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June 24, 2025

James (Jim) Darling
Region M Chair
c/o University of Texas Rio Grande Valley
1201 W University Dr.
Edinburg, TX 78539

Manuel Cruz
Executive Director
Lower Rio Grande Valley Dev. Council
301 W Railroad
Weslaco, TX 78596

Re: Texas Water Development Board Comments for the Rio Grande Regional Water Planning Group (Region M) Initially Prepared Plan, Contract No. 2148302565

Dear Mr. Darling and Mr. Cruz:

Texas Water Development Board (TWDB) staff have completed their review of the Initially Prepared Plan (IPP) submitted by March 3, 2025 on behalf of the Region M Regional Water Planning Group (RWPG). The attached comments follow this format:

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

Please note that 31 Texas Administrative Code (TAC) § 357.50(f) requires the RWPG to consider timely agency and public comment. Section 357.50(g)(1)(D) requires the final adopted plan include summaries of all timely written and oral comments received, along with a response explaining any resulting revisions or why changes are not warranted. Copies of TWDB's Level 1 and 2 written comments and the region's responses to each comment must be included in the final, adopted regional water plan (Contract Exhibit C, Section 2.12.2).

Standard to all planning groups is the necessity to include certain content in the final regional water plans that was not yet available at the time that IPPs were prepared and submitted. Accordingly, the final regional water plans must incorporate the following:

1. An analysis of socioeconomic impacts of not meeting the region's identified needs (31 TAC § 357.40(a)). TWDB will provide a socioeconomic impact analysis report for

each region by July 2025 for inclusion in the final regional water plan. Relevant sections in the plan must be updated accordingly.
2. Completed results from the 2021 Regional Water Plan implementation survey must be presented in the plan, as well as submitting an electronic version of the survey spreadsheet (31 TAC § 357.45(a)).
3. Documentation that comments received on the IPP, including but not limited to TWDB's, were considered in the development of the final plan (31 TAC § 357.50(f)).
4. Certification, in the form of a cover letter from the planning group Chair or Sponsor to the TWDB, that the final, regional water plan is complete and adopted by the RWPG (31 TAC § 357.50(h)(1)).

The following provisions apply to finalizing regional water planning data:

1. If the IPP included PDF copies of the State Water Planning Database (DB27) reports, a final, updated version of all these reports, as appropriate, must be included in the final plan. TWDB *anticipates* final versions of the reports will be available in the Secure Agency Reporting Application by **September 24, 2025**.
2. Continued review of DB27 data is still being performed. If issues arise during staff's ongoing data review, they will be communicated promptly to the planning group to resolve. Please anticipate the need to respond to additional comments regarding data integrity, including any source overallocations, prior to the adoption of the final regional water plans.
3. Please ensure that all numerical values presented in region developed tables throughout the final, adopted regional water plan are consistent with the data reported in DB27.
4. For the purpose of development and adoption of the 2027 State Water Plan, water management strategy and other data entered by the RWPG in DB27 will take precedence over any data discrepancies presented in the final regional water plan (Contract Exhibit C, Section 2.13.1).
5. Any remaining data revisions to DB27 must be communicated to rwpdataentry@twdb.texas.gov no later than **September 22, 2025**.

Additionally, the following final electronic files must be submitted alongside the final regional plan deliverable, including any remaining files that may not have been provided at the time of the submission of the IPP but that were used in developing the final plan (31 TAC § 357.50(g)(2)(C), Contract Exhibit C, Section 2.12.2):

1. All hydrologic model input/output or other model files used in determining water availability.
2. Geographic Information System data deliverables in accordance with Contract Exhibit D, Section 2.5.
3. All other files on which the plan is based (e.g. spreadsheets, maps, etc).

The following standard requirements that apply to recommended water management strategies must also be adhered to in all final regional water plans:

1. Regional water plans may include:
    a. the development of additional water supply sources and supply volumes,

   b. the conveyance and delivery of additional supply volumes to a point intake at a water user group,
   c. the treatment of additional supply volumes at the front end of a water user group's retail system,
   d. additional treatment and related eligible components that are directly related to additional supplies provided through direct reuse, and
   e. infrastructure costs that are associated with development 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 beyond the existing capacity of current facilities.
2. Regional water plan may not include:
   a. any recommended strategies, projects, or costs that are associated with replacing, rehabilitating, or maintaining water supply infrastructure that already exists, or
   b. the costs of any retail distribution lines or other distribution network infrastructure costs with the narrow exception for those strategies directly associated with replacement costs that are for the primary purpose of achieving conservation savings via water loss reduction (§ 357.34(e)(3)(A), Contract Exhibit C, Sections 2.5.2.14 and 2.5.2.15).

As a reminder, the deadline to submit the final, adopted regional water plan and associated material to the TWDB is **October 20, 2025**. It is imperative that you provide the TWDB with information on how you intend to address all TWDB comments well in advance of adoption of the final regional water plan to ensure that all the Level 1 responses are sufficiently responsive for the TWDB Executive Administrator to recommend that the TWDB Board consider approval of your plan in a timely and efficient manner. Your TWDB Regional Water Planner will review and provide feedback to ensure all IPP comments and associated plan revisions have been addressed adequately. Failure to adequately address any Level 1 comments may result in the delay of the TWDB Board approval of your final regional water plan.

Additionally, if the region includes new strategies, or makes significant revisions to its strategy evaluations based on the public comment period, please ensure those significant revisions are pointed out and provided to your TWDB Regional Water Planner to preview in advance of adopting the final regional water plan to ensure that those too will meet all requirements.

Note that the electronic copy of a final report(s) or other deliverable(s) must comply with the requirements and standards specified in 1 Texas Administrative Code (TAC) Chapters 206 and 213 (related to Accessibility and Usability of State Web Sites). Web Content Accessibility Guidelines (WCAG) 2.1 Level AA Standard – WCAG 2.1 Quick Reference can be found at: https://www.w3.org/WAI/WCAG21/quickref/.

If you have any questions regarding these comments or would like to discuss your approach to addressing any of these comments, please do not hesitate to contact Kevin Smith of our Regional Water Planning staff at (512) 475-1561 or Kevin.Smith@twdb.texas.gov. TWDB

staff will be available to assist you in any way possible to ensure successful completion of your final regional water plan.

Thank you for all the time and effort that the RWPG members, the Sponsor, and your consultants have put into developing your draft regional water plan and for the additional effort that will still be required to obtain TWDB Board approval. We look forward to celebrating another successful regional water planning cycle!

Sincerely,

Temple McKinnon
Temple McKinnon (Jun 24, 2025 13:27 CDT)

Matt Nelson
Deputy Executive Administrator of Planning

Attachment

c w/att.: Valerie Ramos, Lower Rio Grande Valley Development Council
Jaime Burke, Black & Veatch
Reem Zoun, TWDB Office of Planning
Temple McKinnon, TWDB Water Supply Planning
Sarah Lee, TWDB Water Supply Planning
Kevin Smith, TWDB Water Supply Planning

Texas Water Development Board (TWDB) comments on the Initially Prepared 2026 Rio Grande (Region M) Regional Water Plan

Level 1: Comments, questions, and data revisions that must be satisfactorily addressed to meet statutory, agency rule, and/or contract requirements.

1. Chapter 1. The plan appears to be missing a description of reuse supplies in Chapter 1. Please include this information in the final, adopted regional water plan. [31 Texas Administrative Code (TAC) § 357.30(3)]

2. Section 2.1, Table 2-1. The total water demand projections for the region presented in Table 2-1 are inconsistent with TWDB Board-adopted projections. For example, Table 2-1 presents a regional total demand of 1,713,003 in 2030, however the Region M TWDB Board-adopted demands in 2030 is 1,713,383. Please revise the water demand projections presented in this table so they are all consistent with Board-adopted projections in the final, adopted regional water plan. [31 TAC § 357.31(e)(1); 31 TAC § 357.31(f)]

3. Section 2.2, Table 2-3. The total population projections for Maverick County presented in Table 2-3 are inconsistent with TWDB Board-adopted projections. For example, Table 2-3 presents a total population for Maverick County of 107,327 in 2080, however the TWDB Board-adopted population projections for Maverick County total 78,490 in 2080. Please revise the population projections presented in this table so they are all consistent with Board-adopted projections in the final, adopted regional water plan. [31 TAC § 357.31(e)(1); 31 TAC § 357.31(f)]

4. Chapter 3. The plan does not appear to include the methodology used for calculating anticipated sedimentation rates and revising the area-capacity rating curves. Please provide details on the methodology used for developing future reservoir elevation-area-capacity rating curves in the final, adopted regional water plan. [Contract Exhibit C, Section 2.3.1]

5. Section 3.2. The plan does not appear to include a table documenting the methods used for estimating non-modeled available groundwater (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]

6. Section 3.4 and the state water planning database (DB27). The plan refers to Appendix 3D for presenting major water provider (MWP) supplies by category of use, however the DB27 report presented in Appendix 3D does not include supplies by category of use. It appears that MWP supplies by category of use can be found in the region developed table in Appendix 4B. Please include a statement in the final, adopted regional water plan—within Chapter 3—that MWP supplies by category of use and decade are shown in Appendix 4B. [31 TAC § 357.32(f)]

7. Section 3.3. Table 3-12 lists all existing reuse projects in the region but does not specify whether they are direct or indirect. Please clarify whether these projects are

direct or indirect, in the final, adopted regional water plan. [Contract Exhibit C, Section 2.3.3]

