is identified as the project sponsor in the 2016 Plan by default because no entity has requested to be identified as the project sponsor. The impact of the project on BRA's system rate would be determined when and if the BRA decided to pursue the project. The BRA has no current plans to develop the project. Costs for the project would need to be borne by the end users of the water supply. Any reservoir project is expensive, and will have a large impact on the end users' water rates. Perhaps those costs, as shown in the plan, would provide additional motivation for specific end users to pursue conservation to a more aggressive level, reducing the need for the reservoir project.

- 8. Specific errors or anomalies have been identified with regard to how supplies are assigned from the Little River OCR to various water user groups and the Brazos River Authority. Additionally, a completion date of 2020 appears unrealistic and should be changed to 2050 or later.*

These technical items have been reviewed and the values corrected, as necessary.

- 9. Supplies from the proposed Little River Off-Channel Reservoir will be used to meet demands for Williamson County entities only, and therefore, any recommended strategy should be located in Williamson County. The citizens of Milam County would not benefit from supplies from the proposed reservoir.*

Supplies from the proposed Little River Off-Channel Reservoir are identified in the plan to supplement supplies available from the Brazos River Authority (Lakes Belton, Stillhouse Hollow, Georgetown and Granger), and from groundwater sources. The plan addresses specific water user groups in Williamson County. However, entities in Milam County also receive supplies from the BRA system through the Central Texas WSC, including the Town of Buckholts, Bell-Milam-Falls WSC, Little Elm Valley WSC, and Salem-Elm Ridge WSC. Although this is not specifically identified in the plan, these utilities would benefit from the proposed reservoir by reducing dependence on the limited supplies from the existing BRA reservoirs. Additionally, future steam-electric demands in Milam County are identified in the plan to be supplied from the reservoir.

- 10. The water demands for Williamson County are overstated and the reservoir is not needed.*

The population of Williamson County is expected to increase from the 2010 census of 211,306 persons to 705,691 persons in 2030 and 1,523,206 persons in 2070. These projections were developed by the Texas State Demographer and accepted by entities in Williamson County. Water demand projections for water user groups in Williamson County reflect this dramatic population increase, but also reflect conservation through the

increased use of water efficient plumbing fixtures. Williamson County entities requested that the plan include additional advanced conservation as a strategy to achieve a water conservation goal of 120 gpcd rather than the standard goal of 140 gpcd used for the rest of the Brazos G Area.

11. The proposed Little River Off-Channel Reservoir is located above the recharge zone of the Carrizo-Wilcox Aquifer and the reservoir will be unable to hold water, if constructed. This will cause degradation of the water quality in the aquifer because Brazos River has lower water quality than the native water in the aquifer.

Any impacts of locating the reservoir above the recharge zone of the Carrizo-Wilcox Aquifer would be determined through a detailed study to determine if that would preclude the reservoir from long-term retention of water. Simply locating the reservoir atop a recharge zone would not necessarily prevent the reservoir from holding water long-term, as any leakage might reduce over time. Long-term leakage would be a function of reservoir depth, aquifer properties, and other factors that might influence the rate of migration of water into the underlying aquifer. Any impacts to the water quality of the Carrizo-Wilcox Aquifer would likely be localized, and would be a function of the long-term leakage rates from the reservoir to the aquifer.

12. Other sites for the proposed Little River Off-Channel Reservoir should have been investigated.

This specific site for the Little River Off-Channel Reservoir has been identified in the regional water planning process since the first planning cycle that developed the 2001 Plan. No other sites have ever been suggested for the project, and no detailed alternative siting analysis has been performed. A detailed review of other potential sites would most likely be one of the first priorities should a project sponsor be identified that is interested in pursuing the Little River Off-Channel Reservoir.

13. The proposed Little River Off-Channel Reservoir will destroy the investments made by previous and current landowners to improve their property.

