TO: REGION C WATER PLANNING GROUP

FROM: DAN BUHMAN, CHAIR

SUBJECT: SEPTEMBER 5, 2025 PUBLIC MEETING

DATE: AUGUST 29, 2024

This memorandum will serve as a notice that the Region C Water Planning Group (RCWPG) is holding a public meeting at 1:00 P.M. on Friday September 5, 2025, at the Trinity River Authority General Manager Conference Room, 5300 South Collins, Arlington, TX 76018. An agenda (including information on how to participate in the public meeting) has been prepared for the meeting and is attached to this memorandum. The following is a brief overview of the agenda items to be discussed with relevant materials and handouts.

OPEN MEETING

- I. ROLL CALL
- II. APPROVAL OF MINUTES
 - A. February 24, 2025
 - B. July 11, 2025

Agenda Item II.A: RCWPG Minutes from February 24, 2025 Agenda Item II.B: RCWPG Minutes from July 11, 2025

- III. PUBLIC COMMENTS (Limited to 3 minutes per speaker)
- IV. PRIMARY ACTION ITEMS FOR CONSIDERATION
 - A. Overview of the Mediated Agreement between Region C and Region D and consider ratification of the Mediated Agreement.

On June 26, 2025, the TWDB found that an interregional conflict existed between the 2026 Region C and Region D Initially Prepared Plans and invited the planning groups to engage in mediation to resolve the conflict. The undersigned representatives of the regions met in mediation at the end of July and came to an agreement to resolve the conflict on August 1, 2025. This action item will discuss and consider ratification of the Mediated Agreement.

Agenda Item IV.A: Mediated Agreement Between Region C and Region D

B. Consider appointing up to five (5) representatives to serve on an interregional working group.

Part of the Mediated Agreement includes supporting an independent study to address the potential benefits and impacts of the Marvin Nichols Reservoir and the associated mitigation land acquisition on the economic, agricultural, and natural resources of Regions C and D. Region C and Region D are to identify up to five (5) members to participate in an interregional working group to coordinate on activities related to the independent study such as study scoping, progress, and conclusions. This action item will consider appointing up to five (5) representatives to serve on an interregional working group.

C. Consider authorizing the interregional working group to develop a draft technical scope of work for the specified study in the Mediated Agreement and authorize the working group to issue a Request for Statement of Qualifications to prospective technical consultants.

This action item will consider authorizing the interregional working group to develop a draft technical scope of work for the specified study in the Mediated Agreement and authorize the working group to issue a Request for Statement of Qualifications to prospective technical consultants.

- V. OTHER ITEMS (MAY RESULT IN ACTIONS)
 - A. Update on Agency and Public Comments on the Region C Initially Prepared Plan.

The public comment period for the Region C Initially Prepared Plan closed on July 18, 2025. This agenda item will present a brief overview of the comments received.

Agenda Item V.A: Draft Response to Public and Agency Comments on the Region C Initially Prepared Plan

B. Schedule overview and next meeting.

VI. OTHER DISCUSSION

- A. Report from Regional Liaisons.
- B. Report from the Interregional Planning Council.
- C. Report from Texas Water Development Board.

RCWPG MEMORANDUM FOR SEPTEMBER 5, 2025 PAGE 3

D. Other Reports.

VII. ADJOURNMENT

The following items are enclosed with this memorandum:

- I. RCWPG Agenda September 5, 2025
- II. Meeting Handouts
 - A. Agenda Item II.A –RCWPG Minutes from February 24, 2025
 - B. Agenda Item II.B RCWPG Minutes from July 11, 2025
 - C. Agenda Item IV.A Mediated Agreement Between Region C and Region D
 - D. Agenda Item V.A Draft Response to Public and Agency Comments on the Region C Initially Prepared Plan

Agenda Item II.A - Attachment

RCWPG Minutes from February 24, 2025

MINUTES OF AN OPEN PUBLIC MEETING February 24, 2025

The Region C Water Planning Group (RCWPG) met in an open public meeting on Monday, February 24, 2025, at 1:00 P.M. The meeting was held at the North Central Texas Council of Governments located at 616 Six Flags Drive, Centerpoint Two Building, First Floor Transportation Council Room, Arlington, Texas. Notice of the meeting was legally posted.

Jenna Covington called the Region C Regional Water Planning Group meeting to order at approximately 1:05 P.M. and welcomed guests.

I. ROLL CALL

Secretary Covington conducted a roll call. The following members were in attendance:

David Bailey	John Lingenfelder
Jay Barksdale	Steve Mundt
Dan Buhman	Denis Qualls
Shela Chowdhury (Alt. for Chris Harder)	Haley Salazar (Alt. for Stephen Gay)
Glenn Clingenpeel	Rick Shaffer
Jenna Covington	Doug Shaw
Grace Darling	Steve Starnes
Harold Latham	John Stevenson

Kevin Smith, TWDB, Howdy Lisenbee, Region D, and Matt Beseda, TSSWCB, were present. The registration lists signed by guests in attendance are attached.

II. APPROVAL OF MINUTES – January 6, 2025

The minutes of the January 6, 2025, RCWPG meeting were approved by unanimous consensus by the RCWPG.

III. PUBLIC COMMENTS (Limited to 3 minutes per speaker)

One speaker made public comments but asked to delay comments until after the last item.

IV. PRIMARY ACTION ITEMS FOR CONSIDERATION

A. Announcement of Region C RWPG Chair vacancy; Call for nominations from the nominating committee to fill vacancy and vote to fill vacancy.

Steve Mundt, Chair of the Nominating Subcommittee, presented this item to consider nominations to fill the Chair vacancy left by Kevin Ward's resignation. The Nominating Subcommittee met on January 23, 2025 to discuss a replacement for the Chair vacancy. Upon a motion by Steve Mundt, and a second by Jay Barksdale, the Nominating Subcommittee approved nominating Dan Buhman to replace Kevin Ward.

There were no public comments on this action item.

Ms. Covington asked if there were any nominations from the floor. Hearing none, upon a motion by Doug Shaw, and a second by John Stevenson, the Region C WPG voted unanimously to elect Dan Buhman as Chair of the Region C WPG.

B. Review and discuss the 2026 Region C Initially Prepared Plan (IPP).

Simone Kiel, FNI, led this discussion on the contents of the 2026 Region C IPP. The IPP has the following 10 Chapters:

- 1. Description of Region C
- 2. Population of Water Demand Projections
- 3. Analysis of Water Supply
- 4. Identification of Water Needed
- 5. Water Management Strategies (5 Sections)
- 6. Impacts of Region C Plan
- 7. Drought Response
- 8. Unique Stream Segments, Unique Reservoir Sites, Legislative Recommendations
- 9. Implementation and Comparison to Previous Plan
- 10. Plan Approval Process and Public Participation

Ms. Kiel added that the IPP has 16 Appendices (A-P)

- Appendix G WMS Evaluation
- Appendix H Cost Estimates
- Appendix J Updated Impacts Analysis of Marvin Nichols
- 2 Placeholders
 - TWDB Socioeconomics Report
 - Response to IPP Comments

There were no public comments on this action item.

C. Accept public comments on the Region C Initially Prepared Plan (limit three minutes per speaker).

One comment was received from Eddie Figuora who stated that Celina will have a lot of water needs in the future. Mr. Figuora asked how the City can facilitate additional resources.

Jenna Covington stated that NTMWD is looking for additional water supplies.

D. Consider approval of the Region C IPP, authorize the Technical Consultant to make non-substantial changes prior to TWDB submittal, and authorize TRA and Technical Consultant to submit the IPP to the TWDB by March 3, 2025.

Ms. Kiel stated that this item is seeking approval of the IPP for the 2026 Region C Plan as reviewed in the preceding Agenda Items IV.B and IV.C.

There were no public comments on this action item.

Upon a motion by Glenn Clingenpeel, and a second by Denis Qualls, the RCWPG voted unanimously to approve the IPP for the 2026 Region C Plan; authorize the

Consultant to make non-substantial changes prior to TWDB submittal; and authorize TRA and Technical Consultant to submit the IPP to the TWDB by March 3, 2025.

E. Authorize TRA to post Public Notice and hold a Public Hearing for the IPP.

Ms. Kiel advised the Planning Group that this item will authorize TRA to post public notice for the public hearing where the IPP will be presented. This notice must be posted 30 days in advance of the public hearing.

There were no public comments on this action item.

Upon a motion by Denis Qualls, and a second by Glenn Clingenpeel, the RCWPG voted unanimously to authorize TRA to post Public Notice and hold a Public Hearing for the presentation of the IPP.

V. OTHER ITEMS (MAY RESULT IN ACTIONS)

A. Schedule Overview

Simone Kiel, FNI, gave the following timeline:

- Initially Prepared Plan (IPP) Due by March 3, 2025
- IPP Public Hearing Spring 2025
- Final Water Plan October 20, 2025
- B. Set date and time for the Public Hearing Suggested dates: 4/14, 4/21, 5/5, 5/19
- C. Future Business None

VI. OTHER DISCUSSION

- A. Updates from the Chair None
- B. Report from Regional Liaisons
 - Region B None
 - Region D Howdy Lisenbee reported that Region D adopted their IPP on February 19, 2025, and they are looking at setting date for Public Hearing.
 - Region G Doug Shaw advise Region G is on same cycle.
 - Region H Chairman Ward said Region H has not adopted their IPP yet.
 - Region I None
- C. Interregional Planning Council Jenna Covington advised that the IRPC work has been completed.
- D. Report from Texas Water Development Board None
- E. Report from Texas Department of Agriculture None
- F. Report from Texas Parks and Wildlife Department None
- G. Other Reports Matt Beseda, TSSWCB, advised he will tour Wetlands Conservation project on April 15, 2025.
- H. Confirm Date and Location of Next Meeting TBD; NCTCOG, 616 Six Flags Drive, Centerpoint Two Building, First Floor Transportation Council Room, Arlington, Texas 76011

RCWPG	MIN	IUT	ES
February	24,	202	25
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I. Public Comments - None

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There being no further business, the meeting of the Region C WPG adjourned at approximately 2:54 PM.

DAN BUHMAN, Chairman

OPEN MEETING February 24, 2025

NAME	REPRESENTING	E-MAIL ADDRESS
Clifty E. Miller	Cometrics, LLC	cmillerocemetrics.us
Kevid Smith	TWDB	Kevin Smith @ twdb. texus. 95V
JASON Stovall	SRA	; stovall D gratx. org
CONRDO KINH	SRA	BCKING DSRATX. ORG
Pedro Paulo Costa	A.C.E.	pedrap. bc costa @ gmail. com
COURTNEY CORSO	FNI	COURTNEY. CORSO @ FREESE. COM
Diwen Zhames	Plummer	Qiwenzhon, @ Plummer.com
Holt Chambers	FNI	holt.chanber@freese.com
Loha Loujen felde	Public	Thisperte Heroi Cquail. un
Howdy Lisenber	Region D	havely. I is enber e conmerce +x. org
JOHN STEWENSON	KIN WENMENTAL	STEVENSON @ THEIPOWENTS GROUP. COM
Rick Shaffer	Rugion C	vshaffe e weether Land gov

OPEN MEETING February 24, 2025

NAME	REPRESENTING	E-MAIL ADDRESS
Steve Sterne	Counties	Steve , Stanue tex 05 @ Guail.com
Corey Janes	NTGCD	Com Jores ntack. con
Pors Sher	UTGCP	day a upperaish sed, on
Claire & Venchot	TGPRILLEH FARMS	a venchot eyahoo.
Jay Barksdale	Public	j barks dale D sunvestion. com
Haley Salazar	city of Denton	haley. Sahzor acity of Dentan ar
Brigit Buff	Plummer	bbuff@plymmer.com
P.J Muneski	NTMWD	rmuraski (NT MWD. com
Ellen Monald	Plummer	emedoralle plummer.com
Rachel Ickut	TLWS	Vachel. ickute towh.com
Fach Huff	TRWD	Zach. huff @ trwd.oor
GRACE DARWING	Ace	DARLINGE @ SACCIOBAL, NET

OPEN MEETING February 24, 2025

NAME	REPRESENTING	E-MAIL ADDRESS
Zach Huff	TRUS	Zuch huffe brud. com
lisa Estrada Perdue		Lisa Estrada Cle avahor
Dan Buhman		
Schna Cournator	NTHUP	
Laura Lee	Plummer Assevintes	Ikler@ plummer. com
Ranna Hourt	UTRUD	
DECIO STEPPER	ASCENDANT COMMUNITY GOUC.	decio Sieleert @ qued Con
Igor Gridelli	ASCENDANT COMMUNITY EPUC.	igar guidelli @ gmail. Com
Chany Lee	DWY	chang la @ dallas you
MATHER WYSESE DA	755WCB	inbeglick + souds, resis, gov.
Gless C. Clingenped	TRA	clingapula thin 3 a.or
Nicole Lutiquiano	TRUB	Nicole. Rusi Sliano @ drust

OPEN MEETING February 24, 2025

NAME	REPRESENTING	E-MAIL ADDRESS
MICK KONKN AMELA CHOWDHURY	Celina City of FORY WORTH	NIchelas. Koven C Holeman
Andrew Pynem	Celina	Shela-chowdhury afort worth texas. 96 V
SHELA CHOWOMURY	CITY OF FORT WORTH	shela-choudhury afort north texas.gov
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Agenda Item II.B – Attachment

RCWPG Minutes from July 11, 2025

MINUTES OF AN OPEN PUBLIC MEETING July 11, 2025

The Region C Water Planning Group (RCWPG) met in an open public meeting on Friday, July 11, 2025, at 3:00 P.M. The meeting was held at the North Central Texas Council of Governments located at 616 Six Flags Drive, Centerpoint Two Building, First Floor Transportation Council Room, Arlington, Texas. Notice of the meeting was legally posted.

