Appendix G – *Comments Received on the Initially Prepared Plan and Responses*

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The Region N Initially Prepared Plan was adopted by Region N on February 27, 2025 and submitted to the TWDB in March 2025, according to schedule.

The public hearing on the Initially Prepared Plan was held on May 15, 2025. Public comment period closed July 15, 2025 (60 days after hearing). The table below summarizes comments received from agencies, stakeholders, and the public. The Region N RWPG reviewed these comments and adopted the attached responses on September 11, 2025. The federal and state agency comments and responses are included first, with responses following agency comments. The chapters in the Final Plan were updated or revised accordingly to address comments, as indicated.

Federal and State Agency comments received on the Region N IPP		
Respondent	*Additional Information*	*Subject Matter*
TWDB comments	Email 6/23/2025	Tier 1 & 2 comments
Texas Parks and Wildlife	Letter dated 7/15/2025	Env impacts, general, etc.
Public comments received on Region N IPP (comment period close: 7/15/2025)		
Respondent	*Additional Information*	*Subject Matter*
Jason Hale	Email to CBRWPG 7/15/2025	Manufacturing water demand

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TWDB comments received on June 23, 2025

Note: Responses embedded in comment document (see italics)

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Texas Water Development Board (TWDB) comments on the Initially Prepared 2026 Coastal Bend (Region N) 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. Section 1.4. In the first paragraph of Section 1.4, the City of Corpus Christi, San Patricio Municipal Water District, South Texas Water Authority, and Nueces County Water Control and Improvement District No. 3 are identified as wholesale water providers (WWPs) and major water providers (MWPs). Then in the second paragraph of Section 1.4, a different set of MWPs is identified as having been designated as MWPs by the planning group. Please review and reconcile the regions designated MWPs as appropriate in the final, adopted regional water plan. [31 Texas Administrative Code (TAC) § 357.30(4)]

   Proposed Response: *This comment has been accepted. The region's designated MWPs has been reconciled in Section 1.4. The following sentence has been removed from the first paragraph "These four entities are considered the major water providers of the region. The CBRWPG did not identify any additional entities as major water providers during development of this plan." The designated major water providers are City of Corpus Christi, SPMWD, STWA, and the City of Alice, as stated in the second paragraph of section 1.4.*

2. Section 2.2 and Table 2.1. The state-level population projections presented in Table 2.1 are incorrect for decades 2020 (historical) through 2070 (projected). The projected populations appear to be based on data for the 2021 regional water plans. For example, the 2023 statewide population projections associated with the 2021 Regional Water Plans is 33,913,233, whereas the 2030 statewide population projections associated with the 2026 regional water plans is 34,243,764. Please update the projected populations with data for the 2026 Regional Water Plans. [31 TAC § 357.31(a)]

   Proposed Response: *Comment accepted. The projected populations shown in Table 2.1 have been updated with the data for the 2026 regional water plans. The state level projections have been updated to the following values:*

   - *2020: 29,145,505*
   - *2030: 34,243,764*
   - *2040: 38,478,446*
   - *2050: 42,228,326*
   - *2060: 45,660,162*
   - *2070: 49,027,720*

3. Section 2.4. Table 2.11 does not include information for the City of Alice as a MWPs, as designated in Sections 1.4 and 3.1.8 of the plan. Please include water demands by category of use, for each MWP in the final, adopted regional water plan. [31 TAC § 357.31(b)]

Proposed Response: *Comment accepted. Table 2.11 in Section 2.4 has been revised to include information for the City of Alice as a MWP. Water demands by category of use have been added for the City of Alice.*

4. Section 3.1.8 Page 3-13 refers to Table 4A.25 for the presentation of MWP supplies by category of use, however Table 4A.25 appears to present MWP demand by category of use, not supplies by category of use. Please ensure that existing supplies by category use, for each MWP, are clearly included in the final, adopted regional water plan. [31 TAC § 357.32(f)]

   Proposed Response: *Comment acknowledged. The following text has been added as footnote 13 to Table 4A.25 in Section 4A.4 as explanation: "Supplies are equal to projected demands for those systems that rely solely on water supplies from the regional CCR/LCC/Lake Texana/MRP system, in accordance with direct or indirect contracts with the City of Corpus Christi when maximum amounts are not specified. For entities that receive additional supplies from reuse or other strategies, those supplies are considered first with the remaining amount up to the demand assumed to be provided by safe yield supplies from the City's regional CCR/LCC/Lake Texana/MRP system."*

   Revised comment response: *Demands by category of use for each MWP have been added under the total water surplus/shortage lines for each MWP in Table 4A.25.*

5. Chapter 3. The plan does not appear to provide a methodology for estimating the amount of existing reuse water available, nor does the plan narrative indicate whether existing reuse supplies in the region are direct or indirect, however the supplies for the region in DB27 appear limited to direct reuse. Please clarify in the text of the final, adopted regional water plan 1) whether existing supplies in Region N are direct or indirect reuse and 2) the methodology(ies) used to determine the direct and/or indirect reuse supplies in the region—including how projected population and water demands were considered in the determination of volumes available for reuse supplies—in the final, adopted regional water plan. [Contract Exhibit C, Section 2.3.3; Contract Exhibit C, Section 2.3.6]

   Proposed Response: *Comment acknowledged. The following text has been added to the end of the first paragraph of Section 3.4 to address both parts of the comment: "The reuse supply was estimated from the maximum historical reuse during the 2018-2022 period based on data from the TWDB's Historical Water Use data dashboard. After these estimates, reuse supply projections were further revised based on the projected demand by county and type of use. Existing and projected reuse in the Coastal Bend Region is direct non-potable reuse.* ***Error! Reference source not found.*** *shows the existing reuse water projects in the Coastal Bend Region by county."*

6. Section 3.3 and the state water planning database (DB27). The livestock local supplies values presented in Table 3.4 are inconsistent with the value of 1,860 acre-feet per year stated in paragraph four of Page 3-17, as well as the livestock availability data entered into DB27 of 1,590 acre-feet per year. Please review this table and reconcile the data as necessary in the final, adopted regional water plan so

that livestock supplies are presented consistently between the plan and DB27. [Contract Exhibit C, Section 2.3.6]

Proposed Response: *Comment acknowledged. The data in Table 3.4 and paragraph four of Page 3-17 have been reconciled. The total livestock local supplies value has been revised to 1,591 acre-feet per year in Section 3.3. Table 3.4 was revised to the table values below:*

County	***2030***	***2040***	***2050***	***2060***	***2070***	***2080***
Aransas	*29*	*29*	*29*	*29*	*29*	*29*
Bee	*464*	*464*	*464*	*464*	*464*	*464*
Brooks	*135*	*135*	*135*	*135*	*135*	*135*
Duval	*30*	*30*	*30*	*30*	*30*	*30*
Jim Wells	*212*	*212*	*212*	*212*	*212*	*212*
Kenedy	*0*	*0*	*0*	*0*	*0*	*0*
Kleberg	*0*	*0*	*0*	*0*	*0*	*0*
Live Oak	*211*	*211*	*211*	*211*	*211*	*211*
McMullen	*295*	*295*	*295*	*295*	*295*	*295*
Nueces	*52*	*52*	*52*	*52*	*52*	*52*
San Patricio	*163*	*163*	*163*	*163*	*163*	*163*
Total	***1,591***	***1,591***	***1,591***	***1,591***	***1,591***	***1,591***

7. Section 4A.4, Section 5D, and DB27. The needs for several water user groups (WUG) represented in the tables in Section 4A.4 (and Section 5D) appear to present information on projected water needs that is inconsistent with data reported in DB27. For example, El Oso WSC in Bee and Live Oak counties (Tables 4A.5 and 4A.18) shows zero needs for El Oso WSC in the plan, however DB27 reports a need for El Oso WSC in Bee and Live Oak counties within Region N in decades 2070 and 2080. Please review all data in the tables and related text and revise as necessary to present data consistent with DB27 in the final, adopted regional water plan. [31 TAC § 357.33(c)]

   Proposed Response: *Coordinated with Region L on updates to DB27 to show Carrizo Wilcox source supplies (Region L) being used to meet El Oso WSC- Bee and Live Oak County projected water demands and updated Section 5D tables for consistency. ~~plan~~*

8. Section 4A.4. The plan does not appear to present MWP needs by category of use. Table 4A.25 shows demands by category of use for each MWP, but only total needs. Please ensure that needs by category of use, for each MWP, are clearly included in the final, adopted regional water plan. [31 TAC § 357.33(c)]

   Proposed Response: *Comment acknowledged. The following text has been added as footnote 13 to Table 4A.25 in Section 4A.4 as explanation: "Supplies are equal to projected demands for those systems that rely solely on water supplies from the regional CCR/LCC/Lake Texana/MRP system, in accordance with direct or indirect*

contracts with the City of Corpus Christi when maximum amounts are not specified. For entities that receive additional supplies from reuse or other strategies, those supplies are considered first with the remaining amount up to the demand assumed to be provided by safe yield supplies from the City's regional CCR/LCC/Lake Texana/MRP system."

Revised comment response: *Needs by category of use for each MWP have been added under the total water surplus/shortage lines for each MWP in Table 4A.25.*

9. Chapter 5 and DB27. The strategy evaluation for the Lower Balancing Reservoir Storage strategy appears to be the only water management strategy (WMS) evaluation that clarifies that the strategy yield was evaluated under drought of record conditions. Please confirm that water supply yields of all potentially feasible strategies were evaluated under drought of record conditions in the final, regional water plan. If any strategies were not evaluated to determine a firm yield under drought of record conditions, please re-evaluate if necessary and revise the yield in the plan and in DB27. [31 TAC § 357.34(b)]

   Proposed Response: *The water supply yields for all water management strategies were evaluated under drought of record conditions. Given the Local Balancing Storage Reservoir recommended water management strategy relies on surface water run-of-the-river sources and TWDB guidance has specific provisions for how to calculate yield, we felt the additional discussion on methodology was useful in the description of the strategy. Additional text was added to the statement included in the previously submitted IPP in Chapter 5A:* ***All potentially feasible water management strategy evaluations in the 2026 regional water plan included in Section 5B were evaluated under drought of record conditions and in accordance with 31 Texas Administrative Code (TAC) 357.34 requirements and the Texas Water Development Board (TWDB) guidelines.***

10. Section 5B.10.1 and DB27. The evaluation for the O.N. Stevens Water Treatment Plant (WTP) Improvements (WMSId 5311) strategy appears to document that the water treatment plant improvements will increase the firm supply for Corpus Christi by approximately 32,000 acre-feet per year, however this strategy has been entered as providing zero yield of firm supply in all decades in DB27. All recommended strategies and projects that are entered into DB27 must be designed to reduce the consumption of water, reduce the loss or waste of water, improve the efficiency in the use of water, or develop, deliver or treat additional water supply volumes to WUGs or WWPs in at least one planning decade such that additional water is available during drought of record conditions. Please confirm whether this strategy is increasing the volume of supply in the final, adopted regional water plan and update the firm yield in DB27, or remove this as a recommended strategy in the plan and in DB27. [31 TAC § 357.34(d); Contract Exhibit C, Section 2.5.2.15]

    Proposed Response: *The current O.N. Stevens WTP capacity is adequate for safe yield supplies. As discussed in the write-up, the O.N. Stevens WTP improvements strategy is to increase capacity for future raw water supplies. The yield of the strategy is equal to yield expected from the Evangeline Laguna Groundwater Project, or 25,637 ac-ft/yr. The Evangeline Laguna Groundwater supply is*

anticipated to be delivered to O.N. Stevens WTP by way of the Mary Rhodes Pipeline Phase I Improvements to Increase Capacity and Reliability strategy.