8. Section 3.3, Appendix 3A, and DB27. Table 3-12 and the Region M Water User Group (WUG) Existing Water Supply Table from DB27 (Appendix 3A) do not consistently present existing reuse supplies in the region. Please review and adjust as appropriate in the final, adopted regional water plan. [Contract Exhibit C, Section 2.3.6]

9. Section 5.1.2. The plan does not appear to include a quantitative measure for assessing reliability of water supplies for water management strategy (WMS) evaluations. The matrix provided in Table 5-1 provides a qualitative rating of low to high. Please provide a quantitative basis for reliability used in the evaluations of all 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)]

10. Chapter 5. The plan does not appear to include a discussion of the plan's impact on other water resources of the state including groundwater and surface water interrelationships. Please include this discussion in the final, adopted regional water plan. [31 TAC § 357.34(e)(4)]

11. Section 5.5. The plan does not include the implementation status for the following large strategies and projects that meet the criteria in accordance with 31 TAC § 357.34(g): 1) Brownsville - Banco Morales Reservoir, 2) HCDD#1 Delta Region WMS - Delta Panchita Reservoir, 3) HCDD#1 Delta Region WMS - Engleman Reservoir, 4) HCDD#1 Delta Region WMS - Santa Cruz Reservoir, and 5) McAllen - North WWTP Potable Reuse Phase 1. Please ensure that the implementation status for these projects are included within the implementation status table provided in Appendix 5E and that a timeline graphic is included for each of these projects, in the final, adopted regional water plan. [31 TAC § 357.34(g)(2), Contract Exhibit C, Section 2.5.2.7]

12. Section 5.2 and DB27. Based on data entered into DB27, the demand reduction volumes appear to be equivalent to over 40 percent of total demands for the following municipal water user groups (WUG) in at least one planning decade: Laguna Madre Water District, McAllen, Mission, Port Mansfield PUD, Rio Grande City, Valley MUD 2, and Zapata County WCID-Hwy 16 East. As these volumes appear relatively high, please add discussion to support this magnitude of the demand reduction volume for these water user groups in the final, adopted regional water plan. [31 TAC § 357.34(j)(2)(B)]

13. Section 5.2 and DB27. For the following municipal water user groups, the whole WUG's GPCD adjusted for conservation is less than 60 GPCD in at least one planning decade: County-Other, Cameron, County-Other, Hidalgo, Edcouch, Elsa, Hidalgo County MUD 1, and La Villa. Please confirm the reasonableness of these anticipated low GPCDs in the final, adopted regional water plan. [31 TAC § 357.34(j)(2)(B)]

14. Section 5.2.1.1, page 5-29. Municipal water use reduction and water loss mitigation WMS are recommended separately, however the plan states that advanced metering infrastructure (AMI) is included in water use reduction strategies. For regional water planning purposes, AMI is to be included under water loss mitigation strategies. Please revise the municipal conservation description, yields, cost information, and reconcile updates in DB27 as appropriate to correctly group AMI with water loss mitigation in the final, adopted regional water plan. [Contract Scope of Work, Task 5C; Contract Exhibit C, Section 2.5.2.5; Contract Exhibit D, Appendix 17]

15. Section 5.2.1.3, Table 5-15, Table 5-16, and DB27. The water savings and costs for the on-farm irrigation conservation strategies are presented by irrigation WUG in Table 5-15 and Table 5-16, however these individual projects and related strategy supply have been entered under one strategy within DB27 (WMSId 3853). This current data structure causes reporting to show that the irrigation strategy for each county relies on the project for that county and every other county in order to be implemented. Projects may not be aggregated and presented as a single capital cost representing multiple projects that would be located in multiple locations and funded by separate sponsors or implemented separately. Please work with TWDB's Water Supply and Strategy Analysis team to revise the irrigation conservation strategy and project data in DB27 to present separate strategies and projects for the irrigation WUGs in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.12]

16. Section 5.2.5. The plan does not appear to describe how population and water demands were used to determine the expected available volume of supplies to support the recommended reuse strategies. Please provide additional details on how the region estimated availability of future reuse—including how projected population and water demands were considered in that determination—in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.3]

17. Appendix 5D. The evaluation for the following reservoir strategies and projects do not appear to separately present the estimated mitigation land area and associated estimate of acquisition cost: 1) Brownsville – Banco Morales Reservoir, 2) Hidalgo County Drainage District No. 1 – Delta Panchita Reservoir, 3) Hidalgo County Drainage District No. 1 – Santa Cruz Reservoir, 4) Hidalgo County Drainage District No. 1 – Engleman Reservoir, and 5) Brownsville – Matamoros Wier and Reservoir. Please provide an estimated separate acreage and cost related to land acquisition (or range) for each 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]

18. Section 5.2.7.1. The evaluation for the East Rio Hondo WSC – FM 2925 Transmission Line water management strategy description indicates that the transmission line would replace the supply from the decommissioned Arroyo WSC water treatment plant (WTP). Any portion of strategies or costs that replace portions of existing water supply are prohibited from being included in the regional water plans. The types of facilities and associated capital or other costs that may be included in a regional water plan must be directly associated with development 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. Please provide additional clarification documenting specifically how, and what share of, this strategy would increase the volume of water supply in the final, adopted regional water plan and/or modify or remove the strategy, as appropriate, to exclude replacement of existing infrastructure capacity. [Contract Exhibit C, Section 2.5.2.15]

19. Section 5.2.7.2. The evaluation for the El Jardin WSC – Distribution Pipeline Replacement water management strategy indicates that this will include replacement of 2, 3, 4 and 6-inch pipes with 8-in pipe, and has been included as a separate conservation water loss mitigation project due to pipe size increases. Per Exhibit C, Section 2.5.2.14, replacement of water lines for the purposes of addressing water loss limits the replacement of lines to not more than two standard pipe diameters larger than the existing pipe. The replacement of 2 and 3 inch pipes with 8 inch pipes exceeds this limit and may not be for the purpose of provision of fire hydrant capacity. If the distribution line replacement for the water conservation strategy is subject to adopted utility standard minimum size requirements that exceed two standard pipe diameters, the water management strategy evaluation must note the specific utility standard justifying such a large increase in capacity and include: 1) a map of the proposed line replacement; and, 2) detailed water loss calculations before and after the proposed line replacement. Please either clarify the utility standards and include the additional information required by Exhibit C above, or remove the portion of the strategy that exceeds the pipeline size increase limit, and make any necessary adjustments to the strategy cost and volumes in DB27. [Contract Exhibit C, Section 2.5.2.14]

20. Section 5.2.7.3. The evaluation for the HCID No. 6 – Service Area Expansion water management strategy indicates that the sponsor has plans to expand its service area in order to continue delivering to Agua SUD's customers as development occurs in the area. Per Exhibit C, Section 2.5.2.15, item 4 on page 69, regional water plans are prohibited from including strategies or costs associated with expanding the distribution network to reach new retail areas. Please remove this water management strategy project from the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.15]

21. 5.2.7.5. Based on the evaluation for the Rio Hondo – Emergency Interconnects water management strategy it is unclear if the yield for this strategy is new additional supply above the existing supply available. Any portion of strategies or costs that replace portions of existing water supply are prohibited from being included in the regional water plans. The types of facilities and associated capital or other costs that may be included in a regional water plan must be directly associated with development 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. Please provide additional clarification documenting specifically how this strategy is increasing the volume of supply in the final, adopted regional water plan and/or modify or remove the strategy, as appropriate, to exclude replacement of existing infrastructure capacity. [Contract Exhibit C, Section 2.5.2.15]

22. Section 5.2.9.7. The evaluation for the Rio Hondo – New Fresh Groundwater Supply water management strategy states the strategy will include “construction of two alternating 750-gpm wells for redundancy and O&M purposes”. Please provide clarification of whether both wells are required to provide the increased supply to Rio Hondo and ensure that strategy volumes and capital costs do not include any costs for maintenance of, upgrades to, replacement or rehabilitation of existing equipment or water supply capacity or for costs that do not directly increase the volumetric water supply in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.15]

23. Section 5.2.9.8. The evaluation for the Webb County Water Utility – Expanded Fresh Groundwater Supply water management strategy states that the strategy includes “rehabilitation of the utility’s water treatment plant and groundwater system”. Any portion of strategies or costs that replace portions of existing water supply are prohibited from being included in the regional water plans. The types of facilities and associated capital or other costs that may be included in a regional water plan must be directly associated with development 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. Please provide additional clarification documenting specifically how this strategy would increase the volume of supply in the final, adopted regional water plan and/or modify or remove the strategy, as appropriate, to exclude replacement of existing infrastructure capacity. [Contract Exhibit C, Section 2.5.2.15]

24. Section 5.2.10.19. The evaluation for the Southmost RWA – Phase 3 SRWA Wellfield water management strategy states that the strategy includes “reconstruction of 20 existing wells”. Any portion of strategies or costs that replace portions of existing water supply are prohibited from being included in the regional water plans. The types of facilities and associated capital or other costs that may be included in a regional water plan must be directly associated with development 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. Please provide additional clarification documenting specifically how the reconstruction of the existing wells is increasing the volume of supply in the final, adopted regional water plan and/or modify or remove the strategy, as appropriate, to exclude replacement of existing infrastructure capacity and the associated costs. [Contract Exhibit C, Section 2.5.2.15]

25. Chapter 5. The plan includes WTP expansion and other strategy types that include a WTP expansion as a stated project component. Any portion of strategies or costs that are associated with replacing portions of existing supply, including WTP capacity, are prohibited from being included in the regional water plans. The types of facilities and associated capital or other costs that may be included in a regional water plan must be directly associated with development of additional supplies from new water sources or additional supplies from more efficient use of existing supplies, or volumetric increases to existing water supplies. Please confirm that only the portion of WTP facilities (and costs) required to increase treated water supply volume (not to replace lost capacity) are included in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.15]