Chairman Dan Buhman called the Region C Regional Water Planning Group meeting to order at approximately 3:00 P.M. and welcomed guests.

I. ROLL CALL

Chairman Buhman conducted a roll call. The following members were in attendance:

Jay Barksdale	Denis Qualls
Dan Buhman	Haley Salazar (Alternate for Stephen Gay)
Glenn Clingenpeel	Rick Shaffer
Chris Harder	Doug Shaw
Steve Mundt	Paul Sigle
R. J. Muraski	Steve Starnes

Kevin Smith, TWDB, Darrell Dean, TDA, Matt Beseda, TSSWCB, Howdy Lisenbee, Region D, and Kathy Turner Jones, Region G, were present. The registration lists signed by guests in attendance are attached.

II. PUBLIC COMMENTS (Limited to 3 minutes per speaker)

There were no public comments.

III. PRIMARY ACTION ITEMS FOR CONSIDERATION

A. Announcement of Region C RWPG voting member vacancies: Denis Qualls representing Municipalities; Call for nominations to fill vacancy and vote to fill vacancy.

Chairman Buhman led this discussion to consider recommendations for replacement of RCWPG members who have resigned. Denis Qualls resigned from the RCWPG effective April 1, 2025. Mr. Qualls nominated Matt Penk to fill the Municipalities interest vacancy.

Chairman Buhman asked if there were any nominations from the floor. Hearing none, Chairman Buhman asked for a vote on the nomination.

There were no public comments on this action item.

Upon a motion by Chairman Buhman, and a second by Glenn Clingenpeel, the Region C WPG voted unanimously to appoint Matt Penk to fill the municipalities interest vacancy left by the resignation of Denis Qualls.

B. Announcement of interregional conflict declaration and mediation; Consider appointing up to four (4) representatives authorized to negotiate on behalf of the Region C Water Planning Group in a TWDB facilitated mediation with Region D regarding a potential conflict between the Region C and Region D 2026 Initially Prepared Plans.

The TWDB declared that an interregional conflict exists between Region C and Region D 2026 Initially Prepared Plans on June 26, 2025. The TWDB recommended facilitated mediation between Region C and Region D planning group representatives. This action item will consider appointing up to four (4) representatives authorized to negotiate on behalf of the Region C Water Planning Group.

Legal/Special Conditions (from TWDB Board Meeting):

- 1. Require the Region C and Region D planning groups to appoint by July 14, 2025, up to four representatives per region authorized to negotiate on their behalf in a facilitated mediation to occur by July 31, 2025.
- 2. Require the Executive Administrator to appoint up to two representatives to be available as resources in the facilitated mediation.
- 3. Limit participation in that facilitated mediation process to the representatives identified in Items 1 and 2 and the chosen mediation staff.
- 4. The Executive Administrator will report back to the Board at a regularly scheduled Board meeting.

There were no public comments on this action item.

Upon a motion by Glenn Clingenpeel, and a second by Steve Mundt, the RCWPG voted unanimously to authorize Dan Buhman, Jenna Covington, Sarah Standifer and Larry Patterson to negotiate on behalf of the Region C Water Planning Group in a facilitated mediation to occur by July 31, 2025.

IV. ADJOURNMENT

There being no further business, the meeting of the Region C WPG adjourned at approximately 3:40 PM.

DAN BUHMAN, Chairman	

OPEN MEETING July 11, 2025

NAME	REPRESENTING	E-MAIL ADDRESS
Day Ster	VTCCP	dows @ uppersinity sedian
Howdy Lisenbee	Region D - Commerce TX	howly, lisenbee Commerce tx. org
TROY D. HENRY	SABINE RISER AUDIERING	THENRY @ SRATK. ORG
Danell Dean	TX Dopt of Ag	Savel. Den @ rechsagniculare. sur
Glenn Clingen Pul	TRA	clingenpel gotninityra.org
RAS MEHER	TALORS	mi.melto jacobs com
Kather Turner Jones	PACO	Kiones @ prairie lands god of
Riwen zhong	Plummer	Divershens @ Phummer com.
MattPenk	DWU	matthew.penk@dollas.gov
MATHEW SESENA	75566 B	mbe sedal +sscocb. +gragor
Steve Starnes	COUNTY	Steve Stornes Texas @ Courtil On
Jay Barksdole	Public	jourksoule @ sunwester. com

OPEN MEETING July 11, 2025

NAME	REPRESENTING	E-MAIL ADDRESS
Chang Lee	Dwa	Chang lee @ dallar gov
DEUIS COURTY	OEURO	DEUI), Quanto @ (IT) of DEUTON, som
Rick Shaffer	Roin C WPG	rshaffer a weather for to. go
SHELA CHOWDHURY	CITY OF FORT WORTH	she la chondhurya fort worth texas .gov
RJ Muraska	NTMUSP	rmuraski @ n+mwo.com
Chas Heder	FWWD	chrshpb. Herd e Portwell Excursion
Zach Huff	TRUD	Zuch. huft @t Rud Con
Nicole Rurigliano	TRUD	Nicole. Rutigliano (md. co.
Kevin Smith	TWDB	kevinsmith @t who texus, gov

Agenda Item IV.A – Attachment

Mediated Agreement Between Region C and Region D

Agreement Resolving the Declared Conflict Between the Region C and Region D 2026 Initially Prepared Water Plans

On June 26, 2025, the Texas Water Development Board (TWDB) found that an interregional conflict existed between the 2026 Region C and Region D Initially Prepared Plans and invited the regional water planning groups to engage in mediation to attempt to resolve the conflict.

On July 25, 28, 29, 30, and 31, 2025, the undersigned representatives of the regions met in mediation and discussed the issues related to the current conflict in their regional water plans relating to the proposed Marvin Nichols Reservoir.

The undersigned representatives of Region C and Region D agree to resolve the conflict that the TWDB found between their Initially Prepared Plans as follows:

- 1. Region C will make Toledo Bend a Recommended Strategy (alongside Marvin Nichols Reservoir) so both can be explored.
 - a. Region C will advance the Marvin Nichols project to 2070 and include Toledo Bend as a recommended water management strategy in the current round of planning.
 - b. Region C will seek funding from TWDB to facilitate and conduct an "Apples-to-Apples" monetary and non-monetary comparison of the Marvin Nichols and Toledo Bend projects. Study is to be conducted by firm(s) that can provide a fresh assessment, commence by March 2026, and be completed by July 2027.
 - c. Neither Region will protest either regional plan; and, each Region's board and board members will serve as representatives of this agreement, refraining from activities whose aim is to adversely impact the examination of the Marvin Nichols project prior to 2030. Members may continue to express their personal preferences and opinions regarding the proposed project but agree to honor the process outlined in this agreement.
 - d. No application for permitting would occur for Marvin Nichols prior to 2030.
- 2. Regions C and D will support an independent study to address the potential benefits and impacts of Marvin Nichols and the anticipated associated mitigation land acquisition on the economic, agricultural, and natural resources of Regions C and D.
 - a. Regions C and D will jointly pursue immediate funding through TWDB with the intent to initiate the study no later than March 2026. The study must be completed by July 2027. Should state resources not be allocated, Regions C and D would work to advance this study and agree to equally share the costs of the study (not to exceed \$250,000 each, unless subsequently agreed upon).
 - b. Regions C and D will each identify up to 5 members to participate in an interregional working group to cooperatively participate in interregional activities related to the independent study and seek opportunities to jointly communicate about the study scoping, progress, and conclusions.

Agreement Resolving the Declared Conflict Between the Region C and Region D 2026 Initially Prepared Water Plans

- c. The study will include consideration of economic, agricultural, and natural resource impacts in Regions C and D, including monetary and non-monetary factors, such as: water affordability, private property rights, community impacts; mitigation land scenarios (including assessment of compensation strategies for impacted landowners and industries); and unexplored economic opportunities to Region D associated with Marvin Nichols implementation.
- d. Results of the study should be included in the September 2028 Technical Memoranda along with acknowledgements from Regions C and D of their participation in the study scoping and selection of the contractor(s).
- 3. Regions C and D will jointly seek state financial support for alternatives to Marvin Nichols that are more costly, to resolve this ongoing conflict.
- 4. Regions C and D will engage in a joint informational campaign to convey information considered in, and resulting from, this negotiated agreement, including: 1) a shared statement on the outcome of mediation and what is going into the Initially Prepared Plans as a result, and 2) mutually agreed upon facts from the Initially Prepared Plans that influenced the resolution of the interregional conflict.

For Region D

The undersigned representatives agree to transmit this agreement to the Texas Water Development Board and further agree (1) to seek ratification of this agreement by their respective regional water planning groups, and (2) to seek inclusion of the language relating to the terms of the agreement in their region's adopted 2026 regional water plans.

For Region C

Dan Buhman Date: 01/08/25	Howdy Lisenbee Date: 31/07/25
Jenna Covington Date: 31/07/25	Fred Milton Date: 31/07/25
Larry Patterson Date: 3_1/_07/_25	Travis Ransom Travis Ransom (Jul 31, 2005 20 18 37 CDT) Travis Ransom Date: 31/07/25
Sarah Standifer Date: 31 /07 /25	Jim Thompson Jim Thompson (Aug 1, 2025 08 06:10 CDT) Jim Thompson Date: 01/08/25

Agenda Item V.A – Attachment

Draft Response to Public and Agency Comments on the Initially Prepared Plan

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APPENDIX Q RESPONSE TO COMMENTS ON IPP

SECTION OUTLINE	
Section Q.1	Introduction
Section Q.2	State Agency Comments
Section Q.3	Public Comments
Section Q.4	Other Changes to WWP and/or WUG Plans
Attachment Q-1	Comments Received on Initially Prepared Plan

Introduction 0.1

This appendix contains comments on the 2026 Initially Prepared Region C Water Plan (IPP) received by the Region C Water Planning Group (RCWPG) with corresponding responses. The original comments received are in Attachment Q-1.

The RCWPG adopted the IPP at its public meeting on February 24, 2025, and submitted it to the TWDB before March 3, 2025. As part of the public review process and in compliance with requirements of Texas Administrative Code Title 31 Part 10 Chapter 357 Rule 357.21 (h)(7), a copy of the IPP was made available for viewing at the office of the County Clerk and at least one public library in each Region C county identified in Table Q.1. Copies were made available to the public at these locations 30 days prior to and 60 days following the Public Hearing held on May 19, 2025. Additionally, an electronic copy of the IPP was made available to the public on the Region C website (https://regioncwater.org/).

The Texas Water Development Board, as administrator of the regional water planning process, provided a detailed review of the plan and compliance with the rules and regulations governing regional water plans. The TWDB comments were received on July 19, 2025. Other state agencies (such as Texas Parks and Wildlife, and the Texas State Soil and Water Conservation Board) were given the opportunity to review and submit written comments on the IPP up to 90-60 days after the Public Hearing. Responses to these comments are in Section Q.2. Additionally, the public was given the opportunity to comment on the IPP at the Public Hearing as well as the opportunity to submit written comments 30 days prior to and up to 60 days following the Public Hearing. Responses to these comments are in Section Q.3. Any other changes made to the IPP that were not directly related to an official comment are summarized in Section Q.4.

