

January 18, 2019

Mr. J. Kevin Ward  
General Manager  
Trinity River Authority  
P.O. Box 60  
Arlington, TX 76004

RE: Informal Review Comments on Region C's Technical Memorandum

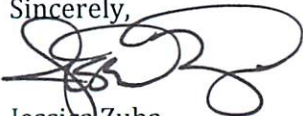
Dear Mr. Ward:

In addition to reviewing the Technical Memorandum report for administrative completeness, Texas Water Development Board (TWDB) staff have reviewed the draft groundwater and surface water data and methodologies presented in the planning group's Technical Memorandum. The attached comments are being provided for Region C's consideration during the remainder of their regional water plan development.

Unlike TWDB comments on the initially prepared plans (IPP), these are informal comments that do not require responses from the planning group. We have added this to our process timeline to allow for a more thorough review of source data and methodologies, and a longer timeline for planning group consideration, prior to the IPP comment and response period.

If you have any questions, please feel free to contact Sarah Backhouse, Regional Water Planning manager at 512-936-2387 or via email at [sarah.backhouse@twdb.texas.gov](mailto:sarah.backhouse@twdb.texas.gov).

Sincerely,



Jessica Zuba  
Deputy Executive Administrator  
Water Supply and Infrastructure

Attachment: TWDB Comments

cc: Howard Slobodin, Trinity River Authority  
Amy Kaarlela, Freese and Nichols, Inc.  
John Dupnik, TWDB  
Sarah Backhouse, TWDB  
Nelun Fernando, Ph.D., TWDB

JZ/SB/ms



Region C Regional Water Planning Group  
TWDB Informal Comments on the Technical Memorandum  
Groundwater and Surface Water Source Data & Methodologies

1. With the Initially Prepared Plan submittal, please consider providing information for the sedimentation rate, source of the rate, and methodology for projecting reservoir capacity and the area-capacity-elevation rating curve for all major reservoirs in Region C.
2. North Lake and Valley Lake are major reservoirs and permitted sources. Please consider reporting these sources in the state water planning database (DB22) and the Initially Prepared Plan.
3. For Benbrook Lake, the comment stating *"storage at elevation 694 feet in 1998 survey is 14307 [ac-ft]"* in the Water Availability Model (WAM) input file, BenCurrentSY.dat appears to be a typo. Please confirm the elevation (our information indicates 665 feet) and that the calculations were reported correctly.
4. For the West Fork System (Bridgeport–Eagle Mt.–Lake Worth), the current firm yield is either 120,925 acre-feet/year (AFY) or 118,525 AFY according to the associated Excel sheets submitted (CurrentBportMin.xls and CurrentBportMax.xls). At the same time, there is a firm yield of 115,300 AFY by standalone simulation of "OriginalCode", and 115,000 AFY by standalone simulation of "NewCodeCheck". None of these numbers match the firm yield of 115,908 AFY reported in the Technical Memorandum (Table 1-6). Please clarify how the final firm yield was determined for this system in the Initially Prepared Plan and correct discrepancies as necessary.
5. For White Rock Lake, please provide clarification on whether "Dallas will continue to dredge this source", as stated in the WAM input file. It was noted that the rating curves in the WAM input files are kept the same. Please ensure that reflecting the dredging of a reservoir in the Initially Prepared Plan complies with Exhibit C (Section 3.7, #15, footnote 28) which states "An exception would be that it should not necessarily be assumed that reservoirs would be dredged to remove silt as a regular operation and maintenance item. If anticipated, future dredging of a reservoir should be shown as a WMS".
6. For Moss Lake, please clarify with the Initially Prepared Plan submittal the use of 950 acre-feet for the inactive pool in the simulation for 2060.

Please also note that the permitted capacity of Moss Lake is 23,210 acre-feet, but a TWDB 1999 hydrographic survey identifies a capacity of 24,155 acre-feet, which is instead used in the current firm yield simulation. This capacity matches neither the

TCEQ permitted capacity nor the 2020 condition reported in the Technical Memorandum. Based on the results dataset, the firm yield for 2000 is 7,630 AFY (or 7,740 AFY by the excel file), while the firm yield for 2060 is 8,090 AFY. None of these indicate a firm yield of 7,410 AFY as is listed in the Technical Memorandum (pdf page 11).

Additionally, it was noted that the 2008 WAM input file was used instead of the 2013 updated input file that is available from Texas Commission on Environmental Quality. Please note that there is a more recently updated WAM input file now available, dated 8/13/2018.