26. Section 5.2.5.2.5, Appendix 5D, and DB27. The plan does not appear to include a detailed costing summary for the recommended project McAllen – North WWTP Potable Reuse Phase 2 (WMSProjectId 2684) The costing summary included in Appendix 5D for McAllen - Direct Potable Reuse appears to include costs for McAllen - North WWTP Potable Reuse Phase I only (WMSProjectId 2370). Please provide a detailed costing table for this project, using either Uniform Costing Model (UCM) output or a table analogous to the UCM output, including cost and unit cost categories, in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.13]

27. Section 5.2 The plan appears to include a limited amount of project maps. Please include, at minimum, a map for each strategy meeting the criteria under 31 TAC § 357.34(g) in the final, adopted regional water plan. [Contract Scope of Work, Task 5B]

28. Section 5.2.3 and DB27. The unit capital cost of $3,043/ac-ft presented in Section 5.2.3 for the Conversion of Surface Water Rights strategies differs from unit capital costs calculated from supply yields divided by project total capital costs included in DB27 for the following projects: WMSProjectIds 2597; 2615; 2731; 2734; 4153; and 4158. For example, DB27 reports a total capital cost of $6,816,000 and 4,480 ac-ft/yr yield in 2080, for Conversion of Surface Water Rights - Donna (WMSProjectId 2597) which would result in a $1,521.43 unit capital cost, however page 5-73 lists unit capital cost of $3,043/ac-ft. Please review and provide additional clarification on the calculation for estimating unit capital costs for these projects and revise as necessary to ensure that project capital costs in DB27 are consistent with those presented in the final, adopted regional water plan. [31 TAC § 357.35(g)(1)]

29. Section 5.2.7.5 and DB27. The online decade for Rio Hondo – Emergency Interconnects water management strategy project does not appear to be presented in the plan, however DB27 reports the recommended project (WMSProjectId 5231) and related strategy as online in 2030. Since the online decade was not reported in the plan, TWDB was unable to confirm the online decade was entered correctly into DB27. Please confirm the online decade for this project and revise the plan if 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)]

30. Sec 5.2.6.2 and DB27. Based on the evaluation for the East Rio Hondo WSC - North Harlingen Surface WTP Phase 1 the strategy appears to increase access to existing surface water availability rather than reduce the demand for the WUG. In DB27, this is currently categorized as a Demand Reduction strategy, however this strategy should likely be categorized as Other Surface Water. Please coordinate with TWDB's Water Supply and Strategy Analysis team to update the structure of this strategy in DB27 and reflect accordingly in the final, adopted regional water plan. [31 TAC § 357.35(g)(1); 31 TAC § 357.50(g)(2)(B)]

31. Section 5.3.2.3.3 and DB27. The online decade for the Laredo – El Pico WTP – Phase 2 Expansion water management strategy and project (WMSProjectId 2591) appears to be inconsistently reported between the plan and DB27. For example, the project and related strategy supply is reported to be online in 2030 in DB27, whereas the plan reports the strategy being online in 2040. Please review the online decades

for all 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)(3)]

32. Section 5.2.3 and DB27. It is unclear whether the online decade for the Conversion of Surface Water Rights - East Rio Hondo WSC water management strategy and project (WMSProjectId 5248) is correctly reported between the plan and DB27. For example, DB27 shows this strategy as providing supply in 2030 with the associated project coming online later in 2050. Please confirm the anticipated online decade for this strategy and project and revise as necessary to ensure that the projects needed to implement strategies are online prior to the strategy supply online decade. [31 TAC § 357.35(g)(3)]

33. Chapter 5. The plan does not appear to include management supply factors for MWPs. Please include the management supply factor for each MWP in the final, adopted regional water plan. [31 TAC § 357.35(g)(2)]

34. Sec 5.2.10. The plan does not appear to include explanations for the following recommended strategy volumes that remain 100 percent unallocated to WUGs: Southmost RWA - Brackish Groundwater Desalination Wellfield Expansion; Southmost RWA - Phase 3 SRWA Wellfield and WTP Expansion; Southmost RWA - Phase 3 Wellfield Optimization; and Southmost RWA - Phase 4 SRWA Wellfield and WTP Expansion. Please provide a specific explanation why each of these strategies remains 100 percent unallocated in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.3]

35. Section 6.3 and DB27. The plan states that "Region M does not have municipal unmet needs", however this is inconsistent with unmet needs data reported in DB27. DB27 reports an unmet municipal need for North Alamo WSC in all decades. Additionally, the unmet need presented in Table 6-2 for Irrigation, Hidalgo County in 2080 is inconsistent with DB27. Please revise the unmet needs information presented in Section 6.3 so that it is reported consistently with DB27, in the final, adopted regional water plan. [31 TAC § 357.40(c)]

36. Section 6.3 and DB27. The plan does not include the required justification for the unmet municipal needs associated with North Alamo WSC. 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 Initially Prepared Plan, to amend the regional water plan to address all or a portion of the unmet municipal need. [31 TAC § 357.50(j)]

37. Section 7.4.2. It is unclear from the emergency interconnection data presented in Table 7-3 which emergency connections are existing and which are potential future emergency connections to be implemented. Please clearly identify which emergency

interconnects are existing vs future in the final, adopted regional water plan. [31 TAC § 357.42(d)]

38. Section 9.7. The counts of water management strategies benefitting more than one WUG provided in Section 9.7 is inconsistent with strategies reported in DB22 and DB27 as benefitting more than one WUG. Please review the data reported in TWDB Secure Agency Reporting Application (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)]

39. Section 9.7. Please include the specific number of recommended water management strategies in the previous plan that serve multiple WUGs and have been implemented since that plan—or include a statement acknowledging if none have been implemented—in the final, adopted regional water plan. [31 TAC § 357.45(b)(2)]

40. Section 9.3. The plan does not appear to include a discussion of the differences in the droughts of record between the 2021 and 2026 plans. Please include a description of the difference in the final, adopted regional water plan. [31 TAC § 357.45(c)(2)]

41. The plan does not appear to meet minimum accessibility requirements. Please ensure that the final, adopted regional water plan has
    - the primary language set to English,
    - the primary view set to document title,
    - a PDF with a good (i.e. descriptive) title set in document properties,
    - and a PDF set up as a tagged document.

    See items 1d, 2a, and 2c in TWDB's accessibility checklist for more information. [Contract, Article III, Paragraph G]

42. Geographic Information System (GIS) data deliverables do not include all of the required attribute fields listed in Table 1 of Exhibit D, Section 2.5.2.1 Please include the following attribute fields in all submitted WMS project GIS data: ShapeDescription, with the final GIS files submitted. Attribute field labeled Location may be updated to ShapeDescription to meet this requirement. [Contract Exhibit D, Section 2.5.2.1]

43. 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 ID	WMS Project Name
5197	Advanced Metering and Water Use Reduction Improvements - Palm Valley

Level 2: Comments and suggestions for consideration that may improve the readability and overall understanding of the regional water plan.

1. Section ES.2. Please consider adding decade 2080 to Figure ES-2 on page ES-6.

2. Section 3.2. Table 3-11 includes the incorrect column header for decades 2020-2070. Please consider correcting the column header on Table 3-11 to 2030 through 2080 in the final plan.

3. Appendix 4B. Please consider including "Supplies" in the title of Appendix 4B, currently titled "MWP Population, Demands, Needs, and Second-Tier Needs".

4. Chapter 3. Please consider including the sedimentation rates for Amistad and Falcon reservoirs in the final plan.

5. Section 3.3. The plan uses the terms 'recycled' and 'reuse' interchangeably (e.g. Section 3.3). The TWDB has different definitions for each term. Please consider consistently using the terms 'recycled' (as defined in Section 3.5.3 of Exhibit D) and 'reuse' (as defined in Section 1.7.3 of Exhibit C) in the final plan.

6. Section 9.6. Page 9-16 states that new requirements in 2026 Regional Water Plan included “Removal of the requirement to discuss unnecessary or counterproductive drought response.” Please consider removing this incorrect statement. This is a current planning requirement and is addressed in Chapter 7.

7. Section 7.4.2. Page 7-10 states "Detailed information about these interconnections was previously submitted securely to the Executive Administrator of the TWDB." Please consider clarifying when this information was submitted, or remove the statement, as TWDB has not received confidential information for the Region M plan since the 2016 Regional Water Plan.

8. Chapter 10. Please consider providing a list of rural entities that were not responsive to regional water planning group outreach efforts in the final plan.

