



# TEXAS WATER DEVELOPMENT BOARD



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June 28, 2010

Mr. John Burke  
Chairman, Lower Colorado Regional  
Water Planning Group  
c/o Aqua Water Supply Corporation  
P.O. Drawer P  
Bastrop, Texas 78602

Mr. James Kowis  
Lower Colorado River Authority  
P.O. Box 220, MC H300  
Austin, Texas 78767

Re: Texas Water Development Board Comments for the Lower Colorado Regional Water Planning Group (Region K) Initially Prepared Plan, Contract No. 0904830870

Dear Mr. Burke and Mr. Kowis:

Texas Water Development Board (TWDB) staff completed a review of the Initially Prepared Plan (IPP) submitted by March 1, 2010 on behalf of the Region K Regional Water Planning Group. The attached comments (Attachments A and B) follow this format:

- Level 1: Comments, questions, and online planning database revisions that must be satisfactorily addressed in order to meet statutory, agency rule, and/or contract requirements; and
- Level 2: Comments and suggestions for consideration that may improve the readability and overall understanding of the regional plan.

Based on the information provided to date by regional water planning groups, TWDB has identified potential interregional conflicts that are summarized in Attachment C. The TWDB's statutory requirement for review of potential interregional conflicts under Title 31, Texas Administrative Code (TAC) §357.14 will not be completed until submittal and review of adopted regional water plans.

### ***Our Mission***

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

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Title 31, TAC §357.11(b) requires the regional water planning group to consider timely agency and public comment. Section 357.10(a)(3) of the TAC requires the final adopted plan include summaries of all timely written and oral comments received, along with a response explaining any resulting revisions or why changes are not warranted. Copies of TWDB's Level 1 and 2 written comments and the region's responses must be included in the final, adopted regional water plan.

If you have any questions, please do not hesitate to contact David Meeseey at (512) 936-0852.

Sincerely,



Carolyn L. Brittin  
Deputy Executive Administrator  
Water Resources Planning and Information

Attachments (3)

c w/att: Ms. Jaime Burke, AECOM Inc.

## TWDB Comments on Initially Prepared 2011 Region K Regional Water Plan

**LEVEL 1. Comments and questions must be satisfactorily addressed in order to meet statutory, agency rule, and/or contract requirements.**

### General Comments

1. Population, demand, and water availability figures in various tables and text are slightly different than the amounts in the online planning database. These differences may be due to rounding or reallocation between river basins. Please revise or coordinate with TWDB staff to ensure that the data in the plan is consistent with the database (e.g. pages 2-1 and 2-5; total population projections are off by 1 from TWDB projections for 2020, 2030 and 2050). [*Title 31 Texas Administrative Code (TAC) §357.7(d)(1),(2); §357.5(a)(3)*]
2. Please include one-page summaries of the region-specific studies performed during phase I of this third round of planning including a description of whether and/or how each region-specific study was incorporated into the regional water plan. [*Contract Exhibit "C" Section 11.1*]

### Executive Summary

3. Page ES-10, Table ES-4: Water supply from the Lower Colorado River Authority/San Antonio Water System Project is shown as available beginning in 2020. Table 4-28 on page 4-23 shows this supply becoming available in 2010. Please reconcile the two tables.

### Chapter 3

4. Please provide a statement regarding any water availability requirements promulgated by a county commissioners court pursuant to TWC §35.019, which in Region K applies to the Hill Country Priority Groundwater Management Area. [*31 TAC §357.5(k)(1)(H)*]

### Chapter 4

5. Please describe how the planning group explored opportunities and benefits of regional water supply facilities or providing regional management of regional facilities. [*31 TAC §357.5(e)(6)*]
6. Please describe how publicly available plans of major agricultural, municipal, manufacturing and commercial water users were considered. [*31 TAC §357.5(k)(1)(E)*]

7. Please include a discussion of how information from water loss audits of water users in the region was considered in the development of water management strategies in the final plan. [31 TAC §357.7(a)(7)(A)(iv)]
8. Please ensure that the final plan includes quantitative reporting of impacts of potentially feasible water management strategies on agricultural resources, as appropriate. [31 TAC §357.7(a)(8)(A)(iii)]

#### Chapter 6

9. Please ensure that specific factors for each water supply source to initiate a drought response are included in the final plan. [31 TAC §357.7(a)(3)]

#### Appendix 3

10. Appendix 3-D: the total water available to Region K is different for each decade than the amounts shown in tables 3-23 (page 3-49) and ES-2 (page ES-6). Please reconcile these totals.

