

Agenda Item 6.8
Suggested Responses to
Comments Received on the
2011 Initially Prepared Plan

July 21, 2010

BRAZOS G
WATER PLANNING GROUP

HDR



Comments on the 2011 IPP

- ✓ **April 21, 2010 Public Hearing**
 - **Sixteen members of the public spoke**
- ✓ **June 25, 2010 – Deadline for Written Comments**
 - **50 written comments (including TWDB and TPWD)**
 - ✓ **Helpful editorial suggestions for clarity**
 - ✓ **Some request changes to the Plan**
 - **HDR has prepared suggested responses**
- ✓ **Today:**
 - 1. Consider some “harder” responses**
 - 2. Modify the Plan as necessary**

Comments/Responses to Review

Commenter — State Representative Fred Brown (oral and written comments)

- ✓ **Comment: Requested that Millican Reservoir (Panther Creek site) not be a recommended water management strategy.**
- ✓ **Response: Millican Reservoir will not be a recommended water management strategy in the 2011 Brazos G Regional Water Plan.**

Comments/Responses to Review

Commenter — Randy Rogers (oral comments)

- ✓ **Comment:** *Mr. Rogers notes that the use of water from O.H. Ivie Reservoir could be increased by increasing treatment capacity.*
- ✓ **Response:** *The City of Abilene is not currently pursuing additional treatment capacity from O.H. Ivie Reservoir due to several factors, including brine disposal issues and uncertainty regarding the actual reliable supply available from that source.*

Comments/Responses to Review

Commenter — Randy Rogers (oral comments)

- ✓ **Comment:** *Mr. Rogers notes that the quantity of water proposed to be used for a power plant planned by Tenaska in Nolan County will use substantially less water than the 20,000 acre-feet of steam-electric demand identified for Jones County that is planned for Abilene to meet.*
- ✓ **Response:** The quantity of water planned to be used by Tenaska is, to the planning group's knowledge, less than the 20,000 acre-feet per year identified in the 2011 IPP. However, the Nolan County demand for water should not be identified specifically as a "Tenaska" demand, but should instead be considered as a regional water demand for steam-electric power generation. The demand identified for Nolan County by the University of Texas Bureau of Economic Geology (BEG) and the TWDB was originally 94,298 acre-feet per year. The planning group requested that the TWDB adopt a smaller, more realistic demand projection.

Comments/Responses to Review

Commenter — Randy Rogers (oral comments)

- ✓ **Comment:** *Mr. Rogers noted concerns that the Cedar Ridge Reservoir would adversely impact water quality in Possum Kingdom Lake, specifically dissolved minerals.*
- ✓ **Response:** Analysis of the impact of Cedar Ridge Reservoir on salinity levels in Possum Kingdom Reservoir is beyond the scope of work authorized by the TWDB for developing the 2011 Brazos G Regional Water Plan. However, during development of the 2016 Brazos G Regional Water Plan, additional treatment of salinity issues could be added to the scope of work if requested by the planning group and approved by the TWDB.

Comments/Responses to Review

Commenter — Leonard and Cathy Cox(oral comments)

- ✓ **Comment: Mr. and Mrs. Cox both requested that the planning group consider a portion of the Navasota River as a “unique ecological stream segment.”**
- ✓ **Response: While the planning group understands and respects Mr. Cox’s desire to designate the Navasota River as unique stream segment, the planning group has not opted to recommend that the Texas Legislature make such a designation.**

Comments/Responses to Review

Commenter — Stephanie Martin, Eastland County Water Supply District and Ron Holliday, City of Eastland (provided separate written comments)

- ✓ ***Comment:*** Both Ms. Martin and Mr. Holliday noted that the City of Eastland and the Eastland Water Supply District are not in favor of the Eastland Water Supply District supplying water to the City of Strawn, as shown in the 2011 IPP.