Region M_2026 RWP_TWDB IPP Comment Letter

Final Audit Report 2025-06-24

Created:	2025-06-24
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"Region M_2026 RWP_TWDB IPP Comment Letter" History

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Rio Grande Regional Water Planning Group
Responses to TWDB Comments

TWDB Comment Level	TWDB Comment No.	TWDB Comment	Rio Grande RWPG Response
1	1	Chapter 1. The plan appears to be missing a description of reuse supplies in Chapter 1. Please include this information in the final, adopted regional water plan. [31 Texas Administrative Code (TAC) § 357.30(3)]	Section 1.2.8 has been added to the final plan, providing a description of reuse supplies.
1	2	Section 2.1, Table 2-1. The total water demand projections for the region presented in Table 2-1 are inconsistent with TWDB Board-adopted projections. For example, Table 2-1 presents a regional total demand of 1,713,003 in 2030, however the Region M TWDB Board-adopted demands in 2030 is 1,713,383. Please revise the water demand projections presented in this table so they are all consistent with Board-adopted projections in the final, adopted regional water plan. [31 TAC § 357.31(e)(1); 31 TAC § 357.31(f)]	The water demand totals in Table 2-1 have been corrected.
1	3	Section 2.2, Table 2-3. The total population projections for Maverick County presented in Table 2-3 are inconsistent with TWDB Board-adopted projections. For example, Table 2-3 presents a total population for Maverick County of 107,327 in 2080, however the TWDB Board-adopted population projections for Maverick County total 78,490 in 2080. Please revise the population projections presented in this table so they are all consistent with Board-adopted projections in the final, adopted regional water plan. [31 TAC § 357.31(e)(1); 31 TAC § 357.31(f)]	The population projection totals for Maverick County in Table 2-3 have been corrected.
1	4	Chapter 3. The plan does not appear to include the methodology used for calculating anticipated sedimentation rates and revising the area-capacity rating curves. Please provide details on the methodology used for developing future reservoir elevation- area-capacity rating curves in the final, adopted regional water plan. [Contract Exhibit C, Section 2.3.1]	Language has been added to Section 3.1.1.3 Rio Grande WAM of the final plan that describes the methodology used for calculating anticipated sedimentation rates and revising the area-capacity rating curves.
1	5	Section 3.2. The plan does not appear to include a table documenting the methods used for estimating non-modeled available groundwater (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]	Footnotes have been added to Table 3-7 of the final plan to document the Non-MAG availability methodologies by aquifer and county.
1	6	Section 3.4 and the state water planning database (DB27). The plan refers to Appendix 3D for presenting major water provider (MWP) supplies by category of use, however the DB27 report presented in Appendix 3D does not include supplies by category of use. It appears that MWP supplies by category of use can be found in the region developed table in Appendix 4B. Please include a statement in the final, adopted regional water plan—within Chapter 3—that MWP supplies by category of use and decade are shown in Appendix 4B. [31 TAC § 357.32(f)]	A sentence was added on page 3-35 to the last paragraph of Chapter 3: "A summary of MWP supplies by decade and category of use is included in Appendix 4B."

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1	7	Section 3.3. Table 3-12 lists all existing reuse projects in the region but does not specify whether they are direct or indirect. Please clarify whether these projects are direct or indirect, in the final, adopted regional water plan. [Contract Exhibit C, Section 2.3.3]	A column has been added to Table 3-12 to designate whether supply is direct or indirect reuse in the final plan.
1	8	Section 3.3, Appendix 3A, and DB27. Table 3-12 and the Region M Water User Group (WUG) Existing Water Supply Table from DB27 (Appendix 3A) do not consistently present existing reuse supplies in the region. Please review and adjust as appropriate in the final, adopted regional water plan. [Contract Exhibit C, Section 2.3.6]	Table 3-12 was modified in the final plan to consistently present existing reuse supplies as presented in Appendix 3A and DB27.
1	9	Section 5.1.2. The plan does not appear to include a quantitative measure for assessing reliability of water supplies for water management strategy (WMS) evaluations. The matrix provided in Table 5-1 provides a qualitative rating of low to high. Please provide a quantitative basis for reliability used in the evaluations of all 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)]	A paragraph describing reliability in Section 5.1.2 has been modified to reflect the following: "Reliability is an assessment of the availability of the specified water quantity to the user over time. Quantifiably, the water volumes presented in this plan for recommended strategies are firm supplies that are 100 percent reliable during Drought of Record conditions, per TWDB planning guidelines. Considering other factors that can affect long-term availability, such as potential future modeling or rule changes that are beyond the scope of this planning effort, the Rio Grande RWPG developed additional qualified reliability reporting in the form of a reliability evaluation matrix (Table 5-1) that was used in conjunction with other implementation considerations to also qualify the reliability of WMSs. Each WMS evaluation includes a qualified assessment of reliability." In addition, Table 5-1's title has been revised to reflect the qualitative nature of the scoring with clarification about quantitative scoring.
1	10	Chapter 5. The plan does not appear to include a discussion of the plan's impact on other water resources of the state including groundwater and surface water interrelationships. Please include this discussion in the final, adopted regional water plan. [31 TAC § 357.34(e)(4)]	Language has been added to Section 5.1.2 of the final plan that discusses the impacts on other water resources of the State, by WMS Category.

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1	11	Section 5.5. The plan does not include the implementation status for the following large strategies and projects that meet the criteria in accordance with 31 TAC § 357.34(g): 1) Brownsville - Banco Morales Reservoir, 2) HCDD#1 Delta Region WMS - Delta Panchita Reservoir, 3) HCDD#1 Delta Region WMS - Engleman Reservoir, 4) HCDD#1 Delta Region WMS - Santa Cruz Reservoir, and 5) McAllen - North WWTP Potable Reuse Phase 1. Please ensure that the implementation status for these projects are included within the implementation status table provided in Appendix 5E and that a timeline graphic is included for each of these projects, in the final, adopted regional water plan. [31 TAC § 357.34(g)(2), Contract Exhibit C, Section 2.5.2.7]	Implementation survey responses and applicable timelines have been added to Appendix 5E for the projects mentioned, with the exception of McAllen Potable Reuse. McAllen Potable Reuse Phase II was accidentally included in DB27, but has been removed for the final plan. Since Phase II was removed, Phase I does not meet the criteria for this task item.
1	12	Section 5.2 and DB27. Based on data entered into DB27, the demand reduction volumes appear to be equivalent to over 40 percent of total demands for the following municipal water user groups (WUG) in at least one planning decade: Laguna Madre Water District, McAllen, Mission, Port Mansfield PUD, Rio Grande City, Valley MUD 2, and Zapata County WCID-Hwy 16 East. As these volumes appear relatively high, please add discussion to support this magnitude of the demand reduction volume for these water user groups in the final, adopted regional water plan. [31 TAC § 357.34(j)(2)(B)]	The following explanatory language has been added to the municipal conservation section of Chapter 5 in the final plan: “Seven WUGs – Laguna Madre, McAllen, Mission, Port Mansfield, Rio Grande City, Valley MUD 2, and Zapata County WCID-Hwy 16 East – have high baseline GPCDs (185+). Because the municipal conservation strategy applies a higher reduction for WUGs with GPCD above 140, and because these entities remain above that threshold throughout most of or all of the planning horizon, the cumulative savings are proportionally higher. Additionally, a separate drought management strategy applies a 5% per-decade reduction to reflect temporary demand reductions during drought conditions. While these reductions represent a significant decrease from current usage levels, they are considered achievable and align with state water planning goals.”
1	13	Section 5.2 and DB27. For the following municipal water user groups, the whole WUG's GPCD adjusted for conservation is less than 60 GPCD in at least one planning decade: County-Other, Cameron, County-Other, Hidalgo, Edcouch, Elsa, Hidalgo County MUD 1, and La Villa. Please confirm the reasonableness of these anticipated low GPCDs in the final, adopted regional water plan. [31 TAC § 357.34(j)(2)(B)]	We coordinated with TWDB to ensure that Irrigation District conservation WMSs, categorized as supply increase, are not counted in GPCD adjustment calculations. No change to the Irrigation District Conservation WMS was necessary; however, changes to the calculations are reflected in "DB27 RWP Data - Water User Group (WUG) Adjusted Planning Gallons Per Capita per Day (GPCD) with Water Efficiency & Recommended Conservation Savings," and the adjusted 2080 GPCDs are as follows: County-Other, Cameron (99) County-Other, Hidalgo (80) Edcouch (76) Elsa (97) Hidalgo County MUD 1 (80) La Villa (80)

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1	14	Section 5.2.1.1, page 5-29. Municipal water use reduction and water loss mitigation WMS are recommended separately, however the plan states that advanced metering infrastructure (AMI) is included in water use reduction strategies. For regional water planning purposes, AMI is to be included under water loss mitigation strategies. Please revise the municipal conservation description, yields, cost information, and reconcile updates in DB27 as appropriate to correctly group AMI with water loss mitigation in the final, adopted regional water plan. [Contract Scope of Work, Task 5C; Contract Exhibit C, Section 2.5.2.5; Contract Exhibit D, Appendix 17]	The WMS Municipal Conservation - Water Loss Mitigation has been updated to include both AMI and Leak Detection and Repair. The WMS Municipal Conservation - Water Use Reduction has been updated to include non-capital cost conservation improvements. The descriptions, yields, cost information, and DB27 information has been updated to reflect these changes in Section 5.2.1.1.
1	15	Section 5.2.1.3, Table 5-15, Table 5-16, and DB27. The water savings and costs for the on-farm irrigation conservation strategies are presented by irrigation WUG in Table 5-15 and Table 5-16, however these individual projects and related strategy supply have been entered under one strategy within DB27 (WMSId 3853). This current data structure causes reporting to show that the irrigation strategy for each county relies on the project for that county and every other county in order to be implemented. Projects may not be aggregated and presented as a single capital cost representing multiple projects that would be located in multiple locations and funded by separate sponsors or implemented separately. Please work with TWDB's Water Supply and Strategy Analysis team to revise the irrigation conservation strategy and project data in DB27 to present separate strategies and projects for the irrigation WUGs in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.12]	This has been corrected in DB27.
1	16	Section 5.2.5. The plan does not appear to describe how population and water demands were used to determine the expected available volume of supplies to support the recommended reuse strategies. Please provide additional details on how the region estimated availability of future reuse—including how projected population and water demands were considered in that determination—in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.3]	Language has been added in the final plan, to each non-potable and potable reuse strategy, describing how population and water demands were used to determine the expected available volume of supplies to support the recommended reuse strategies.

