



TEXAS WATER DEVELOPMENT BOARD



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July 26, 2010

Mr. Jim Parks
Chairman, Region C Regional Water Planning Group
c/o North Texas Municipal Water District
P.O. Box 2408
Wylie, TX 75098

Re: Texas Water Development Board Comments for the Region C Regional Water Planning Group Initially Prepared Plan, Contract No. 0904830862

Dear Mr. Parks: *Jim*

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 C 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 B. 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.

In addition, the TWDB reserves the right to submit additional Level 1 comments after a TWDB staff review of the online database (DB12) versus the Region C Initially Prepared Plan is completed.

Our Mission

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

P.O. Box 13231 • 1700 N. Congress Avenue • Austin, Texas 78711-3231
Telephone (512) 463-7847 • Fax (512) 475-2053 • 1-800-RELAYTX (for the hearing impaired)
www.twdb.state.tx.us • info@twdb.state.tx.us

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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 Mr. David Meesey of my staff at (512) 936-0852.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. L. Brittin".

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

Attachments (2)

c w/att: Mr. Tom Gooch, Freese and Nichols, Inc.

**TWDB Comments on Initially Prepared 2011 Region C
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. Please confirm that the hydrologic and climate data was updated in the plan and whether the data used (2006-2007) is the most recently available. [*Contract Exhibit "A", Task 1.b*]

Chapter 2

2. Please include categories of water use by river basin for water user groups and wholesale water providers. [*Title 31 Texas Administrative Code (TAC) §357.7(a)(2)(A)(iv) and §357.7(a)(2)(B)*]
3. Page 2.13, Table 2.4: The total of 501,886 acft/yr in 2060 appears to incorrectly total the data contained within the table for Collin County. Livestock demand has apparently been excluded from all totals. Please revise table to show correct totals in each decade (e.g. 502,770 acft/yr in 2060).

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 C applies to the Northern Trinity and Woodbine Aquifers Priority Groundwater Management Area. [*31 TAC §357.5(k)(1)(H)*]
5. Page 3.8, paragraph 5; page 3.12, paragraph 1 and others: The text indicates that the Sparta Aquifer supplies water to users in Region C, but the aquifer does not actually occur in the region. Please correct or remove references to the Sparta Aquifer.

Chapter 4

6. Please explain how the region considered emergency transfers of non-municipal use surface water without causing unreasonable damage to the property of the non-municipal water rights holder pursuant to Texas Water Code §11.139. [*31 TAC §357.5(i)*]
7. Please describe how third party impacts from voluntary redistributions of water and moving water including from rural and agricultural areas were considered, if applicable. [*31 TAC §357.7(a)(8)(G)*]

8. Please include in the final plan 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 include a summary of information regarding water loss audits specific to Region C. *[31 TAC §357.7 (a)(1)(M)]*

Chapter 7

10. Please clarify in the plan whether or not water management strategies were adjusted for potential impacts to threatened or endangered species and those instances when mitigation of potential effects was selected instead. *[31 TAC §357.5(e)(1)]*

Appendix Q

11. Page Q.14: Please revise cost estimates or justify why a 30-year debt service period rather than the TWDB-recommended 20-year debt service period was used for evaluating water management strategies other than reservoirs. *[Contract Exhibit "C" Section 4.1.2]*
12. *(Attachment B)* 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, apparent water source over allocations, and apparent unmet water needs 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 1.96, paragraph 2: Please consider referencing Appendix M for baseline water quality conditions used to evaluate water management strategies.

