

To: Brazos G Regional Water Planning Group	
From: David D. Dunn, P.E.	Project: 2006 Brazos G Regional Water Plan
CC: Teresa Clark, BRA	
Date: November 15, 2005	Job No: 00044110036

RE: Initially Prepared 2006 Brazos G Regional Water Plan
Comments Received and Potential Responses

HDR Engineering, Inc. has reviewed the comments received regarding the Initially Prepared 2006 Brazos G Regional Water Plan. Brazos G has received 23 separate comment communications in written form. Two of these are transcripts of oral comments received at the August 17, 2005 Public Hearing. All comments received in written form have been posted to the Brazos G website (www.brazosgwater.org).

Many of the comments received were lengthy, and HDR has paraphrased each comment, attempting to capture the substance of each comment to the best of our ability. Please refer to the actual comment letters received for the full text of each comment. Many of the comments received are strictly editorial in nature, or correct facts within the text of the plan. These do not constitute “changes” to the plan, but have been noted and will be addressed alongside other editorial or factual changes to the text that HDR has noted since release of the IPP. Many of these refer to minor typographical errors in tables.

Some of the comments received are general in nature and require no changes to the plan, or request actions by the planning group that are outside the scope of regional water planning.

Comments are shown in *italics*, with the potential response following in regular type. Those comments for which HDR has identified potential responses that constitute changes to the plan are noted with a symbol “☆” in the left margin. Such revisions include changes to recommended water management strategies, changes in water demand projections, additions to adopted water policy recommendations, or would constitute substantial deviations from previous planning group decisions. Other changes not so marked are simply editorial modifications or clarifications of the information in the plan.

Please note that all of the proposed changes below are potential changes that the planning group can choose to accept or reject. Not all are recommended by HDR. We will ask the planning group to decide on each during the meeting on Wednesday, November 16.

Commenter — Texas Water Development Board (Letter)

1. Provide information on the plan’s impacts on navigation.

The plan has little or no impact to navigation, as the Brazos River and tributaries are not used for commercial navigation and none of the strategies would significantly impact non-commercial navigation activities. Add additional information to Section 1.

2. *Report supply information for WWPs by category of use, by county and river basin.*

Add additional table in Section 3.

3. *Include groundwater supply estimates for each decade from 2010 to 2060 (Page 3-41).*

This section describes groundwater availability, which may or not be actual supply depending upon well capacities installed in each county. The availability estimates are constant for each decade. Actual groundwater supplies are tabled in Appendix C by county, but are not differentiated by source aquifer. We will add an additional subsection in section 3 that details actual supply estimates, in addition to the availability estimates that are already shown.

4. *Please clarify statement (Page 3-40, text and Table 3.4-1) in text stating that “availability estimates are not developed for undifferentiated aquifers...”*

The statement is incorrect and will be removed from the text.

5 & 6. *Text/table numeric disagreements noted.*

Corrected.

7. *Provide information on the sedimentation data update and its effects on Lake Mexia.*

The information is included in Appendix M.

8. *Provide results of [various] studies for Millican Reservoir.*

As Millican Reservoir was not included as a recommended strategy, these studies were not completed in order to conserve State funds. HDR (and Brazos G) will not invoice costs associated with these studies.

9, 10, & 11. *Text/table numeric disagreements noted.*

Corrected.

12. *Complete Chapter 10, Adoption of Plan*

This will be completed prior to submittal of final plan to the TWDB.

13, 15, & 16. *Various text or figure improvements suggested.*

Corrected or accepted.

14. *Add description of groundwater quality issues in the region.*

Adding this information in a form that would provide useful information is beyond the scope of the regional plan. Groundwater quality varies substantially within each of the aquifers in the region, and considerable detail would be needed to adequately address the issue sufficiently for it to add any value to the plan. The level of detail required to address the issue adequately for all of the aquifer systems in the region is beyond the scope of the plan. Any attempt to address the issue in the plan would be superficial, and likely misleading to the reader.

17. *Change the reference on Fig. 4B.4-1 to Fig. 4B.4-2.*

The figure is referenced correctly as it is.

18. *Fig. 4B.7-4 referenced incorrectly.*


Corrected.

19. *Consider adding “implementation issues” discussion to Palo Pinto Creek Off-channel Reservoir evaluation.*


A discussion of implementation issues will be added.

***Commenter — National Wildlife Federation / Environmental Defense / Sierra Club
(Letter)***

Various generalized comments A-E. Please see comment letter.