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TWDB Comment Level	TWDB Comment No.	TWDB Comment	Rio Grande RWPG Response
1	17	Appendix 5D. The evaluation for the following reservoir strategies and projects do not appear to separately present the estimated mitigation land area and associated estimate of acquisition cost: 1) Brownsville – Banco Morales Reservoir, 2) Hidalgo County Drainage District No. 1 – Delta Panchita Reservoir, 3) Hidalgo County Drainage District No. 1 – Santa Cruz Reservoir, 4) Hidalgo County Drainage District No. 1 – Engleman Reservoir, and 5) Brownsville – Matamoros Wier and Reservoir. Please provide an estimated separate acreage and cost related to land acquisition (or range) for each 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]	Language has been added to the final plan for each of the referenced strategies within each appropriate section to further describe the acreage and cost for land acquisition for both the reservoir footprint and additional mitigation separately.
1	18	Section 5.2.7.1. The evaluation for the East Rio Hondo WSC – FM 2925 Transmission Line water management strategy description indicates that the transmission line would replace the supply from the decommissioned Arroyo WSC water treatment plant (WTP). Any portion of strategies or costs that replace portions of existing water supply are prohibited from being included in the regional water plans. The types of facilities and associated capital or other costs that may be included in a regional water plan must be directly associated with development 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. Please provide additional clarification documenting specifically how, and what share of, this strategy would increase the volume of water supply in the final, adopted regional water plan and/or modify or remove the strategy, as appropriate, to exclude replacement of existing infrastructure capacity. [Contract Exhibit C, Section 2.5.2.15]	The project description for East Rio Hondo WSC - FM 2925 Transmission Line in the final plan has been modified to include additional/clarifying details about the project, which helps to accurately describe how this project's infrastructure is central to improve efficiency and enhance conservation by eliminating water losses.

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TWDB Comment Level	TWDB Comment No.	TWDB Comment	Rio Grande RWPG Response
1	19	Section 5.2.7.2. The evaluation for the El Jardin WSC – Distribution Pipeline Replacement water management strategy indicates that this will include replacement of 2, 3, 4 and 6-inch pipes with 8-in pipe, and has been included as a separate conservation water loss mitigation project due to pipe size increases. Per Exhibit C, Section 2.5.2.14, replacement of water lines for the purposes of addressing water loss limits the replacement of lines to not more than two standard pipe diameters larger than the existing pipe. The replacement of 2 and 3 inch pipes with 8 inch pipes exceeds this limit and may not be for the purpose of provision of fire hydrant capacity. If the distribution line replacement for the water conservation strategy is subject to adopted utility standard minimum size requirements that exceed two standard pipe diameters, the water management strategy evaluation must note the specific utility standard justifying such a large increase in capacity and include: 1) a map of the proposed line replacement; and, 2) detailed water loss calculations before and after the proposed line replacement. Please either clarify the utility standards and include the additional information required by Exhibit C above, or remove the portion of the strategy that exceeds the pipeline size increase limit, and make any necessary adjustments to the strategy cost and volumes in DB27. [Contract Exhibit C, Section 2.5.2.14]	In the final plan, the El Jardin WSC – Distribution Pipeline Replacement water management strategy has been revised to remove the 2-inch and 3-inch pipeline replacement, while leaving the 4-inch and 6-inch pipeline replacement. The linear feet of pipe being replaced and the cost of the project have been updated to reflect these changes.
1	20	Section 5.2.7.3. The evaluation for the HCID No. 6 – Service Area Expansion water management strategy indicates that the sponsor has plans to expand its service area in order to continue delivering to Agua SUD's customers as development occurs in the area. Per Exhibit C, Section 2.5.2.15, item 4 on page 69, regional water plans are prohibited from including strategies or costs associated with expanding the distribution network to reach new retail areas. Please remove this water management strategy project from the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.15]	The description for this water management strategy in the final plan has been modified to better reflect that the proposed infrastructure is a Transmission Line, not a service area expansion or distribution network.

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TWDB Comment Level	TWDB Comment No.	TWDB Comment	Rio Grande RWPG Response
1	21	Section 5.2.7.5. Based on the evaluation for the Rio Hondo – Emergency Interconnects water management strategy it is unclear if the yield for this strategy is new additional supply above the existing supply available. Any portion of strategies or costs that replace portions of existing water supply are prohibited from being included in the regional water plans. The types of facilities and associated capital or other costs that may be included in a regional water plan must be directly associated with development 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. Please provide additional clarification documenting specifically how this strategy is increasing the volume of supply in the final, adopted regional water plan and/or modify or remove the strategy, as appropriate, to exclude replacement of existing infrastructure capacity. [Contract Exhibit C, Section 2.5.2.15]	Clarification language has been added to Section 5.2.7.5 in the final plan: "During drought, when agricultural water is cut off, Irrigation District canals that move water from the Rio Grande to agricultural and municipal users have less water in them, because the agricultural water is not in the canal to “push” the municipal water to its recipients, reducing the volume of municipal supplies that reaches Rio Hondo. This emergency interconnect strategy provides a new increased supply of firm water above existing supply under drought of record conditions that Rio Hondo can rely on."
1	22	Section 5.2.9.7. The evaluation for the Rio Hondo – New Fresh Groundwater Supply water management strategy states the strategy will include “construction of two alternating 750-gpm wells for redundancy and O&M purposes”. Please provide clarification of whether both wells are required to provide the increased supply to Rio Hondo and ensure that strategy volumes and capital costs do not include any costs for maintenance of, upgrades to, replacement or rehabilitation of existing equipment or water supply capacity or for costs that do not directly increase the volumetric water supply in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.15]	In the final plan, the referenced sentence was revised to say: "This strategy is for the construction of two 750 gpm wells.”
1	23	Section 5.2.9.8. The evaluation for the Webb County Water Utility – Expanded Fresh Groundwater Supply water management strategy states that the strategy includes “rehabilitation of the utility’s water treatment plant and groundwater system”. Any portion of strategies or costs that replace portions of existing water supply are prohibited from being included in the regional water plans. The types of facilities and associated capital or other costs that may be included in a regional water plan must be directly associated with development 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. Please provide additional clarification documenting specifically how this strategy would increase the volume of supply in the final, adopted regional water plan and/or modify or remove the strategy, as appropriate, to exclude replacement of existing infrastructure capacity. [Contract Exhibit C, Section 2.5.2.15]	The strategy description in the final plan was revised, as rehabilitation was used too generally and does not reflect the groundwater well situation: "This strategy is to provide additional supply to Webb County Water Utility, as a part of the improvements to the utility’s WTP and groundwater system. The strategy shown here reflects only the additional new groundwater supply components that provide an increase to their existing supplies."

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TWDB Comment Level	TWDB Comment No.	TWDB Comment	Rio Grande RWPG Response
1	24	Section 5.2.10.19. The evaluation for the Southmost RWA – Phase 3 SRWA Wellfield water management strategy states that the strategy includes "reconstruction of 20 existing wells". Any portion of strategies or costs that replace portions of existing water supply are prohibited from being included in the regional water plans. The types of facilities and associated capital or other costs that may be included in a regional water plan must be directly associated with development 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. Please provide additional clarification documenting specifically how the reconstruction of the existing wells is increasing the volume of supply in the final, adopted regional water plan and/or modify or remove the strategy, as appropriate, to exclude replacement of existing infrastructure capacity and the associated costs. [Contract Exhibit C, Section 2.5.2.15]	This strategy description has been modified in the final plan to provide more details for the "reconstruction of 20 wells". Rather than a "reconstruction", the optimization of 20 wells will include deepening the wells, increasing the casing diameter from 6-inches to 10-inches, and increasing the screened area to improve the efficiency of the existing wells.
1	25	Chapter 5. The plan includes WTP expansion and other strategy types that include a WTP expansion as a stated project component. Any portion of strategies or costs that are associated with replacing portions of existing supply, including WTP capacity, are prohibited from being included in the regional water plans. The types of facilities and associated capital or other costs that may be included in a regional water plan must be directly associated with development of additional supplies from new water sources or additional supplies from more efficient use of existing supplies, or volumetric increases to existing water supplies. Please confirm that only the portion of WTP facilities (and costs) required to increase treated water supply volume (not to replace lost capacity) are included in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.15]	The Rio Grande RWPG confirms that all WMSs that include a WTP expansion as a project component are directly associated with development of additional supplies from new water sources or additional supplies from more efficient use of existing supplies, or volumetric increases to existing water supplies. WMSs with WTP expansions have been revised to include clarifying language, as follows: "Only WTP infrastructure and costs associated with the expansion of the WTP that will increase supplies beyond those existing and that do not replace portions of existing supply have been included in this plan."
1	26	Section 5.2.5.2.5, Appendix 5D, and DB27. The plan does not appear to include a detailed costing summary for the recommended project McAllen – North WWTP Potable Reuse Phase 2 (WMSProjectId 2684) The costing summary included in Appendix 5D for McAllen - Direct Potable Reuse appears to include costs for McAllen - North WWTP Potable Reuse Phase I only (WMSProjectId 2370). Please provide a detailed costing table for this project, using either Uniform Costing Model (UCM) output or a table analogous to the UCM output, including cost and unit cost categories, in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.13]	The 2026 Rio Grande Regional Water Plan did not intend to include McAllen – North WWTP Potable Reuse Phase 2 as a project. It was included in DB27 accidentally. For the final plan, it has been removed from DB27.