#### Appendix 4

11. Appendix 4-B: Please confirm that water management strategy costs are based on September 2008 dollars. [Contract Exhibit "C"]
12. (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.
13. (Attachment C) Based on the information provided to date by the regional water planning groups, TWDB has also attached a summary, in spreadsheet format, of potential interregional conflicts and apparent water source over allocations that were identified during the review of the online planning database and Initially Prepared Regional Water Plan. [Additional TWDB comments regarding the general conformance of the online planning database (DB12) format and content to the Guidelines for Regional Water Planning Data Deliverables (Contract Exhibit D) are being provided by TWDB staff under separate cover as 'Exception Reports']

**LEVEL 2. Comments and suggestions that might be considered to clarify or enhance the plan.**

Chapter 1

1. Page 1-28: Footnote 12 states that populations for partial Region K counties were estimated by determining the percent decreases in projections from the Census and TWDB; these decreases were then averaged and applied to (previous decades) partial county projections. Please consider revising this statement to more completely describe and clarify the methodology used for the projections.

Chapter 4

2. Please consider presenting quantitative reporting of and impacts of voluntarily redistributing water in Chapter 5, instead of Chapter 4 in accordance with TWDB guidance.
3. Page 4-113, last paragraph: states that there is “one unique reservoir and twelve unique stream segments within ten miles of the proposed pipeline alignment.” Please consider clarifying the basis for these tallies.





REGION K

IPP document reference: IPP document number Non-matching numbers Online Planning Database (DB12) number

Region IPP	Item	Page number	Table number	non-decimal number	2010	2020	2030	2040	2050	2060	non-decimal number	2010	2020	2030	2040	2050	2060
K	Water Transfer - Manville WMS volume	4.71	4.71									NA	NA	NA	NA	NA	NA
K	Water Transfer - Lee County WSC WMS volume	4.71	4.71									NA	NA	NA	NA	NA	NA
K	Temporary Drought Use Queen City WMS annual cost	4.72	4.73														
K	Temporary Drought Use Gulf Coast Aquifer annual cost	4.72	4.73														
K	Municipal Water Needs	4.75	4.75														
K	Manor MAIN Conservation Savings	4.77	4.76														
K	godthawk Channel Dam Cap/Ann Costs	4.83	4.80														
K	Continued Use of Downstream Return Flows WMS volume	4.87	4.84														
K	WMS name	4.87	4.84														
K	Stream Electric Needs	4.103	4.101														
K	Bastrop Co Total WMS	4.109	4.106														
K	Fayette Co Total WMS	4.109	4.106														
K	Llano Co Total WMS (LCRA CONTRACT REDUCTIONS is not included)	4.109	4.106														
K	Trans Co Total WMS (LCRA CONTRACT REDUCTIONS is not included)	4.109	4.106														
K	included?	4.109	4.106														
K	TOTAL WMS	4.109	4.106														
K	On-Farm Conservation	4.111	4.109														
K	Total	4.111	4.110														
K	LCRA Alternative WMS name	4.115	4.111														
K	Mills Co-Other Desalination of Brackish Ellenburger-San Saba	4.115	4.111														
K	San/Ann Costs	4.116	4.112														
K	WMS name	Appendix A															
K	Colorado Co Mining in Colorado basin/Expansion of Gulf Coast Aquifer/ WMS volume	Appendix A	4														
K	Colorado Co Mining in Lavaca basin (Expansion of Other Aquifer) WMS volume	Appendix A	4														
K	Colorado Co Mining in Lavaca basin (Expansion of Gulf Coast Aquifer) WMS volume	Appendix A	4														
K	Hays C-O Water Allocated to Cimarron Park Water	Appendix A	6														
K	Llano C-O Water Allocated to City of Llano	Appendix A	6														
K	Llano WMS name	Appendix A	6														
K	Matagorda Co Steam Electric Reduction in LCRA Commitment	Appendix A	8														
K	Matagorda Co Steam Electric WMS Name	Appendix A	8														
K	Mills Co Water allocated to Irrigation	Appendix A	8														
K	Manville WSC Transfer Water to Manville	Appendix A	10														
K	Lee County WSC WMS - Water Transfer	Appendix A	1														
K	Lee County WSC WMS - Water Transfer	Appendix A	5														
K	Alternative WMS name	Appendix A															
K	Alternative LCRA WMP Interruption Supply WMS volume	Appendix A															
K	Development of Carrizo Wilcox annual/ Cap cost	Appendix A															
K	Expansion of Carrizo Wilcox annual/Cap cost	Appendix A															
K	new Carrizo Wilcox well field annual cost	Appendix A															
K	Drought Management annual cost	Appendix A															
K	Manville - New LCRA Contract annual cost	Appendix A															
K	Manville -drought management annual cost	Appendix A															
K	Manufacturing Restartop Colorado basin - Expand Carrizo WMS annual cost	Appendix A															
K	Co-Other Blanco New well field Ellenburger - San Saba Capital/annual costs	Appendix A															
K	Bertram - Expansion Ellenburger-San Saba New wells annual cost	Appendix A															