11. Section 5B.10.2 and DB27. The evaluation for the Mary Rhodes Rehabilitation (WMSId 6923) strategy appears to increase the pipeline capacity, however it appears that the strategy won't increase the volume of supply from the source. This strategy has been entered as providing zero yield of firm supply in all decades in DB27. All recommended strategies and projects that are entered into DB27 must be designed to reduce the consumption of water, reduce the loss or waste of water, improve the efficiency in the use of water, or develop, deliver or treat additional water supply volumes to WUGs or WWPs in at least one planning decade such that additional water is available during drought of record conditions. Please either provide additional clarification documenting whether and how this strategy is increasing the volume of supply in the final, adopted regional water plan and update the firm yield in DB27, or remove this as a recommended strategy in the plan and in DB27. [31 TAC § 357.34(d); Contract Exhibit C, Section 2.5.2.15]

    Proposed Response: *The strategy name and description in section 5B.10.2 and DB27 has been changed to "Mary Rhodes Pipeline Phase I Improvements to Increase Capacity and Reliability" to clarify the strategy will increase the overall MRP Ph I capacity by allowing new water sources to be tied into either the existing or proposed pipeline. Additional text explanations have been added throughout the writeup, including clarification of the yield (25,637 ac-ft/yr) coming from the Evangeline Laguna Groundwater Project.*

12. Section 5B.10.3 and DB27. The evaluation for the San Patricio Municipal Water District – Conveyance System Improvements and New Water Treatment Plant strategy appears to include three separate strategies that have been entered as providing zero yield of firm supply in all decades in DB27: SPMWD Project No. 1 - New WTP at Plant D (WMSId 7045); SPMWD Project No. 2 - New Intake PS and Raw Water Transmission (WMSId 7046); and SPMWD Project No. 3 - New Pump Station & Transmission Rehab (WMSId 7047). All recommended strategies and projects that are entered into DB27 must be designed to reduce the consumption of water, reduce the loss or waste of water, improve the efficiency in the use of water, or develop, deliver or treat additional water supply volumes to WUGs or WWPs in at least one planning decade such that additional water is available during drought of record conditions. Additionally, WMSIds 7046 and 7047 appear to include replacement of existing transmission lines. Please remove the transmission line replacement portions of these projects from the plan and provide additional clarification documenting specifically how the remaining portion of these strategies will increase the net volume of water supply in the final, adopted regional water plan and/or further modify or remove the strategy, as appropriate, to exclude replacement of existing infrastructure capacity. If these strategies remain as recommended, please update the firm yields in DB27 to reflect the non-zero firm yield. [31 TAC § 357.34(d); Contract Exhibit C, Section 2.5.2.15]

    Proposed Response: *Each of the three SPMWD WMSs include the replacement of existing transmission lines with either a larger pipe diameter (new pipeline) and/or with a more durable material (PVC to replace HDPE sections) to withstand the*

additional pressures resulting from adding new supplies and new pump stations. A table will be included in Section 5B.10.3 that summarizes the additional capacities that each of the three SPMWD WMSs is anticipated to achieve.

Revised response: *The strategy name has been revised from "San Patricio Municipal Water District – Conveyance System Improvements and New Water Treatment Plant" to "SPMWD Increase Contracted Water Supply form the City of Corpus Christi" to better reflect the strategy. Table 5B.10.14 has also been revised to reflect the new pipeline.*

13. Section 5B.4.3. The plan contains a partial project evaluation for the Oso Regional WWTP Reuse strategy. Please ensure that the completed strategy evaluation is included in the final, adopted regional water plan and all relevant data has been entered into DB27. [31 TAC § 357.34(e)(2)]

    Proposed Response: *The Oso Regional WWTP Reuse Strategy has been updated to include relevant data needed for the strategy to be consistent with other recommended strategies in the plan based on TWDB guidance.*

14. Chapter 5. The plan does not appear to include quantified reporting on the reliability of strategy yields. Please include this information in the final, adopted regional water plan—ensuring that any recommended strategies provide a firm water supply throughout drought of record conditions. If this reporting is incorporated into an impact matrix, please ensure it is correlated to quantified values. [31 TAC § 357.34(e)(3)(A)]

    Proposed Response: *Section 5A has been updated to include the following sentence at the end of the last paragraph in the section: Reliability is required to be considered in the water management strategy evaluations. 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.*

15. Section 5B.11. It is unclear whether the Water Availability Analysis (WAM) analysis for the Nueces River Diversion to Choke Canyon Reservoir strategy considered the freshwater water inflow standards adopted for the Nueces Bay and Delta. Freshwater inflow standards are not hard-coded in the WAMs like instream flow standards; rather they are considered in post-modeling analysis to evaluate impairment on attainment frequencies of the standards. It is unclear if this post-modeling analysis was completed. Please confirm whether freshwater inflow standards for the region were considered and if post-modeling analysis was completed for the assessment of available supplies. If post-modeling analysis has not been completed, please update the yields as necessary in the final, adopted regional water plan and in DB27. [31 TAC § 357.34(e)(3)(B)]

    Proposed Response: *Section 5B.11.3 Environmental issues has been updated to include a discussion of the WAM evaluation of freshwater inflow standards including a table and graphs that show freshwater inflow frequency targets, goals and performance.*

16. Section 5B.8 and DB27. The Local Balancing Reservoir strategy is currently entered into DB27 as an "Other Surface Water" strategy type, however this strategy should be classified as a "New Reservoir" for water supply planning purposes. Please coordinate with TWDB's Water Supply and Strategy Analysis team to update the strategy type in DB27. [31 TAC § 357.50(g)(2)(B)]

    Proposed Response: *The HDR team coordinated with TWDB's Water Supply and Strategy Analysis team to update the strategy type in DB27 from "Other Surface Water" to "New Reservoir".*

17. Section 5.B and DB27. It is unclear from the evaluation and implementation status for the Local Balancing Reservoir strategy whether a Federal 404 permit will likely be needed for the project. Please clarify in the final, adopted regional water plan whether this permit will be needed, and if so, adjust the online decade to at least 2040 in the plan and DB27. [31 TAC § 357.34(g)(1)(A)]

    Proposed Response: *Section 5B.8.3 Environmental Issues has been updated to state "It is likely that waters of the U.S. could be avoided when siting this project, thereby avoiding the need for a Section 404 Permit". No adjustment to the online decade will be made.*

18. Section 5B.8. The evaluation for the Local Balancing Reservoir strategy does not appear to separately present the estimated mitigation land area and associated estimate of acquisition cost. Please provide an estimated separate acreage and cost related to land acquisition (or range) for both the reservoir footprint and mitigation within the appropriate section of the plan or costing sheet, in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.12]

    Proposed Response: *Table 5B.8.1 costs have been revised with a footnote added stating "Costs for this strategy only include facilities needed for the local balancing reservoir strategy, but does not included costs for the detention pond, as this is included in Nueces County Drainage District No. 2's project for flood control." Additionally, after discussing with our environmental team lead the first sentence in the Environmental Issues subsection has been revised: "Potential environmental issues associated with implementation of the local balancing storage reservoir includes consideration of impacts to affected aquatic and terrestrial habitats, cultural resources, and threatened and endangered species, in accordance with applicable state and federal requirements."*

19. Section 5B.5. The evaluation for the Corpus Christi Aquifer Storage and Recovery (ASR) with Indirect Potable Reuse (IPR) strategy (WMSId 6919) does not appear to include the injected volume, expected percent of recovery, and expected recovered volume from the aquifer. Please provide the injected volume, expected percent of recovery, and expected net recovered supply volume in the final, adopted regional water plan. If the strategy supply volumes do not reflect the lesser, expected percent of recovery, please modify the supply volumes as appropriate in the final, adopted regional water plan and in DB27. [Contract Exhibit C, Section 2.5.2.4]

    Proposed Response: *Additional information was added to the ASR strategy in Section 5B.5.2, as shown below.*

"Phase I

- *Recharge for 5 years and recovery for 2 years would be implemented for the ASR cycle. 5 MGD over 5 years is approximately 28,000 ac-ft recharged to the aquifer. 8 MGD over 2 years is approximately 18,000 ac-ft recovered. The percent recovery is 64%. This assumes a portion of water remains in storage to maintain the buffer zone from native groundwater.*

Phase II

- *Recharge for 5 years and recovery for 2 years would be implemented for the ASR cycle. 7.3 MGD over 5 years is approximately 41,000 ac-ft recharged to the aquifer. 10 MGD over 2 years is approximately 22,500 ac-ft recovered. The percent recovery is 55%. This assumes a portion of water remains in storage to maintain the buffer zone from native groundwater."*

20. Chapter 5BA and DB27. As shown in Table 4A.28 of the plan and in DB27, there are a number of WUGs which are projected to have municipal needs beginning in 2030. In Table 5D.113, municipal water conservation is not shown as a recommended water management strategy to address needs until 2040, and was not recommended at all to address municipal needs for County Other - Bee County, County Other - Brooks County, County Other - Duval County, County Other - Jim Wells County, and County Other - Live Oak County. Please document in the plan why conservation was not recommended to address these municipal needs. [31 TAC § 357.34(j)(2)(B)]

    ***Proposed Response**: Comment acknowledged. Table 5D.115 was updated to include municipal water conservation beginning in 2030 for those that qualify, i.e. above 140 gpcd target regardless of needs. Updated conservation tables were provided for DB27. Municipal water conservation was considered by the CBRWPG but not recommended to address municipal needs for 'County Other' in Bee, Brooks, Duval, Jim Wells, and Live Oak Counties since their 2020 (base year adopted by TWDB) gpcd values are already well below the 140 gpcd target for Region N.~~113~~.*

21. Section 5B.1.2.3. The plan includes cost and savings information for line replacement and advanced metering infrastructure (AMI), however only cost and savings for water use reduction conservation strategies have been entered into DB27. For regional water planning purposes, line replacement and AMI are to be included under water loss mitigation strategies and must be recommended and entered into DB27 separately from water loss reduction strategies. Please revise the municipal conservation description, yields, cost information, and reconcile updates in DB27 as appropriate to correctly group line replacement and AMI as water loss mitigation in the final, adopted regional water plan. Additionally, please provide a clear distinction in the plan between water loss mitigation and water use reduction conservation strategies. [Contract Scope of Work, Task 5C; Contract Exhibit C, Section 2.5.2.5; Contract Exhibit D, Appendix 17]

    ***Proposed Response:** The strategy write-up is being updated to include additional tables and descriptions that summarize water savings and costs associated with water loss mitigation programs- pipeline and meter replacement, for entities that*

report high water loss. These programs are different and separate from the water use reduction conservation strategies shown in Tables 5B.1.11. Water loss mitigation is clearly identified and summarized in Tables 5B.1.9 and Tables 5B.1.10 The comment response has been revised to correctly state pipeline replacement and meter replacement are water loss mitigation.