Comments/Responses to Review

Commenter — Eastland (cont'd)

- ✓ **Response:** The concept for Eastland County WSD to supply the City of Strawn was obtained from *“West Central Brazos River Basin Regional Water Treatment and Distribution Facility Plan”*, August 2004. A supply from Eastland County WSD to the City of Strawn is identified as one of the strategies in the “preferred alternative” in the report. As the supply from the District to Strawn appears technically and economically feasible, the Brazos G Regional Water Planning Group will continue to recommend this future water supply strategy for Strawn. This recommendation in no way obligates the District to supply the water to Strawn. It is simply a recommendation of the Brazos G Regional Water Planning Group. Financial requirements for this project would be entirely the responsibility of Strawn.

The following text will be added to Section 4C.27.3: “The Eastland County WSD has not agreed to this recommended water management strategy.”

Comments/Responses to Review

Commenter — Jayson E. Barfknecht, City of Bryan (written comments)

- ✓ ***Comment:*** *The City of Bryan is requesting that the 2011 IPP be modified to reflect the City of Bryan as a Wholesale Water Provider.*
- ✓ ***Response:*** *The supplies and demands for the City of Bryan, Wellborn SUD and Brazos County-Other will be adjusted to account for the two supply contracts. We will adjust the water management strategy for Wickson Creek SUD to include supplies from Bryan as a recommended water management strategy.*

Comments/Responses to Review

Commenter — Jerry Atkinson, Bell County WCID No. 1 (written comments)

- ✓ ***Comment:*** *The recommended strategy of reallocation of supplies is not necessary and should be removed from the Plan.*

- ✓ ***Response:*** *The recommended strategy will be changed to “Firm up Existing BRA Supplies with Lake Granger Augmentation”, as suggested.*

- ✓ ***Comment:*** *Additionally, the District requests that several reuse strategies we are pursuing be included in the Plan.*

- ✓ ***Response:*** *The requested reuse strategies will be included in the 2011 Plan as requested.*

Comments/Responses to Review

Commenter — Ben White, City of College Station (written comments)

- ✓ **Comment: Requests that the College Station future water deficit be met with surface water from the BRA System Operations Permit, not the Millican Reservoir (Panther Creek) project.**
- ✓ **Response: The Millican Reservoir (Panther Creek) had been removed from the plan. The water supply plan for College Station has been updated to show the City's future shortage being met with water from the BRA System Operation Permit.**

Comments/Responses to Review

Commenter — Rex Bland, Adobe Wells, Inc., (written comments)

- ✓ **Comment:** *Expresses concern that groundwater from the Seymour Aquifer in Jones County is being ignored for planning purposes and offers to sell his well water to the City of Abilene and the West Central Texas Municipal Water District. Offers an ASR alternative to the City of Abilene at the well field for sewer effluent from the Abilene wastewater treatment plant in conjunction with the Cedar Ridge Reservoir or the Tenaska Coal Plant.*

Comments/Responses to Review

Commenter — Rex Bland (cont'd)

Response: County-wide, the estimated available groundwater in Jones County from the Seymour Aquifer is 8,000 acft/yr. Approximately 3,633 acft/yr of that available supply (45.4 percent) is being utilized in the Plan as a current supply. No water management strategies were evaluated or updated to investigate utilizing the remainder of the available supply. It is the intention of the planning group to conform the strategies in the plan to what is requested by specific WUGs and WWPs, when those entities request specific strategies be put into the plan for them. No WUG or WWP has asked that additional groundwater supply from the Seymour Aquifer be evaluated as a potential water management strategy. This option has been previously studied in 2001 for the BGRWPG and in 2005 for the City of Abilene. If a municipal WUG or WWP requests that this source be considered as a water management strategy, or if the planning group is informed that two parties (buyer and seller) have established a level of commitment through a contract or memorandum of understanding to pursue the supply, then a Seymour Aquifer project in Jones County would be considered as a water management strategy in the plan. This can occur during the 2016 planning process if the planning group is notified of such a commitment.