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1	27	Section 5.2 The plan appears to include a limited amount of project maps. Please include, at minimum, a map for each strategy meeting the criteria under 31 TAC § 357.34(g) in the final, adopted regional water plan. [Contract Scope of Work, Task 5B]	Project maps for projects meeting the criteria listed are included in the final plan. These include: 1. Brownsville Southside WWTP Potable Reuse, 2. Southmost RWA Phase 4 SRWA Wellfield and WTP Expansion, 3. Laguna Madre Water District Seawater Desalination Plant, 4. Brownsville - Banco Morales Reservoir, 5. HCDD#1 Delta Region WMS - Delta Panchita Reservoir, 6. HCDD#1 Delta Region WMS - Engleman Reservoir, 7. HCDD#1 Delta Region WMS - Santa Cruz (Delta West) Reservoir, 8. Brownsville PUB - Brownsville/Matamoros Weir and Reservoir (Alternative)
1	28	Section 5.2.3 and DB27. The unit capital cost of $3,043/ac-ft presented in Section 5.2.3 for the Conversion of Surface Water Rights strategies differs from unit capital costs calculated from supply yields divided by project total capital costs included in DB27 for the following projects: WMSProjectIds 2597; 2615; 2731; 2734; 4153; and 4158. For example, DB27 reports a total capital cost of $6,816,000 and 4,480 ac-ft/yr yield in 2080, for Conversion of Surface Water Rights - Donna (WMSProjectId 2597) which would result in a $1,521.43 unit capital cost, however page 5-73 lists unit capital cost of $3,043/ac-ft. Please review and provide additional clarification on the calculation for estimating unit capital costs for these projects and revise as necessary to ensure that project capital costs in DB27 are consistent with those presented in the final, adopted regional water plan. [31 TAC § 357.35(g)(1)]	In the final plan, coordination with WSSA occurred to address any errors related to costs and projects input in DB27 and in Chapter 5.
1	29	Section 5.2.7.5 and DB27. The online decade for Rio Hondo – Emergency Interconnects water management strategy project does not appear to be presented in the plan, however DB27 reports the recommended project (WMSProjectId 5231) and related strategy as online in 2030. Since the online decade was not reported in the plan, TWDB was unable to confirm the online decade was entered correctly into DB27. Please confirm the online decade for this project and revise the plan if 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)]	In the final plan, the strategy description in Section 5.2.7.5 has been updated to include the project online decade of 2030.

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1	30	Section 5.2.6.2 and DB27. Based on the evaluation for the East Rio Hondo WSC - North Harlingen Surface WTP Phase 1 the strategy appears to increase access to existing surface water availability rather than reduce the demand for the WUG. In DB27, this is currently categorized as a Demand Reduction strategy, however this strategy should likely be categorized as Other Surface Water. Please coordinate with TWDB's Water Supply and Strategy Analysis team to update the structure of this strategy in DB27 and reflect accordingly in the final, adopted regional water plan. [31 TAC § 357.35(g)(1); 31 TAC § 357.50(g)(2)(B)]	In the final plan, the East Rio Hondo WSC - North Harlingen Surface WTP Phase 1 strategy has been categorized as "Other Surface Water" in DB27.
1	31	Section 5.3.2.3.3 and DB27. The online decade for the Laredo – El Pico WTP – Phase 2 Expansion water management strategy and project (WMSProjectId 2591) appears to be inconsistently reported between the plan and DB27. For example, the project and related strategy supply is reported to be online in 2030 in DB27, whereas the plan reports the strategy being online in 2040. Please review the online decades for all 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)(3)]	In the final plan, the Laredo – El Pico WTP – Phase 2 Expansion water management strategy and project has been corrected in DB27 to reflect an online date of 2040.
1	32	Section 5.2.3 and DB27. It is unclear whether the online decade for the Conversion of Surface Water Rights - East Rio Hondo WSC water management strategy and project (WMSProjectId 5248) is correctly reported between the plan and DB27. For example, DB27 shows this strategy as providing supply in 2030 with the associated project coming online later in 2050. Please confirm the anticipated online decade for this strategy and project and revise as necessary to ensure that the projects needed to implement strategies are online prior to the strategy supply online decade. [31 TAC § 357.35(g)(3)]	In the final plan, the Conversion of Surface Water Rights - East Rio Hondo WSC water management strategy and project has been corrected in DB27 to reflect an online date of 2030.
1	33	Chapter 5. The plan does not appear to include management supply factors for MWPs. Please include the management supply factor for each MWP in the final, adopted regional water plan. [31 TAC § 357.35(g)(2)]	In the final plan, management supply factors for MWPs have been added to Appendix 5C.

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1	34	Sec 5.2.10. The plan does not appear to include explanations for the following recommended strategy volumes that remain 100 percent unallocated to WUGs: Southmost RWA - Brackish Groundwater Desalination Wellfield Expansion; Southmost RWA - Phase 3 SRWA Wellfield and WTP Expansion; Southmost RWA - Phase 3 Wellfield Optimization; and Southmost RWA - Phase 4 SRWA Wellfield and WTP Expansion. Please provide a specific explanation why each of these strategies remains 100 percent unallocated in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.3]	In the final plan, recommended strategy volumes from the Southmost RWA - Brackish Groundwater Desalination Wellfield Expansion; Southmost RWA - Phase 3 SRWA Wellfield and WTP Expansion; Southmost RWA - Phase 3 Wellfield Optimization; and Southmost RWA - Phase 4 SRWA Wellfield and WTP Expansion water managment strategies have been fully allocated in DB27, maintaining percentage splits as outlined for existing Southmost RWA allocations.
1	35	Section 6.3 and DB27. The plan states that "Region M does not have municipal unmet needs", however this is inconsistent with unmet needs data reported in DB27. DB27 reports an unmet municipal need for North Alamo WSC in all decades. Additionally, the unmet need presented in Table 6-2 for Irrigation, Hidalgo County in 2080 is inconsistent with DB27. Please revise the unmet needs information presented in Section 6.3 so that it is reported consistently with DB27, in the final, adopted regional water plan. [31 TAC § 357.40(c)]	The municipal unmet need was due to a county split error which has been corrected in the final plan to eliminate municipal unmet needs.
1	36	Section 6.3 and DB27. The plan does not include the required justification for the unmet municipal needs associated with North Alamo WSC. 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 Initially Prepared Plan, to amend the regional water plan to address all or a portion of the unmet municipal need. [31 TAC § 357.50(j)]	The municipal unmet need was due to a county split error which has been corrected in the final plan to eliminate municipal unmet needs.
1	37	Section 7.4.2. It is unclear from the emergency interconnection data presented in Table 7-3 which emergency connections are existing and which are potential future emergency connections to be implemented. Please clearly identify which emergency interconnects are existing vs future in the final, adopted regional water plan. [31 TAC § 357.42(d)]	Section 7.4.2 has been clarified in the final plan that all emergency interconnection data is existing.

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Responses to TWDB Comments

TWDB Comment Level	TWDB Comment No.	TWDB Comment	Rio Grande RWPG Response
1	38	Section 9.7. The counts of water management strategies benefitting more than one WUG provided in Section 9.7 is inconsistent with strategies reported in DB22 and DB27 as benefitting more than one WUG. Please review the data reported in TWDB Secure Agency Reporting Application (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)]	In the final plan, the SARA Report ID 125 has been reviewed and used to update the number of strategies reported in DB22 and DB27 as benefitting more than one WUG.
1	39	Section 9.7. Please include the specific number of recommended water management strategies in the previous plan that serve multiple WUGs and have been implemented since that plan—or include a statement acknowledging if none have been implemented—in the final, adopted regional water plan. [31 TAC § 357.45(b)(2)]	Language was added to Section 9.7 of the final plan as follows: Since the 2021 RWP, three confirmed WMSs have been implemented: Arundo Donax Biological Control and two of the ID Conservation WMSs. The Arundo Donax Biological Control and the ID Conservation measures will continue to be implemented in future years.
1	40	Section 9.3. The plan does not appear to include a discussion of the differences in the droughts of record between the 2021 and 2026 plans. Please include a description of the difference in the final, adopted regional water plan. [31 TAC § 357.45(c)(2)]	Language was added to Section 9.3 of the final plan as follows: For the 2021 RWP, the Rio Grande WAM had a period of record that only went through the year 2000. While the drought spanning from July of 1992 through the year 2000 (end of the WAM's period of record) included the minimum storage event for both the United States and the combined (United States and Mexico) systems, the extent of the model did not include the end of the drought. As such, the drought of record (DOR) for the 2021 Plan was the longest duration drought modeled for both the combined reservoir system and the US portion spans the 1960s: 12/1959 through 10/1971 for the combined storage belonging to the United States and Mexico, and 6/1961 through 10/1971 for the US portion. For the 2026 RWP, because the WAM's period of record was extended through 2018, a new DOR occurred. The new DOR modeled for both the combined reservoir system and the United States portion spans the late 1990s to early 2000s: 6/1994 to 8/2003 for the United States portion and 1/1994 to 5/2003 for the combined system.
1	41	The plan does not appear to meet minimum accessibility requirements. Please ensure that the final, adopted regional water plan has • the primary language set to English, • the primary view set to document title, • a PDF with a good (i.e. descriptive) title set in document properties, • and a PDF set up as a tagged document. See items 1d, 2a, and 2c in TWDB's accessibility checklist for more information. [Contract, Article III, Paragraph G]	The final, adopted regional water plan has been checked to ensure it meets minimum accessibility requirements.