22. Chapter 5 and DB27. Unit costs have been entered into DB27 as $0 for the recommended conservation strategies for the mining and manufacturing WUGs. Please include non-zero unit costs for these strategies in DB27 and include assumptions used in the costing methodology utilized in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.12]

    Proposed Response: *Unit costs for mining and manufacturing conservation strategies have been provided in order to update DB27. The assumptions used for the costing methodology are based on the additional guidance provided by TWDB. Cost estimates assume that an average water demand of 1,000 acft/yr equates to a $10,000 water audit cost, with a minimum cost of $2,000. In addition, one audit will be conducted every five years, and implementation of these audits will occur by 2030.*

23. 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 volumes (not to replace lost capacity) are included in the final, adopted regional water plan. [Contract Exhibit C, Section 2.5.2.15]

    Proposed Response: *The SPMWD WMS (New 20 MGD WTP) is required to increase their capacity to serve future customers by increasing their treated water supply volume.*

    Response revised: *The strategy name has been revised from "San Patricio Municipal Water District – Conveyance System Improvements and New Water Treatment Plant" to "SPMWD Increase Contracted Water Supply form the City of Corpus Christi" to better reflect the strategy which includes three separate infrastructure projects needed by SPMWD for future, additional water supplies. Table 5B.10.14 has also been revised to reflect the new pipeline.*

24. Chapter 5, Table 5D.113, and DB27. The plan includes several strategies that are presented inconsistently as recommended strategies in Table 5D.113 and DB27. For example, Table 5D.113 does not include the City of Beeville Brackish Groundwater or the Driscoll Brackish Groundwater Treatment Project strategies as recommended strategies, however these are recommended strategies and projects in DB27. Table 5D.113 includes a recommended strategy and project for City of Alice- Brackish Groundwater Desalination, however this strategy is not included in DB27, nor does

the plan include an evaluation for this strategy. Additionally, the values for strategy supplies and costs for the Corpus Christi seawater desalination projects presented in the table do not match data reported in DB27. Please review the recommended strategy table in detail, and revise as necessary to ensure that all data in DB27 are consistent with those presented in the final, adopted regional water plan. [31 TAC § 357.35(g)(1)]

Proposed Response: *DB27 updated as necessary. Table 5D.113 has been updated to remove the City of Alice Brackish Groundwater Desalination project as it has been constructed and added the brackish groundwater strategies for the City of Beeville and STWA (Driscoll) consistent with the water supply plan tables shown for Bee and Nueces County. Overall, Table 5D.113 has been checked and revised as necessary to be consistent with DB27 in the final plan.*

25. Executive Summary Table ES.10, Chapter 5 Tables 5D.113 and 5D.114, and DB27. The online decade for the Evangeline/Laguna Treated Groundwater strategy and associated project (WMSProjectId 4258) appear to be inconsistently reported between the plan and in DB27. For example, DB27 and Table 5D.114 show this strategy/project as providing supply in 2030 whereas Table ES.10 and Table 5D.113 show this strategy/project providing supply in 2040. Please confirm the anticipated online decade for this strategy and project and revise as necessary to ensure that all the strategy supply online decade(s) are reported consistently throughout the final, adopted regional water plan and DB27. [31 TAC § 357.35(g)(1)]

    Proposed Response: *Revisions have been made to Table 5D.113 and Table ES.10 to show online decade of 2030, consistent with DB27 and Table 5D.114.*

26. Chapter 5, Table 5D.113, and DB27. The project capital costs presented in the plan are inconsistent with capital costs in DB27 for the following projects: Municipal Conservation – Nueces WSC (WMSProjectId 4186), Municipal Conservation – Orange Grove (WMSProjectId 4172), and Municipal Conservation – El Oso WSC (WMSProjectId 4319). For example, the total project cost presented for Municipal Conservation – Nueces WSC in Table 5D.113 is $177,00 whereas in the capital cost is reported as $245,318 in DB27. Please review the costing information for all projects and revise as necessary to ensure that all project capital costs in DB27 are consistent with those in the final, adopted regional water plan. [31 TAC § 357.35(g)(1)]

    Proposed Response: *Updates have been made in DB27 and the final plan to show consistent capital costs for municipal conservation.*

27. Chapter 5, Table 5D.113, and DB27. Online decades for the following municipal conservation strategies and their associated projects appear to be inconsistently reported in the plan and DB27: Municipal Conservation – Orange Grove (WMSProjectId 4172) and Municipal Conservation – El Oso WSC (WMSProjectId 4319). The online decade for both of these projects is 2030 in DB27, whereas DB27 reports the related strategy volume as providing supply in 2040. Additionally, the plan presents these strategies as online in 2040 in Table 5D.113. Please review the online decades for all strategies and projects and revise as necessary to ensure that

all online decades and associated strategy supplies in DB27 are consistent with those presented in the final, adopted regional water plan. [31 TAC § 357.35(g)(1)]

Proposed Response: *The municipal water conservation tables have been updated to show conservation water savings beginning in 2030. This information will be updated in DB27.*

28. Chapter 5, Table 5D.113, and DB27. Strategy supplies associated with the following municipal conservation strategies appear to be inconsistently reported between the plan and DB27: Municipal Conservation – Orange Grove (WMSProjectId 4172), Municipal Conservation – Portland (WMSProjectId 5436), Municipal Conservation – El Oso WSC (WMSProjectId 4319), and Municipal Conservation – San Diego MUD 1 (WMSProjectId 4170). For example, in DB27 the yield for Municipal Conservation – Orange Grove ranges from 33 acre-feet per year in 2040, to 93 acre-feet per year in 2080, whereas in Table 5D.113, supplies for this strategy range from 40 acre-feet per year in 2040 to 232 acre-feet per year in 2080. Please review the supply volumes for all strategies and revise as necessary to ensure that all strategy supplies in DB27 are consistent with those presented in the final, adopted regional water plan. [31 TAC § 357.35(g)(1)]

    Proposed Response: *The municipal water conservation tables have been updated to show conservation water savings beginning in 2030. These updates including those to water savings and costs will be reflected in the DB27 revision request.*

29. Executive Summary Table ES.10, Chapter 5, Table 5D.113, Section 5D.12.6, and DB27. The plan appears to present information for the Municipal Conservation – Portland (WMSId 6842) that is inconsistent between the plan and DB27. For example, DB27 and Table ES.10 report this strategy as recommended for Portland, however Section 5D.12.6 and Table 5D.113, does not include conservation as a recommended strategy for Portland. Please review the information presented for this strategy to ensure that all the strategy and project information is presented consistently between the plan and DB27. [31 TAC § 357.35(g)(1)]

    Proposed Response: *Comment accepted. Text has been updated accordingly in the referenced sections.*

30. Section 6.8 and DB27. The plan states that "there are no identified water needs that remain unmet for the 2026 regional water plan", however this is inconsistent with unmet needs data reported in DB27. For example, DB27 reports unmet needs for the following WUGs: County-Other, Bee County, San Diego MUD 1, and Manufacturing, Nueces County. Please revise the information presented in Section 6.8 so that it is reported consistently with DB27, in the final, adopted regional water plan. [31 TAC § 357.40(c)]

    Proposed Response: *There are no identified water needs that remain unmet in the 2026 Region N Plan. Confirmed with TWDB's Water Supply and Strategic Analysis team on 9/3/25 that DB27 shows this consistent with the final plan.*

31. Section 6.8 and DB27. The plan states that "there are no identified water needs that remain unmet for the 2026 regional water plan", however, the following municipal

WUGs shows unmet needs in DB27: County-Other, Bee County, and San Diego MUD 1. 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)]

Proposed Response: *There are no identified water needs that remain unmet in the 2026 Region N Plan. Confirmed with TWDB's Water Supply and Strategic Analysis team on 9/3/25 that DB27 shows this consistent with the final plan*

32. Section 7.5. Table 7.9 is missing emergency response information for several County-Other WUGs, including County-Other, Aransas; County-Other, Bee; County-Other, Jim Wells; County-Other, Nueces; and County-Other, San Patricio. Please update Table 7.9 to include the emergency response information for these County-Other WUGs in the region in the final, adopted regional water plan. [31 TAC § 357.42(g)]

    Proposed Response: *Table 7.9 was updated to include Aransas County-Other, Bee- County Other, Jim Wells- County Other, Nueces- County Other and San Patricio County-Other.* ~~*The remaining WUGs are not included in the table because they are not small WUGs (2020 population is over 10,000).*~~

    Comment response revised: *All county-other WUGS have been added to Table 7.9 even if the population is over 10,000.*

33. Section 9.1 and Appendix E. While the draft plan deliverable included an electronic version of the 2021 Regional Water Plan implementation survey, a copy of the table, as referenced on page 9-2 to be included in Appendix E, does not appear to have been included in the plan. Additionally, page 9-2 includes language that appears to be left over from the 2021 Regional Water Plan, as it indicates the survey was completed in February 2020. In the final, adopted regional water plan, please include a copy of the results of the 2021 regional water plan implementation survey, and ensure that appendices are referenced correctly. [31 TAC § 357.45(a)]

    Proposed Response: *The text in Section 9.1 has been updated to reflect the results of the 2021 regional water plan implementation survey and Appendix E has been updated to include the new survey.*

34. Section 9.2.4. The counts of water management strategies benefitting more than one WUG provided in Section 9.2.4 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 in Table 9-5 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)]

Proposed Response: *The counts presented in section 9.2.4 have been reconciled to match DB22 and DB27 in the final plan.*

35. Chapter 9. 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)]

    Proposed Response: *Comment acknowledged. An additional sub-section 9.2.5 is included that compares water management strategies from the 2021 Plan and 2026 Plan that serve multiple WUGs.*