 The recommendations lettered A-E would require substantial modification of the plan and a deviation from the direction the RWPG has taken.

1. *Environmental flows should be acknowledged as a category of water demand.*

 Environmental flows are not designated as a type of water use by the TWDB. Definitive quantification of such demands has not yet been done for streams in the Brazos G Area, except for new water rights issued since the 1980's, which contain instream flow provisions. Any such designation in the Brazos G Plan would imply that the BGRWPG recommends that existing water right holders without instream flow provisions curtail use to maintain environmental flows.

2. *Note in Table 2-4 that projected per capita water use rates are before any additional water conservation beyond the 1991 State Water Efficient Plumbing Fixtures Act.*

Text on page 2-13 describes the assumptions in the projected water use rates; no modification is necessary.

3. *Asks for clarification of last column of Table 2-4.*

The column correction states that the reduction between 2010 and 2060 is due to the 1991 Water Efficient Plumbing Fixtures Act. It does not state that it is a portion of the reduction. Inspection of the data will show that the reduction listed is the total reduction. No modification is necessary.

4. *A large decline in water demand for Abilene from 2000 to 2010 is shown in Table 2-5.*

This decline is because the water demands were corrected by the TWDB, except for the year 2000 values. The year 2000 values were not corrected by the TWDB. A footnote at the bottom of Table 2-4 explains the dramatic reductions in per capita use. A similar footnote will be added to Table 2-5.

6. *Wastewater effluent discharges (return flows) in Table 3.2-1 reflect assumed large volumes of reuse that are not reflected in recommended water management strategies.*

The return flows used in the Brazos G WAM were developed in order to provide a conservative estimate of water available to existing water rights, future appropriations, and environmental flows, without resorting to the default TWDB assumption of 100% reuse. The return flows are not intended to be used in a drop-by-drop mass balance of water whereby any wastewater flows not discharged to the stream are accounted for expressly in recommended water management strategies. They are solely used to determine a realistic, yet conservative estimate of surface water availability.

7. *Management plans and definitions for evaluating groundwater availability are inferred, but should be explicitly stated.*

The Brazos G RWPG did not adopt any specific management plans or definitions, but evaluated previous estimates of groundwater availability using GAMs when available, or other data when GAMs were not. GAMs were used by the BGRWPG to evaluate different levels of pumpage, and qualitative judgments were made by the members of the planning group that the effects of the availability were acceptable. This process is described in Section 3.4.1 and Appendix B.

8. *Drought management is not included as a water management strategy as required by Texas Water Code Requirements.*

The BGRWPG considered drought management as a water management strategy and rejected it for the reasons stated in Section 4B.1.7.

9. *The method for applying water conservation as a water management strategy makes it difficult to quantify the amount of savings attributable to pro-active water conservation as opposed to those savings realized by the 1991 Water Efficient Plumbing Fixtures Act.*

The methodology is clearly spelled out how potential water conservation savings were determined. Many combinations of programs could be used to meet conservation goals, and those used in the plan to compute conservation savings and costs provide adequate examples of reasonable goals for a variety of programs without specifying specific programs for specific water user groups. The section will be updated to specifically list those BMPs identified by the Water Conservation Task Force. In addition, an additional table will be added showing for those entities for which conservation is



recommended, the differentiation between 1991 Plumbing Act savings and the additional savings recommended by the BGRWPG.

10 & 11. The BGRWPG should have been more aggressive in adopting water conservation goals.



Additional water conservation goals beyond those recommended by the BGRWPG are difficult to quantify, both in actual water savings and costs. The expected savings and costs are reasonable and do represent significant water savings throughout the region.

12. The Initially Prepared Plan provides for WUGs' needs as though the amount supplied through conservation were not real. The final plan should reflect a confidence and an expectation that water conservation will actually be employed to meet WUGs' future water needs.

Water conservation savings are largely voluntary in nature and cannot be mandated by the planning group for a water user group to adopt, nor can most be quantitatively defined with any confidence or assurance of accuracy. TWDB rules allow for planning for more than projected shortages (needs), because water demand projections often lag actual demands due to unexpected growth, and often water user groups will voluntarily discontinue an existing supply source that is adequate to meet some demands in favor of a new source that is cheaper, more reliable, or provides better quality water. Water utilities need excess supply capacity to be able to respond to unanticipated future conditions. The BGRWPG is not in the position of mandating limits on development of future projects, especially when savings due to conservation measures are often speculative.

13. Conservation savings should reflect Federal clothes washer efficiency standards, for which a 5.6 gpcd projected reduction in water use will result. The Region B IPP includes this assumption.

