

## **Response to TWDB Comments on Draft Final Region-Specific Study Reports (4/07/09)**

### **Surface Water Availability Modeling Study**

1. Page ES-1, the last paragraph states “overall, total availability increased slightly as compared to the 2006 Region K plan.” However, the first paragraph on the next page indicates that availability in three sectors was unchanged, while the availability for municipal, irrigation, and steam-electric demands was “smaller” than in the 2006 plan. Please reconcile these two statements in the final report.

***Response: Agreed. In some places, the word “supply” should have been used instead of “availability”. The referenced paragraph and the appropriate places in Section 3.0 will be revised to provide necessary clarification.***

2. Page 3-2, the second paragraph refers to FNI, but does not define the term. Please define it in the final report.

***Response: Agreed. The term will be defined.***

3. It is difficult to find information in appendices A and B, then to relate the information to the main body of the report. Please consider adding an index to both appendices in the final report.

***Response: Agreed. An index for Appendices A, B, and C will be added along with page numbers.***

### **Environmental Impacts of Water Management Strategies**

1. Interpretation of the study results is somewhat difficult because two different base models were used for “with” and “without” strategy comparisons (i.e. WAM Run 3 Cutoff Model and LSWP Model). Also, one or more strategies may have been incorporated in the “without” strategy (base) model used to evaluate other strategies. The report documents the necessity of conducting the analysis in this fashion but could be improved by making it explicitly clear which model was used and which strategies were incorporated in the base model for the analysis of each strategy. Please consider adding a clarifying sentence to the description of each strategy analysis in Chapter 3.0 Results (pp 3-1 to 3-50). For example, on page 3-2, the first paragraph could read (additions in *italics*): “This strategy involves the expansion of LCRA contracts to meet shortages. The increase in contract amounts should decrease interruptible supplies, and therefore, regulated streamflows downstream of the strategy.” *For the analysis, the (WAM Run 3 Cutoff Model or LSWP Model) with the inclusion of strategies (xxx) was used for the base condition.*

***Response: Agreed. A clarifying sentence will be added to the description of each strategy analysis in Chapter 3.***

2. Figure 3.1 on page 3-2 is titled “location of control points” but it seems to list only the major control points used in the study, as there are several other control points referred to in the text that are not included in this or a similar figure. Please consider re-titling Figure 3.1 “location of major control points” and referencing the map in Exhibit B of all control points.

***Response: Figure 3.1 only shows the location of control points discussed in Section 3, as is stated in the sentence on page 3-1 that describes the graphic. The title of Figure 3.1 will be changed to include the word “Selected”. On page 2-2, a reference is made to the Appendix B exhibit showing the location of all control points discussed in the study. A sentence referring the reader to the Appendix B exhibit will be provided in the description of each strategy that references control points other than those shown on Figure 3.1.***

3. Strategies number 4 (pp. 3-13 through 3-15), 10 (pp. 3-38 through 3-40), and 11 (pp. 3-43 through 3-45) use four control points, but the contract scope of work states that five designated control points on the Colorado River and major tributaries will be used for a quantitative impact analysis. Likewise, strategy number 13 (pp. 3-48 through 3-49) only uses three control points. Please justify the deviation from the contract scope of work in the final report.

***Response: For the strategies mentioned, the appropriate number of control points were analyzed, as required by the contract scope of work, but the results were not chosen for discussion in Section 3.0. Instead, page 3-1 refers the reader to Appendix C for the graphic impact analysis of all control points. The control points chosen for discussion in Section 3.0 were ones where additional stream gauge data was available for comparison. For each of the strategies mentioned, a sentence will be added to refer the reader to Appendix C for additional control point analysis results.***

4. In the Executive Summary, an example of the detailed results of a single strategy is given. Please include a summary of the significant results of all the strategies in the final report.

***Response: A table showing a summary of the results of all of the strategies will be included.***

5. Figures 3.2 – 3.19 beginning on page 3-6 show 58-year median flows with 10<sup>th</sup> and 90<sup>th</sup> percentile flows. The legend is shown on the x axis, which actually shows flow volumes in increments of 50,000 acre-feet per year. Please consider moving this legend to the y axis which shows median flows for each month of the year.

***Response: The request to move the legend was considered, but it was determined that making this costly change would not substantially benefit the report.***

## **Evaluation of High Growth Areas**

1. Please note that TWDB's acceptance of a final report for this study does not constitute approval of any revised population or water demand projections contained therein. The formal procedure for requesting revised projections is stated in TAC 357.5 (d) (2):

"Before requesting a revision to the population and water demand projections, the regional water planning group shall discuss the issue at a public meeting for which notice has been posted pursuant to the Open Meetings Act in addition to being published on the internet and mailed at least 14 days before the meeting to every person or entity that has requested notice of regional water planning group activities. The public will be able to submit oral or written comment at the meeting and written comments for 14 days following the meeting. The regional water planning group will summarize the public comments received in its request for projection revisions. Within 45 days of receipt of a request from a regional water planning group for revision of population or water demand projections, the executive administrator shall consult with the requesting regional water planning group and respond to their request."

All requested revisions which receive the consensus recommendation of the Texas Water Development Board, Texas Department of Agriculture, Texas Commission on Environmental Quality, and Texas Parks and Wildlife Department, will then be presented for consideration of Board approval at the next scheduled meeting.

***Response: Acknowledged.***

2. Page 3-6, the first paragraph states that a population density of 150 persons per square mile was assumed but no explanation is provided. Please provide the rationale for this assumption in the final report.

***Response: A more thorough explanation will be provided.***

3. Page 3-6, Table 3-6 includes the numerical difference between the State Data Center's estimated 1/1/07 population in the study area and the interpolated TWDB estimates for the same time period. In addition to the numerical difference between the projections, please consider including the percentage difference as well.

***Response: Agreed. The percentage difference will be added to the table.***

4. Page 3-7, Table 3.7 lists the "CAMPO" growth estimates for 2035 compared with the 2006 Region K plan estimates. For areas where they don't agree (Manor and Mustang Ridge), suggested increases were made to the projections by subtracting from county-other, but no explanation or methodology for the selected projections is provided. Please provide the rationale for these assumptions in the final report.

***Response: Agreed. The rationale for the assumptions will be included.***