36. Chapter 10. The plan does not appear to include a description of the rural outreach conducted by the planning group. Please include a summary of the region's rural outreach in the final, adopted regional water plan. [Contract Scope of Work, Task 10; Contract Exhibit C, Section 2.10]

    Proposed Response: *Comment acknowledged. The following response has been added to Section 10.3, Rural Outreach: "The CBRWPG held a rural community and water utility workshop on January 26, 2024. A Region N survey was sent to rural water user groups on November 19, 2024 to gather input on water supplies and contract relationships, water supply challenges, current water supply plans and future projects under consideration. The survey remained open until February 1, 2025. The following six (6) water utilities sent back survey responses: River Acres Water Supply Corporation, City of Mathis, City of Beeville, City of Portland, City of Orange Grove, and Nueces County WCID No. 3. The survey results are included in Table 10-1 and Table 10-2.*

37. Geographic Information System (GIS) files do not adhere to the contractually required naming convention. The file name shall include "WMSProject," Region letter, and geometry type with no spaces (EX: WMSProject_RegionN_Point). Please rename the GIS files following the naming convention outlined in Exhibit D, Section 2.5.2.1 in the final GIS files submitted [Contract Exhibit D, Section 2.5.2.1]

    Proposed Response*: The GIS files have been renamed following the naming convention outlined in Exhibit D, Section 2.5.2.1.*

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

1. Section 1.11. On page 1-24, first paragraph, the plan is mis-identified as 2021 Coastal Bend Regional Water Plan. Please consider correcting to 2026 Coastal Bend Regional Water Plan

   Proposed Response: *Comment accepted. In the first paragraph of Section 1.11, the plan has been revised and correctly identified as the 2026 Coastal Bend Regional Water Plan.*

2. Section 2.4. The MWPs identified in Section 2.4 do not correlate with the MWPs designated by the planning group during their October 17, 2024 meeting. Please update and revise as appropriate in the final plan.

   Proposed Response: *Comment accepted. In the first paragraph of Section 2.4, the following sentence has been removed: "The CBRWPG designated these four WWPs as major water providers (MWPs) on November 9, 2017." The sentence was replaced with the following text that correlates with the MWPs designated by the planning group during their October 17, 2024 meeting: "On October 17, 2024, the CBRWPG designated four major water providers: City of Corpus Christi, SPMWD, STWA, and the City of Alice."*

3. Section 2.2. The calculated growth rate for the region in Table 2.1 does not appear to match the data values. Annual growth, calculated as ([last year/first year] to the power of [1/n]) minus one where n is count of years, is consistent with the growth rate for the state but not for the Region N and county growth rates. Additionally, many of the calculations described in the text in Section 2.2 are not consistent with the data values in the table, please review and consider revising as appropriate in the final plan.

   Proposed Response: *Comment accepted. The calculated growth rate for the region in Table 2.1 has been revised to match the data values. The calculations described in the text in Section 2.2 have been revised to be consistent with the data values in the table.*

4. Section 3.4. The plan does not contain a table showing the existing water reuse projects in the region. Please consider adding one to Section 3.4 (Reuse Availability). Additionally, Section 3.4 includes tables that show surface water availability. Please consider moving these to Section 3.3 in the final plan.

   Proposed Response: *Comment accepted. Table 3.5 has been added to section 3.4 to show the existing water reuse projects in the region based on TWDB-provided information. Surface water availability Tables 3.3 – 3.5 have been moved to Section 3.3.*

5. Section 4A.4. Please consider adding separate lists or tables identifying the region's WWPs and MWPs, respectively. For example, column headers in Tables 4A.25 and Table 4A.26 give the impression that Nueces County WCID 3 is designated as a MWP for this plan; however statements in the first paragraph of Section 4A.4 and in Section 3.1.8 on Page 3-13 indicate that the City of Alice, City of Corpus Christi, South Texas Water Authority, and San Patricio Municipal Water District are the only MWPs this planning cycle.

   Proposed Response: *Comment acknowledged. Table 4A.25 and Table 4A.26 column headers have been revised to identify both WWPs and MWPs. Rows*

have been added to Table 4A.25 and Table 4A.26 to separate and identify WWPs from MWPs.

6. Chapter 4. Throughout Section 4A of the plan, there are numerous references to obtaining reuse water supply data from "the TWDB data dashboard". Please clarify which data dashboard was used (e.g., Water Use Summary and Data Dashboard), as the TWDB has many data dashboards and it may not be clear to readers which one was consulted.

   Proposed Response: *Comment acknowledged. Text has been added to sections 4A.2.3 and various subsection in section 4A.3 to revise "TWDB's data dashboard" to "TWDB's Historical Water Use data dashboard"*

7. Section 4A.5. On page 4A-50 the plan refers to Appendix A for the second-tier needs for WUGs, however Appendix A does not appear to be included in the plan. Please update the reference to the pertinent section in the Executive Summary where readers may access the applicable DB27 report showing second-tier WUG needs.

   Proposed Response**:** Appendix A showing second-tier needs to be included in the final plan.

8. Chapter 4B. The footnote at the bottom of Page 4B-2 does not reference the correct date that TWDB distributed information to the RWPGs regarding Project Feasibility analyses. Please consider revising this date to January 10, 2023.

   Proposed Response: *Comment acknowledged. The footnote at the bottom of Page 4B-2 has been revised to correctly reference the date of January 10, 2023 as the date that TWDB distributed information to the RWPGs regarding Project Feasibility analyses.*

9. Chapter 5. Please consider adding a separate section and/or a table in Chapter 5 that clearly identifies specific strategies that could potentially provide flood mitigation benefits.

   Proposed Response**:** *Comment acknowledged. The following was added to Chapter 5B: Several water management strategies could potentially provide flood mitigation benefits, which include: 5B.8 Local Balancing Storage Reservoir project to firm up run-of-river supplies for possible co-location with Nueces County Drainage District No. 2 flood detention basins; 5B.11 Nueces River Diversion to Choke Canyon Reservoir, and 5B.12 Lake Corpus Christi Sediment Removal. The latter two projects were identified in the Nueces Basin (Region 13) Regional Flood Plan as flood mitigation strategies (FMSs).*

10. Section 5D.15. Information presented for the Corpus Christi Inner Harbor project in the implementation schedules figure for all projects (Figure 5D.2), does not match information presented in the implementation status table (Table 5D.114) or individual project schedule (Figure 5D.2) For example, Table 5D.114 and Figure 5D.2 shows the project online in 2030 in but Figure 5D.8 shows it coming online anywhere

between 2030 and 2039 [making it 2040 for online decade]. Please consider correcting this discrepancy in the final plan.

Proposed Response**:** *Verifying that tables (and figures) consistently report implementation schedule of Year 2030. Figure 5D.8 (now Figure 5D.11) has been revised to show the Corpus Christi Inner Harbor project as online in 2030 to align with Figure 5D.2 and Table 5D.114.*

11. Section 5B. Please consider clarifying in the plan why municipal water conservation was not recommended to address municipal water needs for any WUG for the 2030 decade.

    Proposed Response: *Tables 5B.1.11, 5B.1.12 and 5B.1.13 have been revised accordingly to include municipal conservation for the 2030 decade for WUGs.*

12. Section 5B.4.1.1. Please consider explicitly stating that this recommended strategy involves indirect reuse.

    Proposed Response: *Comment acknowledged. No change made. The type of reuse water is described as non-potable, rather than as indirect potable reuse in the third paragraph, first sentence of Section 5B.4.1.1 .*

    "**The Nueces River Authority is considering developing up to 1 mgd from Petronila Creek Regional WWTP as a non-potable Type 1 reuse supply to serve Nueces County industries."**

13. Section 5B. In the third paragraph of Page 5B-5, please consider correcting the reference to the planning period to the full planning horizon of 2030 through 2080. Also in that paragraph, please consider correcting the statement referring readers to Appendix A for calculated management supply factors for each decade by WUG.

    Proposed Response: *Comment acknowledged. The reference to the planning period has been revised to reference the full planning horizon of 2030 through 2080. The statement in that same paragraph referring readers to Appendix A for the calculated management supply factors has been revised to refer readers to Table 5B.6.*

14. Chapter 5, Page 5A-2. In the first paragraph on this page there is a reference to Chapter 11.3, which does not exist in the 2026 Coastal Bend Regional Water Plan. Please consider updating or removing this reference as needed.

    Proposed Response: *Comment acknowledged. The reference in the first paragraph of Chapter 5 on page 5A-2 has been revised from Chapter 11.3 to Chapter 9.3.*

15. Chapter 5, Page 5B-5. In the first paragraph on this page there is a statement indicating that "each strategy was evaluated with respect to 11 impact categories, as

required by TWDB rules." Further in the paragraph there is a statement referring to "the 10 impact categories". Please consider revising the second statement to properly reflect the 11 impact categories.

Proposed Response: *Comment acknowledged. The statement in the first paragraph on page 5B-5 in Chapter 5 has been revied from "10" to "11" to properly reflect 11 impact categories.*

16. Chapter 5, Page 5B-5. In the third paragraph on this page, the planning period is incorrectly identified as 2040 through 2080. Please consider correcting this to reflect the current planning period of 2030 through 2080.

    Proposed Response: *Comment acknowledged. The reference to the planning period has been revised from 2040 to 2030 to reference the full planning horizon of 2030 through 2080.*

17. Chapter 5, Page 5B-9, Table 5B-6, and DB27. The MWPs indicated in Table 5B-6 do not reflect the MWPs reported in DB27. Please revise this table to ensure consistency between DB27 and the final plan.

    Proposed Response**:** *In progress. Revisions will be made as needed to ensure consistency between DB27 and the final plan.*

18. Chapter 5, Page 5B-15, and Table 5B.1.1. In the last paragraph on Page 5B-15, there is a statement indicating that the City of Corpus Christi had reduced its municipal water use to 150 Gallons Per Capita Per Day (GPCD) by 2016. In Table 5B.1.1, the 2020 base year GPCD for Corpus Christi is reported as 173. Please consider providing additional clarification as to why the base year GPCD would be at least 15 percent higher than municipal water use values from 5 years prior.

    Proposed *Response:* *The last paragraph on Page 5B-15 has been revised to clarify the 2020 base year GPCD for Corpus Christi in comparison to municipal water use values from 5 years prior.*

19. Chapter 5, Page 5B-31. In the third paragraph on this page, there is a reference to the 2021 Coastal Bend Regional Water Plan while describing activities conducted for the current planning cycle. Please consider reviewing this reference and update to the 2026 Coastal Bend Regional Water Plan if appropriate.