TABLE Q.1 LIST OF PLACES WHERE A COPY OF THE IPP WAS AVAILABLE FOR VIEWING

COUNTY	OFFICE OR LIBRARY	ADDRESS
Collin	Collin County Clerk's Office	2300 Bloomdale Rd Ste. 2106, McKinney, TX 75071
Collin	L.E.R Schimelpfenig Library	5024 Custer Rd, Plano, TX 75023
Cooke	Cooke County Clerk's Office	112 S Dixon St, Suite 116, Gainesville, TX 76240
Cooke	Cooke County Library	200 S Weaver St, Gainesville, TX 76240
Dallas	Dallas County Law Library	600 Commerce St B40, Dallas, TX 75202
Dallas	J. Erik Jonsson Central Library	1515 Young Street Dallas, TX 75201
Denton	Denton County Clerk's Office	1450 E McKinney St, Denton, TX 76209
Denton	Lewisville Public Library	1197 W Main St, Lewisville, TX 75067
Ellis	Ellis County Clerk's Office	109 S Jackson St, Waxahachie, TX 75165

COUNTY	OFFICE OR LIBRARY	ADDRESS
Ellis	Nicholas P Sims Library	515 W Main St, Waxahachie, TX 75165
Fannin	Fannin County Clerk's Office	800 E 2nd St, Bonham, TX 75418
Fannin	Bonham Public Library	305 E 5th St, Bonham, TX 75418
Freestone	Freestone County Clerk's Office	103 E Main St, Fairfield, TX 75840
Freestone	Fairfield Library	350 W Main St, Fairfield, TX 75840
Grayson	Grayson County Clerk's Office	100 W Houston St # 17, Sherman, TX 75090
Grayson	Denison Public Library	300 W Gandy St, Denison, TX 75020
Henderson	Henderson County Clerk's Office	125 N Prairieville St #101, Athens, TX 75751
Henderson	Clint W. Murchison Memorial Library	121 S Prairieville St, Athens, TX 75751
Jack	Jack County Clerk's Office	100 N Main St #208, Jacksboro, TX 76458
Jack	Gladys Johnson Ritchie Public Library	626 W College St, Jacksboro, TX 76458
Kaufman	Kaufman County Clerk's Office	1902 US-175, Kaufman, TX 75142
Kaufman	Kaufman County Library	3790 S Houston St, Kaufman, TX 75142
Navarro	Navarro County Clerk's Office	300 W 3rd Ave #001A, Corsicana, TX 75110
Navarro	Corsicana Public Library	100 N 12th St, Corsicana, TX 75110
Parker	Parker County Clerk's Office	1112 Santa Fe Dr, Weatherford, TX 76086
Parker	Weatherford Public Library	1014 Charles St, Weatherford, TX 76086
Rockwall	Rockwall County Clerk's Office	1111 E Yellow Jacket Ln #100, Rockwall, TX 75087
Rockwall	Rockwall County Library	1215 E Yellow Jacket Ln, Rockwall, TX 75087
Tarrant	Tarrant County Clerk's Office	100 W Weatherford St, Fort Worth, TX 76196
T	Fort Worth Public Library – Southwest	4001 Library Ln. Fort Worth TV 76100
Tarrant	Regional	4001 Library Ln, Fort Worth, TX 76109
Wise	Wise County Clerk's Office	200 N Trinity St, Decatur, TX 76234
Wise	Decatur Public Library	1700 Hwy 51 South, Decatur, TX 76234

Q.2 State Agency Comments

A summary of the agencies that provided comments are shown in **Table Q.2**.

TABLE 0.2 SUMMARY OF AGENCY COMMENTS

COUNT	NAME	REPRESENTING
1	Sarah N. Lee	Texas Water Development Board
2	Marty Kelly	Texas Parks & Wildlife Department

Q.2.1 Texas Water Development Board Comments

TWDB's original comments on the IPP are compiled and located in Attachment Q-1. Table Q.3 lists TWDB's comments and the responses or action taken to address them.

TABLE Q.3 TWDB COMMENTS AND RESPONSES

COMMENT NO.	TWDB COMMENT	REGION C RESPONSE/ACTION
	ments: Comments, questions, and data revisions that must be sa	tisfactorily addressed in order to meet statutory, agency rule,
and/or contra	act requirements	
1	Appendix E. The plan states that "New area-capacity tables were developed based on the volume reduction due to sedimentation.", however it is unclear what methodology was used. Please provide additional details on the methodology used to develop the area-volume rating curve in the final, adopted regional water plan. [Contract Exhibit C, Section 2.3.1]	Additional details on the area-volume rating curve methodology were added into Appendix E.
2	Section 3.3.3. The plan appears to be missing a table describing the methodologies used for estimating non-MAG groundwater availability. Please include the methodologies for non-MAG availability, in table form, broken out by aquifer and county, in the final, adopted regional water plan. [Contract Exhibit C, Section 2.3.4.2]	A table describing the methodology used for estimating non-MAG availability was added into Section 3.3.3.
3	Section 3.3.3, Table 3.5. The value in Table 3.5 for Other Aquifer in Kaufman County is a new groundwater source for the 2026 plan. The report text states that the methodology is based on a previous regional water plan and therefore appears to be inaccurate since this is a new groundwater source that was not in the previous plan. Please clarify the methodology for determining the non-MAG value for this source in the final, adopted regional water plan. [Contract Exhibit C, Section 2.3.4.2]	The non-MAG availability for Other Aquifer in Kaufman County was estimated based on TWDB historical pumping data, however this is a new groundwater source that was not in the 2021 Plan. Clarification that this is a new groundwater source was added into Section 3.3.3.
4	Section 3.5. Table 3.8 appears to present major water provider (MWP) supplies by source, but not category of use. Please ensure that existing supplies by category use, for each MWP, are included in the final, adopted regional water plan. [31 TAC § 357.32(f)]	A new table presenting MWPs existing supplies by category of use was added into Section 3.5.

COMMENT NO.	TWDB COMMENT	REGION C RESPONSE/ACTION
5	Section 3.6 and Chapter 5E. The plan presents existing supplies by water user group (WUG) within Chapter 5E, however existing supplies by WUG are required to be presented as part of Chapter 3. Please include at minimum, a reference in Chapter 3 to where the existing supply estimates are included within Chapter 5, in the final, adopted regional water plan. [31 TAC § 357.22(b); 31 TAC § 357.32(f); Contract SOW Task 3]	Chapter 5E of the 2026 Region C IPP shows population and demand projections, supplies, needs, and water management strategies by WUG. Chapter 5E is organized by county and discusses each WUG in detail. Chapter 5E does not split WUGs by county/basin and looks at the complete WUG (including wholesales) to provide clarity to the individual water providers that are looking to develop water for all their needs. A reference was added in Chapter 3 that existing supplies for each WUG are shown in Chapter 5E. The DB27 tables that provide detailed information by WUG are included in Appendix D.
6	Chapter 4 and Chapter 5E. The plan presents identified water needs by WUG within Chapter 5E, however needs at the WUG level are required to be presented as part of Chapter 4. Please include at minimum, a reference in Chapter 4 to where identified water needs are included within Chapter 5, in the final, adopted regional water plan. [31 TAC § 357.22(b); 31 TAC § 357.33(c); Contract SOW Task 4A]	Appendix D contains the DB27 reports that include details of water needs by WUG. A reference to Appendix D was added to Chapter 4 and the introduction of Chapter 5E. Chapter 5E shows population and demand projections, supplies, needs, and water management strategies by WUG. Chapter 5E is organized by county and discusses each WUG in detail. Chapter 5E does not split WUGs by county/basin and looks at the complete WUG (including wholesales) to provide clarity to the individual water providers that are looking to develop water for all their needs. A reference was added in Chapter 4 that a summary of needs by WUG are shown in Chapter 5E.
7	Section 4.5 and DB27. The total values for the second-tier needs presented for WUGs in Table 4.6 appear to be inconsistent with data reported in DB27. For example, Table 4.6 shows the total second-tier needs in 2080 as 1,045,839 acre-feet/year, however DB27 reports the total second-tier needs in 2080 as 1,032,758 acre-feet/year. Please review the data presented in the table and revise as necessary to present data consistent with DB27 in the final, adopted regional water plan. [31 TAC § 357.33(d)	Table 4.6 has been updated to be consistent with DB27.

COMMENT NO.	TWDB COMMENT	REGION C RESPONSE/ACTION
8	Appendix H and DB27. Table H.11D and DB27 report the "Conservation, Water Loss Control - Savoy" WMS as providing zero acre-feet of demand savings in all decades. Any recommended strategies must show a yield during drought of record conditions in at least one planning decade. Please either reassess the demand savings or remove this as a recommended strategy in the final, adopted regional water plan. [31 TAC § 357.34(d)]	Appeals were submitted in DB27 to note that the savings are less than 1 AF/Y, as several WUGs are small and have low demand projections. However, Region C still provides these WUGs with conservation recommendations that include cost and yield estimates. FNI has updated Table H.11D in the report to indicate savings of <1 AF/Y and updated DB 27 to show 1 AF/Y of savings in 2080.
9	Appendix G. The plan does not appear to include a quantitative measure for assessing reliability of water supplies for water management strategy evaluations. Reliability as presented in Table G.1 appears to correlate reliability to a qualitative reporting of low to high. Please clearly provide the quantitative basis for reliability used in the evaluations of water management strategies in the final, adopted regional water plan—ensuring that any recommended strategies provide a firm water supply throughout drought of record conditions. [31 TAC § 357.34(e)(3)(A)]	All recommended and alternative projects are 100% reliable by TWDB standards (firm yield for surface water and MAGs for groundwater). However, there are varying levels of uncertainty for different projects, such as competition for water for groundwater projects and reliance on adoption rates for conservation. FNI will state this in Appendix G and Chapter 5 and adjust the heading to be uncertainty in Table G.1.
10	Section 5F.2, page 5F-6. The plan does not include the implementation status for the Denton - Direct Potable Reuse project which meets the criteria for large projects in accordance with 31 TAC § 357.34(g) and Contract Exhibit C, Section 2.5.2.7 as direct potable reuse >5,000 AFY. Please ensure that the implementation status for this project is included within the implementation status table provided in Appendix N and that a timeline graphic is included in the final, adopted regional water plan. [31 TAC § 357.34(g)(2), Contract Exhibit C, Section 2.5.2.7]	The Direct Potable Reuse strategy was reduced to 5,000 AFY, which is below the criterion for requirements under 31 TAC 354.34(g).

COMMENT NO.	TWDB COMMENT	REGION C RESPONSE/ACTION
11	Section G.2.7.6 and DB27. It is unclear in the plan whether strategy water supply volumes for the Small Aquifer Storage and Recovery for Denton, UTRWD, and NTMWD (WMSIds 6928, 6088, and 4939), were reduced to reflect the expected net water supply recovery from the aquifer. Please clearly state the expected percent of recovery for these projects and, as appropriate, the lesser volumes as the net water supply yields for these strategies. If the strategy supply volumes do not already reflect the lesser, expected share of recovered water, please modify the supply volumes as appropriate in the final, adopted regional water plan and in DB27. [Contract Exhibit C, Section 2.5.2.4]	The ASR discussion in Appendix G addresses recovery rates. Successful ASR development is highly reliable. It is normally possible to achieve 90-95% recovery efficiency. Table G.12 was updated to clearly state the recovery percentage and the expected net water supply. DB27 reflects the expected net water supply recovery.
12	Section G.6.1 and DB27. It is unclear in the plan whether strategy water supply volumes for the TRWD ASR (WMSId 4936) strategy were reduced to reflect the expected net water supply recovery from the aquifer - noted as 88 percent. Please clearly state if the volume was reduced. If the strategy supply volume does not already reflect the lesser, expected share of recovered water, please modify the supply volume as appropriate in the final, adopted regional water plan and in DB27. [Contract Exhibit C, Section 2.5.2.4]	Table G.12 was updated to clearly state the recovery percentage and the expected net water supply. DB27 reflects the expected net water supply recovery.
13	Appendix I, Section I.1.3, Appendix H, Table H.11.B, Chapter 5B, and DB27. The plan appears to include future conservation savings considered previously implemented as "Demand Reduction Since Base Year (already implemented)". Adjustments to GPCD from conservation savings due to previously implemented conservation measures should be applied as an upfront adjustment to the base year GPCD for demand projections rather than as a 'future' recommended water management strategy. Please note adjustments to Boardadopted demand projections may be requested but require a revision process separate from plan revisions in response to public comments. Please remove the "Residual Savings from Conservation Measures Implemented Since Baseline Year" strategies as recommended conservation strategies in in DB27. [31 TAC 357.31(e)(2); Contract Exhibit C Section 2.2.2.1]	The savings identified as "Demand Reduction Since Base Year (already implemented)" represent conservation savings from strategies implemented after the planning baseline year but prior to the 2030 planning horizon. In response to the comment, DB27 has been updated to remove these "Residual Savings from Conservation Measures Implemented Since Baseline Year" as a recommended conservation strategy and these savings are now reflected as part of the municipal conservation water management strategy. Corresponding clarifications have been added to Chapter 5B, and related costs and savings have been revised in Appendices I and H to reflect these changes.