Comments/Responses to Review

Commenter — Brazos River Authority (written comments)

- ✓ **Comment: Section 4C.38.3. Stonewall, Kent, and Garza County Chloride Control Project. BRA is not actively involved in pursuing this chloride control strategy. BRA recognizes downstream benefits from upper basin chloride control and is not opposed to the project; however, BRA's long-range financial planning does not currently contemplate large financial participation in 2020 as currently shown for this strategy.**
- ✓ **Response: The BRA is identified as the project sponsor because the BRA is a major regional entity in the Brazos River Basin. BRA is identified in the plan for several water management strategies when a clear sponsor for a major project has not been identified. Also, it is the technical consultant's understanding that BRA has participated in the project in the past.**

Comments/Responses to Review

Commenter — Brazos River Authority (written comments)

- ✓ **Comment: Should this strategy for Cleburne be associated with Lake Whitney instead of Lake Granbury?**
- ✓ **Response: The strategy for taking water from Lake Granbury has been removed as a recommended water management strategy for Cleburne. The strategy description will remain as a Lake Granbury supply, but will not be recommended.**

Comments/Responses to Review

Commenter — Brazos River Authority (written comments)

- ✓ **Comment: Chisholm Trail SUD has no plans to utilize the 3,472 acft balance of HB 1437 water.**
- ✓ **Response: Needs (shortages) for the SUD do not appear until 2050, and the SUD has not indicated any plans to meet the future shortages that are projected. The strategy is included as a recommendation of the planning group.**

Comments/Responses to Review

Commenter — Ross Melinchuk, Texas Parks and Wildlife Department (written comments)

- ✓ **Comment: *The Brazos G IPP does not recommend nomination of any stream segments as ecologically unique. No explanation is provided for the lack of recommendations. TPWD...encourages the planning group to consider this creek [Salado Creek], and other rivers and streams, in the next planning cycle.***
- ✓ **Response: *The Brazos G Regional Water Planning Group deliberated at length regarding the subject of recommending stream segments having unique ecological value during both the 2006 and the 2011 planning cycles. Ultimately, the planning group members were unsure of the future legal ramifications of such a designation and elected to not recommend any stream segments as having unique ecological value. The planning group will reconsider this issue during the next planning cycle.***

Comments/Responses to Review

Commenter — Texas Water Development Board (written comments)

- ✓ ***Comment: Pages 3-28 and 3-30, Table 3.2.2: Plan includes water supply estimates using the 75/75 basis as availability for irrigation. Developing a strategy for agricultural needs must reflect availability under drought of record conditions. Please modify analysis based on firm yield or firm diversion and revise table results to reflect drought of record conditions (e.g. firm yield). Please update plan regarding any resulting changes to water needs, if applicable. [31 TAC §357.7(a),(5); Contract Exhibit “D” Section 3.0]***

Comments/Responses to Review

Commenter — Texas Water Development Board (written comments)

- ✓ **Response:** The Brazos G Regional Water Planning Group respectfully declines to make this change to the plan. The 75/75 convention for determining availability of supply for surface water irrigation rights was utilized in both the 2001 and 2006 Brazos G Regional Water Plans with the knowledge and approval of the TWDB, under the same or similar TAC requirements. Use of the 75/75 convention was articulated clearly at regional water planning group meetings during the development of the 2011 IPP (see Agenda item 6.7, February 18, 2009 meeting). TWDB representatives present at those meetings gave no indication that Brazos G was to discontinue use of the 75/75 convention for irrigation rights. The 2011 Plan is to be an update to the 2006 Plan, and should follow similar conventions. Modification of this convention at this late date would modify a large portion of the regional water plan, and would necessitate adding a number of additional water management strategies to supply increased irrigation needs. When the scope of work was developed for the 2011 Plan, this potential situation was never considered and potentially feasible water management strategies were never identified to meet irrigation needs that would be substantially greater than those in the 2001 and 2006 Plans. This would be a significant modification of the basic assumptions of the plan and would require a new public hearing and public comment period, because potentially new water management strategies to meet new irrigation needs would have to be identified, evaluated and incorporated into the regional water plan.