    Proposed Response: *Comment acknowledged. The reference to the 2021 Coastal Bend Regional Water Plan has been revised to the 2026 Coastal Bend Regional Water Plan in the third paragraph of Chapter 5, section 5B.1.4.*

20. Chapter 5. There appears to be some duplication of page numbering within Chapter 5, beginning with 5B-25 (Chapter 5B.2, Manufacturing Water Conservation). Please review and consider correcting page numbering in the final, adopted regional water plan.

***Proposed Response*:** *In progress. Page numbering will be corrected as needed in the final plan.*

21. In Section 7.6 of the IPP, the last paragraph on Page 7-52 contains a statement indicating a “new” TWDB provision for including recently implemented drought condition responses. This statement is incorrect – this provision was a requirement for the 2021 Regional Water Plans but is not a requirement for the 2026 Regional Water Plans. Please consider updating or removing this statement in the final plan.

    Proposed Response: *The following revisions were made to Section 7.6 in the last paragraph on Page 7-52:*

    - **Recent implementation of measures to respond to drought conditions -** In response to the 2021~~a new~~ TWDB provision to include whether measures have been recently implemented in response to drought conditions, the CBRWPG recognizes that the City of Corpus Christi’s direct and indirect customers are required to adhere to the City of Corpus Christi DCP criteria and reductions. A Coastal Bend Region survey was prepared and sent to municipal water providers on November 19, 2024, with reminder sent on December 3, 2024. The results of the municipal survey are included in **Error! Reference source not found.**. ~~At this time, it is impractical to poll all 40+ municipal WUGs to inquire about the implementation status of DCP measures and TWDB funding has not been provided for this activity~~.

22. In Table 7.9 on Page 7-51, the Potential Entity Providing Supply listed for San Diego MUD 1 is "#NA". Please consider listing the correct supplier name or, if there is not one, follow the formatting convention of the remainder of the table.

    Proposed Response*: Removed #N/A and replaced with “-“ to remain consistent with the formatting convention for Table 7-9.*

23. Section 7.4. In the second paragraph on page 7-47, a reference is made to assessing and updating emergency interconnections identified in the 2016 Coastal Bend Regional Water Plan. Please consider updating this reference to the 2021 Coastal Bend Regional Water Plan.

    Proposed Response: *Comment accepted. The text on page 7-47 has been updated to reference the 2021 Coastal Bend regional water plan.*

24. Section 7.5. The emergency response analysis for the 2026 Regional Water Plans should have been based on projected 2030 populations to align with the planning horizon, please consider updating Section 7.5 to reflect the decade 2030 for the analysis for municipal WUG population, instead of 2020.

Proposed Response: *Updated table. In 2020 the population of the Aransas Pass and Ingleside were under 10,000. They are still included even though the estimated 2030 population is over 10,000.*

25. Section 7.7. Page 7-55, footnote 13 at the bottom of the page contains a non-working web link to the Texas Commission on Environmental Quality's webpages containing information and example drought contingency plans for public water suppliers. Please consider updating this link in the final plan.

    Proposed Response: *Comment accepted. The text in footnote 13 has been updated with a working link.*

26. Chapter 9. Please consider adding a new subsection in final plan to present the regionalization assessment required by § 357.41(b), which is currently grouped under Section 9.2.4.

    Proposed Response: *Comment accepted. The following text has been updated accordingly and a new subsection 9.2.5 has been added.*

    "The 2026 regional water plan considers water management strategies that are intended to serve more than one WUG. Many of these strategies are sponsored by the major WWPs in the region. The strategies considered in the 2021 regional water plan were classified as conservation, reuse, aquifer storage and recovery (ASR), seawater desalination, brackish groundwater desalination, local balancing storage, groundwater supplies, or regional water supply management and treatment facilities. The 2026 regional water plan considered the same categories of strategies in addition to Nueces River Diversion to Choke Canyon Reservoir and Lake Corpus Christi Sediment Removal. The 2021 regional water plan considered 13 water management strategies that serve more than one WUG, not including municipal, irrigation, or manufacturing conservation. The 2026 regional water plan identifies 21 strategies, not including municipal or manufacturing conservation, that serve more than one WUG. Most notably – there are three new reuse strategies and four new regional water supply management and treatment facilities strategies for the 2026 regional water plan compared to the 2021 regional water plan."

27. 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.

    Proposed Response: *Comment acknowledged. The text was updated to include a list of rural entities that responded to the CBRWPG survey in Section 10.3, Rural Outreach. Additionally,a list of rural entities that were not responsive were added. .*

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TWDB comments received on:

- **August 18, 2025 for the Three New Water Management Strategies since the Initially Prepared Plan Submittal**
- **August 22, 2025 for the Infrastructure Water Management Strategies**
- **August 27, 2025 for the Second Round Comments**

Note: Responses embedded in comment document (see italics)

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Table G.1.
Additional TWDB Comments

Strategy	Comment	Section Page	Resolution	Proposed Response
EV Ranch	Overall, I am concerned with how this strategy is presented and how it will be perceived for funding purposes. Based on the write-up it is unclear which party/parties are responsible for construction, etc. and if the project can benefit multiple MWPs/WUGs.	*5D.1*	**Pending**: asked Kristi for input on 08/21/2025. Kristi to ask CoC how they wish to proceed.	
EV Ranch	If the proposed yield will trigger 357.34(g) for the project (brackish groundwater >10,000 AFY in any decade), please add this to the implementation of large projects section and complete that analysis for this project	*5D.2*	**Resolved:** Added to the implementation status table with input from Taylor Hecht (Garver).	This project has been added to the Implementation Status table.
EV Ranch	Maps and other info show this project going through Jim Hogg, Duval, Jim Wells, Kleberg, and Nueces counties. Check species and update text and Table 5B.7.13 as needed.	*5D.4*	**Resolved**: Changed the counties referenced in the text.	The text in the report has been changed to refelect the 5 counties that this analysis inlcudes.
EV Ranch	treatment facility? Missing word(s) here.	*5D.8*	**Resolved**: added the proposed text	The proposed language has been added to form a complete statement.
EV Ranch	I do not see this in the cost table. Was this included in the facilities costs, or somewhere else? Please explain or remove from this list.	*5D.9*	**Resolved**: The cost was included in land acquisition, but has been moved to its own line item.	The cost of the one-time due diligence fee was included in the land acquisiton costs in the UCM costing form. It has been broken out into its own line item for clarity.
EV Ranch	Table 5B.7.15?	*5D.11*	**Resolved**: no change required. This must have been an artifact from final formatting. It is not present in the current Word document.	This appears to have been an artifact from final formatting. We will do our best to ensure no such erros exist in future versions.
EV Ranch	Costs for brine injection wells, 18 mile pipeline, pumps, etc. are missing. Need to add. Where are your costs for long term lease - included in land acquisition??	*5D.12*	**Resolved:** The piping and injection pumps were included in the "Well Field" line item of the costing summary, but have been moved to their own line item.	The cost of the brine injection wells, the wellfield piping, and the pumps were included in the "Well Fields" item of Table 5B.7.15. These items have been broken out into their own line items for clarity.
EV Ranch	This paragraph may need to be updated with information provided by TWDB Groundwater/BRACS staff.	*5B.7.5.2*	**Resolved**: Confirmed by the TWDB Groundwater and BRACS data science team. Added a footnote indicating confirmation.	TWDB Groundwater and BRACS data science team confirmed information presented in this paragraph.
EV Ranch	I see three separate numbers for this in the writeup - 70, 79 (Table 5B.7.14), and 89 (p. 5D.9). Which is the correct number? Revise for consistency and update/revise costs as needed for the correct number.	*5B.7.5.3*	**Resolved:** The transmission pipeline length was updated throughout the strategy as 79 miles.	The transmission pipeline length was updated to 79 miles throughout the strategy.
EV Ranch	Based on 79 miles from Hebbronville to ON Stevens. See earlier comment regarding pipeline length represented.	*5D.6.6*	**Resolved:** No change needed. 79 miles is the correct distance.	The value shown is correct. Transmission pipeline length of 79 miles updated throughout the strategy.
Oso Reuse	This proposed yield will trigger 357.34(g) for the project (DPR >5,000 AFY in any decade). Please add this to the implementation of large projects section and complete that analysis for this project	*5B-64*	**Resolved:** Added to the implementation status table with input from Taylor Hecht (Garver).	This project has been added to the Implementation Status table.
Petronila Regional WWTP Reuse	Changed for consistency with TCEQ nomenclature for reuse classification.	*5B.4.1.1*	**Resolved:** Updated numbering.	Nomenclature has been updated.
Petronila Regional WWTP Reuse	Not per 30 TAC 210.32(2).	*5B.4.1.2*	**Resolved:** Removed text.	Text inconsistent with 30 TAC 210.32(2) has been removed.
Petronila Regional WWTP Reuse	No septic, as per first paragraph of section?	*5B.4.1.4*	**Resolved:** No change needed.	The Regional WWTP will replace nearby failing septic systems, but the number of systems to be replaced is unknown at this time and therefore not mentioned.
Petronila Regional WWTP Reuse	I don't even see a preliminary assessment of species that may be potentially impacted.	*5B.4.1.4*	**Resolved:** Added species that may be potentially impacted.	A preliminary assessment of potentially impacted species has been added.
Petronila Regional WWTP Reuse	Not consistent with costs presented in Table 5B.4.2.	*5B.4.1.8*	**Resolved**: Updated costs.	Costs have been updated.
Greenwood WWTP Reuse	Environmental/natural resource evaluation is incomplete. Species impacts? Cultural?	*5B.4.2.3*	**Resolved:** Added environmental and cultural resource evaluation.	The environmental and cultural resource evaluation was added.

