



10900 Stonelake Blvd.
Bldg. 2, Ste. 126 / Austin, TX 78759
P 512-453-5383

carollo.com

March 19, 2024

Mr. Jeff Walker
Executive Administrator
Texas Water Development Board
1700 N. Congress Ave.
Austin, TX 78711-3231

Subject: Draft Amendment Packet for Major Amendment to the 2021 Brazos G Regional Water Plan to address Infeasible Water Management Strategies and Projects

Dear Mr. Walker:

The Brazos G RWPG has considered and taken action to initiate a major amendment and authorized posting of a public hearing notice at its regular meeting on February 13, 2024. The Texas Water Development Board (TWDB) requires that draft amendment materials be prepared in accordance with TWDB rules and guidance for consideration at a public hearing. This public hearing is presently scheduled for March 27, 2024. The accompanying documentation represents the draft amendment packet required to be submitted to the TWDB Executive Administrator for review no later than 7 days prior to the public hearing date.

The need for this major amendment is the result of an evaluation performed by the Brazos G RWPG to determine if Water Management Strategies and/or Water Management Strategy Projects recommended in the 2021 Plan are infeasible, in accordance with Texas Water Code §16.053(h)(10). The Scope of Work Committee of the Brazos G RWPG met on October 10, 2023, November 15, 2023, and January 9, 2024, to develop and recommend a list of infeasible WMSs and WMSPs from the 2021 Plan, which was formally adopted by the Brazos G RWPG on February 13, 2024. Several of the identified infeasible strategies relate to major reservoir strategies, and thus qualify as a major amendment. The Brazos G RWPG will submit a completed amendment package after the required public comment period, addressing any comments received.

If you have any questions about this matter, please feel free to contact me. The TWDB's participation and assistance in this effort is very much appreciated.

Sincerely,
CAROLLO ENGINEERS, INC. on behalf of the Brazos G RWPG

Tony L. Smith, P.E.
Technical Consultant Project Manager
Carollo Engineers, Inc.

Enclosures: Digital Attachments

This document is released for the purpose of draft information exchange review and planning only under the authority of Tony L. Smith, P.E., March 19, 2024, TX PE#92620.

Introduction and RWPG Action

Per Texas Administrative Code §357.12(b), the Brazos G Regional Water Planning Group (RWPG) is responsible for performing an analysis of potentially infeasible Water Management Strategies (WMSs) or Water Management Strategy Projects (WMSPs), as defined by Texas Water Code (TWC) §16.053(h)(10), included in the most recently adopted 2021 Regional Water Plan (RWP). The Brazos G RWPG's Scope of Work Committee met on October 10, 2023, November 15, 2023, and January 9, 2024, to develop and recommend a list of infeasible WMSs and WMSPs from the 2021 Plan, which was subsequently formally adopted by the Brazos G RWPG on February 13, 2024. The infeasible WMSs and WMSPs have been identified based on project sponsor provided information and local knowledge, as acquired through plan development activities such as surveys and by phone, and as determined based on implementation schedules consistent with implementation by the project sponsors. Several of the identified infeasible strategies relate to major reservoir strategies, and thus qualify as a major amendment.

A list of 7 infeasible WMSs and 9 infeasible WMSPs was provided in Appendix N of the Brazos G RWPG's March 1, 2024, Technical Memorandum, and is presented in Table 1.

Required Draft Major Amendment Materials

Per TWDB guidelines, the following materials must be submitted to the TWDB Executive Administrator for a review of a draft major amendment:

1. A cover letter from the RWPG stating the need for the amendment and summarizing RWPG action taken.
2. Documentation of what plan sections the amendment applies to and where changes would occur based on the amendment.
3. Information to demonstrate that a new WMS has been fully evaluated in accordance with statute, rule, and regional water planning technical guidelines.
4. A summary of infeasible strategy and/or infeasible project components and why they were determined to be infeasible (for amendments associated with an infeasibility analysis).
5. Summarize any changes to unmet needs as a result of removing infeasible strategies, including adequate justification of increases in or new unmet municipal needs per 31 TAC §357.50(J), if applicable.
6. Relevant water availability modeling files, if applicable.
7. Relevant data revisions for the regional water planning database.

