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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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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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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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.