The Region B IPP assumed water savings of 5.6 gpcd was taken from a 1999 study of 37 households in Seattle, WA, where water efficient washers were installed in the homes and monitored. The 5.6 gpcd cited is for each washer replaced in a single-family residence. Actual savings for all customers of a water user group would be less, and depend upon the percentage of replacement over time. The BGRWPG has adopted a conservation savings target of 21 gpcd. Any combination of the Best Management Practices available could be used to meet the 21 gpcd goals, not just those used to estimate the reasonable target.

14 & 15. Statements regarding impacts of reuse strategies are inconsistent between Tables 4B.3.1.1, 4B.3-12, and tables for individual water management strategies.

The statements are not inconsistent, because overall, reuse will tend to have minimal impacts to the environment, but could possibly have high local impacts depending greatly on local situations. Local impacts are site-specific, and would require detailed studies for each stream reach that are beyond the scope of this plan.

16. Changes in streamflow are not quantitatively reported, as required by TWDB rules.

The reuse strategies, overall, will not provide changes in streamflow below baseline conditions. Baseline streamflow conditions already assume a level of reuse greater than the individual water management strategies.

17. Changes in flow due to the BRA's System Operation water management strategy are not evaluated at a sufficient number of locations.

The water supplied from the BRA's proposed System Operation strategy was included at each of the proposed WUG diversion locations to determine the cumulative effects of the total plan, as shown in Section 7.1. Any remaining Brazos G supply from the strategy was assumed to be diverted at Hempstead for purposes of evaluating the cumulative effects of the plan.

18. Many of the studied reservoirs would satisfy no specific water demands. The majority of the water available from the BRA's System strategy would be allotted to Region H.

Yes, both statements are true.

19. Table 4B.12-1 does not note that costs are for raw water at the reservoir, not treated water delivered.

A note will be made on the table.

20. Evaluations of instream flow effects of new reservoirs are insufficient.

The requested analyses are beyond the scope of the plan, and would be completed if a project were pursued by a local entity as part of the permitting and authorization process.

21. Statements regarding the effects of Little River Reservoir on the instream biological community are unsubstantiated.

The statements were made using the best professional judgment of the consultant team, given the resources available for evaluation.

22 & 23. The environmental and implementation issues assessment for Carrizo-Wilcox Aquifer development are insufficient.

The anticipated pumping from the two strategies is less than the water estimated to be available; therefore the water level declines from the two strategies are less than what would be caused by withdrawing water at the full availability estimates. Information to that effect will be included in the report sections.

24. Conservation savings may have been double counted for WUGs for which conservation is planned.



The savings from conservation will be corrected for the individual WUGs.

25. City of Killen projected water use exceeds 140 gpcd after 2000, but conservation is not recommended as a water management strategy.



Conservation will be added as a recommended water management strategy for the City of Killeen.

26. *Conservation is not listed as a water management strategy for the City of Marlin (which has no projected shortages), despite Brushy Creek Reservoir being recommended as a water management strategy.*



Conservation will be included as a recommended water management strategy for the City of Marlin.

27. *Proposed savings from additional water conservation beyond the default 1991 Water Efficient Plumbing Fixtures Act savings should be shown.*

Agreed. A table and discussion will be added.

28. *Commenter disagrees over how drought management is considered.*



The BGRWPG stands by the statements made. To not meet demands is antithetical to water supply planning. While drought management is vital, it should be utilized to extend supplies to safeguard for times when a drought of record might be exceeded. Including drought demand management as a water management strategy leaves no room for error when severe droughts do occur.

29. *The cumulative effects analysis does not fully show the effects of the plan on streamflows. A comparison to current streamflows should at least be made, in addition to the baseline run.*



The current comparison demonstrates the effects of the plan, considering that current water rights are allowed to use water as they are fully authorized and entitled to do. A comparison to current conditions (using TCEQ's WAM Run 8) would demonstrate changes that could occur in the future, but would not demonstrate the effects of just the plan. Changes in streamflow shown by comparison to current conditions would be due in part to full utilization of existing water rights. The BGRWPG will consider adding an additional comparison to the TCEQ's WAM Run 8 (current conditions), but also adding text stating that those changes are not due solely to the strategies in the plan..

30. *Mid-region locations for diversion of the unused BRA System Operations supply are not shown; the only location is at Hempstead.*

No mid-region diverter has been identified, beyond those already noted as potential recipients of the BRA System water. It is more likely that the majority of the unused Brazos G portion of the supply would be diverted in the lower basin.