REGION C

POTENTIALLY OVER ALLOCATED SOURCES

Source Name	Source			Comments	Over allocated by WUG or	
	Region	Source County	Source Basin		WWP?	Interregional?
BARDWELL LAKE/RESERVOIR	C	RESERVOIR	TRINITY	Possible issue with WMS Flags.	WUG	No
DIRECT REUSE	C	COOKE	TRINITY	Possible issue with WMS Flags.	BOTH	No
DIRECT REUSE	C	DALLAS	TRINITY	Possible issue with WMS Flags.	BOTH	No
DIRECT REUSE	C	DENTON	TRINITY	Possible issue with WMS Flags.	WUG	No
DIRECT REUSE	C	ELLIS	TRINITY	Over allocated by current supplies.	BOTH	No
DIRECT REUSE	C	TARRANT	TRINITY	Over allocated by current supplies.	BOTH	No
DIRECT REUSE	C	WISE	TRINITY	Possible issue with WMS Flags.	BOTH	No
HUBERT H MOSS LAKE/RESERVOIR	C	RESERVOIR	RED	Possible issue with WMS Flags.	WUG	No
INDIRECT REUSE	C	DALLAS	TRINITY	Possible issue with WMS Flags.	BOTH	No
INDIRECT REUSE	C	DENTON	TRINITY	Possible issue with WMS Flags.	WUG	No
INDIRECT REUSE	C	ELLIS	TRINITY	Possible issue with WMS Flags.	WUG	No
INDIRECT REUSE	C	NAVARRO	TRINITY	Possible issue with WMS Flags.	BOTH	Yes - C/G
INDIRECT REUSE	C	TARRANT	TRINITY	Possible issue with WMS Flags.	WUG	No
LEWISVILLE LAKE/RESERVOIR NON-SYSTEM PORTION	C	RESERVOIR	TRINITY	Over allocated by current supplies.	WUG	No
OTHER AQUIFER	C	COLLIN	TRINITY	Over allocated by current supplies.	WUG	No
OTHER AQUIFER	C	ELLIS	TRINITY	Over allocated by current supplies.	WUG	No
OTHER AQUIFER	C	JACK	TRINITY	Over allocated by current supplies.	WUG	No
RAY HUBBARD LAKE/RESERVOIR	C	RESERVOIR	TRINITY	Over allocated by current supplies.	BOTH	No
RAY ROBERTS LAKE/RESERVOIR NON-SYSTEM PORTION	C	RESERVOIR	TRINITY	Over allocated by current supplies.	BOTH	No
RAY ROBERTS-LEWISVILLE-GRAPEVINE LAKE/RESERVOIR SYSTEM	C	RESERVOIR	TRINITY	Over allocated by current supplies.	BOTH	No
RICHLAND CHAMBERS LAKE/RESERVOIR NON-SYSTEM PORTION	C	RESERVOIR	TRINITY	Possible issue with WMS Flags.	BOTH	Yes - C/G
TAWAKONI LAKE/RESERVOIR	D	RESERVOIR	SABINE	Over allocated by current supplies.	WUG	yes - C/D
TEXOMA LAKE/RESERVOIR NON-SYSTEM PORTION	C	RESERVOIR	RED	Possible issue with WMS Flags.	BOTH	yes - C/D
TRINITY AQUIFER	C	COOKE	TRINITY	Over allocated by current supplies.	WUG	No
TRINITY AQUIFER	C	ELLIS	TRINITY	OK - Overdraft	WUG	No
TRINITY AQUIFER	C	FANNIN	RED	OK - Overdraft	WUG	No
TRINITY AQUIFER	C	GRAYSON	TRINITY	Over allocated by current supplies.	WUG	No
TRINITY AQUIFER	G	JOHNSON	TRINITY	Over allocated by current supplies.	WUG	Yes - C/G
TRINITY AQUIFER	C	PARKER	TRINITY	Possible issue with WMS Flags.	WUG	No
TRWD LAKE/RESERVOIR SYSTEM	C	RESERVOIR	TRINITY	Possible issue with WMS Flags.	BOTH	Yes - C/G
WAXAHACHIE LAKE/RESERVOIR	C	RESERVOIR	TRINITY	Over allocated by current supplies.	WUG	No
WEATHERFORD LAKE/RESERVOIR	C	RESERVOIR	TRINITY	Over allocated by current supplies.	WUG	No
WOODBINE AQUIFER	C	COLLIN	TRINITY	Over allocated by current supplies.	WUG	No
WOODBINE AQUIFER	C	ELLIS	TRINITY	Over allocated by WMS. Project name does not include 'Overdraft'	WUG	No
WOODBINE AQUIFER	C	FANNIN	RED	Over allocated by current supplies.	WUG	No
WOODBINE AQUIFER	C	FANNIN	SULPHUR	Over allocated by current supplies.	WUG	yes - C/D
WOODBINE AQUIFER	C	FANNIN	TRINITY	OK - Overdraft	WUG	yes - C/D
WOODBINE AQUIFER	C	GRAYSON	RED	Over allocated by current supplies.	WUG	No