Loss of sometimes multi-generation held property is an unfortunate consequence when constructing large public infrastructure projects such as reservoirs. Appropriate economic compensation should be made for the property and improvements, although the Brazos G RWPG recognizes that the value of the property lost cannot be measured in purely economic terms.

14. The proposed Little River Off-Channel Reservoir will destroy parts of FM 2095 and impair access to the City of Cameron by citizens of the communities of Gause and Hanover.

FM 2095 will need to be re-routed around the reservoir or the reservoir might be located a distance upstream to avoid impacting FM 2095.

15. The proposed Little River Off-Channel Reservoir will have an adverse affect on the tax bases of the Gause Independent School District, the Milano Independent School District, and Milam County.

Development of the reservoir will remove roughly 4,400 acres (6.875 square miles) from the tax rolls. The impact of this on the tax base of the two school districts and the county are not determined as part of the regional water planning study. The total area of Milam County is 1,022 square miles, so the area of the reservoir represents roughly 0.67 percent (a little more than half a percent) of the total land area in the county.

16. The proposed Little River Off-Channel Reservoir will cover agricultural lands protected by the federal Farmland Protection Policy Act.

The Farmland Protection Policy Act is intended to minimize the extent to which Federal programs “contribute to the unnecessary and irreversible conversion of farmland to nonagricultural uses.” The act directs the Department of Agriculture and other Federal agencies to take steps to assure that the actions of the Federal Government do not cause farmland to be irreversibly converted in cases in which other national interests do not outweigh the benefits of maintaining farmland resources. The Little River Off-Channel Reservoir would not be a project developed by the Federal Government and is unlikely to be impacted by this legislation.

17. The proposed Little River Off-Channel Reservoir would provide no significant recreational or economic value to the citizens of Milam County.

Recreational use for the reservoir likely will be allowed, but that decision would be made by the project sponsor who would own and control the rights to the reservoir’s use.

18. The TWDB has new requirements for water conservation content to be included in the Plans including directives...to assess the highest level of water conservation and efficiencies achievable, report the resulting projected water use savings in gallons per capita per day, and develop conservation strategies based on this information. The IPP...fails to report any savings from water conservation for the entities in Williamson County that are to receive water from the Little River Off-Channel Reservoir. Please break this information out as required.

Conservation savings are documented for each of the Williamson County municipal WUGs identified to receive water from the Little River Off-Channel Reservoir. These include Brushy Creek MUD, Chisholm Trail SUD, City of Georgetown, City of Round Rock and Williamson County-Other. Conservation (140 gpcd) savings are documented in Volume II, Section 2.1.3 and additional advanced conservation (120 gpcd) savings are documented in Volume II, Section 2.1.4.

19. There would be little water available to fill the reservoir. It will seldom be full and most of the time would be quite low.

Water available to the project was determined using the Brazos River Basin Water Availability Model (Brazos WAM), as stipulated by Texas Water Development Board planning rules. A storage trace showing how the reservoir would perform over a historical period of record analysis is included in the technical evaluation of the project in Volume II, Figure 4.7-8, page 4.7-7.

20. Please remove from the plan all identified off-channel reservoir sites.

Most of the off-channel reservoir sites identified in the technical evaluations in Volume II are not recommended strategies, but were potentially feasible alternatives that were considered and evaluated, but not recommended. These are potentially feasible water management strategies that were evaluated during the process of developing the 2016 Plan and should remain documented as such in the report.

21. Milam County OCR should be preferred over the Little River OCR because it is a smaller, less expensive project and would have fewer negative environmental impacts. The Milam County OCR could also replace the Peach Creek OCR (specific comment from Mr. Theis)

The Milam County OCR is not the preferred option because it doesn't generate sufficient supply. Future evaluations of alternative sizes for the project may prove that the Milam County OCR is the more preferred option. However, evaluation of multiple iterations of the project was outside the scope of this planning study. The Peach Creek OCR was evaluated, but is not a recommended water management strategy in the 2016 Plan.