REGION K		Non-matching numbers											
Region IPP		Online Planning Database (DB12) number											
Item		IPP document number					non-decadal number						
Page number	Table number	2010	2020	2030	2040	2050	2060	2010	2020	2030	2040	2050	2060
Appendix 4B	cost breakdown	\$3,105	\$5,348	\$7,590	\$10,005	\$12,248	\$14,835	NA	NA	NA	NA	NA	NA
K	Chisolm Trail SUD HB 1431 WMS annual cost												
K	Kemper WSC - Burnett Bratos basin Conservation annual cost												
K	Kingland WSC-new LCRA contract annual cost												
K	Llano-New Ellensburg-San Saba Cap/ann costs												
K	Llano-Drip Hickory Aquifer Cap/ann costs												
K	Livestock-Llano - Expand Hickory supply annual costs												
K	Co other- Mills-Expand Trinity supply												
K	Autism annual costs												
K	Elgin Expansion of Carrizo-Wilcox Cap/Ann costs												
K	West Travis Co Regional W5 annual costs												
K	Steam Electric power - Travis-Direct Reuse COA Cap/annual costs												
K	Steam-electric power Wharton - Dvip Gulf Coast Aquifer - Annual costs												



REGION K

POTENTIALLY OVER ALLOCATED SOURCES

Source Name	Source			Comments	Over allocated by WUG or WWP?	
	Region	Source County	Source Basin		WUG?	Interregional?
CARRIZO-WILCOX-AQUIFER	K	BASTROP	COLORADO	GBRA Simsboro Project	BOTH	Yes - K/L
GULF COAST AQUIFER	K	MATAGORDA	BRAZOS-COLORADO	Conjunctive use of groundwater - includes overdrafts	WUG	No
GULF COAST AQUIFER	K	COLORADO	BRAZOS-COLORADO	Conjunctive use of groundwater - includes overdrafts	WUG	No
GULF COAST AQUIFER	K	COLORADO	LAVACA	Conjunctive use of groundwater - includes overdrafts	WUG	No
GULF COAST AQUIFER	K	MATAGORDA	COLORADO	Conjunctive use of groundwater - includes overdrafts	WUG	No
GULF COAST AQUIFER	K	MATAGORDA	COLORADO-LAVACA	Conjunctive use of groundwater - includes overdrafts	WUG	No
GULF COAST AQUIFER	K	WHARTON	BRAZOS-COLORADO	Conjunctive use of groundwater - includes overdrafts	WUG	No
GULF COAST AQUIFER	K	WHARTON	COLORADO-LAVACA	Conjunctive use of groundwater - includes overdrafts	WUG	No
QUEEN CITY AQUIFER	K	BASTROP	BRAZOS	Temporary Drought Period Use of Queen City Aquifer	WUG	No