Rio Grande Regional Water Planning Group
Responses to TWDB Comments

TWDB Comment Level	TWDB Comment No.	TWDB Comment	Rio Grande RWPG Response
1	42	Geographic Information System (GIS) data deliverables do not include all of the required attribute fields listed in Table 1 of Exhibit D, Section 2.5.2.1 Please include the following attribute fields in all submitted WMS project GIS data: ShapeDescription, with the final GIS files submitted. Attribute field labeled Location may be updated to ShapeDescription to meet this requirement. [Contract Exhibit D, Section 2.5.2.1]	The Attribute field labeled Location has been updated to ShapeDescription in the GIS data deliverables submitted with the final plan.
1	43	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 ID 5197 WMS Project Name Advanced Metering and Water Use Reduction Improvements - Palm Valley	The GIS data file has been updated to include the location of every recommended and alternative WMS Project listed in the final adopted regional water plan
2	1	Section ES.2. Please consider adding decade 2080 to Figure ES-2 on page ES-6.	In the final plan, Figure ES-2 has been updated to include decade 2080.
2	2	Section 3.2. Table 3-11 includes the incorrect column header for decades 2020- 2070. Please consider correcting the column header on Table 3-11 to 2030 through 2080 in the final plan.	In the final plan, the Table 3-11 column headers have been corrected.
2	3	Appendix 4B. Please consider including "Supplies" in the title of Appendix 4B, currently titled "MWP Population, Demands, Needs, and Second-Tier Needs".	The word "Supplies" has been added to the Appendix 4B title in the final plan.
2	4	Chapter 3. Please consider including the sedimentation rates for Amistad and Falcon reservoirs in the final plan.	In the final plan, langugage has been added to Section 3.1.1.3 discussing the sedimentation methodology and the rates in general, but they are not identified numerically.
2	5	Section 3.3. The plan uses the terms 'recycled' and 'reuse' interchangeably (e.g. Section 3.3). The TWDB has different definitions for each term. Please consider consistently using the terms 'recycled' (as defined in Section 3.5.3 of Exhibit D) and 'reuse' (as defined in Section 1.7.3 of Exhibit C) in the final plan.	In Section 3.3 of the final plan, the word "recycled" has been replaced with the word "reuse."

Rio Grande Regional Water Planning Group
Responses to TWDB Comments

TWDB Comment Level	TWDB Comment No.	TWDB Comment	Rio Grande RWPG Response
2	6	Section 9.6. Page 9-16 states that new requirements in 2026 Regional Water Plan included "Removal of the requirement to discuss unnecessary or counterproductive drought response." Please consider removing this incorrect statement. This is a current planning requirement and is addressed in Chapter 7.	This incorrect statement has been removed from the final plan.
2	7	Section 7.4.2. Page 7-10 states "Detailed information about these interconnections was previously submitted securely to the Executive Administrator of the TWDB." Please consider clarifying when this information was submitted, or remove the statement, as TWDB has not received confidential information for the Region M plan since the 2016 Regional Water Plan.	Language was added to page 7-10 of the final plan to clarify that detailed information about these interconnections was previously submitted securely to the Executive Administrator of the TWDB during the 2016 planning cycle.
2	8	Chapter 10. Please consider providing a list of rural entities that were not responsive to regional water planning group outreach efforts in the final plan.	This information has been added to Chapter 10 of the final plan as Table 10-2.

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David Yoskowitz, Ph.D.
Executive Director

July 22, 2025

Mr. Jim Darling, Regional Planning Group Chairman
Region M Regional Water Planning Group
c/o Lower Rio Grande Valley Development Council
301 W. Railroad Street
Weslaco, Texas 78596

Re: 2026 Region M Initially Prepared Regional Water Plan

Dear Mr. Darling:

The Texas Parks and Wildlife Department (TPWD) has reviewed the 2026 Initially Prepared Regional Water Plan for Region M (IPP) and appreciated the opportunity to provide comments. Water impacts every aspect of TPWD's mission to manage and conserve the natural and cultural resources of Texas. TPWD is the agency with primary responsibility for protecting the state's fish and wildlife resources (Parks and Wildlife Code (PWC) Section (§) 12.0011) and serves as an ex officio member on each Regional Water Planning Group (Texas Water Code (TWC) §16.053(c)). The comments reflected in this letter are a continued reflection of TPWDs participation as an ex-officio member. TPWD offers these comments intending to help conserve state fish and wildlife resources as mandated in TWC §16.053(a).

TPWD understands that regional water planning groups are guided by the rules in Title 31 TAC Chapter 357 when preparing regional water plans. These water planning rules spell out requirements related to natural resources and environmental protection. Accordingly, TPWD staff reviewed the IPP with a focus on the following questions:

- Does the IPP include a quantitative reporting of environmental factors including the effects on environmental water needs and habitat?
- Does the IPP include a description of natural resources and threats to natural resources due to water quantity or quality problems?
- Does the IPP discuss how these threats will be addressed?
- Does the IPP describe how it is consistent with long-term protection of natural resources?
- Does the IPP include water conservation as a water management strategy?
- Does the IPP include Drought Contingency Plans?
- Does the IPP recommend any stream segments be nominated as ecologically unique?
- Does the IPP address concerns raised by TPWD in connection with the 2021 Water Plan?

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Population Growth and Water Needs

Region M's population is projected to grow substantially through 2080, with the largest increases expected in Cameron, Hidalgo, and Webb counties. Correspondingly, regional water demand is anticipated to rise, driven primarily by municipal, irrigation, and industrial uses. To meet these demands, the Plan outlines a diverse portfolio of water management strategies (WMSs), including advanced municipal, agricultural, and industrial conservation; surface and groundwater development; desalination of both seawater and brackish sources; wastewater reuse; and aquifer storage and recovery (ASR). Conservation strategies alone are projected to meet approximately 14% of total identified needs by 2080, with desalination, reuse, and groundwater development contributing additional substantial volumes. The Plan recommends early and aggressive implementation of conservation measures, particularly in municipal and agricultural sectors, to help offset projected deficits. It prioritizes conservation in areas with high per capita use, encourages improvements to irrigation district infrastructure to reduce canal losses, and supports expansion of brackish desalination where feasible. The Plan also calls for aligning infrastructure investments with regional growth patterns to ensure that water supplies meet future demand while minimizing environmental impacts. Finally, strategies such as ASR and improved system interconnectivity are promoted to enhance long-term resilience and operational flexibility.

The Plan could be strengthened by more clearly explaining how the relative contributions of each WMS category, especially reuse and desalination, will be implemented across planning decades. A more transparent breakdown of how each WMS type scales with population growth would improve understanding of long-term supply reliability. Additionally, the Plan would benefit from a more detailed discussion of interregional dependencies and the vulnerability of key infrastructure to extreme weather events, especially in relation to the Rio Grande's binational watershed. Including adaptive scenario planning would further ensure that projected strategies remain viable over the 50-year planning horizon.

Natural Resources and Environmental Impacts

The Plan includes both qualitative and quantitative evaluations of potential impacts to natural resources. It assesses effects on wetlands, habitat acreage, threatened and endangered species, cultural resources, and downstream water quality in water bodies such as the Gulf of America, Laguna Madre, and Arroyo Colorado. For each WMS, impacts are quantified, habitat and agricultural land losses are measured in acres, while species impacts are reported as counts of federally listed species in the affected counties. The plan also acknowledges the need to monitor cumulative impacts, particularly those arising from surface and groundwater interactions and the pressures of urbanization. To minimize ecological disruption, the Plan recommends selecting WMSs with lower habitat and wetland impact scores and avoiding sites with high concentrations of sensitive species. It promotes the use of best management practices (BMPs) during project construction and operation to limit environmental disturbance. The Plan further calls for ongoing development of

a system to track cumulative impacts and emphasizes the need to expand ecological monitoring—especially in areas where multiple WMSs or land use changes intersect. Collaboration with TPWD is encouraged to ensure that data collection, impact assessment, and mitigation practices align with current conservation priorities.

The Plan references the U.S. Endangered Species Act to identify species of conservation concern but does not incorporate the most recent version of the *TPWD Rare, Threatened, and Endangered Species of Texas by County*, which was updated again in January 2025. As a result, the Plan omits federally Threatened species such as the Devils River minnow (*Dionda diaboli*) from Kinney County. While fish are used below as an example, all taxa including; plants, invertebrates, herpetofauna, birds, and mammals should be reevaluated and considered to ensure comprehensive environmental planning. Additionally, again using fish taxon as an example, the state of Texas recognizes an additional 10 state-listed Threatened species within Region M. Integration of both federal and state-level species listings would strengthen the protection of key species.

The Plan recommends avoiding sensitive habitats when siting new infrastructure and promotes early coordination with TPWD and the U.S. Fish and Wildlife Service during project permitting to reduce impacts to listed species. Proposed mitigation strategies include habitat restoration, pre- and post-project species monitoring, and the use of native vegetation buffers. Where direct impacts are unavoidable, the Plan supports compensatory mitigation. Additionally, the Plan encourages the integration of Species Greatest Conservation Need data during early planning stages to minimize future conflicts and strengthen long-term ecological resilience.

TPWD recommends expanding the quantitative treatment of cumulative impacts across multiple WMSs and planning decades. For example, the Plan could include overlay maps showing where multiple infrastructure strategies intersect ecologically sensitive areas. The Plan would benefit from a clearer accounting of potential indirect effects on landscape connectivity, groundwater–surface water interactions, and long-term ecological resilience.