31. *Biological significance of streamflow changes are not shown.*

Biological significance of streamflow changes would require extensive study beyond the scope of this plan, and would require that daily, rather than monthly, flows be evaluated for a full understanding of instream flow effects.

32. *Stating (Section 7.2.1) that water level declines in an aquifer will be less than a certain amount does not provide assurance of protection of the State's natural resources.*

The statements in the section are appropriate and will stand.

Commenter — Johnson County SUD (Meeting with consultant, provided a marked plan section)

Recommends that the Bethany WSC acquire future supplies from Johnson County SUD, rather than Fort Worth.



The plan will be modified as requested, if Bethany WSC concurs.

Commenter — Fort Hood (Letter)

Year 2000 per capita water use is listed incorrectly on Table 2-4.

The table will be corrected with a water use rate of 197 gpcd.

Projected population does not agree with information supplied by Fort Hood.

Fort Hood supplied the requested revisions to the population projections too late in the planning process for the TWDB to make the revisions.

Per capita water use rates are too high, and should be listed no higher than 197 gpcd.

When the Fort Hood population projections could not be revised, we utilized the projections supplied by Fort Hood, which included both personnel living on-base and those commuting onto the base from the surrounding area. Based upon the data provided by Fort Hood, personnel living off-base constitute approximately 49 percent of the total personnel (military, dependents, contract and civilian) associated with the base. We utilized a per capita use rate for the on-base personnel equal to the regional average of 145 gpcd, and then assigned the remainder of the base's 197 gpcd to the off-base personnel (52 gpcd). A total water demand was projected using these use rates for the projected on- and off-base personnel. These water demand projections were used to determine the total water demands for the base. The projected per capita use rates were then back calculated by dividing by the TWDB's lower population projections. This results in a higher apparent gpcd, but ensures that the base's water demands are accounted for correctly. The base and the TWDB both agreed to this methodology in a series of emails and telephone conversations in February, March, and June of 2005. A footnote to Table 2-4 will be made noting that on-base personnel were assumed to use 145 gpcd and that off-base personnel raise the use rates to those shown in the table, since they are not accounted for in the population of the base.

Fort Hood does not wish to supply the City of Gatesville with any water from its water right.



We will coordinate with the City of Gatesville and probably increase its supply from Lake Belton through an expanded BRA contract.

Commenter — Acton MUD (Letter)

Projected population for areas served by the MUD is too low. Revised population and water demand projections are provided.

Population projections cannot be changed at this late date to accommodate the request. Increasing Acton MUD's population would require reducing population projections elsewhere in the region so as to maintain regional totals.

Commenter — ALCOA (Letter)

Requested revisions to mining demands in Lee and Milam Counties, based upon Railroad Commission of Texas requirements for continued mine reclamation activities.



Recommend increasing mining demands in Lee County to 5,450 acft/yr in years 2010-2040, and in Milam County to 4,000 acft/yr in years 2010-2030, 3,000 acft/yr in 2040, and 1,500 acft/yr in 2050-2060 to more accurately reflect ongoing mining activities and requirements of the Railroad Commission of Texas.

Commenter — Bell-Milam Land and Water Rights Association (Letter)

Expresses opposition to the Little River Reservoir and all its various configurations.

The Little River Reservoir is not a recommended water management strategy in the 2006 Brazos G Plan; however the off-channel configuration was selected by the Region H Planning Group as a recommended strategy starting in 2050.

Commenter — Brazos River Authority (Letter)

Section 4A, Table 4A-6 – Suggestions to add additional information regarding Little River System demands, Main Stem/Lower Basin demands, and additional coordination with Region H regarding demands in Region H.

The requested revisions to the table will be made. We will coordinate with Region H to verify and finalize the Region H demands to ensure consistency between the two regional water plans.

Page 4C-250 – Liberty Hill WSC will likely obtain additional supply from BRA (Lake Stillhouse Hollow), and not LCRA (Lake Travis).



Liberty Hill WSC has made a similar comment. The water supply plan for Liberty Hill WSC will be modified to reflect additional supply from BRA and a release of the current supply contracted for out of Lake Travis.

Pages 4C-263 & 264 – Suggests adding clarification regarding supplies and demands for Lake Aquilla System.

The information will be clarified as requested.

Page 4C-265 – Suggests adding clarification regarding projected shortages to the Little River System.

The information will be clarified as requested.

Page 4C-267 – Suggests adding clarification to the Lake Granger Augmentation by listing groundwater and surface water components separately.