Each of these materials are addressed by number herein. A summary of the identified infeasible WMS and WMSPs is presented in Table 1.



Table 1 – Summary of Infeasible Water Management Strategies and Water Management Strategy Projects Identified from the 2021 Brazos G Regional Water Plan

Type	Water Management Strategy / Project	Sponsor	Online
Groundwater	Trinity Aquifer Development (WMS same as Johnson County SUD and Individual WMSP)	City of Godley	2020
	Trinity Aquifer Development (WMS same as City of Godley and Individual WMSP)	Johnson County SUD	2020
	Trinity Aquifer Development (WMS and WMSP)	Highland Park WSC	2020
WTP	Jayton WTP New (WMS and WMSP)	Jayton	2020
Major Reservoir	Cedar Ridge Reservoir (WMS, WMSP, and related WMSP)	Abilene	2030
Major Reservoir	Lake Creek Reservoir (WMS and WMSP)	NCTMWA	2030
Major Reservoir	New Throckmorton Reservoir (WMS and WMSP)	Graham and Throckmorton	2030
Minor Reservoir	Coryell County OCR (WMS and WMSP)	Multi-County WSC	2030

Further, over the course of the 2026 planning process several editorial revisions to the 2021 Brazos G RWP have been identified and incorporated into this amendment, namely:

- Correct capital cost for Williamson County groundwater WMS; and
- Correct typo on “Trinity Aquifer Development WMS - Palo Pinto County Irrigation”.



Item 1 – Cover Letter

Presented above.

Item 2 – Documentation of Applicable Plan Sections

The sections of the 2021 Brazos G RWP wherein changes would occur based on the infeasibility analysis are presented in Table 2 below.

The two additional editorial changes to the 2021 Brazos G RWP are identified below:

1. During development of the draft 2022 State Water Plan, TWDB staff identified a data entry error related to the capital cost of the Williamson County Groundwater Project. The capital cost for this project in DB22 was entered as \$4,015,016,000; however, the capital cost represented in the evaluation for this strategy in the 2021 Brazos G RWP is \$415,016,000 (Table 5.3-1).

To reflect accurate costs in the 2022 State Water Plan, TWDB staff updated the DB22 cost for this project to \$415,016,000, as the resulting total cost for Region G reported in the State Water Plan thus differs from the Recommended Projects Associated with Water Management Strategies DB22 report in the Region G Executive Summary Appendix.

With this amendment, the total capital cost of the WILLIAMSON COUNTY GROUNDWATER project represented within Table 5.3-1 and the Recommended Projects Associated with Water Management Strategies DB22 report are corrected to \$415,016,000, in alignment with the Final 2022 State Water Plan.

2. Correct typo on “Trinity Aquifer Development WMS - Palo Pinto County Irrigation”

Within Volume II of the 2021 Brazos G RWP there is a typo on Page 13-49 within the statement in the project description for the “Trinity Aquifer Development - Palo Pinto County Irrigation” Water Management Strategy indicating the transfer of water from Erath County to “City of Strawn.” This statement is amended to state the transfer of water from Erath County to Palo Pinto Irrigation.



Table 2 – Applicable Plan Sections

Type	Strategy / Project	Sponsor	Online	Status	Vol.	Page No.	Applicable Section where Changes would Occur
Groundwater	Trinity Aquifer Development (WMS same as Johnson County SUD and WMSP)	City of Godley	2020	Recommend identify strategy as infeasible, defer to 2030 with unmet 2020 need.	1	PDF. 196 of 1064	TWDB: Recommended WUG WMS DB22 Report
						PDF. 215 of 1064	TWDB: Recommended Projects DB22 Report
						5.17-9	Section 5.17.8
					2	13-31	Section 13.3.14
	Trinity Aquifer Development (WMS same as City of Godley and WMSP)	Johnson County SUD	2020	Recommend identify strategy as infeasible, add a 2020 strategy to increase the purchase of surface water from TRWD.	1	5.17-10	Section 5.17.10
						5.17-11	
	2	13-32	Section 13.3.14				
	Trinity Aquifer Development (WMS and WMSP)	Highland Park WSC	2020	Recommend identify strategy as infeasible, defer to 2030 with unmet 2020 need.	1	PDF. 216 of 1064	TWDB: Recommended Projects DB22 Report
						5.2-3	Section 5.2.3
						5.2-4	
2					13-9	Section 13.3.2	
WTP	Jayton WTP New (WMS and WMSP)	Jayton	2020	Recommend identify strategy as infeasible, remove strategy and revise supply from 0 to groundwater well annual production capacity, as sufficient MAG is available.	1	PDF. 129 of 1064	TWDB: WUG Needs/Surplus DB22 Report
						PDF. 199 of 1064	TWDB: Recommended WUG WMS DB22 Report
						5.19-1	Table 5.19-1
						5.19-1	Section 5.19.1
						5.19-2	
					2	13-101	Section 13.5
13-112							