Instream Flow and Freshwater Inflows

Although there are no established environmental flow standards within its planning boundaries, the Plan recognizes the ecological importance of maintaining instream flows in the Rio Grande and its connected systems. It states that implementation of the recommended WMSs is not expected to reduce flows below the thresholds established under 30 TAC Chapter 298. The Plan includes quantitative evaluations of potential impacts to freshwater inflows, particularly those affecting downstream bays and estuaries, to ensure that reductions remain minimal. Projects are scored based on their expected impact on freshwater inflows, with built-in considerations for mitigation where appropriate. The Plan promotes adaptive management strategies for protecting instream and freshwater inflows, such as incorporating

flow-based triggers into drought responses and WMS operations. It also encourages the use of voluntary instream flow programs, environmental flow set-asides, and enhanced bypass requirements where applicable. To support these goals, the Plan recommends prioritizing low-impact WMSs and developing monitoring systems to track flow protection outcomes. Finally, it advises integrating environmental flow metrics into project feasibility assessments and grant scoring criteria to better align regional water planning with state conservation objectives.

We suggest that the Plan include specific recommendations for developing a voluntary instream flow program or an ecological monitoring network to track freshwater inflow changes over time. Region M could identify "ecological trigger points" tied to flow thresholds that, when met, initiate management responses such as conservation measures or temporary reductions in diversions. Additionally, the Plan should explicitly address whether any WMSs might collectively reduce flow variability, which is vital to sustaining estuarine and riverine ecosystems.

Invasive Species Management

The Plan includes a biological control strategy for Giant reed (*Arundo donax*) and recommends continued support for managing other invasive aquatic plants such as Waterthyme (*Hydrilla* sp.) and Water hyacinth (*Eichhornia crassipes*). It also endorses TPWD-led initiatives like Zebra mussel (*Dreissena polymorpha*) mapping and eradication as part of a broader effort to protect regional ecosystems. These issues are addressed within the Plan's policy recommendations, which call for greater state oversight and funding for invasive species control. The Plan encourages enhanced regional coordination with TPWD to implement rapid response protocols, expand public education campaigns, and strengthen boat inspection programs aimed at preventing the spread of invasive species such as Zebra mussels. It supports increased investment in biological control programs and further research into environmentally sound eradication techniques. Additionally, the Plan recommends that all new water infrastructure projects integrate invasive species prevention and monitoring measures into their design, construction, and operational phases.

We recommend that the Plan explicitly require invasive species risk assessments as part of the design phase for all water transfer and treatment projects. Further, each WMS involving conveyance or reservoir construction should incorporate site-specific invasive species prevention and monitoring plans.

Water Conservation Emphasis

Water conservation remains a cornerstone of Region M's long-term water supply strategy, with targeted WMSs for municipalities, irrigation districts (IDs), and industrial users. Advanced municipal conservation measures include leak detection, tiered water pricing, and public education initiatives. IDs which are responsible for delivering over 85% of the region's water are prioritized for infrastructure upgrades such as canal lining, telemetry systems, and metering improvements. Conservation

is expected to supply a significant share of future water needs, particularly under drought-of-record (DOR) conditions. The plan also highlights major new state funding opportunities through Proposition 6 and the Texas Water Fund. It calls for accelerated implementation of conservation strategies that can deliver near-term benefits, especially in water-stressed areas. The plan suggests piloting demonstration farms and urban conservation districts to promote the adoption of best management practices (BMPs). Finally, the plan advocates for standardized, region-wide metrics to track conservation effectiveness over time.

Response to TPWD Comments

The Plan shows clear progress in responding to concerns previously raised by TPWD in the 2021 planning cycle. It enhances the quantitative evaluation of environmental impacts, applies Ecological Mapping Systems of Texas (EMST) data more consistently, and incorporates environmental flow standards into WMS assessments. Although the region again refrains from nominating any stream segments as ecologically unique, the Plan now includes more detailed impact evaluations for wetlands, riparian corridors, and listed species. Flow-related impacts on downstream water bodies are also addressed with greater clarity and consistency.

Region M may wish to consider nominating ecologically unique stream segments with high biodiversity or ecological significance in future cycles TPWD has included in the 2024 Land and Water Resources Conservation and Recreation Plan a goal of updating the statewide assessment of ecologically significant stream segments by 2028. TPWD looks forward to assisting the Region M Planning Group as they investigate and pursue designation of ecologically unique stream segments, and we are willing to assist with the preparation of a recommendation packet as identified in 31 TAC § 357.43. Additionally, establishing a formal process for ecological monitoring of WMS implementation could support a more adaptive management approach. The RWPG is also encouraged to develop a framework to assess the long-term ecological benefits or trade-offs of selected strategies.

Region M Water Planning Efforts

The Rio Grande Regional Water Planning Group has developed a comprehensive and forward looking, Plan that balances the region's growing water demands with environmental stewardship. The Plan's strong integration of conservation measures, a diversified suite of WMSs, and detailed ecological evaluations reflect that commitment to stewardship of the natural resources in the area.

Thank you for your consideration of these comments. TPWD looks forward to continuing to work with the planning group to develop water supply strategies that not only meet the future water supply needs of the region but also preserve the ecological health of the region's aquatic resources.

If you have any questions or comments, please do not hesitate to contact me by email at Marty.Kelly@TPWD.Texas.gov or by phone at (512) 389 – 8214.

Sincerely,

Marty Kelly
Water Resources Program

MK:dh

cc: Mr. Robin Riechers
Ms. Lindsey Elkins, Coastal Fisheries

Rio Grande Regional Water Planning Group
Responses to TPWD Comments

TPWD Comment No.	TPWD Comment	Rio Grande RWPG Response
1	The Plan could be strengthened by more clearly explaining how the relative contributions of each WMS category, especially reuse and desalination, will be implemented across planning decades. A more transparent breakdown of how each WMS type scales with population growth would improve understanding of long-term supply reliability.	Thank you for your suggestion. The Rio Grande RWPG considered this comment at the August 12, 2025, RWPG meeting and determined there was not enough time to make changes to the 2026 Plan. The Rio Grande RWPG may consider this comment during the next planning cycle.
2	The Plan would benefit from a more detailed discussion of interregional dependencies and the vulnerability of key infrastructure to extreme weather events, especially in relation to the Rio Grande's binational watershed. Including adaptive scenario planning would further ensure that projected strategies remain viable over the 50-year planning horizon.	Thank you for your suggestion. The Rio Grande RWPG considered this comment at the August 12, 2025, RWPG meeting and determined there was not enough time to make changes to the 2026 Plan. The Rio Grande RWPG may consider this comment during the next planning cycle.
3	The Plan references the U.S. Endangered Species Act to identify species of conservation concern but does not incorporate the most recent version of the TPWD Rare, Threatened, and Endangered Species of Texas by County, which was updated again in January 2025.	Thank you for letting us know. The final plan has been updated to reflect the most recently listed species.
4	TPWD recommends expanding the quantitative treatment of cumulative impacts across multiple WMSs and planning decades. For example, the Plan could include overlay maps showing where multiple infrastructure strategies intersect ecologically sensitive areas. The Plan would benefit from a clearer accounting of potential indirect effects on landscape connectivity, groundwater—surface water interactions, and long-term ecological resilience.	Thank you for your suggestion. The Rio Grande RWPG considered this comment at the August 12, 2025, RWPG meeting and determined there was not enough time to make changes to the 2026 Plan. The Rio Grande RWPG may consider this comment during the next planning cycle.
5	We suggest that the Plan include specific recommendations for developing a voluntary instream flow program or an ecological monitoring network to track freshwater inflow changes over time. Region M could identify "ecological trigger points" tied to flow thresholds that, when met, initiate management responses such as conservation measures or temporary reductions in diversions.	Thank you for your suggestion. The Rio Grande RWPG considered this comment at the August 12, 2025, RWPG meeting and chose not to make any changes to the plan. The Rio Grande RWPG may consider this comment during the next planning cycle.
6	The Plan should explicitly address whether any WMSs might collectively reduce flow variability, which is vital to sustaining estuarine and riverine ecosystems.	The Rio Grande RWPG does not have any major surface water WMSs recommended in this plan that might collectively reduce flow variability. The Rio Grande RWPG may consider this comment again during the next planning cycle.
7	We recommend that the Plan explicitly require invasive species risk assessments as part of the design phase for all water transfer and treatment projects. Further, each WMS involving conveyance or reservoir construction should incorporate site-specific invasive species prevention and monitoring plans.	Thank you for your suggestion. The Rio Grande RWPG considered this comment at the August 12, 2025, RWPG meeting and chose not to make any changes to the plan. The Rio Grande RWPG may consider this comment during the next planning cycle.

Rio Grande Regional Water Planning Group
Responses to TPWD Comments

TPWD Comment No.	TPWD Comment	Rio Grande RWPG Response
8	Region M may wish to consider nominating ecologically unique stream segments with high biodiversity or ecological significance in future cycles TPWD has included in the 2024 Land and Water Resources Conservation and Recreation Plan a goal of updating the statewide assessment of ecologically significant stream segments by 2028. TPWD looks forward to assisting the Region M Planning Group as they investigate and pursue designation of ecologically unique stream segments, and we are willing to assist with the preparation of a recommendation packet as identified in 31 TAC § 357.43.	Thank you for your suggestion. The Rio Grande RWPG may consider this comment during the next planning cycle and would appreciate your assistance.
9	Establishing a formal process for ecological monitoring of WMS implementation could support a more adaptive management approach.	Thank you for your suggestion. The Rio Grande RWPG considered this comment at the August 12, 2025, RWPG meeting and chose not to make any changes to the plan. The Rio Grande RWPG may consider this comment during the next planning cycle.
10	The RWPG is encouraged to develop a framework to assess the long-term ecological benefits or trade-offs of selected strategies.	Thank you for your suggestion. The Rio Grande RWPG considered this comment at the August 12, 2025, RWPG meeting and determined there was not enough time to make changes to the 2026 Plan. The Rio Grande RWPG may consider this comment during the next planning cycle.