COMMENT NO.	TWDB COMMENT	REGION C RESPONSE/ACTION
14	Chapter 5B, Appendix H, and DB27. For the following municipal WUGs, the whole WUG's GPCD adjusted for conservation is less than 60 GPCD in at least one planning decade: Ables Springs SUD, AMC Creekside, Denton County FWSD 11-C, Howe, North Kaufman WSC, Pelican Bay, and Reno (Parker). Please confirm the reasonableness of this anticipated low GPCDs in the final, adopted regional water plan. [31 TAC § 357.34(j)(2)(B)]	Ables Springs SUD, AMC Creekside, Denton County FWSD 11-C, North Kaufman WSC, Pelican Bay, and Reno (Parker) each have baseline GPCD values ranging from 60 to 62. The projected water conservation savings through water use reduction and water loss mitigation for these WUGs are modest, estimated at 0 to 12 percent over the planning horizon. These reductions are relatively minor when considered across a 50-year timeframe and are consistent with the scale of conservation programs typically applied to small utilities. Region C believes that achieving additional conservation is reasonable and attainable, even for systems that already have relatively low baseline usage. These WUGs are small and, as such, more susceptible to variability and uncertainty in population estimates, which can influence GPCD values. Due to this sensitivity, we do not propose to treat these WUGs differently based solely on their current GPCD. Additionally, the City of Howe has reported an average water loss of approximately 44 percent based on 2018–2022 data. The majority of the projected conservation savings for Howe are attributed to water loss mitigation efforts. These improvements are intended to bring Howe closer to the TWDB's water loss threshold, which is discussed in Appendix I. Based on this analysis, we believe the proposed savings are realistic and achievable.
15	Section 6.2.5 and DB27. The plan includes a summary of water needs by basin related to an interbasin transfer (IBT) of surface water, with the exception of the Brazos Basin, which includes WUGs in Region C receiving strategy supply from the Sulphur Basin. In the final, adopted regional water plan, please update this section to include a summary of water needs in the Brazos Basin and to acknowledge that the region includes recommended strategy supplies that propose to move water from the Sulphur Basin to multiple basins within the region. [31 TAC § 357.34(e)(6)]	There should be no water from the Sulphur Basin going to WUGs in the Brazos Basin. Strategy allocations were updated in DB27 to reflect this.

COMMENT NO.	TWDB COMMENT	REGION C RESPONSE/ACTION
	Chapter 5B and DB27. TWDB Secure Agency Reporting	The following WUGs were updated to exclude any supply from
	Application (SARA) Report ID 120 'Recommended WMS with	proposed IBT strategies: Irrigation, Kaufman; Mining, Tarrant; and
	New/Amended IBT Permit & Conservation' appears to include the	Steam-Electric Power WUGs for counties: Dallas, Freestone,
	following WUGs in which Region C is the primary region, that	Jack, Kaufman, Tarrant, and Wise.
	receive strategy supply from a proposed IBT strategy, but that do	
	not have any recommended conservation strategy: Irrigation,	A water conservation strategy was added for the manufacturing
	Kaufman; Mining, Tarrant; Manufacturing WUGs for counties:	WUGs.
16	Collin, Dallas, Denton, Ellis, Grayson, Kaufman, Navarro, Parker,	
	Rockwall, Tarrant, Wise; and Steam-Electric Power WUGs for	
	counties: Dallas, Freestone, Jack, Kaufman, Tarrant, Wise.	
	Please include a water conservation strategy for each WUG that	
	is to obtain water from a proposed IBT to which TWC § 11.085	
	applies, in the final, adopted regional water plan. These	
	conservation strategies should reflect what would be required to	
	result in the highest practicable level of water conservation and	
	efficiency achievable. [31 TAC § 357.34(j)(2)(C)]	The Martin Leanard Wetlands present includes a halomaing
	Appendix G.6.2, Appendix H, and DB27. The evaluation for the Marty Leonard Wetlands (Cedar Creek Wetlands) Reuse does not	The Marty Leonard Wetlands project includes a balancing reservoir. This has been added to the strategy description in
	appear to include a balancing reservoir, however the costing	Appendix G.
	table for "TRWD - Marty Leonard Wetlands (Cedar Creek	Аррепиіх О.
17	Wetland)" (Table H.26) shows a balancing reservoir under capital	
17	costs and a balancing reservoir project component was included	
	in DB27. Please confirm if a balancing reservoir is included within	
	the project scope, and modify the plan and/or DB27, as	
	appropriate, to clarify. [Contract Exhibit C, Section 2.5.2.15]	
	Appendix H, Table H.20 and H.21. The costing tables for the	Costs for the "Sulphur River Basin Reservoir and Transmission
	"Sulphur River Basin Reservoir and Transmission System	System Alternatives" are in September 2023 dollars. The initial
	Alternatives" (i.e. Marvin Nichols (328) recommended and	dollar year reference was a typo and has been corrected in
	alternative versions) indicate that the costs were indexed to	Appendix H.
	September 2021 dollars. Please correct the dollar-year reference	7,475
18	or update Tables H.20 and H.21 and elsewhere to correctly	
	reflect costs in September 2023 dollars instead of September	
	2021 dollars, and, if appropriate, update any necessary costs in	
	DB27, and in the final, adopted regional water plan. [Contract	
	Exhibit C, Section 2.5.2.12]	

COMMENT NO.	TWDB COMMENT	REGION C RESPONSE/ACTION
19	Appendix G and Appendix H. The evaluations for new water supply reservoir water management strategies and projects do not appear to separately present the estimated mitigation land area and associated estimate of acquisition cost. Please provide an estimated separate acreage and cost related to land acquisition (or range) for both the reservoir footprint and mitigation within the appropriate section of the plan or costing sheet, in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.12]	Mitigation costs are estimated at 2 X land costs for the reservoir. The amount and location of acreage required will not be known until the 404 process is completed. For planning purposes, the land required for large on-channel reservoirs is equal to the reservoir acreage. For off-channel reservoirs, the land required is much less. These estimates of land required for mitigation are shown in the individual cost tables in Appendix H.
20	Appendix H. Section H.7 states that debt-service for non-reservoir infrastructure is 30 years, and several costing tables show 30 year debt service, for example TRWD - Carrizo Wilcox Groundwater-Anderson County (Table H.33). For strategies other than reservoirs, the length of debt service is 20 years unless otherwise justified. Please provide a justification for revising the length of debt service from 20 to 30 years in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.12]	Non-reservoir debt service was estimated at 30 years to compare across all projects. Large non-reservoir projects will not be financed over 20 years. This was decided by the RWPG and respective sponsors. Justification was added into Appendix H. (Note: costs for Dallas Water Utilities followed the financing amortization period used for its Long-Range Water Supply Plan that was published in 2024.)
21	Appendix H and DB27. Unit costs have been entered into DB27 as \$0 for the recommended water management strategies: WMSIds 2063, 2419, 2712, 5092, 6236, 6955, 2429, 4750, 4864, 5871, 5873, 5874, 6292, 4936, 4745, 2467, 5982, 4746, 2182, 6218, 6216, and 4767. Please include non-zero unit costs for these strategies in DB27 and include assumptions used in the costing methodology utilized, in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.12]	Costs have been reviewed and updated.
22	Appendix H and DB27. The WMS level unit costs have been entered into DB27 as \$1 for the NTMWD - Additional Lavon Watershed Reuse strategy however, the WUG level unit cost ranges up to \$4,861. Please review the unit costs for this strategy and confirm they have been entered correctly in DB27. [Contract Exhibit C, Section 2.5.2.12]	The Unit costs have been reviewed and updated to ensure the right values are correctly entered into DB27.

COMMENT NO.	TWDB COMMENT	REGION C RESPONSE/ACTION
23	Appendix H and DB27. Unit costs entered into DB27 appear high for WUGs and groundwater development in relationship to the WMS level unit costs for the TRWD -Carrizo-Wilcox Groundwater strategy. For example, the WMS level unit costs are \$1,222 whereas the WUG level unit costs range up to \$52,397. Please review the unit costs for this strategy and confirm they have been entered correctly in DB27. [Contract Exhibit C, Section 2.5.2.12]	Unit Costs have been reviewed and updated.
24	Appendix H and DB27. The WMS level unit costs entered into DB27 appear high compared to the WUG level unit costs for the following strategies: Conservation, Water Loss Control - Lake Worth and Conservation, Water Loss Control - Bells. For example, the WMS level unit cost for Conservation, Water Loss Control - Bells is \$20,570 whereas the WUG level unit costs range up to \$1,460. Please review the unit costs for these strategies and confirm they have been entered correctly in DB27. [Contract Exhibit C, Section 2.5.2.12]	Yes, the unit costs have been confirmed. The higher cost for water loss mitigation is primarily due to the significant expense of water main replacement. Additionally, estimated savings are relatively low because the WUG's current water loss levels are already modest, limiting the potential for additional reductions.
25	Appendix H and DB27. The WMS level unit costs appear low compared to the WUG level unit costs for the following strategies: Frisco - Additional Direct Reuse; Conservation, Water Loss Control - Southwest Fannin County SUD; and Alternative - Euless Additional Purchase from TRA. For example, the WMS level unit costs for Conservation, Water Loss Control - Southwest Fannin County SUD is \$345, whereas the WUG level unit costs range up to \$24,781. Please review the unit costs for these strategies and confirm they have been entered correctly in DB27. [Contract Exhibit C, Section 2.5.2.12]	Yes, the unit costs have been confirmed. The higher cost for water loss mitigation is primarily due to the significant expense of water main replacement. Additionally, estimated savings are relatively low because the WUG's current water loss levels are already modest, limiting the potential for additional reductions.
26	Appendix G.2.4. The strategy evaluation for Increase Delivery Infrastructure states that "this strategy does not create supply" however the "transmission infrastructure enables the entity to receive the water." Please confirm in the final, adopted regional water plan that all projects evaluated under this strategy are directly associated with delivery of additional water supplies from new water sources or additional supplies from more efficient use of existing supplies, or volumetric increases to existing water supplies. [Contract Exhibit C, Section 2.5.2.15]	All projects evaluated under the "Increase Delivery Infrastructure" strategy are directly associated with the delivery of additional water supplies from new water sources, more efficient use of existing supplies, or volumetric increases to existing water supplies. Clarification was added to the strategy description in Appendix G.

COMMENT NO.	TWDB COMMENT	REGION C RESPONSE/ACTION
27	Section 5A.1.4, page 5A-5. Reallocation of reservoir storage was identified as a feasible strategy for Bardwell Lake, however this strategy does not appear to be evaluated in the plan. Please include an evaluation for all potentially feasible strategies or include an explanation as to why this strategy was not evaluated, in the final, adopted regional water plan. [Contract Scope of Work, Task 5B]	Reallocation of reservoir storage for Lake Bardwell was not identified nor evaluated for the 2026 Plan. Reference to Bardwell Lake was removed from Chapter 5A. TWDB confirmed that this was not in the Scope of Work for Task 5B.
28	Section 5C.4.5, Appendix G.4.1, Table H.20, and DB27. The Main Stem Balancing Reservoir evaluation and map appear to include construction of an off-channel reservoir that relies on river diversions of indirect reuse water. This strategy should be classified as a "New Reservoir" for water supply planning purposes. Please coordinate with TWDB's Water Supply and Strategy Analysis team to update this strategy type in DB27, prior to adoption of the final plan and revise appropriate sections of the plan to reflect this as a new water supply reservoir. [31 TAC § 357.50(g)(2)(B)]	The Main Steam Balancing Reservoir primary source of water is return flows from DWU's wastewater treatment plants. The strategy description was updated to "new reservoir" in DB27 for water supply planning purposes.