Type	Strategy / Project	Sponsor	Online	Status	Vol.	Page No.	Applicable Section where Changes would Occur
Major Reservoir	Cedar Ridge Reservoir (WMS, WMSP, and related WMSP)	Abilene	2030	Recommend identifying WMS and associated WMSP as infeasible and moving online decade to 2040.	1	PDF. 187 of 1064	TWDB: Recommended WUG WMS DB22 Report
					1	5.33-2	Section 5.33.1
				Recommend identifying Sweetwater WMSP "Interconnect from Abilene to Sweetwater" as infeasible and moving online decade to 2040. This will affect two secondary customers to the City of Sweetwater.	1	5.33-3	Section 5.33.1
				Recommend amending the recommended strategy for the City of Roscoe for purchase of 88 ac-ft/yr of supply in 2030 to 50 ac-ft/yr of supply from the City of Sweetwater, leaving an unmet municipal need in only the 2030 decade of 38 ac-ft/yr for the City of Roscoe.	1	5.26-3	Section 5.26.2
					1	5.26-7	Section 5.26.6
				Recommend amending the recommended strategy for Nolan County Mining, delaying the onset of the purchase of additional supply from Sweetwater until 2040, leaving unmet mining needs in 2020 of 71 ac-ft/yr and in 2030 of 64 ac-ft/yr.	2	4.3-11, 4.3-12	Section 4.3.4
						13-90, 13-91	Section 13.4.12
						13-92	Section 13.4.12
						13-92	Section 13.4.12
	Lake Creek Reservoir (WMS and WMSP)	NCTMWA	2030	Recommend identifying WMS and associated WMSP as infeasible and moving online decade to 2040.	1	PDF. 197 of 1064	TWDB: Recommended WUG WMS DB22 Report
					5.38-15	Section 5.38.10	
				1	5.14-1	Section 5.14.1	
This will extend unmet needs to 2030 for the City of Haskell (473 ac-ft/yr), Knox City (214 ac-ft/yr), and Munday (229 ac-ft/yr).					5.20-2	Section 5.20.1	
					5.20-3	Section 5.20.2	
	2	4.7-10, 4.7-11	Section 4.7.4				

Type	Strategy / Project	Sponsor	Online	Status	Vol.	Page No.	Applicable Section where Changes would Occur			
	New Throckmorton Reservoir (WMS and WMSP)	Graham and Throckmorton	2030	Recommend identifying WMS and associated WMSP as infeasible and moving online decade to 2050.	1	PDF. 196 of 1064	TWDB: Recommended WUG WMS DB22 Report			
					1	5.37-3	Section 5.37.3			
						5.34-2	Section 5.34.1			
				1	5.34-2	Section 5.34.1				
				1	This will result in extending unmet needs to 2030 and 2040 for the City of Throckmorton (127 ac-ft/yr to 121 ac-ft/yr).	2030	This will result in extending unmet needs to 2030 and 2040 for the City of Graham (1,351 ac-ft/yr to 1,306 ac-ft/yr).	1	5.37-4	Section 5.37.3
								2	4.10-9, 4.10-10	Section 4.10.4
13-99, 13-100	Section 13.4.17									
Minor Reservoir	Coryell County OCR (WMS and WMSP)	Multi-County WSC	2030	Recommend identifying WMS and associated WMSP as infeasible and moving online decade to 2050.	1	PDF. 205 of 1064	TWDB: Recommended WUG WMS DB22 Report			
						5.7-10	Section 5.7.8			
				1	5.7-5	Section 5.7.4				
				1	5.7-8	Section 5.7.6				
				2	This will result in unmet municipal needs the City of Gatesville (2030 - 280 ac-ft/yr and 2040 - 543 ac-ft/yr). The 2021 Brazos G Plan already has an unmet municipal need in 2020 for the City of Gatesville of 1,041 ac-ft/yr.	4.4-11, 4.4-12	Section 4.4.4			
						13-77	Section 13.4.3			
						13-75	Section 13.4.3			