Comments/Responses to Review

Commenter — Texas Water Development Board (written comments)

- ✓ **Comment: The plan does not present categories of water use delineated by counties and river basins. Please present water user group water demands by county and river basin. [31 TAC §357.7(a)(5)A)(iv)]**
- ✓ **Response: Water demand data are detailed by water user group and county, which is sufficient detail for readers of the regional water plan. Further detailing to the river basin detail in the Brazos G Plan is unnecessary. Categories of water use are delineated by county and river basin within the TWDB's water planning database, DB12, for those interested in seeing such detailed information. The DB12 constitutes part of the regional water plan.**

Comments/Responses to Review

Commenter — Texas Water Development Board (written comments)

- ✓ ***Comment: Page 4C.39-4: The water management strategy shown as “Groundwater Development” appears to be included in the online planning database as “Additional Carrizo Aquifer Development (includes overdrafting)”. Please revise to consistently name water management strategies in both the plan document and online planning database. [Contract Exhibit ‘D’ Section 3.0]***

Comments/Responses to Review

Commenter — Texas Water Development Board (written comments)

- ✓ **Response:** The addition of “(includes overdrafting)” to the description of this water management strategy in the online planning database has been objected to strenuously by at least one wholesale water provider, when that description was observed as they were completing the Water Infrastructure Financing survey. The description “(includes overdrafting)” connotes a negative situation where the recommended strategy would “overdraft” the aquifer, when in fact it does not result in an over allocation of the resource in that county. The Brazos G Regional Water Planning Group respectfully requests that the text “(includes overdrafting)” be removed from the online planning database because of the negative connotation it places on recommended water management strategies that do not result in over allocation of the Carrizo-Wilcox Aquifer.

Comments/Responses to Review

***Commenter* — Texas Water Development Board (written comments)**

- ✓ **Response:** The addition of “(includes overdrafting)” to the description of this water management strategy in the online planning database has been objected to strenuously by at least one wholesale water provider, when that description was observed as they were completing the Water Infrastructure Financing survey. The description “(includes overdrafting)” connotes a negative situation where the recommended strategy would “overdraft” the aquifer, when in fact it does not result in an over allocation of the resource in that county. The Brazos G Regional Water Planning Group respectfully requests that the text “(includes overdrafting)” be removed from the online planning database because of the negative connotation it places on recommended water management strategies that do not result in over allocation of the Carrizo-Wilcox Aquifer.

Comments/Responses to Review

Commenter — Texas Water Development Board (written comments)

- ✓ **Comment: Please include a summary of information regarding water loss audits specific to water users located in Region G. [31 TAC §357.7(a)(1)(M)]**
- ✓ **Response: Section 1.12 has been added to Section 1 to summarize the water loss audit information for Brazos G entities.**

Comments/Responses to Review

Commenter — Texas Water Development Board (written comments)

- ✓ ***Comment: It appears that total county 'balance' surpluses/shortages were calculated incorrectly throughout Appendix C Tables by subtracting Tota1 Demand' from Tota1 Supply'. Please revise to reflect total subcategory and county-wide water needs as the sum of the individual needs of each water user group in the county; needs that are calculated based on each water user group's own demands and supplies. [31 TAC §357.7(a)(4)(B)]***

Comments/Responses to Review

Commenter — Texas Water Development Board (written comments)

- ✓ **Response:** The Brazos G Regional Water Planning Group respectfully declines to make the suggested change. The tables are prepared this way intentionally to illustrate the overall county water balance. Even though some water users have “needs”, supplies in the county may still exceed demands. For the municipal demands and supply comparisons shown in the county tables (odd-numbered tables), this effectively illustrates the difference between total demand and total supply for all municipal users in the county, in contrast to the itemized individual needs documented in the municipal water user group tables for each county. Summations of individual water “needs” are effectively itemized in other places in the report.

A footnote will be added to the tables explaining this.

Comments/Responses to Review

Commenter — Texas Water Development Board (written comments)

- ✓ **Comment: (Attachment B) Comments on the online planning database (i.e. DB12) are herein being provided in spreadsheet format. These Level 1 comments are based on a direct comparison of the online planning database against the Initially Prepared Regional Water Plan document as submitted. The table only includes numbers that do not reconcile between the plan (left side of spreadsheet) and online database (right side of spreadsheet). An electronic version of this spreadsheet will be provided upon request.**
- ✓ **Response: The spreadsheets have been reviewed and database and plan numbers have been corrected to remove inconsistencies, or the inconsistencies have been explained.**

Questions?