COMMENT NO.	TWDB COMMENT	REGION C RESPONSE/ACTION
	Chapter 5, Appendix G, and DB27. The online decades for several water management strategies and their associated projects appear to be inconsistently reported in the plan and DB27, including:	As part of the final review, the Region C Water Plan was checked for consistency across the report and DB27. Corrections were made as appropriate.
29	DWU – Connect Lake Palestine (Dallas Portion of IPL & IPL to Bachman) (WMSProjectId 967); DWU – Neches River Run-of-the-River Diversions (WMSProjectId968); Blue Ridge - Connect to and Purchase Water from NTMWD (WMSProjectId 999); Ladonia – Infrastructure and Treatment for Water from Ralph Hall (UTRWD) (WMSProjectId 1059); Forney – Increase Delivery Infrastructure from NTWMD (WMSProjectId 1084); Kennedale – Additional Delivery Infrastructure from Ft. Worth (WMSProjectId 1122); Alternative – County-Other, Tarrant – DFW Airport Supply from Euless (WMSProjectId 4393); Bois d'Arc MUD – Connect to NTWMD (WMSProjectId4099); DWU – Sabine Conjunctive Use Part 1 – Carrizo Wilcox Groundwater (WMSProjectId 5303); DWU – Sabine Conjunctive Use Part 2 – Sabine River Off Channel Reservoir (WMSProjectId5304); Two Way SUD – New Well(s) in Trinity Aquifer (WMSProjectId5339)	
	For example, the online decade for the DWU – Connect Lake Palestine (Dallas Portion of IPL & IPL to Bachman) strategy and project is reported as 2030 in DB27, whereas the online decade is presented as 2040 on page G-86 of Volume 2. Please review the	
	online decades for these strategies and projects and revise as necessary to ensure that online decades in DB27 are consistent with those presented in the final, adopted regional water plan. [31 TAC § 357.35(g)(1); 31 TAC § 357.35(g)(3)]	

COMMENT NO.	TWDB COMMENT	REGION C RESPONSE/ACTION
30	Chapter 5, Appendix H, and DB27. Project costing tables for the following projects present total capital costs that differ from the project capital costs reported in DB27: WMSProjectIds 3859; 5169; 5170; 5172; 5175; 5177 and 5179. For example, DB27 reports total capital cost of \$67,187 for Conservation, Water Loss Control – Kaufman County MUD 14 (WMSProjectId 5172,), whereas Table H.11D (page H-28) lists total capital costs of \$219,790 for the same project. Please review the costing information for these projects and revise as necessary to ensure that all project capital costs in DB27 are consistent with those presented in the final, adopted regional water plan. [31 TAC § 357.35(g)(1)]	As part of the final review, the Region C Water Plan was checked for consistency across the report and DB27. Corrections were made as appropriate.
31	Chapter 5, Appendix G, and DB27. Evaluations for the following strategies and projects present total capital costs that differ from the project capital costs reported in DB27: NTMWD – Additional Lake Texoma Blend Phase 2 (WMSProjectId 957), and Melissa – Additional Delivery Infrastructure from NTMWD (WMSProjectId 1005). For example, DB27 reports a total capital cost of \$997,393,000 for WMSProjectId 957. Table G.32(page G-70) lists total capital costs of \$741,772,000 for the same project. Please review the costing information for these projects and revise as necessary to ensure that all project capital costs in DB27 are consistent with those presented in the final, adopted regional water plan. [31 TAC § 357.35(g)(1)]	Capital Cost for both projects have been updated to be consistent in the information provided on DB27 as well as the Report

COMMENT NO.	TWDB COMMENT	REGION C RESPONSE/ACTION
32	Section G.4.3 and DB27. The evaluation of Neches River Basin Supply (Neches Run-of-River Supply) water management strategy on page G-90 shows Upper Neches River Municipal Water Authority as the project sponsor, however DB27 reports this sponsor as Dallas Water Utilities. Please review and revise as necessary to ensure that project sponsor in DB27 is consistent with those presented in the final, adopted regional water plan. [31 TAC § 357.35(g)(1)]	The Neches River Basin Supply strategy sponsor was updated to the Upper Neches River Municipal Water Authority in DB27.
33	Section 6.5.1 and DB27. The municipal unmet need presented in Table 6.3 appears to be inconsistent with municipal unmet needs reported in DB27. For example, Table 6.3 shows no unmet needs in 2040 for Celina, however DB27 reports unmet needs of 5,342 acre-feet/year in 2040 for Celina. Additionally, Table 6.3 does not present unmet needs for the following WUGs, which show unmet needs for the WUG splits within Region C in DB27: Hickory Creek	Celina: The brackish groundwater strategy for GTUA was denied as a new source in DB27. The available groundwater under the current MAG is less than the supply amount. This results in unmet needs for Celina in more decades than currently shown in the 2026 Region C IPP. Parker County SUD: There is less water from BRA to Parker
	SUD, Parker County SUD, Burleson, and Johnson County SUD. Please review the data presented in the table and revise as necessary to present data consistent with DB27 in the final, adopted regional water plan. [31 TAC § 357.40(c)]	County SUD in DB27 than assumed in the 2026 Region C IPP. This results in an unmet need for Parker County SUD in the later decades.
		Split WUGs: Most of these split WUGs are planned for by another region: Hickory Creek SUD (Region D primary), Burleson (Region G primary), and Johnson County SUD (Region G primary). Additionally, Burleson receives all its water from Fort Worth and should not have any unmet needs.
		Table 6.3 has been updated to reflect the unmet needs for Celina and Parker County SUD shown in DB27. Split WUGs primarily planned by another Region will be addressed in their respective Regional Plan.

COMMENT NO.	TWDB COMMENT	REGION C RESPONSE/ACTION
34	Section 6.5.1 and DB27. The plan does not appear to provide justification for the following municipal WUGs with unmet needs reported in DB27: Hickory Creek SUD, Parker County SUD, Burleson, and Johnson County SUD. Please provide adequate justification for these unmet municipal need in the final, adopted regional water plan, including: 1) documentation that all potentially feasible WMS were considered to meet the need, including drought management WMS; 2) explanations as to why additional conservation and/or drought management WMS were not recommended to address the need; 3) descriptions of how, in the event of a repeat of the drought of record, the WUG associated with the unmet need shall ensure the public health, safety, and welfare in each planning decade with an unmet need; and, 4) explanation as to whether there may be occasion, prior to the development of the next IPP, to amend the RWP to address	Parker County SUD: There is less water from BRA to Parker County SUD in DB27 than assumed in the 2026 Region C IPP. This results in an unmet need for Parker County SUD in the later decades. Justification for Parker County SUD unmet needs was added into Chapter 6. Split WUGs: Most of these split WUGs are planned for by another region: Hickory Creek SUD (Region D primary), Burleson (Region G primary), and Johnson County SUD (Region G primary). Additionally, Burleson receives all its water from Fort Worth and should not have any unmet needs. Split WUGs primarily planned by another Region will be addressed in their respective Regional Plan.
35	all or a portion of the unmet municipal need. [31 TAC § 357.50(j)] Section 7.5. Table 7.4 appears to present a summary of existing emergency interconnects, but it is unclear if the table presents any potential future emergency interconnects. Please clearly identify which emergency interconnects are existing vs future—or clarify if there are no potential future interconnects—in the final,	Table 7.4 shows a summary of existing emergency interconnections only. Clarification was added into Section 7.5.
36	adopted regional water plan. [31 TAC § 357.42(d)] Section 7.7 and Appendix M. Table M.2 appears to be missing emergency response information for the following WUGs which have an estimated 2030 population less than 7,500 and rely on a sole source of supply: Haslet, Westover Hills, and Westworth Village. Please revise the evaluation to include these WUGs in the final, adopted regional water plan. [31 TAC § 357.42(g); Exhibit C, Section 2.7.7]	Emergency response information for Haslet, Westover Hills, and Westworth Village was added into Table M.2.

COMMENT NO.	TWDB COMMENT	REGION C RESPONSE/ACTION
37	Section 8.3. In its unique reservoir site recommendations for the George Parkhouse II (North) site and George Parkhouse I (South) sites, the plan does not appear to include the reasons for the unique designation and the expected beneficiaries of the water supply to be developed. Please include this information within Chapter 8 or provide a specific reference to where this information is found elsewhere in the plan, in the final, adopted regional water plan. [31 TAC § 357.43(c)]	Chapters 5 and Chapter 8 were updated to include expected beneficiaries and reasons for including the two reservoirs for unique designation.
38	Section 9.3. The counts of water management strategies benefitting more than one WUG provided in Section 9.3 appears inconsistent with strategies reported in DB22 and DB27 as benefitting more than one WUG. Please review the data reported in TWDB SARA Report ID 125 and either reconcile the counts presented this section to align with the report or clarify the difference in counts reported in the final, adopted regional water plan. [31 TAC § 357.45(b)(1)]	Section 9.3 text was updated to reflect the number of strategies from each plan that benefited more than one entity.
39	The plan does not appear to meet minimum accessibility requirements. Please ensure that the final, adopted regional water plan PDF is a tagged document. See item 1d in TWDB's accessibility checklist for more information. [Contract, Article III, Paragraph G]	The final 2026 Region C Plan meets the minimum accessibility requirements.
40	The following WMS Projects are missing from the GIS data submitted. Please include the locations of every recommended and alternative WMS Project listed in the final adopted regional water plan with the final GIS files submitted. [Contract Exhibit D, Section 2.5.2, Exhibit C, Section 2.12.2(9)] WMS Project IDs and Names: 976-Alternative-DWU- Lake Texoma Desalination; 5795-Alternative- Manufacturing Grayson- Direct Reuse from Sherman; 5309- Fort Worth- Village Creek WRF Future Direct Reuse; 5775-Mansfield- New 30 MGD WTP; 5776- Melissa- Additional Delivery Infrastructure from NTMWD through Mckinney; 962- NTMWD-Alternative Lake Texoma Desal at Leonard	Locations of all recommended and alternative WMS projects within the final 2026 Region C Plan are located in the submitted GIS files.

COMMENT NO.	TWDB COMMENT	REGION C RESPONSE/ACTION
Level 2 Comr water plan.	ments: Comments and suggestions for consideration that may im	prove the readability and overall understanding of the regional
1	Section 5A.1.6. The plan states that all MWPs meet the criteria for an ASR assessment, however no ASR assessment for Fort Worth was included, yet Fort Worth is identified as a MWP in Chapter 1. Please consider adding clarification to the plan that the ASR assessment was not considered applicable to Fort Worth by the region. [Contract Exhibit C, Section 2.5.2.4]	Section 5A.1.6 of the 2026 Region C IPP states "For Region C, significant needs are considered only for municipal needs greater than 25,000 acre-feet per year. For purposes of this assessment, the Region C major water providers (MWPs) are shown to have significant needs. Customers of MWPs are not considered individually." Fort Worth receives a majority of its water from TRWD and ASR was evaluated for TRWD. ASR is not applicable to Fort Worth, as Fort Worth is a customer. Clarification that the ASR assessment was not considered applicable to Fort Worth was added to Section 5A.1.6.
2	Section 5B.4.4. The plan appears to recommend conservation for the mining water use category that includes recycling of water as the best management practice. Per Contract Exhibit D, Section 3.5.3, this type of strategy should be entered into DB27 as onsite water recycling. TWDB's Water Supply and Strategy Analysis team will update the mining conservation data to this correct data type in DB27. Please consider clarifying this strategy is not considered conservation for planning purposes in the final plan.	The strategy type has been corrected in DB 27 accordingly.
3	Section 5B.6.4. Please consider linking directly to the Region's web page with the model water conservation plan rather than the planning group home page.	An updated link directly to the model water conservation plans was added into Section 5B.6.4.
4	Appendix H. Please consider revising the titles of the cost estimate summary tables to more closely align with the Appendix H list of tables. For example, on page H-10, Table H.33 is titled "TRWD - Carrizo Wilcox Groundwater (Anderson County)", however the title of Table H.33 is "TRWD - WMS # 19 Groundwater."	The Appendix H list of tables and cost estimate summary tables were reviewed and updated accordingly for the final 2026 Region C Plan.