Item 3 – Demonstration that New WMSs have been Fully Evaluated

Preliminary lists of potentially infeasible WMSs and WMSPs, and the interrelation between WMSs and WMSPs, were provided by the TWDB to support the RWPG’s infeasibility review. This review included written surveys submitted to project sponsors and Water User Groups (WUGs), and subsequent follow-up phone calls by the Brazos G RWPG’s technical consultant team.

Per TWC §16.053(h)(10):

“[A] water management strategy or project is considered infeasible if the proposed sponsor of the water management strategy or project has not taken an affirmative vote or other action to make expenditures necessary to construct or file applications for permits required in connection with the implementation of the water management strategy or project under federal or state law on a schedule that is consistent with the completion of the implementation of the water management strategy or project by the time the water management strategy or project is projected by the regional water plan or the state water plan to be needed.”

Utilizing this information, the RWPG developed a process to identify potentially infeasible WMSs and WMSPs and determine if a strategy or project was infeasible, as shown in Figures 1 and 2.

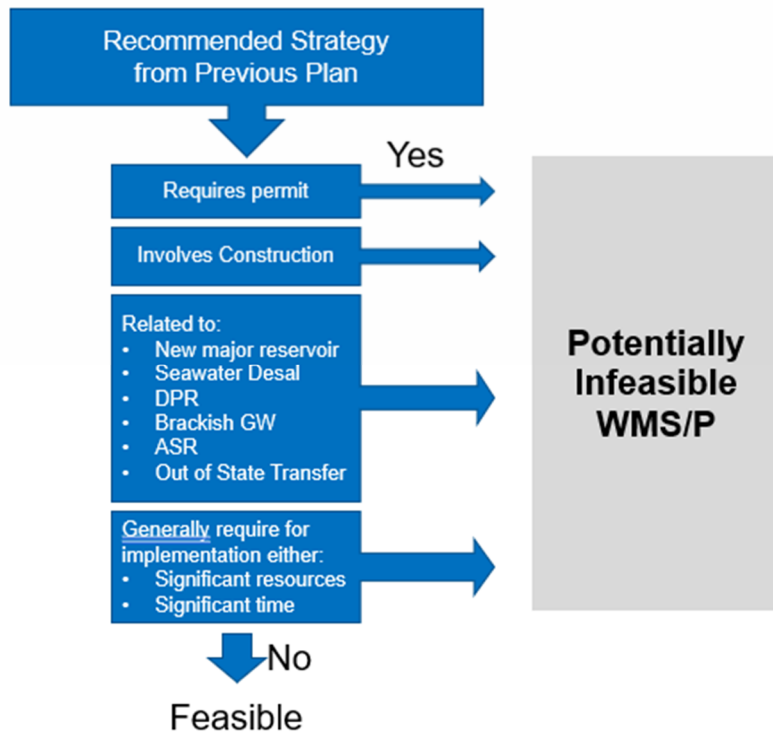


Figure 1 – Process for Identification of Potential Infeasibility of a Water Management Strategy or Water Management Strategy Project