The information will be clarified as requested.

Page 4C-267 – Requests listing the stand-alone groundwater development strategy as an alternative instead of recommended water management strategy.



The water management strategy will be included as an alternative, not recommended, strategy.

4C-267 – Suggests final coordination with BRA and Region H regarding shortages shown for the lower basin.

Consultant will coordinate with Region H and BRA to verify and finalize lower basin demands.

4C-272 – Suggests noting that more recent data have indicated lower sedimentation rates for Lake Aquilla than utilized for the plan.

The information will be clarified as requested.

4B.6 – Requests changing statement that BRA has little uncommitted water at Lake Granbury.

The information will be clarified as requested.

Commenter — Liberty Hill WSC (Letter)

Requests changing strategy for Liberty Hill from Lake Travis to Lake Stillhouse Hollow. The BRA has made a similar request.



The recommended water management strategy will be changed for Liberty Hill.

Commenter — Camp Creek Water Company (Letter)

Notes that Camp Creek Lake and surrounding homes would be inundated by Millican Reservoir.

The consultant has not verified this statement. However, Millican Reservoir is not a recommended water management strategy. Furthermore, any entity pursuing Millican Reservoir would be required to address issues such as these.

Commenter — Cities of Bryan and College Station (Letter)

Requests that language similar to that adopted for the 2001 Plan amendment regarding BRA System Operations and return flows be also included in the 2006 Plan.



The language will be added to the plan at the appropriate locations.

Requests language be added as a third footnote to Table 3.2-1 stating that the cities of Bryan and College Station have filed application with TCEQ to reuse their current and future effluent.

The footnote will be added as requested.

Commenter — City of Temple (Letter)

1.a. The permitted amount shown in Appendix D should equal the supply shown in Appendix C.

The values shown in Appendices C and D represent different totals. The permitted amount stated in Appendix D (35,804), is the total of the water rights owned by Temple. The total supply shown in Appendix C (approximately 37,500 acre-feet per year) is the actual amount of water estimated to be available for diversion by Temple through the drought of record, and is based on WAM results and water contracts/agreements with the BRA.

1.b. Reported use in Appendix D are inaccurate.

The reported use in Appendix D are from the TWDB database, which is known to have some errors. The Appendix D table will be corrected.

2. Reported water use in Table 2-5 for year 2000 should be 21,234 acft/yr.

The value in Table 2-5 will be corrected.

Commenter — Post Oak Savannah GCD, Clearwater UWCD, and Lost Pines GCD (Separate Letters)

All three letters request that the plans for use of the Carrizo-Wilcox Aquifer in Region L by the San Antonio Water System (SAWS) from Lee and Milam counties be dropped, in response to the cancellation of the water supply contract between SAWS and Alcoa.



The Region L planning group has not decided if they will retain the strategy in the Region L plan. The Brazos G plan will retain mention of it in a manner appropriate to the actions of Region L. If Region L retains it in the plan, the Brazos G plan will note that the SAWS/Alcoa contract has been cancelled, but also note that Region L has elected to retain that supply in the Region L plan.

Commenter — Eugene Pollard, Private Citizen, College Station (e-mail)

Recommends that free public access points to rivers be allowed to remain open.



Public access to rivers is beyond the scope of regional water planning. However, the BGRWPG could adopt a policy recommendation of this sort if it chooses.

Commenter — FHLM WSC (Letter)

Requests that recommended strategies for water user groups to which FHLM WSC supplies water be changed from City of Waco and/or BRA System Operations to Carrizo-Wilcox supplies and expanded use of the Trinity.

Note that FHLM WSC has not been identified as a water user group or a wholesale water provider. The recommended strategies for Chalk Bluff WSC, Gholson WSC, City of Mart and City of Riesel will be changed to Carrizo-Wilcox Aquifer (with those WUGs' concurrence), but not expanded use of the Trinity. The Trinity Aquifer is currently being overdrafted and cannot sustain expanded use. Brazos G will direct its consultant to coordinate with FHLM and include a Carrizo-Wilcox strategy as requested.



Commenter — Lambshead Land and Cattle Company (Letter)

Requests that 4,000 acft/yr of irrigation demand be added to Throckmorton County

The Brazos G consultant has discussed this request with TWDB staff, and they are agreeable because Throckmorton County currently shows zero irrigation demand, provided that the ranch provides sufficient documentation to support their request. The Brazos G consultant will coordinate with the ranch and the TWDB.