COMMENT NO.	TWDB COMMENT	REGION C RESPONSE/ACTION
5	Appendix H. Please consider labeling the cost summary tables H.20 and H.21 to clearly designate Sulphur River Basin Reservoir and Transmission System Alternatives WMS as recommended and alternative scenarios for the Marvin Nichols Reservoir.	The cost summary tables have been labeled to clearly designate the Sulphur River Basin Reservoir and Transmission System Alternatives WMS as the recommended and alternative scenarios for the Marvin Nichols Reservoir.
6	Section 7.3.7. The TWDB guidance quoted on page 7-11 was guidance TWDB provided for the prior 2021 regional water plan. Please consider updating the information to reflect current requirements from Contract Exhibit C, Section 2.7.3	Section 7.3.7 was updated accordingly.
7	Section 7.8.1. Please consider removing reference to the TWDB Chapter 7 template in Section 7.8.1. TWDB did not provide a template for the 2026 Regional Water Plan drought chapter, and drought chapter requirements have been revised since the template was developed for the 2021 Regional Water Plans.	Reference to the TWDB Chapter 7 template was removed in Section 7.8.1.
8	Section 7.9. The hyperlinks on the Region C website providing model drought contingency plans are labeled only as "2026 Model Conservation Plan". Please consider updating the description on the website to clearly note these documents include model drought contingency plans as well.	A footnote has been added to section to explain these documents including both plans.
9	Please consider revising references to project names in plan so they more clearly align with project names reported in DB27 for following projects: Purchase Water from TRWD with New 2 MGD WTP, page 5E-219; 75MGD WTP Expansion, page H-89; Western WTP Expansion, page H-60; Expand Eastern WTP, page H-60; Infrastructure Improvements, page 5E-39	Project names were reviewed and where appropriate, names were modified to be consistent in the plan and DB27.

Q.2.2 Texas Parks and Wildlife Comments

TPWD's original comment letter is located in **Attachment Q-1. Table Q.4** lists TPWD's comments and the responses or action taken to address them.

TABLE Q.4 TPWD COMMENTS AND RESPONSES

COMMENT NO.	SUMMARY OF TPWD COMMENT	REGION C RESPONSE/ACTION
1	The Plan adequately describes the natural resources in Region C and how WMS's may impact them. Chapter 1 addresses water related threats to natural resources and Chapter 6.4 discusses how the Plan is consistent with protection of the State's resources.	Region C appreciates your comment. No change needed.
2	TPWD acknowledges that quantitative reporting of environmental factors impacted by WMS's is covered in Appendix G with further discussion on MNR in Appendix J. TPWD appreciates the inclusion of potential habitat impacts and inundated stream miles by George Parkhouse I and II, and MNR reservoirs. TPWD encourages Region C to continue to update the quantitative environmental information as it becomes available.	Region C appreciates TPWD's recognition of the effort to include more quantitative environmental information within the Plan. Region C recognizes the concerns regarding impacts from new reservoir strategies and will strive to continue to update the quantitative environmental information included within the regional water plans. No change needed.
3	TPWD is encouraged to see the advancement of water conservation and reuse in Region C as it will limit the need for the development of new surface water and associated ecological impacts.	Region C appreciates TPWD's recognition of Region C's conservation and reuse efforts. Region C will continue to encourage conservation. No change needed.
4	TPWD continues to support regional water planning groups in recommending ecologically unique river and stream segments. TPWD has a goal of updating the statewide assessment of ecologically significant stream segments by 2028.	Region C appreciates the TPWD's support of Region C's efforts regarding Ecologically Significant River and Stream Segments. When the statewide assessment of ecologically significant stream segments is updated, this information will be considered in future regional water plans. No change needed.

Q.3 Public Comments

The RCWPG considered each comment received from the public regarding the IPP and appreciates those individuals and organizations who took the time to thoughtfully consider the plan and to present ideas to improve upon the plan. A summary of the public comments received along with corresponding responses are discussed in the following sections. Comments are summarized for clarity within this section and are grouped by concern and/or topic. Table Q.5 summarizes the comments from the public hearing and the responses made. Table Q.6 summarizes the public comments received by letters or reports and email and the respective responses. Attachment Q-1 contains an overview of the public hearing deposition as well as copies of any public comments received as letters, reports, or by email.

Q.3.1 Public Comments Received at the IPP Public Hearing

TABLE Q.5 PUBLIC HEARING COMMENTS AND RESPONSES

COMMENTER	SUMMARY OF COMMENT	REGION C RESPONSE	
Chris Wallace	North Texas Commission is in full support of the plan. They strongly oppose removing any strategies that are in the plan.	Your comment has been noted.	
Ronna Hartt	Representing Upper Trinity Regional Water District, they are in support of the plan and will submit written comments separately.	UTRWD comments will be addressed separately.	
Pedro Paulo	Presents a water conservation and water reduction system.	Your comment has been noted.	
The following co	mments were received opposing the Marvin Nichols Reservoir Proj	ect (MNR). Some comments were made by multiple	
Molly Rooke	MNR will cause social, environmental, and economic destruction. It also adds to the amount of land that has been taken away from Texas farmers over the past 30 years.	Appendix J presents the economic, fiscal, environmental, and developmental impacts of the proposed MNR reservoir A study by Terry Clower (2020) on the economic impacts of the Marvin Nichols Reservoir found that the construction of the project would boost economic activities in Region D.	
Lon Burnam	There needs to be greater water conservation efforts in DFW. Focus on this instead of taking water from the East.	Conservation and reuse water make up 33% of Region C's supplies in 2080.	
Sharon Richey	She opposes taking water from the East and instead should focus on water conservation.	Conservation and reuse water make up 33% of Region C's supplies in 2080.	
Water waste is a major issue and there should be legislation limiting water use, specifically for irrigation. Tanda Rasco Region C includes sever strategies in the plan in reuse water make up 33 In Chapter 8, Section 4,		Region C includes several recommended conservation strategies in the plan in Chapter 5B. Conservation and reuse water make up 33% of Region C's supplies in 2080. In Chapter 8, Section 4, Region C makes recommendations to the legislature including for state funding for conservation efforts.	
David Marquis	He is in support of using filtration systems to get DFW more water instead of building a new reservoir.	Your comment has been noted.	
Christine Guldi	More water conservation needs to happen because building MNR will cause economic and social losses.	Conservation and reuse water make up 33% of Region C's supplies in 2080. Economic studies have shown that the project will boost economic activity in the region.	
Howdy Lisenbee	More thought needs to be given to how much East Texans are sacrificing	Your comment has been noted.	

COMMENTER	SUMMARY OF COMMENT	REGION C RESPONSE
James Orenstein	Reservoirs are no longer the best solutions and alternatives need to be looked at again. DFW uses too much water and should be cut back.	There are over 170 recommended water management strategies and 38 alternatives included within the plan. There are only 4 new reservoirs recommended in the Region C plan.
Rita Beving	State Representatives oppose the building of MNR. Focus more on conservation. Make a final decision so the ranchers know if they're still going to have their property	Conservation and reuse water make up 33% of Region C's supplies in 2080.
Arthur Kuehne	DFW should not ask East Texas to give up their land if DFW is not willing	Your comment has been noted.
Diane Harrington Tasian	There is a conflict of interest since water suppliers want to sell more water. MNR will destroy historical sites and gut the economy and population. Water conservation is needed.	Appendix J presents the economic, fiscal, environmental, and developmental impacts of the proposed MNR reservoir.
Paul Anthony Hale	Building MNR will worsen wildfires and devastate the timber industry.	Appendix J presents the economic, fiscal, environmental, and developmental impacts of the proposed MNR reservoir.
Laura Stelljes	MNR will force families off land and devastate local economy. DFW needs to have better water conservation efforts. Region C should have aquifer storage and recovery, desalinations of brackish water.	Conservation, Aquifer Storage & Recovery, and Desalination strategies are all recommended strategies within the plan.
Claire Verchot	Asks why speakers at a legislative hearing did not acknowledge the DWU Main Stem Balancing Reservoir. Asks for this to be a part of the deliberations about MNR.	The DWU Mainstem Balancing Reservoir is a recommended strategy in the 2026 Region C Water Plan. This strategy was classified as a reuse project in the Region C IPP. The topic of the legislative hearing was focused on the MNR, not the MSBR.
James Matlock	Asks how many of the reservoirs have significantly less water in them than their capacity allows. Wells in West Texas are blowing up and flooding land.	According to TWDB's "Water Data for Texas" as of 7/22/25, New Terrell City Reservoir is the only reservoir in Region C below 30% capacity. All other reservoirs are >80% full.
Robert Vann	DFW needs better water conservation and to fix failing infrastructure. Building MNR destroys people's livelihoods. Theres a conflict of interest with the namesake of the reservoir being FNI founder.	Conservation and reuse water make up 33% of Region C's supplies in 2080.

COMMENTER	SUMMARY OF COMMENT	REGION C RESPONSE	
Linda Hanratty	DFW growth will stall, conflict of interest with FNI being both the planners and the builders. Reduce water use.	Your comment has been noted.	
Carrie Schweitzer	MNR will destroy ecosystem of human lives and wildlife. MNR projections could be overstated and use outdated assumptions.	Appendix J presents the economic, fiscal, environmental, and developmental impacts of the proposed MNR reservoir.	
Susybelle Gosslee	DFW needs water conservation and more advertising about it as well.	Conservation and reuse water make up 33% of Region C's supplies in 2080.	
Michelle Spann- Rodriguez	She opposes the perception that all East Texans are uneducated. Both her and her husband have spent their careers working for the government and take great pride in their state and country. MNR is wrong because it is disrespectful to East Texans.	Your comment has been noted.	
Angie Turner	MNR will forever damage East Texas. It is disrespectful to the man and women that are buried there.	Your comment has been noted.	
Gary Cheatwood	Does not want MNR built, it will take his land and his home.	Your comment has been noted.	
Troy Jones Jr.	People are going to lose their land and livelihood.	Your comment has been noted.	
Eddie Belcher	His land is not for sale and is not willing to give up his family's land.	Your comment has been noted.	
Jana Weatherall Goforth	She does not want her land taken because that's where her family is, both living and dead.	Your comment has been noted.	
Stanley Jessee	It will flood the land causing loss of agriculture, forestry, and threaten endangered species. MNR will have substantial adverse effects.	Appendix J presents the economic, fiscal, environmental, and developmental impacts of the proposed MNR reservoir.	

Q.3.2 Public Comments Received Via Email or Letter

TABLE Q.6 PUBLIC COMMENTS SUMMARIES AND RESPONSES

COMMENTER	SUMMARY OF COMMENT	REGION C RESPONSE	CHANGES TO REGION C PLAN
	Recommend for State legislation for:		
Greg Peters,	Stop water waste: vanity ponds, wasteful irrigation practices	Region C advocates for water conservation practices that include reductions in water waste. This is done at the water provider level. Region C appreciates the challenges of enforcing water restrictions in unincorporated areas. Groundwater is a property right and any enforcement of restricting water waste would need to be addressed by the GCD, which has limited authority over irrigation practices. Groundwater for vanity ponds may be restricted by the GCD as wasteful.	Added recommendation to Legislature in Chapter 9 to provide greater authority to GCDs to restrict and/or prohibit wasteful use of groundwater, including use for vanity ponds.
City of Anna	Prohibit regional water districts from protesting an application for a TCEQ permit	The ability to protest water rights is given to all affected parties. Restricting this right for regional water providers could have significant unintended consequences.	No changes.
	Advocate for regional water district restructuring and new requirements	This is not under the regional water planning purview.	No changes.
	Requirements for regional water districts to plan for and provide water supplies within their service area and communicate with customers	This is not under the regional water planning purview.	No changes.
	Requirements for salary disclosures for regional water districts	This is not under the regional water planning purview.	No changes.
Claire Verchot	Asked why the speakers at a legislative hearing did not acknowledge the DWU Mainstem Balancing Reservoir. She provided a map of the project with the location of her property.	The DWU Mainstem Balancing Reservoir is a recommended strategy in the 2026 Region C Water Plan. The location of the project is adjacent to but does not affect Ms. Verchot's property.	No changes.