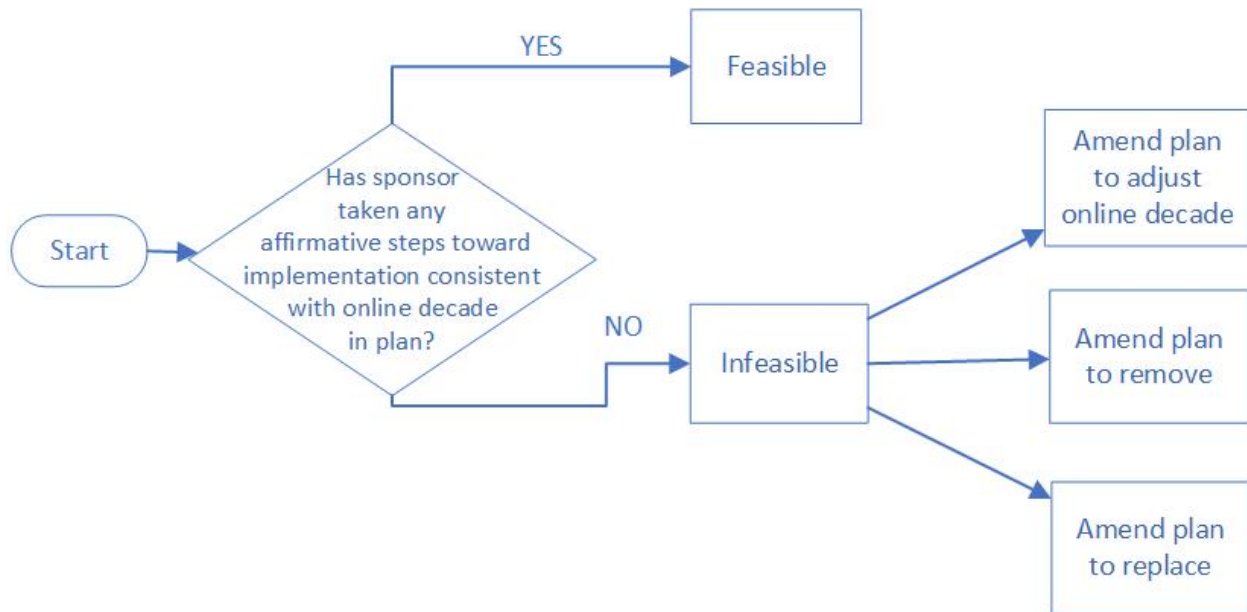


Figure 2 – Steps for Evaluation of Infeasibility of a Water Management Strategy and Water Management Strategy Project

The RWPG considered that the RWP could be amended to:

- Remove infeasible WMS/WMSP;
- Revise infeasible WMS/WMSP to make it feasible;
- Incorporate a new WMS/WMSP to address the identified need.

After the identification of each infeasible WMS and/or WMSP, the resultant identified need for each associated WWP and/or WUG was re-evaluated by the RWPG consistent with all applicable statutes, rules, and guidelines to determine the feasibility of other WMSs and/or WMSPs to address the new need. Limited availability from existing sources and other WMS and/or WMSPs and input from the associated sponsors and water users as to planned strategies resulted in the delaying the onset of WMSs and WMSPs to make the strategy and/or project feasible, and the resultant identification of unmet needs in the interim period. It is important to note that needs would typically only be unmet should a drought of severity equivalent to the drought of record occur prior to the time in which a WMS and/or WMSP is scheduled to be in place.

For the Johnson County Special Utility District (SUD), the WUG's representative indicated that the WUG has already implemented a different strategy for the purchase of surface water, purchasing supply from the City of Mansfield and increasing the contracted supply from the Brazos Regional Public Utility Authority, consistent with their more recent 2022 Water System Master Plan. The RWPG determined that based on the determinations of source and supply availability for the purposes of the 2021 Brazos G RWPG, there is sufficient unallocated firm supply availability to recommend increasing the existing surface water contract by 46 ac-ft/year with the Tarrant Regional Water District to meet the identified 2020 needs.

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For the City of Jayton, per discussions with the WUG's representative the conditions under which a need was identified (relating to water quality) have been determined to be no longer applicable. Thus, the WUG's supply is recommended to be revised from 0 acre-feet per year (ac-ft/yr) to the WUG's groundwater well annual production capacity, as sufficient Modeled Available Groundwater (MAG) has been determined to be available to meet projected demands.

Item 4 – Summary of Determination of Infeasibility

A summary of the information compiled by the RWPG utilized to determine the infeasibility of the identified WMSs and WMSPs is presented in Table 3 below.