Commenter — Neighbors for Neighbors (Michelle Gangnes) (Oral — See Transcript)

Requests that groundwater availability estimate from the Carrizo-Wilcox Aquifer in Lee County be revised to 7,500 acft/yr.

The Brazos G planning group makes no change.



Commenter — Patricia McCain, Private Citizen, Bryan (Letter)

Notes that “illegal changing of creeks and sloughs by private landowners has caused environmental damages.”

Alteration of watercourses is a regulatory issue and outside the scope of regional water planning. However, the BGRWPG could adopt a policy recommendation of this sort if it chooses.



Commenter — Texas Mining and Reclamation Association (Letter)

Comments that the BRA System Operations strategy, if permitted by the TCEQ in its current form, would compromise the efforts of entities involved with mining reclamation to maintain surface water ponds and lakes as required by the Railroad Commission of Texas by appropriating surface water that is needed to maintain storage in these water bodies. Requests that language be added to the description of the BRA System Operations option that would promote protection of future mining reclamation efforts

Language may be added to the plan as follows:

“Consideration of water rights permits, including the need for water for specific purposes, and conditions of the permits, is the responsibility of TCEQ, not the regional water planning process. However, the Brazos G RWPG assumes that any water appropriated by water right permits



associated with this water management strategy will not impair the capability to impound and store water in surface water bodies such as sedimentation ponds, end lakes and other environmental features associated with mining and mining reclamation activities, when such are required by the Railroad Commission of Texas and other regulatory entities. This assumption is applicable only to runoff originating within the watershed that drains directly to each water body, and is not applicable to diversions from rivers or streams to maintain storage in the water bodies. Diversions of water from those water bodies for any reason are also specifically excluded from this assumption.”

Commenter — Lost Pines GCD (Letter)

Comments that Table 3.4-3 (page 3-45) notes that water level declines (“drawdowns”) are not shown.

These are shown in Appendix B. A reference to Appendix B will be made in the table to aid the reader.

Supplies to Manville WSC from the Carrizo-Wilcox Aquifer are not shown appropriately.

Manville’s current supply from the Carrizo-Wilcox Aquifer is 2,396 acft/yr out of a total supply of 4,348 acft/yr (55%). Manville’s current supplies are sufficient to meet the WSC’s projected water demands through the 2060 planning horizon. No additional supplies from the Carrizo-Wilcox Aquifer appear to be necessary and the plan does not recommend or imply them.

Carrizo-Wilcox Aquifer supply is the target source to meet future demands in Williamson County, and currently contracted but unused supplies from the LCRA (Lake Travis) are not utilized.

This statement is not true. The plan makes full use of available LCRA supply to meet the majority of the future demand in Williamson County through the BRA/LCRA Alliance (25,000 acft), existing contracts with Leandar and Cedar Park (6,400 and 18,000 acft), and additional supplies not yet contracted for from the LCRA (26,200 acft), for a total supply from the LCRA into Williamson County of 75,600 acft/yr. Augmentation of Lake Granger’s yield with Carrizo-Wilcox Aquifer supply is targeted for 2050 and later, and may not be fully utilized until much later than that.

The footnote on Table 3.4-4, page 3-50 regarding Lost Pine’s revision to its groundwater availability estimate for Lee County in its management plan is untrue and incorrect.

The footnote is not a blatant misstatement, as claimed by the reviewer. However, it will be modified as follows to further clarify the reasons for the revision by Lost Pines GCD. Edits are shown.

“The Lost Pines GCD originally estimated the Lee County groundwater availability from the Carrizo-Wilcox to be equal to recharge in Lee County, as determined by the Central Carrizo-Wilcox GAM, which is 7,500 acft/yr. This availability equal to recharge estimate was changed by the district to 46,458 acft/yr to be consistent for the appearance of eliminating the apparent conflict with the 2001 Brazos G Regional Water Plan in order to obtain a determination of administrative completeness from the TWDB. ~~However,~~ This change was made under protest to the TWDB and to the BGRWPG.

Commenter — Texas Parks and Wildlife(Letter)

Comments received are fairly general in nature and do not recommend specific revisions to the plan.

No revisions to the plan are necessary to consider, based upon the comments.

Commenter — West Central Texas Municipal Water District (Oral — See Transcript)

The WCTMWD recommends the BGRWPG to adopt a water policy recommendation that would allow planning groups to consider alternative future growth rates higher than the TWDB projections and consider additional water projects to meet those alternative projections.



The BGRWPG may formulate and adopt a policy statement to that effect.