Oso Reuse	This should be Table 5B.4.9.	*5B.4.3.7*	**Resolved**: Numbering is updated and consistent.	Numbering has been updated.
Oso Reuse	11,209 ac-ft/yr per Table 5B.4.7.	*5B.4.3.7*	**Resolved:** Updated yield.	Yield has been updated.
Oso Reuse	Table 5B.5.6? Check table numbering and ensure consistency.	*5B-69*	**Resolved**: Numbering is updated and consistent.	Numbering has been updated.
Oso Reuse	Where are costs for pump station(s), chemical feed systems, storage tanks, brine disposal?	*5B-72*	**Resolved:** Added a footnote to indicate cost provided by Garver includes process building, storage/equalization, pump station, chemical feed and storage, land acquisition and improvements. Emailed Taylor Hecht 8/22/2025 for additional information on brine discharge strategy	A footnote has been added to clarify what is included in the DPR treatment cost estimate. The brine injection wells were broken into a separate line item for further clarification.
Oso Reuse	These seem low relative to described adjacent wetland areas and known cultural sites, as well as compared to other project writeups anticipating fewer potential impacts. Not required to change, but please check.	*5B-72*	**Resolved**: Updated cost to $500,000	The environmental and archaeology cost estimate was increased to account for the adjacent cultural site and wildlife refuge.
Oso Reuse	Based in writeup, these need another look/additional consideration.	*5B-75*	**Resolved**: Updated comments.	Comments for insteam flows, bay and estuary inflows, and wetlands have been modified to "Moderate to high impact". Cultural resource comment now reads "Possible impact to Cayo del Oso cultural site"
Oso Reuse	Plan needs to state that these costs have also been indexed to Sept 2023 dollars, as required by Exh C.	*5B-70*	**Resolved:** No change required. The September 2023 cost basis is mentioned in the following sentence.	The September 2023 cost basis is mentioned in the following sentence.
Nueces BWROF	By the time the plan is adopted, all of these wells will have been constructed. I would remove this list and revise project description text. Your text below already alludes to this fact.	*5B.7.4.1*	**Resolved:** Updated the text	Removed list of wells and added text stating wells will already be constructed
Nueces BWROF	5B.7.6??	*5B.7.4.1*	**Resolved**: No change required. This must have been an artifact from final formatting. It is not present in the current Word document.	This appears to have been an artifact from final formatting. We will do our best to ensure no such erros exist in future versions.
Nueces BWROF	So what is the plan for this project in DB27? -Is there a recommended version of this WMS using the remaining source balance for GCA, Nueces-Rio Grande Basin? If so, the write up needs to clearly identify the MAG limited yield and the envisioned yield. -If this WMS is not included as a recommended WMS at all due to the MAG limitation, pls make sure that is clear from the write up	*5B.7.4.2*	**Resolved**: Included a table that compares MAG limited amount to project amount needed	
Nueces BWROF	I would remove this text	*5B.7.4.3*	**Resolved**: Removed text	
Nueces BWROF	I would remove this statement	*5B.7.4.4*	**Resolved**: Removed text	
Nueces BWROF	In third paragraph of first page you state cost of wells will not be included. Remove.	*5B.7.4.4*	**Resolved**: Wells are not included in costs. The "Well fields" item description in tables 5B.7.12.a and 5B.7.12.b were revised for clairity	Wellfield description for Option A was revised to say "Piping Only". Option B does include well costs for the injection wells, pumps, and piping.
Nueces BWROF	Thought this was going to be a new WTP located in/adjacent to Nueces River Park?	*5B.7.1*	**Resolved:** Updated the text.	Sentence updated: The produced water will be conveyed **through a 3.5 mile raw water pipeline to the new Nueces River Park treatment facility located downstream of the wellfield on the Nueces River at the location shown on Figure 5B.7.6**.
Nueces BWROF	Then where did the TDS value of 3,000 to 5,000 mg/L come from?	*5B.7.1*	**Resolved**: Added text to clarify.	Sentence updated: The Phase 1 raw water quality is non-potable with an estimated TDS of 3,000 to 5,000 mg/L, **based on typical water quality makeup of the lower Chicot and upper Evangeline members of the Gulf Coast Aquifer in this area.**
Nueces BWROF	Comparison Between Envisioned Project Yield and MAG Yield in Acre-Feet per Year	*5B.7.4.2*	**Resolved:** Updated the table caption.	
Nueces BWROF	August 22?	*5B.7.4.3*	**Resolved**: No change needed.	Information was provided by City of Corpus Christi on June 4.

Nueces BWROF	Estimated 7 miles of pipelines, including brine concentrate transport to injection wells for Option B and 5 miles for Option A?	*5B.7.4.4*	**Resolved:** Updated the text to clarify pipeline lengths.	Sentence updated: Transmission costed according to 14,560 ac-ft/yr (13 mgd) for approximately 3.5 miles of pipeline to the treatment facility and an additional 1.5 miles of pipeline to the tie-in location at Sharpsburg and Up River Road.
Nueces BWROF	Envisioned yield amount?	*5B.7.4.4*	**Resolved:** Updated the text.	
Nueces BWROF	Envisioned yield amount?	*5B.7.4.4*	**Resolved:** Updated the text.	
Nueces BWROF	Specify the range for Options A and B?	*5B.7.4.6*	**Resolved:** Updated the text.	Text updated: $2,471 to $3,151 per ac-ft.
Diversion to Choke Canyon Reservoir	Evaluation of potential impacts to wetlands, species, and cultural?	*5B.11.3*	**Resolved:** Added environmental and cultural resource evaluation.	The environmental and cultural resource evaluation was added.
Diversion to Choke Canyon Reservoir	Need to revise based on cost adjustment for 4.8/5 miles of pipeline, not 4.5.	*5B.11.4*	**Resolved:** Updated the text.	
Diversion to Choke Canyon Reservoir	Does not match cost in Table 5B.11.2.	*5B.11.4*	**Resolved:** Updated the text.	
Diversion to Choke Canyon Reservoir	4.8 miles. Round up to 5 if 4.8 is not possible.	*5B.11.4*	**Resolved:** Updated the text.	
Diversion to Choke Canyon Reservoir	Update per revisions noted above.	*5B.11.6*	**Resolved:** Updated the text.	
Diversion to Choke Canyon Reservoir	Evaluations for items 3 through 6 not completed. These are required.	*5B.11.6*	**Resolved:** Updated the text.	
Diversion to Choke Canyon Reservoir	Acreage incorrect?	*5B.11.6*	**Resolved:** Updated the text.	
Diversion to Choke Canyon Reservoir	Acreage incorrect?	*5B.11.6*	**Resolved:** Updated the text.	
San Pat MWD - Conveyance System Improvements and New WTP	IPP Comment: Section 5B.10.3 and DB27. The evaluation for the San Patricio Municipal Water District – Conveyance System Improvements and New Water Treatment Plant strategy appears to include three separate strategies that have been entered as providing zero yield of firm supply in all decades in DB27: SPMWD Project No. 1 - New WTP at Plant D (WMSId 7045); SPMWD Project No. 2 - New Intake PS and Raw Water Transmission (WMSId 7046); and SPMWD Project No. 3 - New Pump Station & Transmission Rehab (WMSId 7047). All recommended strategies and projects that are entered into DB27 must be designed to reduce the consumption of water, reduce the loss or waste of water, improve the efficiency in the use of water, or develop, deliver or treat additional water supply volumes to WUGs or WWPs in at least one planning decade such that additional water is available during drought of record conditions. Additionally, WMSIds 7046 and 7047 appear to include replacement of existing transmission lines. Please remove the transmission line replacement portions of these projects from the plan and provide additional clarification documenting specifically how the remaining portion of these strategies will increase the net volume of water supply in the final, adopted regional water plan and/or further modify or remove the strategy, as appropriate, to exclude replacement of existing infrastructure capacity. If these strategies remain as recommended, please update the firm yields in DB27 to reflect the non-zero firm yield. [31 TAC § 357.34(d); Contract Exhibit C, Section 2.5.2.15]	5B.10.3	**Resolved:** Updated strategies and removed replacement of existing transmission lines.	
San Pat MWD - Conveyance System Improvements and New WTP	Per IPP comment, recommended WMS may not include any portion of replacing existing capacity. Supply and cost needs to be for increased capacity only	*5B.10.3.7*	**Resolved:** Updated text to address the comment.	The cost estimate has been updated to include only the proposed new conveyance system improvements.

San Pat MWD - Conveyance System Improvements and New WTP	Language that triggered comment above. Remove pipeline replacement or clarify as requested by comment	*5B.10.3.8*	**Resolved:** Updated text to address the comment.	Updated sentence: Proposed transmission pipeline improvements include constructing a new 36-inch PVC pipeline, especially under the roadway crossings, to allow for additional pressures from the new 25 MGD pump station
Mary Rhodes Pipeline Phase I Rehabilitation	So the "rehab" portion of this project would significantly reduce water loss, reduction of capacity, and possible loss of service? May want to emphasize these points a bit stronger.	*5B.10.2.1*	**Resolved:** Added text addressing the comment.	Added sentence: In addition to increasing the conveyance capacity, the MRP improvements described in this strategy would also reduce water loss and improve service reliability.
Mary Rhodes Pipeline Phase I Rehabilitation	If not relevant to project, not sure if this is worth stating in the plan. May be confusing to general readers.	*5B.10.2.1*	**Resolved:** No change made.	No change made. Paragraph provides relevant detail about ongoing improvements.
Mary Rhodes Pipeline Phase I Rehabilitation	Emphasize increased capacity from 79 mgd to 100 mgd?	*5B.10.2.1*	**Resolved:** Added text addressing the comment.	Updated sentence: Installing parallel pipe and adding a pump to each of 3 pump stations will allow the MRP Phase I to convey 100 MGD, **up from the current 79 MGD.**
Mary Rhodes Pipeline Phase I Rehabilitation	Based on this, I would not name/describe the project as "rehab"	*5B.10.2.2*	**Resolved:** Updated the text.	The WMS has been renamed to "May Rhodes Pipeline Phase I Improvements to Increase Capacity and Reliability"
Mary Rhodes Pipeline Phase I Rehabilitation	Project is designed for increased capacity and reliability. Would not use term "rehab/rehabilitation", as it is too limiting.	*5B.10.2*	**Resolved:** Updated the text.	The WMS has been renamed to "May Rhodes Pipeline Phase I Improvements to Increase Capacity and Reliability"
Mary Rhodes Pipeline Phase I Rehabilitation	Option 2 is problematic for inclusion in the RWP because full replacement would be replacing existing capacity. Supply and cost in the plan may only include the portion that increases the capacity/yield. Final plan needs to be clear that the recommended version of this WMS does not include any replacement of existing capacity - supply and cost is for new capacity/supply only	5B.10.2.1	**Resolved: Option 1 is recommended.**	
Mary Rhodes Pipeline Phase I Rehabilitation	Is this conveyance capacity large enough to handle additional project yield such as Evangeline Laguna GW project that would use MRP to transport water to ON Stevens? Would reconstruction of portions of MRP be needed to accommodate such projects?	*5B.10.2.1*	**Resolved:** Added text addressing the comment.	Updated paragraph: "The Mary Rhodes Pipeline Phase I improvements described in this strategy will increase conveyance capacity for additional source water supply projects, like the Evangeline Laguna Groundwater Project and others. The City of Corpus Christi is beginning a study to evaluate if reconstruction of portions of the MRP are needed to accommodate future water supplies and to what extent."
Section 2.2 and Table 2.1	The value for 2030 is still incorrect. Please correct to 34,243,764	*TWDB Comment 2*	**Resolved:** Updated the text.	
Section 3.1.8 Page 3-13	The proposed footnote appears to explain allocation from City of Corpus Christi contracts; however, it does not seem to address the comment - especially for other MWPs. Impossible to tell if resolved without revised plan table/text. it needs to be explicitly clear what the supplies are for each MWP by category of use. This is a requirement by the rule referenced in comment.	*TWDB Comment 4*	**Resolved:** Updated the table to show category of use for projected shortages.	
Section 4A.4	See comment response to TWDB Comment 4. It needs to be explicitly clear what the needs are for each MWP by category of use. This is a requirement by the rule referenced in comment.	*TWDB Comment 8*	**Resolved:** Updated the table to show category of use for projected shortages.	
Section 5B.10.1	Same as TWDB Comment 7. HDR still determining supply available for this WMS. Per 8/27 call, coordinating with B&V	*TWDB Comment 10*	**Resolved:** Discussed supply availability needs for DB27. SPMWD projects are related to contractual increases with the City of Corpus Christi. The yield for MRP and O.N. Stevens WTP improvement projects are associated with source water supplies originating from Evangeline Laguna brackish groundwater strategy.	
Table 5D.113	Consider adding footnote(s) to Table 5D.113 to explain. This needs to be added for 2030 to DB27 as well. Should be addressed by conservation update Grady is working on?	*TWDB Comment 20*	**Resolved:** Updated the text to include 2030 conservation savings.	
Section 5B.1.2.3	Comment response needs correcting to state pipeline replacement and meter replacement are water loss mitigation. Plan can acknowledge that additional savings based on water use reduction were considered, but the plan should be clear that water loss mitigation WMS are what is recommended	*TWDB Comment 21*	**Resolved:** Updated 5D.1 write-up to separately include expected water savings and costs for pipeline replacement and meter replacement projects.	