Table 3 – Information on Water Management Strategy and Water Management Strategy Project Infeasibility

Type	Strategy / Project	Sponsor	Online	Information Compiled by Brazos G RWPG
Groundwater	Trinity Aquifer Development (WMS same as Johnson County SUD and WMSP)	City of Godley	2020	Per Mr. Kevin Fregia (Dir. Pub. Works), sponsor has taken no affirmative steps, plan would continue to be to construct in next 5 years if necessary. City has new administrator, may take formal action but none confirmed to date. Recommend identify strategy as infeasible, defer to 2030 with unmet 2020 need of 3 ac-ft/yr.
	Trinity Aquifer Development (WMS same as City of Godley and WMSP)	Johnson County SUD	2020	Sponsor (per Mr. Tyler Lyles, Water Operations Mgr.) indicates strategy no longer feasible, recently increased surface water agreement with City of Mansfield and negotiating revised contract with Brazos Regional PUA, per provided 2022 Water System Master Plan.
				Recommend identify strategy as infeasible, add a 2020 strategy to increase the purchase of surface water from TRWD.
Trinity Aquifer Development (WMS and WMSP)	Highland Park WSC	2020	Per Mr. David Posten (Operator and Dist. System Admin.), sponsor has taken no affirmative steps taken, but intends to implement when needed and requests deferral to online decade of 2030. Recommend strategy is infeasible, defer to 2030 with unmet 2020 need.	
WTP	Jayton WTP New (WMS and WMSP)	Jayton	2020	Per Ms. Michelle Fager, (City Sec.), project shortages due to TCEQ treatment constraint are no longer applicable, thus no shortage exists and WMS no longer necessary. Recommend identify strategy as infeasible, remove strategy and revise supply from 0 to groundwater well annual production capacity, as sufficient MAG is available.

Type	Strategy / Project	Sponsor	Online	Information Compiled by Brazos G RWPG
Major Reservoir	Cedar Ridge Reservoir (WMS, WMSP, and related WMSP)	Abilene	2030	Sponsor (per Mr. Rodney Taylor, City of Abilene, Director of Water Utilities) has taken affirmative steps. The City has submitted a surface water right permit application to the TCEQ and a permit application to the USACE. Each application remains active within its respective agency. The sponsor requests the online decade be changed to 2040.
				Recommend identifying WMS and associated WMSP as infeasible and moving online decade to 2040.
				Recommend identifying Sweetwater WMSP "Interconnect from Abilene to Sweetwater" as infeasible and moving online decade to 2040. This will affect two secondary customers to the City of Sweetwater.
				Recommend amending the recommended strategy for the City of Roscoe for purchase of 88 ac-ft/yr of supply in 2030 to 50 ac-ft/yr of supply from the City of Sweetwater, leaving an unmet municipal need in only the 2030 decade of 38 ac-ft/yr for the City of Roscoe.
Recommend amending the recommended strategy for Nolan County Mining, delaying the onset of the purchase of additional supply from Sweetwater until 2040, leaving unmet mining needs in 2030 of 71 ac-ft/yr and in 2040 of 64 ac-ft/yr.				
Major Reservoir	Lake Creek Reservoir (WMS and WMSP)	NCTMWA	2030	While sponsor has taken affirmative steps, with approx. \$500k expended to date on research/feasibility of project, no applications have been filed.

Type	Strategy / Project	Sponsor	Online	Information Compiled by Brazos G RWPG
				<p>Recommend identifying WMS and associated WMSP as infeasible and moving online decade to 2040.</p> <p>This will extend unmet municipal needs to 2030 for the City of Haskell (473 ac-ft/yr), Knox City (214 ac-ft/yr), and Munday (229 ac-ft/yr).</p>
Major Reservoir	New Throckmorton Reservoir (WMS and WMSP)	Graham and Throckmorton	2030	<p>No affirmative steps taken by sponsors (per Mr. Jimmy Collins, Public Works Director, City of Throckmorton). City of Throckmorton would plan to use existing water from lakes and/or increase contracted amount with the City of Graham. City of Graham (per Mr. Randall Dawson, Public Works Director) indicates no new reservoir project planned.</p> <p>Recommend identifying WMS and associated WMSP as infeasible and moving online decade to 2050.</p> <p>This will result in extending unmet needs to 2030 and 2040 for the City of Throckmorton (127 ac-ft/yr to 121 ac-ft/yr).</p> <p>This will result in extending unmet needs to 2030 and 2040 for the City of Graham (1,351 ac-ft/yr to 1,306 ac-ft/yr).</p>
Minor Reservoir	Coryell County OCR (WMS and WMSP)	Multi-County WSC	2030	<p>Sponsor (per Ms. Kate Timmons, Office Manager, Multi-County Water Supply Corporation) has not taken affirmative steps. No action has been taken to date except an agreement to be the representative of the project if it comes to fruition in the future. The WSC believes the project online decade would be 2050 or later. Discussion with City of Gatesville (per Mr. Scott Albert, GM) indicates strategy is still under consideration, although no affirmative</p>