COMMENTER	SUMMARY OF COMMENT	REGION C RESPONSE	CHANGES TO REGION C PLAN
Don Watenpaugh	Advocates for the benefits of beavers in water supply. Recommends the Region C Plan include recommendations to protect beavers, including a do not kill law, enhancing beaver habitats, develop incentives and ways to optimize beaver-human co-existence.	Your comment has been noted.	No changes.
	Reference to Fairfield Reservoir owner and water right holder as "Todd Interests." "Todd Interests" needs to be corrected to "FLG Owner, LLC" as supported by the Deed and separate Assignment of Certificate of Adjudication into LFG Owner LLC, and 2024 Amendment to COA 08-5040A. Table 3.2 entitled "SURFACE WATER	Reference to Owner has been changed. The lower availability is based on the	Reference to Owner has been changed. No changes.
Ed McCarthy, FLG Owner, LLC	SOURCE AVAILABILITY TO REGION C (NOT LIMITED BY INFRASTRUCTURE)" identifies Fairfield Reservoir with a "permitted" diversion right of 14,150/year but shows a lower "availability" which then decreases by decade from 6395 acft in 2030 to 5315 ac-ft in 2080. Given the new ownership of Lake Fairfield and COA 08-5040, as amended, this information	WAM analyses during a repeat of the drought of record. During a drought, the lake cannot support a diversion rate of 14,150 acre-feet per year. This analysis does not limit the water yield based on previous operations.	No changes.
	should be updated to eliminate the reduction in availability. The permitted consumptive use is 14,150 ac-ft/yr. Section 5.1.4 discusses Tarrant Regional Water District ("TRWD") as major water supplier providing water to Freestone County, including Fairfield. The Section identifies numerous water supply sources as water management strategies for TRWD, including other reservoirs and groundwater, but does not specifically	We reached out to both TRWD and the City of Fairfield to inquire if either water provider would be interested in using Lake Fairfield as a water supply. TRWD is not interested in including Lake Fairfield as a strategy in the 2026 plan. The City of Fairfield did not respond to our outreach.	No changes.

COMMENTER	SUMMARY OF COMMENT	REGION C RESPONSE	CHANGES TO REGION C PLAN
	identify the Fairfield Reservoir. Lake Fairfield could be a water management strategy available to TRWD and other WUGs.	Therefore, Lake Fairfield is not shown as a water management strategy in the 2026 Plan.	
	Section 5.E7 discusses Freestone County, Fairfield being the County Seat, and the water supply sources and demands for the County, focusing on TRWD being a major supplier. The discussion includes the observation that the historic largest demand was for steam electric which is now gone due to the closure of Luminant's Big Brown Plant but suggests the potential reopening of a steam electric plant at the site despite the fact that the property, including the Fairfield Reservoir and COA 08-5040, has been sold to FLG Owner LLC and is being redeveloped. This language also fails to recognize the changes to COA 08-5040, which expressly authorize the use of up to 14,150 ac-ft/yr of the storage from Lake Fairfield for municipal, domestic, industrial and agricultural purposes.	This discussion was changed to recognize that the water source is no longer available to Luminant. Future use of water from Lake Fairfield is unknown at this time.	This discussion was changed to recognize that the water source is no longer available to Luminant. Future use of water from Lake Fairfield is unknown at this time.
Brian Waltenburg, City of Flower Mound	Denton Creek RWS reuse project is not a current supply. The project will not be online until after 2028. Also, Flower Mound's population at buildout is 118,238, which is less than projected for the City.	The Denton Creek RWS reuse is now shown as a future supply. Unfortunately, we cannot change the population numbers. We will note that the city's buildout estimate is less than the projected population in the section in Chapter 5E. We will also make that note for future water plans.	The Denton Creek RWS reuse is now shown as a future supply, and text was added to Chapter 5E noting the city's buildout estimate.

COMMENTER	SUMMARY OF COMMENT	REGION C RESPONSE	CHANGES TO REGION C PLAN
Elizabeth Borstad, City of Athens	Concerns over the reduction in population projections for the City of Athens through 2080. Their own projections show numbers much closer to the 2021 plan than the 2026 plan. They would like to have the reason for the population projection reductions communicated to them.	Region C requested population projection revisions for Athens based on discussions with the city, however the TWBD has the ultimate say. TWDB revised the population projections to use historical growth rate for 2030 and then applied the requested growth rate in the near-term and buildout population in 2080.	Discussion text around insufficient population concerns has been added to Chapter 10.
Woody Patrick, Fannin County Water Supply Agency	Concerns over the population projections for Fannin County since growth rates in recent years have exceeded the 2020-22 growth rates and should be reflected in the Region C Water Plan. They would also like to include more accurate information about groundwater and water use in Fannin County. The Fannin County Water Supply Agency would like to be recognized at the state level so they can receive funding.	The Population Projections for the 2026 Region C Water Plan are final and cannot be changed for the final plan. Region C will take note and consider the more recent population growth rates for the next round of regional water planning. Region C used the Modeled Available Groundwater (MAG) estimates by the TWDB to determine available groundwater supplies.	Discussion text around insufficient population concerns has been added to Chapter 10.
Haley Salazar, City of Denton	Page 5E-112 discusses Denton's WTP capacity. The Lewisville WTP currently has a rated capacity of 30 MGD. In 2030, the City of Denton, with the expansion of the Ray Roberts WTP to 50 MGD, will have the capability to treat 80 MGD or 89,611 acre-feet per year.	The rated capacity for the Lewisville WTP and Ray Roberts WTP have been updated. The rated capacity of a WTP represents the maximum daily treatment capacity. However, regional water planning typically relies on average annual flow rates to estimate water availability and usage. Region C typically uses a 2.0 peaking factor, resulting in an average annual treatment capacity of 44,840 acre-feet per year.	The rated capacities of the respective WTPs have been updated.

COMMENTER	SUMMARY OF COMMENT	REGION C RESPONSE	CHANGES TO REGION C PLAN
	Page 5E-112, states that "Denton also intends to purchase raw water from DWU in the future. This strategy includes infrastructure to convey water from Denton's intake on Lake Lewisville to the Ray Roberts WTP." Denton does not currently have a strategy to convey water from Lewisville Lake to the Ray Roberts WTP.	The infrastructure to convey water from Denton's intake on Lake Lewisville to the Ray Roberts WTP was originally included in the Plan to provide future flexibility. This component has been removed from the Plan.	The associated text and cost estimate for the infrastructure from Denton's intake on Lake Lewisville to the Ray Roberts WTP have been removed.
	Table H.100 details a cost estimate for Denton to purchase additional supplies from Dallas. This cost estimate details a strategy that is not in place for Denton to the degree articulated in the document. Denton has water rights in both Lewisville Lake and Ray Roberts Lake, therefore if this strategy was in place, there would be no need to transport water north from Lewisville Lake to Denton's Ray Roberts Water Treatment Plant. Denton requests this cost estimate page is removed from the plan.		
	Table 5E.99 indicates Denton will purchase water from DWU. The volumes listed in this table express an increase in purchase volume, up to 29 MGD in 2080. Denton has not had discussions with Dallas for the purchase of additional water.	Your comment has been noted. For regional water planning purposes, these demands have been considered and discussed. Sales of water to other users will be subject to agreement and negotiation between the seller and the buyer. The identification of such strategies in this plan does not guarantee that agreements will be reached, nor does it obligate the water provider to supply the water.	Text discussing the sales of water to other users has been added to Denton's section in Chapter 5E.

COMMENTER	SUMMARY OF COMMENT	REGION C RESPONSE	CHANGES TO REGION C PLAN
	Table 5E.99 indicates a projected demand for County-Other, Denton to remain at 50 ac-ft/yr through 2080 and under Potential Future Customers a projected demand to remain at 1,682 ac-ft/yr through 2080. Table 5E.108 indicates a projected demand for County-Other, Denton to have supply met by Denton at a rate of 50 are-ft/yr in 2030 and 2040, then decrease each decade, down to 25 ac-ft/tr in 2080. Table 5E.108 indicates additional supplies for County-Other, Denton to be met by Denton at a rate of 1,682 are-ft/yr in 2030 and 2040, then increasing each decade, up to 1,707 ac-ft/yr in 2080. Denton requests consistency between tables 5E.99 and	Based on the existing supply analysis, Denton does not currently have sufficient supplies to meet all of its customers' demands. As a result, existing supplies have been proportionally allocated among Denton's customers based on availability. This is shown in Table 5E.108 under "Currently Available Water Supplies". Projected unmet needs will be met once Denton's identified water management strategies have been implemented. Denton County-Other demands on the city are fully met through a mix of currently available supplies and water management strategies (total of 1,732 ac-ft/yr for existing and potential future demands).	No changes.
	5E.108. Table E.8 shows Discharge for City of Denton, Indirect Reuse volume as 1,175-acre ft. Denton's Bed and Banks permit CA 08-2348A, currently allows for up to 13,497 ac-ft/yr to be diverted per year. Denton requests the volumes in table E.8 updated to reflect permitted values.	The 1,175 ac-ft/yr listed in Table E.8 refers to direct reuse for SEP Denton. Although the plant is currently mothballed, it could be reactivated at any time and is therefore included in the SEP Denton demand projections. Reuse supplies must be based on drought-of-record conditions and associated decadespecific population and demands. These amounts are limited to the volume of water available to the utilities producing the wastewater and may differ from permitted volumes. To maximize the amount of return flows that Denton can retain, reuse supplies were distributed between existing supplies and water management strategies.	No changes.

COMMENTER	SUMMARY OF COMMENT	REGION C RESPONSE	CHANGES TO REGION C PLAN
	Table H.13, Details Denton's Water Treatment Plant Expansion plans as following: 30 MGD expansion in 2040, 20 MGD Expansion in 2060, 23 MGD expansion in 2070. The same expansion intent is captured in Appendix N — Water Management Strategy Implementation Survey, but with different values. Denton's current plans are to expand by 30 MGD in 2030 and then expand by 35 MGD in 2040. Denton requests that both tables H.13 and Appendix N are updated to reflect Denton's current plans.	Appendix N provides information on the implementation status of specific water management strategies and projects recommended in the 2021 Region C Water Plan. As a result, online dates may differ between Appendix N and Table H.13. The 30 MGD expansion by 2030 is considered under existing supplies. Table H.13 has been updated to reflect a 35 MGD expansion by 2040, as well as corresponding updates to additional WTP expansions beyond 2040 to align with the updated 2040 capacity increase.	The Plan has been updated to reflect a 35 MGD WTP expansion in 2040.
	Table H.103 articulates the cost associated for Ponder to connect to the City of Denton water supply. Currently infrastructure supports several connection point options within approximately 1.5 miles. Denton requests the data in table H.103 be updated to reflect actual distance.	The cost estimate has been updated.	The cost estimate has been updated.
	Table H.99 indicates that Denton's DPR strategy would include the cost of 16.6 miles of 24-inch diameter pipeline. When Denton moves forward on implementing DPR, the effluent would travel roughly 1.8 miles from the Pecan Creek Water Reclamation plant to the Lewisville WTP. If the effluent must be transported to the Ray Roberts WTP, the effluent would travel roughly 10.5 miles. Denton requests that the data in table H.99 is updated to reflect actual distance.	The cost estimate has been updated.	The cost estimate has been updated.

COMMENTER	SUMMARY OF COMMENT	REGION C RESPONSE	CHANGES TO REGION C PLAN
	Table M.2 indicates the City of Denton as a required participant in Black Rock WSC emergency supply plan. While the table also indicated that plans are not in place, the City of Denton has not been informed of the authority and nature of this potential emergency supply option Denton does not currently have an interconnection with Black Rock, WSC, Mustang SUD, Bolivar WSC, or the City of Pilot Point.	A note has been added to Table M.2 for clarification.	The following note was added to Table M.2: Note: (a) The City of Denton is listed as a potential emergency supply participant based on regional proximity and preliminary considerations. However, Denton does not currently have interconnections with Black Rock WSC, Mustang SUD, Bolivar WSC, or the City of Pilot Point, and has not been informed or engaged in planning discussions regarding this potential arrangement. This entry does not imply an existing agreement or infrastructure and would require further coordination for feasibility.
Janice Bezanson, Texas Conservation Alliance	The 2026 Region C Plan overestimates future population growth and undercounts the available water in the future from increased urbanization.	The population projects are based on county-level estimates from the Texas Demographic Center and input from water user groups (WUGs), wholesale water providers (WWPs), and other sources. Surface water supplies must be estimated using the TCEQ WAMs. TCEQ does not consider increased runoff from urbanization in the WAMs.	No changes.
Jason Beard, City of Corsicana	Corsicana wants to provide future water supplies to Wortham and Freestone County Other. They also have concerns over the projection population and water demands for Wortham and would like them to be increased.	Wortham and Freestone County Other have been added as potential future customers of Corsicana. The population projections for the 2026 Region C Water Plan are final and cannot be revised. However, Region C will take the recent population growth trends into account during the next cycle of regional water planning.	Wortham and Freestone County Other have been added as potential future customers of Corsicana. Discussion text around insufficient population concerns has been added to Chapter 10.