Chapter 5	Response not adequate at this time. Response needs to document that new WTP does not include replacement of existing capacity. Same for any WTP expansions (e.g: O.N. Stevens WTP Improvements)	*TWDB Comment 23*	**Resolved:** Updated the text to clarify that the strategy is for new capacity.	
Section 7.5 Table 7.9	Proposed response is not acceptable. Per 357.42(g)(3), ALL County-Other WUGs must be evaluated for potential emergency responses to drought or loss of existing supplies. Plan will not be approvable by TWDB unless all County-Other WUGs listed in the comment are included in the table: County-Other, Bee County-Other, Jim Wells County-Other, Nueces County-Other, San Patricio	*TWDB Comment 32*	**Resolved:** Table 7.9 was updated to include Aransas County-Other, Bee County Other, Jim Wells- County Other, Nueces County Other and San Patricio County Other according to TWDB guidance.	
Chapter 10	Thank you for this response. However, the comment suggested indicating a list of entities that were NOT responsive to outreach efforts.	*TWDB Comment 27*	**Resolved:** A list of entities that did not provide responses was added.	
Chapter 10	This sentence is very awkward. Perhaps just end after "...February 1, 2025."?	*TWDB Comment 36*	**Resolved:** Updated the text.	

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Texas Parks and Wildlife comments received via letter dated July 15, 2025

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July 15, 2025

Mr. Scott Bledsoe and Dr. Pancho Hubert, Co-Chairs
Region N Water Planning Group
c/o Mr. Travis Pruski, Nueces River Authority
539 South Highway 83
Uvalde, Texas 78801

Re: 2026 Region N Initially Prepared Regional Water Plan

Dear Mr. Bledsoe and Dr. Hubert:

The Texas Parks and Wildlife Department (TPWD) has reviewed the 2026 Initially Prepared Regional Water Plan for Region N (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 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?

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- Does the IPP recommend any stream segments be nominated as ecologically unique?
- Does the IPP address concerns raised by TPWD in connection with the 2016 Water Plan?

The Texas Water Development Board (TWDB) divided the state into 16 planning regions and appointed members to the regional planning groups. The Coastal Bend Regional Water Planning Area (Region N) includes 11 counties. The Coastal Bend Regional Water Planning Group (CBRWPG) has a total of 20 voting members who are responsible for the development of the Coastal Bend Regional Water Plan. The CBRWPG adopted bylaws to govern its operations and, in accordance with its bylaws, selected the Nueces River Authority to serve as its administrative agency.

On May 18, 2023, the CBRWPG adopted the use of safe yield as the basis for determining availability for the Corpus Christi Regional Water Supply System. The TWDB approved the hydrologic variance request on January 8, 2024. Using the Safe Yield approach, surface water is projected to account for approximately 82% of 2080 municipal supplies, with groundwater accounting for 17% and reuse accounting for 1%. The IPP reports a projected population increase from 589,620 in 2020 to 592,173 by 2080, representing an annual growth rate of approximately 0.12% over the planning period. Total regional water demand is projected to increase from 163,074 acre-feet per year in 2020 to 250,809 acre-feet per year by 2080, with increased demand attributed to municipal and manufacturing sectors. Overall, the Coastal Bend Region is projected to experience a municipal water supply shortage throughout the 50-year planning cycle.

To address this shortage, the CBRWPG adopted a process for identifying and selecting potentially feasible water management strategies (WMS). Through this process, the following 12 WMS were selected and reported on:

- Municipal Water Conservation
- Manufacturing Water Conservation
- Mining Water Conservation
- Reuse
- Aquafer Storage and Recovery (ASR)
- Seawater Desalination
- Brackish Groundwater Desalination
- Local Balance Storage Reservoir
- Groundwater Supplies - Rural and Non-Municipal Water Systems
- Regional Water Supply Management and Treatment Facilities
- Nueces River Diversion to Choke Canyon Reservoir

- Lake Corpus Christi Sediment Removal

The 2026 IPP provides a broad overview of the region's natural resources in Chapter 1, particularly in Sections 1.5 and 1.7, including descriptions of estuarine systems, riparian and wetland habitats, coastal prairies, and native fish and wildlife communities. The IPP acknowledges the ecological and economic value of these systems.

The CBRWPG adopted environmental keys (or indicators) on January 30, 2025, for WMS evaluation. The methodology for quantifying environmental concerns is presented in Chapter 5. An evaluation summary is included at the end of each WMS description, which summarizes how each strategy relates to the 10 impact categories. Evaluation of impacts to fish and wildlife resources was initially limited to state and federally listed species and associated habitats. Environmental impacts were focused on individual project footprints to address regulatory permitting requirements. This section further details environmental concerns that may arise as the strategy matures. The scope of information presented in this section is dependent on the status of project development. Some strategies included an evaluation of species listed in the Texas Natural Diversity Database (TXNDD) or Species of Greatest Conservation Needs. Results were grouped into three categories and presented in a table for each WMS (Ex Table 5B.4).

While the IPP includes a quantitative reporting of environmental factors, the methodology for developing evaluation criteria was not adequately described.

> **Recommendation:** The IPP should include a detailed methodology for evaluation criteria development in Section 5B.

The environmental impact discussions in the IPP focus on each WMS individually and do not assess the cumulative effects of implementing multiple strategies concurrently or over time. As a result, the plan does not address landscape-level concerns such as habitat fragmentation, changes in salinity gradients, or shifts in ecosystem functions.

> **Recommendation:** The CBRWPG should incorporate procedures in future IPP's to address cumulative effects to the environment when evaluating an IPP with multiple WMS.

The IPP recognizes the importance of instream flows and freshwater inflows to maintain aquatic ecosystems, estuarine productivity, and

downstream habitat integrity. However, the plan provides limited quantitative analysis of how WMS implementation may affect flow regimes. Environmental flow standards adopted under the Senate Bill 3 (SB3) process are referenced, but the plan does not explicitly evaluate whether cumulative diversions, reuse, or other strategies would reduce streamflow below these benchmarks.

Several WMS (i.e., direct reuse, aquifer storage and recovery, new surface water diversions, and desalination) have the potential to alter flow volumes, timing, and variability, particularly during low-flow conditions. While Chapter 5 contains environmental issue summaries for individual strategies, these do not include flow modeling or instream flow compliance assessments. Consequently, the plan does not demonstrate whether the combined effect of WMS implementation would maintain, exceed, or fall short of established environmental flow standards in key river segments or estuary inflow points. In the absence of this analysis, it remains unclear whether full implementation of the WMS portfolio could contribute to ecologically significant reductions in instream or freshwater inflows.

> **Recommendation:** TPWD recommends that the CBRWPG coordinate with Texas Commission on Environmental Quality (TCEQ) and other appropriate agencies to reestablish the Nueces Estuary Advisory Council (NEAC). The NEAC previously served as a valuable forum for integrating science-based recommendations into freshwater inflow management for the Nueces Estuary.

The CBRWPG formed a subcommittee at an open meeting on October 17, 2024, to consider designation of ecologically unique stream segments for the Coastal Bend Region. The subcommittee met on November 14, 2024, to discuss and prepare recommendations for CBRWPG consideration. The subcommittee considered TPWD's 2002 recommendations for four stream segments in the Coastal Bend Region for designation of ecologically significant value:

- Aransas River Tidal (Segment 2003)
- Nueces River Tidal (Segment 2101)
- Nueces River (below Lake Corpus Christi) (Segment 2102)
- Nueces River (above Lake Corpus Christi) (Segment 2103)

It is unclear if the four proposed segments were adopted. In Section 8.2 of IPP, the report states "The subcommittee's recommendations were considered and adopted by the Coastal Bend Region on December 12, 2024." Subsequently, the IPP states "On December 12, 2024, the Coastal Bend Region considered and adopted the subcommittee's

recommendations that no river or stream segments within the Coastal Bend Region be identified at this time."

> **Recommendation:** TPWD requests the CBRWPG to clarify whether the proposed segments were adopted or if they were not adopted at this time.

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 CBRWPG should they decide to pursue the designation of ecologically unique stream segments and we are willing to assist with the preparation of a recommendation packet as identified in title 31, section 357.43 of the TAC.

The 2026 IPP references federally and state-listed species in the development of the WMS as well as Species of Greatest Conservation Need (SGCN), in multiple sections and recognizing further evaluation may be required.

> **Recommendation:** The TPWD Rare, Threatened, and Endangered Species of Texas (RTEST) database, which was most recently updated on January 15, 2025, should be used to ensure the accuracy and completeness of this list. The RTEST database is publicly available at: https://tpwd.texas.gov/gis/rtest/.

The IPP recognizes the value of fishing and hunting as a primary economic activity within the Coastal Bend Region but lacks any assessment on impacts to these species of concern when evaluating the WMS. These species rely on an adequate conveyance of freshwater inflows and estuarine habitat for healthy life cycle development, which in turn supports a robust regional economy. Potential impacts from the WMS to recreationally and commercially important species such as southern flounder, spotted seatrout, red and black drum, shrimp, oysters, bass, crappie, alligator gar, white tailed deer, dove, etc. at the local and regional level may result in resource management decisions and impacts to the regional economy in the recreation community and tourism.