Type	Strategy / Project	Sponsor	Online	Information Compiled by Brazos G RWPG
				<p>steps have been taken, and not opposed to delaying strategy until 2050.</p> <p>Per 2021 Brazos G Plan "For the project to be economically feasible, an agreement with the Brazos River Authority (BRA) would be required to subordinate Lake Belton water rights to diversions from Cowhouse Creek for impoundment in the OCR. Without subordination, the unappropriated flows in Cowhouse Creek are not sufficient to maintain adequate water levels in the OCR. Currently, BRA indicates that no subordination agreement is likely to be possible."</p> <p>Recommend identifying WMS and associated WMSP as infeasible and moving online decade to 2050.</p> <p>This will result in unmet municipal needs for Flat WSC (2030 - 1 ac-ft/yr and 2040 - 3 ac-ft/yr),</p> <p>This will result in unmet municipal needs the City of Gatesville (2030 - 280 ac-ft/yr and 2040 - 543 ac-ft/yr). The 2021 Brazos G Plan already has an unmet municipal need in 2020 for the City of Gatesville of 1,041 ac-ft/yr.</p>

Item 5 – Summary of Changes to Unmet Needs and Justification

A summary of the changes to unmet needs related to the changes identified within this amendment is presented in Table 4. Revised amounts are highlighted in bold red text.

Table 4 – Changes to Unmet Needs

County	Water User Group	Needs Left Unmet (acft/yr)					
		2020	2030	2040	2050	2060	2070
Municipal WUGs							
Stonewall	Aspermont	39					
McLennan	County-Other	222					
Williamson	County-Other	32					
Coryell	Flat WSC		1	3			
Coryell	Fort Gates	260					
Coryell	Gatesville	1,041	280	543			
Bell and Williamson	Georgetown	10,307					
Johnson	Godley	3					
Young	Graham	1,457	1,351	1,306			
Limestone	Groesbeck	688					
Haskell	Haskell	477	473				
McLennan	Hewitt	480					
Bosque and McLennan	Highland Park WSC	82					
Williamson	Hutto	907					
Knox	Knox City	226	214				
Lampasas	Lampasas	128					
Palo Pinto	Mineral Wells	342					
Knox	Munday	242	229				
Nolan	Roscoe		38				
Brazos	Texas A&M University	99					
Throckmorton	Throckmorton	135	127	121			
Non-Municipal WUGs							
Comanche	Irrigation	14,114	12,382	11,707	11,739	11,707	11,738
Haskell	Irrigation	14,932	13,881	10,540	10,809	11,711	11,825
Knox	Irrigation	13,160	14,678	10,394	8,418	7,954	10,147
Nolan	Irrigation	7,890	7,659	7,428	7,428	7,428	7,428

County	Water User Group	Needs Left Unmet (acft/yr)					
		2020	2030	2040	2050	2060	2070
Robertson	Irrigation	10,476	12,222	11,521	12,106	12,217	12,309
Stephens	Irrigation	86	83	80	80		80
Williamson	Irrigation				146	146	146
Bell	Manufacturing	123					
Bosque	Mining	360	414	207	188	152	141
Haskell	Mining	90	87	77	69	61	55
Hill	Mining	187					
Lee		1					
Limestone	Mining	6,849	6,271	6,016	6,457	6,891	7,467
Shackelford	Mining	336	501	309	201	95	16
Somervell	Mining		44				
Stephens	Mining	3,323	3,295	2,557	1,968	1,440	990
Taylor	Mining	245					
Nolan	Mining		71	64			
Williamson	Mining	4,567	5,493	6,407	7,515	8,656	9,962
Hill	Steam-Electric	4,120	4,120	4,120	4,120	4,120	4,120
Milam	Steam-Electric	32,254	32,254	32,254	32,254	32,254	32,254
Somervell	Steam-Electric	35,387	34,783	34,879	34,975	35,071	35,167
Total Municipal		17,082 17,167	0 2,713	0 1,973			
Total Irrigation		60,658	60,905	51,670	50,726	51,163	53,673
Total Manufacturing		123					
Total Mining		15,958	16,105 16,176	15,573 15,637	16,398	17,295	18,631
Total Steam-Electric		71,761	71,157	71,253	71,349	71,445	71,541
Total Brazos G		165,582 165,667	148,167 150,951	138,496 140,533	138,473	139,903	143,845