22. Impacted areas where projects are located should be notified when projects are included that affect them.

The Brazos G Regional Water Planning Group posts public notices of all of its meetings. In addition, the planning group disseminates the Initially Prepared Plan to each county clerk and a public library in each county in the planning area. The planning group holds a public hearing on the Initially Prepared Plan to obtain public input, with the intention that comments on the Initially Prepared Plan will be considered and incorporated as appropriate into the final plan. It is outside the scope of the regional water planning group's mission to research and notify each property owner potentially affected by the numerous water management strategies recommended in the plan. That notification occurs when a project is actually pursued by a water supply entity and detailed plans are developed so that a more accurate determination can be made of property owners that might be affected by a particular project.

23. Use of "place holder" strategies that will never be built wastes the state's resources and misrepresents the state's water balance.

Several alternatives exist by which regional water planning groups can account for how projected water needs will be met. One alternative is to assume in the plan that certain water needs will go unmet. Another alternative is to include a potentially feasible water management strategy in the plan to meet the projected needs. Another alternative is to include more than one strategy to meet a projected need with the expectation that future detailed evaluations will identify the preferred alternative. Readers should recognize that the strategies recommended are a plan, nothing more and nothing less, and nothing is binding regarding the strategies or the water user groups and wholesale water providers for which they are recommended.

24. Environmental impacts of the proposed reservoir have not been fully determined, including downstream riparian impacts due to modified river flow regimes.

Those detailed evaluations are outside the scope of the evaluations required for the regional water planning process. If a project sponsor elects to pursue permitting of the Little River Off-Channel Reservoir, those detailed evaluations will be made as part of the rigorous state and federal permitting process.

25. Use of GAM and WAM values appear to not be widely accepted amongst all users. Models and water availability estimates used in the planning process should be accepted by all stakeholders.

It would be impossible to achieve acceptance of every aspect of each model from each stakeholder as part of the regional water planning process. The GAM and WAM models used in the planning process are stipulated by Texas Water Development Board rules, and are considered to be the standards by which water supplies are to be evaluated.

26. Utilizing the lowest annual rainfall year to determine the amount of water needed is a flawed approach because it proposes a solution to a problem that has an extremely

low probability of existing. Planning should be based on what is probable, not a worst case scenario.

Hydrology in Texas is highly variable and is characterized by extremes. The Texas Legislature established that all water demands in regional water planning be based upon what is needed in a “dry” year, but not necessarily the driest year on record. Water demands in the Brazos G Area are based on that dry year methodology.

Similarly, supplies are to be developed based on drought of record analysis, i.e., how much water would be available throughout a repeat of the drought of record. The drought of record is based upon recorded historical observations, which represent a relatively short period of time, often less than 100 years. We know that there have been pre-historic periods that appear to have been much drier than what is generally accepted as the drought of record. Because drought periods in Texas span multiple years, water supplies need to be developed that allow for supply to be maintained through sequences of dry years. The need for water is so critical, that prudence calls for planning to meet water demands through a drought of record period.

27. Inclusion of the reservoir location in the water plan unnecessarily encumbers the affected landowners because the land is at risk for condemnation in the future. This has a negative effect on any landowner attempting to sell property.

The Brazos G Regional Water Planning Group understands and sympathizes with those land owners whose property is identified as being within areas shown to be impacted by the project. If the project were being pursued definitely by a project sponsor, it would be appropriate to show the project area to a level of detail that individual properties might be identified because the project sponsor would already have completed a more detailed site alternatives analysis and been in communication with those property owners affected. Conversely, in the absence of a project sponsor, the Brazos G Regional Water Planning Group believes it would be better to simply describe a project as being “in the vicinity” of Milam County without identifying a specific project footprint on a map because there is less definition of the project and the actual project might eventually be located miles or more from the location shown in the plan. However, Texas Water Development Board planning rules require that a footprint of the proposed project be shown in the plan.