COMMENTER	SUMMARY OF COMMENT	REGION C RESPONSE	CHANGES TO REGION C PLAN
Mark Patterson, Red River GCD	Red River GCD supports the position that brackish groundwater should not be considered part of the MAG. They recommend that the TWDB pursue policy changes to establish separate limits for brackish groundwater, those limits protect freshwater resources, and those limits are useable by RWP groups.	Region C acknowledges the brackish groundwater production zones were not included in the determination of the MAG. These supplies should be considered for future planning, and the Joint Planning Process is an appropriate venue to establish brackish groundwater supplies.	This was acknowledged in the discussion of the GTUA regional system that proposes to use brackish groundwater. A recommendation to include brackish groundwater production zones in the Joint Planning Process was added to Chapter 9.
Patty Jones, City of Wortham	Corsicana wants to provide future water supplies to Wortham and Freestone County Other. They also have concerns over the projection population and water demands for Wortham and would like them to be increased.	Wortham and Freestone County Other have been added as potential future customers of Corsicana. The population projections for the 2026 Region C Water Plan are final and cannot be revised. However, Region C will take the recent population growth trends into account during the next cycle of regional water planning.	Wortham and Freestone County Other have been added as potential future customers of Corsicana. Discussion text around insufficient population concerns has been added to Chapter 10.
The following commentors.	omments were received opposing the Mar	vin Nichols Reservoir Project (MNR). Some	comments were made by multiple
Alden Harris	MNR would destroy valuable bottomland habitat important to the native wildlife.	Appendix J presents the economic, fiscal, environmental, and developmental impacts of the proposed MNR reservoir.	No changes.
Barb Glock	Uncertainty about this project has gone on too long. Don't take the resources of Northeast Texas to reward delinquent stewardship of North Texans.	Your comment has been noted.	No changes.
Carolyn Salter	MNR would threaten the ecological and economic stability and rights of East Texas communities. There is a conflict of interest in Region C and DFW residents use too much water.	Appendix J presents the economic, fiscal, environmental, and developmental impacts of the proposed MNR reservoir.	No changes.
Cathy Woodson	Opposes taking water from the Lake of the Pines, Caddo Lake, and the construction of MNR. DWF wastes water and more conservation needs to take place.	After connecting all available water supplies and implementing conservation and direct reuse strategies, Region C still has an over 1 million ac-ft/yr need in 2080.	No changes.

COMMENTER	SUMMARY OF COMMENT	REGION C RESPONSE	CHANGES TO REGION C PLAN
Gregory Taylor	Instead of building MNR, Region C should focus on conservation and focus on other water sources or slow down growth of water dependent businesses.	Conservation and reuse water makes up 33% of Region C's supplies in 2080.	No changes.
Jan Casner	MNR is unnecessary and DFW should focus more on conservation and other alternatives.	Conservation and reuse water makes up 33% of Region C's supplies in 2080.	No changes.
Dustin Arneson	MNR will flood irreplaceable homes and land of families.	Your comment has been noted.	No changes.
Jerilyn Arneson	Flooding land for MNR and urban developed is cultural erasure and is not a viable solution.	Your comment has been noted.	No changes.
Suzanne Tuttle	Region C should focus more on conservation and addressing water waste rather than displacing landowners and wildlife for MNR.	Conservation and reuse water makes up 33% of Region C's supplies in 2080.	No changes.
William Forbes	MNR has been an issue for too long and Region C should focus more on conservation rather than wasteful practices.	Conservation and reuse water makes up 33% of Region C's supplies in 2080.	No changes.
Lesa Dyke	MNR will have a negative impact on families, schools, and local industries. Taxpayer money should not be towards a project that they oppose. DFW citizens should focus more on conservation and water reuse.	Appendix J presents the economic, fiscal, environmental, and developmental impacts of the proposed MNR reservoir.	No changes.
Russ Toates	MNR should not be pursued until all other options have been considered. Region C focuses solely on growth.	After connecting all available water supplies and implementing conservation and direct reuse strategies, Region C still has an over 1 million ac-ft/yr need in 2080.	No changes.
Kerry Quinn	DFW should focus more on conservation and managing water misuse rather than building MNR.	Conservation and reuse water makes up 33% of Region C's supplies in 2080.	No changes.

COMMENTER	SUMMARY OF COMMENT	REGION C RESPONSE	CHANGES TO REGION C PLAN
Erika Hatfield	Region C already has an abundance of water sources to meet future demand without hurting the land and economy of Region D. There is a conflict of interest in Region C with Freese and Nichols, Inc. Encourages TWDB to create a locally controlled water district in Region D.	After connecting all available water supplies and implementing conservation and direct reuse strategies, Region C still has an over 1 million ac-ft/yr need in 2080.	No changes.
Jadell Hines	MNR would flood valuable ecosystems and habitats for important wildlife in the region.	Your comment has been noted.	No changes.
David Venhuizen	Instead of MNR, Region C should consider using building-scale rainwater harvesting.	Rainwater harvesting was considered but was ultimately not recommended as a potentially feasible water management strategy. This is due to a lack of detailed data on the quantity of supplies that would be made available from rainwater harvesting. See Chapter 5A.1.5 for an analysis.	No changes.
Randy Russell	Dam up the Trinity River instead of the Sulphur River for MNR.	Your comment has been noted.	No changes.
Patti Haney, Jana Goforth	There are fault lines within the reservoir footprint.	Previous publications, including one by the University of Texas Bureau of Economic Geology, have found that future seismic movement on the Mexia-Talco Fault Zone is extremely unlikely.	No changes.
Benjamin	Tunnel to the Rockies for water.	Your comment has been noted.	No changes.
The following comments were received in support of the Marvin Nichols Reservoir and other reservoirs in the Plan			
Ben Matthew	We need Marvin Nichols Reservoir. Conservation alone is not enough. Consider higher rates for high water users. We need to plan.	Your comment has been noted.	No changes.

COMMENTER	SUMMARY OF COMMENT	REGION C RESPONSE	CHANGES TO REGION C PLAN
David Waters	I am in favor of MNR. Water sources in Region C are drying up due to the growth in population. There is plenty of water in East Texas and it should be shared. If the people were moving to East Texas rather than North Texas, the same people would be really complaining. They don't like change.	Your comment has been noted.	No changes.
Duane George	The reservoirs as planned for North Texas should be built.	Your comment has been noted.	No changes.
Jeffery Kidd	Adopt the plan and build the projects. These projects should have been built long ago. Fort Worth needs to say no to new construction unless they can ensure there is sufficient water.	Your comment has been noted.	No changes.
Kathy Turner Jones, Prairielands Groundwater Conservation District	Strongly supports the 2026 RWP and all its water management strategies, including expanding surface water infrastructure and reuse capacity. Encourages coordination between GCD's and surface water providers to build resiliency.	Your comment has been noted.	No changes.
Dale Petroskey, Dallas Regional Chamber	Letter of support for the 2026 Region C Plan.	Your comment has been noted.	No changes.
North Texas Commission	Letter of support for the 2026 Region C Plan.	Your comment has been noted.	No changes.
North Texas Regional Chamber Coalition	Letter of support for the 2026 Region C Plan.	Your comment has been noted.	No changes.

COMMENTER	SUMMARY OF COMMENT	REGION C RESPONSE	CHANGES TO REGION C PLAN
Jason Kelliher, Greater Dallas Planning Council	Supports the entirety of the 2026 RWP. Conservation and reuse is not enough to support the projected population growth in Texas to sustain a strong economy	Your comment has been noted.	No changes.
Commentors w	rith Questions on MNR		
	If approved, what is the timeline?	The timeline is shown in Section 5F.2.1 of the Region C Plan.	No changes.
	How do I locate a map to confirm my land will be included?	A map showing the reservoir pool area is in Section 5C.1.4 and Appendix G.	No changes.
Joe Boggs	Who will decide on Fair Market Value and how will that decision be made?	The sponsors will work with the landowners to reach an agreement on a sales price. If eminent domain is used, fair market value will be determined by an outside party (???).	No changes.
	What if part of my land is included in both some of it is not?	You may retain ownership of land that is not needed for the project.	No changes.
	How come we didn't just dig the existing reservoirs much deeper to hold more water?	We have evaluated that option and determined the amount of supply is small and the dredging is costly.	No changes.
	How do I stay informed?	https:/regioncwater.org	No changes.
Tommy Lovell	If MNR moves forward, how much land will be taken through condemnation and be sold off to developers for homes?	Any land taken through eminent domain will be used for the reservoir pool area or environmental mitigation.	No changes.
Commentors w	rith Other Questions		
	How do Region C's 2080 supplies for water conservation and reuse compared to current usage?	In 2022, reuse supply equaled 54,898 ac- ft or 3.5% of Region C's water supplies. By 2080, reuse and conservation supply totals to 1.28 million ac-ft/yr or 33% of Region C's water supplies.	No changes.
Robert Miller	How was it determined that the regionwide municipal per capita water use would be 95 gpcd in 2080?	Each of the water conservation and reuse strategies have a predicted amount by which they would reduce gpcd. See Chapter 5B and Appendix I for how gpcd is calculated and the predicted savings from the conservation measures.	No changes.

COMMENTER	SUMMARY OF COMMENT	REGION C RESPONSE	CHANGES TO REGION C PLAN
	What is included in the plan to reach the 95 gpcd in 2080?	The implementation of Plumbing Code Savings, water loss mitigation, and other conservation measures will reduce	No changes.
		municipal gpcd over time. See Chapter 5B.4 and Appendix I for further discussion.	

Q.4 Other Changes to WWP and/or WUG Plans

During the review and comment period of the IPP, several requests were made by entities within Region C to make minor revisions to the plan. These changes are summarized in **Table Q.7**. Additionally, minor formatting and wording revisions were made upon further review of the IPP but are not included in the table below. These changes were made to enhance the clarity of the plan itself and did not impact content.

TABLE Q.7 SUMMARY OF CHANGES TO WWP AND/OR WUG PLANS

WWP/WUG	REQUESTER	CHANGES TO REGION C PLAN	
Celina	Ronna Hart	Added in a recommended groundwater WMS in the Trinity and Woodbine aquifers. Added in an alternative joint groundwater WMS in East Texas (Wood and Smith counties). This alternative WMS may be pursued jointly with Mustang SUD or independently.	
County- Other, Parker	TRWD	TRWD agreed to provide raw water to the Trinity Basin portion of Parker County-Other in 2040. Moved the "Parker County Regional Water System" WMS to be online in 2040. Parker County-Other has no unmet needs in the Trinity Basin across the planning period.	
Decatur	Andrew Simonsen	Wise County WSD owns and operates the raw water pumpstation and pipeline from Lake Bridgeport and Decatur owns and operates the 3 MGD WTP. Updated Decatur's existing supply allocations/needs to reflect a current WTP capacity of 3 MGD. Added a 3 MGD WTP expansion WMS in 2030 and a 8 MGD WTP expansion WMS in 2050.	
Ennis		Updated Ennis' current WTP capacity to 9 MGD and adjusted existing supply allocations/needs accordingly. Added in a 3 MGD WTP expansion WMS in 2030.	
Mustang SUD	Ronna Hart	Added in a recommended groundwater WMS in the Trinity and Woodbine aquifers. Added in an alternative joint groundwater WMS in East Texas (Wood and Smith counties). This alternative WMS may be pursued jointly with Celina or independently.	
Ponder	Gary Morris	Infrastructure constraints currently prevent Ponder from receiving water from UTRWD. Existing UTRWD supplies have been removed, and the Water Management Strategy has been updated to "Connect to and Purchase Water from UTRWD" once the necessary infrastructure is in place.	
Red River Authority of Texas	Fabian Heaney	Updated Red River Authority of Texas' current WTP capacity to 0.55 MGD and adjusted existing supply allocations/needs accordingly. Added in a Preston Shores 1 MGD WTP expansion WMS in 2030.	
TRWD	Amy Kaarlela	Added Oklahoma water as an alternative WMS. Some minor text clarification on WMSs.	
Wilmer	Wayne McCurley	Pushed back the online date for the direct connection to Dallas transmission line project to 2040.	
Wise County WSD	Andrew Simonsen	Wise County WSD owns and operates the raw water pumpstation and pipeline from Lake Bridgeport and Decatur owns and operates the 3 MGD WTP. Added in infrastructure improvements project to upgrade the raw water pumpstation and pipeline for Wise County WSD.	
Celina	Ronna Hart	Added in a recommended groundwater WMS in the Trinity and Woodbine aquifers. Added in an alternative joint groundwater WMS in East Texas (Wood and Smith counties). This alternative WMS may be pursued jointly with Mustang SUD or independently.	