WATER USER GROUPS WITH APPARENT UNMET NEEDS

WUG Name	WUG			2010	2020	2030	2040	2050	2060
	Region	WUG County	WUG Basin						
MANUFACTURING	C	DENTON	TRINITY	0	-51	-211	-335	-381	-576
ARGYLE	C	DENTON	TRINITY	0	0	0	-32	-107	0
ARGYLE WSC	C	DENTON	TRINITY	0	-133	-11	0	0	0
ATHENS	C	HENDERSON	TRINITY	0	-1,320	-1,568	-1,947	-2,492	-3,216
BARDWELL	C	ELLIS	TRINITY	0	-10	-33	-57	-86	-117
BONHAM	C	FANNIN	RED	0	-69	-404	-192	-1,363	-1,324
BUENA VISTA - BETHEL SUD	C	ELLIS	TRINITY	0	-539	-913	-1,336	-1,647	-2,084
CEDAR HILL	C	ELLIS	TRINITY	-1	0	0	0	0	0
CELINA	C	COLLIN	TRINITY	0	0	-6	-103	-105	-96
CELINA	C	DENTON	TRINITY	0	-331	-771	-1,510	-2,705	-3,212
COMMUNITY WATER COMPANY	C	ELLIS	TRINITY	-14	0	0	0	0	0
COUNTY-OTHER	C	FANNIN	RED	-152	-30	0	0	0	0
COUNTY-OTHER	C	FANNIN	TRINITY	-44	-35	-25	-16	-8	-2
FERRIS	C	ELLIS	TRINITY	-113	-147	-221	-277	-342	-404
GRAPEVINE	C	TARRANT	TRINITY	0	-33	-1,261	-2,372	-1,769	-2,732
HICKORY CREEK	C	DENTON	TRINITY	0	0	0	-26	0	0
HIGH POINT WSC	C	ROCKWALL	TRINITY	0	-1	0	-1	0	0
HOWE	C	GRAYSON	RED	-16	-28	-32	-38	-37	-35
HOWE	C	GRAYSON	TRINITY	0	0	-76	-177	-209	-230
IRVING	C	DALLAS	TRINITY	0	-1,477	-17,493	-19,771	-21,126	-22,368
ITALY	C	ELLIS	TRINITY	0	-30	-56	-87	-76	-101
JOHNSON COUNTY SUD	C	TARRANT	TRINITY	-179	-29	0	0	0	0
LUCAS	C	COLLIN	TRINITY	0	-1	0	0	0	0
MIDLOTHIAN	C	ELLIS	TRINITY	-83	-3,408	-5,054	-6,465	-5,341	-6,382
MUENSTER	C	COOKE	TRINITY	0	-3	-14	-15	-27	-40
OVILLA	C	DALLAS	TRINITY	-3	-4	-4	-6	-7	-11
OVILLA	C	ELLIS	TRINITY	-51	-53	-52	-50	-48	-45
PILOT POINT	C	DENTON	TRINITY	0	-118	-460	-498	-418	-595
SACHSE	C	COLLIN	TRINITY	-1	0	0	0	0	0
SANGER	C	DENTON	TRINITY	-718	-1,448	-2,184	-2,657	-2,986	-3,101
SARDIS-LONE ELM WSC	C	ELLIS	TRINITY	0	-1,944	-2,622	-2,545	-2,103	-1,980
WILLOW PARK	C	PARKER	TRINITY	0	-118	-423	-540	-569	-566
WORTHAM	C	FREESTONE	TRINITY	-258	0	0	0	0	-34
STEAM ELECTRIC POWER	C	ELLIS	TRINITY	0	0	0	-1,796	-3,766	-3,671