Comments Received Supporting Inclusion of the Little River Off-Channel Reservoir in the 2016 Brazos G Regional Water Plan

Numerous comments were received in support of the Little River Off-Channel Reservoir. Those commenting in support of the proposed reservoir are listed below.

Dale Ross, Mayor, City of Georgetown, TX

Several officers of the Chisholm Trail SUD

Board of Directors, Lone Star Regional Water Authority, Jarrell, TX

David L. Mann, Sr., Chairman, The Woods Ad Hoc Water Committee, Georgetown, TX

William L. McGavran III, Chairperson, Williamson County Greater Water Committee, Georgetown, TX

Don Scott, Chairman, Woodland Park and Woodland Park West Water Committee, Georgetown, TX

Judith Prehar, Water Committee Member of Fountainwood, Georgetown, TX

Carlene Boyd, Shady Oaks Ad Hoc Water Committee, Georgetown, TX

Diana Rogoff, Georgetown, TX

These themes and arguments in support of the reservoir are summarized below.

1. *Williamson County and the entire Brazos Basin will be enhanced by inclusion of the project in the plan.*
2. *Every water resource that can be developed, in the Brazos Basin, is a resource that will provide for the continued prosperity of Texas.*
3. *...maintaining a diverse set of identified resource options is proper long-term regional planning.*
4. *Maintaining the reservoir in the plan will continue to make it eligible for state and federal funding.*

Response Option 1. The project has been removed from 2016 Plan and is no longer a recommended water management strategy, due to the many comments and supporting arguments against the viability of the project.

Response Option 2. The Brazos G Regional Water Planning Group understands your support of the Little River Off-Channel Reservoir and has opted to retain it as a recommended water management strategy in the 2016 Brazos G Regional Water Plan.

Commenter — T. Barret Lyne, Ph.D. (oral and written comments)

The groundwater model, MODFLOW, is based upon equations that have limited ability to describe groundwater flow and decisions based upon modeling in MODFLOW are suspect and should not be relied upon by water planners and water managers.

The MODFLOW model has been proven to be a reliable system for evaluating groundwater systems and is used widely in the industry and in academia. It has general acceptance in the water supply community and is the basis for many decisions made by groundwater districts and for establishing Modeled Available Groundwater estimates by the Texas Water Development Board.

Comments Received from the Texas Parks and Wildlife Department

To be completed

Comments Received from the Brazos River Authority

To be completed

Jayson Barfknecht, Ph.D., P.E., Public Works Director, City of Bryan

To be completed

John Firth, Coryell County Judge

To be completed



Coryell County Commissioners Court

To be completed

Jimmy Wood, President, Multi-County Water Supply Corporation

To be completed

Kleber Denny, P.E., on behalf of the Salt Fork Water Quality Corporation

To be completed

Rodney Kroll, President, Southern Trinity Groundwater Conservation District

To be completed

Scooter Radcliffe, General Manager, Southern Trinity Groundwater Conservation District (oral and written comments)

To be completed

Janice Bezanson, Executive Director, Texas Conservation Alliance (oral and written comments)

To be completed

William Oliver

To be completed

10.7 TWDB Comments on Initially Prepared Plan and BGRWPG Responses

The following section summarizes the comments received from the TWDB and the responses of the BGRWPG. Level 1 comments are required to be addressed in order to meet statutory, agency rule, and/or contract requirements. Level 2 comments and suggestions are suggested for consideration to clarify or enhance the plan.

10.7.1 Level 1 TWDB Comments

1. To be completed

Response.....

10.7.2 Level 2 TWDB Comments

1. To be completed.

Response....

10.8 Final Plan Adoption

On **November 5, 2015**, the BGRWPG reviewed and adopted responses to the oral and written comments received. The final plan was adopted by unanimous vote of the members present pending completion of the changes noted in response to comments received.



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