> **Recommendation:** TPWD encourages the CBRWPG to consider expanding WMS evaluations of environmental impacts to include commercial and recreationally important species and habitats.

The IPP WMS lists five seawater desalination facilities and three brackish groundwater water desalination strategies further discussed in the environmental issues. In 2015, House Bill (HB) 2031 (84th Texas Legislature) directed TPWD and the Texas General Land Office (GLO) to identify zones in the Gulf appropriate for the diversion of marine seawater, and for the discharge of marine seawater desalination brine concentrate, while considering the need to protect marine organisms. The report informs an optional expedited permitting process under state law that would avoid diversions from, and discharges into, bays and estuaries.

> **Recommendation:** TPWD encourages the use of this report to help guide seawater desalination project development and planning within Region N. TPWD appreciates the incorporation of this report within the IPP.

With respect to brackish groundwater desalination, no such report identifies appropriate zones for discharge. The IPP recognizes salinity concentrations should be carefully monitored in the receiving waters and farther downstream to minimize impacts on aquatic species and their habitats.

> **Recommendation:** TPWD recommends an assessment of the receiving waters to identify appropriate zones for discharge and the environmental effect further downstream.

The effect of groundwater pumping on the baseflow in downstream reaches is identified in the IPP. Minor land surface subsidence could potentially occur as a result of lowering of groundwater levels. As a result, drainage patterns and other habitats might change to a small extent.

> **Recommendation:** TPWD recommends careful analysis of the potential for land subsidence and hydrologic alteration associated with groundwater withdrawals. Project sponsors should incorporate site-specific hydrogeologic studies and habitat mapping into planning processes.

While the current plan provides only a cursory level of detail regarding potential impacts to natural resources, TPWD looks forward to continued collaboration and the opportunity to provide additional information and recommendations to help minimize impacts as individual WMS projects are further developed and implemented.

Recommendation: TPWD recommends evaluating potential impacts of WMS implementation, particularly reuse, ASR, and desalination on fish and wildlife resources and their habitats.

TPWD is concerned with the transmission of invasive species such as zebra mussels and quagga mussels. As of March 2025, 34 lakes in Texas have been classified as fully infested with zebra mussels, meaning that reproducing populations exist in those waters. The potential transport of zebra mussels and other invasive species via pipelines falls under sections 66.007(n) and 66.0072(g) of PWC.

> **Recommendation:** To prevent the transmission of invasive species, TPWD recommends effective mitigative measures should be considered and implemented for preventing the transfer of zebra mussels.

In addition to aquatic fauna, *Arundo donax*, an invasive riparian plant, poses a growing threat to water supply reliability and ecosystem health in the Coastal Bend. This aggressive, fast-growing species displaces native vegetation, alters stream hydrology, and consumes large volumes of water, reducing availability for native species and human uses. It can also increase flood risk and wildfire susceptibility. *Arundo* infestations undermine conservation goals and habitat restoration efforts.

> **Recommendation:** TPWD encourages the CBRWPG to consider *Arundo* control and prevention in areas where water management strategies intersect with riparian corridors, and to coordinate with local invasive species partnerships and watershed groups where applicable.

The 2026 Region N IPP identifies water conservation as a key WMS and incorporates it into the recommended strategy portfolios for all municipal water user groups with projected shortages. Municipal conservation is discussed in Section 5B.1, which outlines specific practices such as leak detection and repair, fixture retrofits, landscape irrigation efficiency, and public education. In addition, industrial, mining, and agricultural conservation strategies are addressed in Sections 5B.2 and 5B.3, with an emphasis on water-use efficiency and process optimization. The plan promotes achieving the statewide conservation goal of 140 gallons per capita per day (gpcd) through phased reductions in per capita use for entities exceeding that threshold.

Recommendation: TPWD supports the continued emphasis on conservation, as it is the most cost-effective strategy for meeting long-term water needs with minimal ecological impact.

TPWD commends the CBRWPG with the considerable effort invested in the preparation and development of the 2026 IPP. TPWD recognizes the complexity of balancing growing water demands with long-term sustainability and appreciate the thoughtful integration of technical analyses, stakeholder engagement, and strategy evaluation throughout the document.

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 contact me by email at Marty.Kelly@TPWD.Texas.gov or by phone at (512) 389-8214.

Sincerely,

Marty Kelly

Marty Kelly
Water Resources

CC: Alex Nunez, Coastal Fisheries Division

Response – Texas Parks and Wildlife comments

TPWD Recommendation: The Initially Prepared Plan should include a detailed methodology for evaluation criteria development in Section 5B.

Response: The impacts to environmental factors key and agricultural resources key methodology was developed during the 2021 Plan cycle during regular public meetings. This criteria and method will be reviewed in future planning cycles.

TPWD Recommendation: The CBRWPG should incorporate procedures in future Initially Prepared Plans to address cumulative effects to the environment with multiple WMS.

Response: We hear your concern related to impacts that multiple WMS could cause if implemented concurrently or over time and potential habitat fragmentation, changes in salinity gradients or shifts in ecosystem function that could arise. The majority of recommended WMS in the Coastal Bend Region focus on desalination, groundwater, and infrastructure improvements. Currently, there are no publicly available models that include site and project specific details to evaluate the cumulative impacts for these projects. TCEQ and other regulatory agencies require modeling as part of desalination permit application process. Expanding these models to include other local or regional projects in the vicinity, could have value in evaluating cumulative impacts of multiple projects.

TPWD Recommendation: Consider adding how WMS implementation may affect flow regimes.

Response: All water management strategy evaluations include a discussion of instream flow impacts. For example, the Oso WWTP Reuse considers Agreed Order provisions, Local Balancing Reservoir considers instream flow impacts associated with Nueces River diversions, and Nueces River Diversion to Choke Canyon Reservoir includes a flow regime analysis based on estimated diversion rate and frequency of flow diversion.

Water management strategy sponsors are encouraged to conduct flow modeling and instream flow compliance assessments in future phases of project development.

TPWD Recommendation: TPWD recommends that the CBRWPG coordinate with TCEQ and other appropriate agencies to reestablish the Nueces Estuary Council (NEAC). The NEAC previously served as a valuable forum for integrating science-based recommendations into freshwater inflow management for the Nueces Estuary.

Response: There have been conversations during CBRWPG meetings this planning cycle that discussed reestablishing NEAC. There are multiple stakeholders that participated in the process, which would need to initiate the process.

TPWD Recommendation: TPWD requests the CBRWPG to clarify whether river or stream segments were adopted as having unique ecological significance.

Response: The CBRWPG did not designate any river or stream segments in the Coastal Bend Region as having ecologically significant value.

TPWD Recommendation: The TPWD Rare, Threatened, and Endangered Species of Texas (RTEST) database, which was most recently updated on January 15, 2025, should be used to ensure the accuracy and completeness of the list.

Response: HDR used the RTEST database when evaluating potential environmental issues associated with each water management strategy.

TPWD encourages the CBRWPG to consider expanding WMS evaluations of environmental impacts to include commercial and recreationally important species and habitats.

Response: The water management strategy evaluations are considered planning-level, however additional discussion is included in Environmental Issues that states the importance of additional studies on environmental impacts as the project progresses towards implementation which could include specific-studies on impacts to commercial and recreationally important species and habitat. TWDB guidance in future planning cycles would be helpful in standardizing an approach and identifying readily available resources.

TPWD encourages the use of the HB 2031 GLO report that identifies zones in the Gulf appropriate for the diversion of seawater and discharge of brine concentrate.

Response: This report was considered and included in the Seawater Desalination- Barney Davis water management strategy. For the other seawater desalination projects, the project sponsors provided site details.

TPWD recommends an assessment of the receiving waters to identify appropriate zones for discharge and the environmental effects further downstream.

Response: The implementation issues section states additional studies being needed to evaluate impacts of discharge which may be required during permitting.

TPWD recommends careful analysis of the potential for land subsidence and hydrologic alteration associated with groundwater withdrawals. Project sponsors should incorporate site-specific hydrogeologic studies and habitat mapping into planning processes.

Response: Subsidence is discussed in the Environmental and Implementation Issues sections related to groundwater strategies.

TPWD recommends evaluating potential impacts of WMS implementation, particularly reuse, ASR, and desalination on fish and wildlife resources and their habitats.

Response: Agreed. This information can be found in the Implementation Issues discussion for reuse, ASR and desalination strategies.

TPWD recommends effective mitigative measures should be considered and implemented to prevent the transfer of zebra mussels, an invasive species.

Response: Mitigation measures for preventing the spread of zebra mussels in pipelines is chemical treatment with oxidizing biocides (i.e. chlorination). As part of ongoing operations

of maintenance of constructed projects, many water utilities have programs to prevent the spread and proliferation of zebra mussels. The Coastal Bend Regional Water Plan is a planning-level document and it is assumed that sponsors will develop maintenance programs that best relate to their constructed projects.

TPWD encourages the CBRWPG to consider Arundo control and prevention in areas where water management strategies intersect with riparian corridors, and to coordinate with local invasive species partnerships and watershed groups where applicable.

Response: The CBRWPG invites TPWD to present at a future Region N meeting on the impacts of Arundo on water supply quality and quantity for consideration in the water management strategy evaluations in future planning cycles.

TPWD supports the continued emphasis on conversation, as it is the most cost-effective strategy for meeting long-term water needs with minimal ecological impact.

Response: Noted. Thank you.

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Public Comments Received on the Region N Initially Prepared Plan

Jason Hale- email to CBRWPG related to manufacturing water demand, sent 7/15/25

Section 2.3.2- Manufacturing Water Demand: This section mentions how refineries use much less water than the national average. It references a study from 1990. My comment is that the study is over 30 years old and if the plan is going to assert that refineries are still using less water than the national average, it should be verified with a more up to date document, with recent data, that can be inspected by the public to verify those claims. Also if such a document exists, I am unaware of it and would appreciate it if someone emailed the document to me. If that information does not exist then I recommend the plan to be updated to reflect that these conservation measures happened in the past but are not reflective of current water efficiencies in refining.

Proposed Response: HDR reached out to TWDB to inquire about a more recent manufacturing water conservation report but none are available. The TWDB is discussing the development of a manufacturing water conservation toolkit for future planning cycles to more effectively communicate water savings practices. During 2026 Region N plan development, local industries participated in a workgroup call on September 18, 2024 and provided input on successful best management practices (BMPs) for industries that have reduced water use (Table 5B.2.3). Additionally, a survey was sent out in December 2024 to gather information on water use, voluntary BMPs, and challenges/impediments in implementing water conservation strategies. Responses were received for Construction, Chemical Manufacturing, Crude Terminal and Refining industries citing elimination of non-essential water use as the primary BMP implemented during drought which has resulted in approximately 10% water savings.

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