The applicable requirements are presented in 31 TAC 357.50 (j), presented in italicized text below:

"[t]he Board shall consider approval of an RWP that includes unmet municipal Water Needs provided that the RWPG includes adequate justification, including that the RWP:

- (1) documents that the RWPG considered all potentially feasible WMSs, including Drought Management WMSs and contains an explanation why additional conservation and/or Drought Management WMSs were not recommended to address the need;*



The Brazos G RWPG identified no potentially feasible strategies that could be implemented for the 2020 decade for the identified municipal WUGs. The Brazos G RWPG does not recommend advanced water conservation in 2020 because the benefits of such conservation practices will not be readily apparent in such a short period of time, i.e., by 2020, and would be unrealistic to include as a recommended strategy.

The Brazos G RWPG also does not recommend Drought Management as a recommended water management strategy to meet needs. Drought management measures reduce water demands during times of drought, and do not make more efficient use of existing resources, as does conservation. Applying drought management measures is equivalent to not meeting the projected water demands, per the Brazos G RWPG's explanation in Chapter 7 (section 7.6) of the adopted 2021 RWP, and the RWPG has preferred to show the needs projected for municipal WUGs in 2020 as not being met during a drought equivalent to the drought of record rather than artificially showing them as met by reducing demands during drought.

(2) describes how, in the event of a repeat of the Drought of Record, the municipal WUGs associated with the unmet need shall ensure the public health, safety, and welfare in each Planning Decade that has an unmet need; and

While the Brazos G RWPG does not recommend Drought Management as a water management strategy to meet projected needs for municipal WUGs, the Brazos G RWPG recognizes that such measures will be implemented by utilities as outlined in their individual Drought Contingency Plans. These measures can prolong supply and reduce impacts to communities by limiting water use to only essential water uses in order to protect public health, safety and welfare.

The Brazos G region is vast with many relatively isolated communities with limited water supply alternatives. If Drought Management were to be recommended, this could provide a false sense of security that "needs are met", when, in actuality, projected water demands would not be met. In the event of a drought worse than the drought of record, this approach could further imperil a community because the benefits of drought management have already been realized in the plan and there are no additional management strategies that can be employed in response to the drought.

(3) explains whether there may be occasion, prior to development of the next IPP, to amend the RWP to address all or a portion of the unmet need.

There will be limited opportunity to amend the 2021 Plan prior to development of the next initially prepared plan to address the additional unmet municipal needs identified from the infeasibility analysis. The 2021 Brazos G RWP includes unmet municipal needs in several near-term decades, as the delay in the online decade of the major reservoir strategies recommended in this proposed amendment reflects timeframes accommodating the status of each project as described by the sponsor. Any amendments would have to be accomplished by March 2025, and identification of such strategies by the Brazos G RWPG while concurrently developing the strategies for the 2026 Initially Prepared Plan (IPP) is unlikely.

Item 6 – Relevant Water Availability Modeling Files

No Water Availability Modeling was performed for the purposes of this amendment. Source availabilities are those as determined for the purposes of the 2021 Brazos G RWP as reported in the adopted 2021 Brazos G RWP.



Mr. Jeff Walker
Texas Water Development Board
March 19, 2024

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Item 7 – Relevant Data Revisions for the Regional Water Planning Database

Draft data revisions to the Regional Water Planning Database are included as a digital attachment to this letter. The Brazos G RWPG will provide finalized corrected DB22 data that reflect public comments received as appropriate and the associated changes in the 2021 Brazos G Regional Water Plan and State Water Plan before June 4, 2024.

