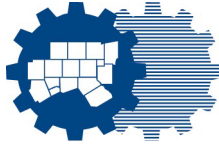




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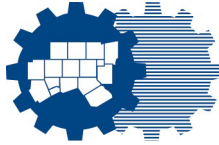
Figure 10. Comments on the Draft 2024 Update to the WQMP and NCTCOG’s Responses. Direct quotes from commenters are in italics.

Date Received	Entity	Comment	NCTCOG’s Response
6/7/24	Trinity River Authority	<p><u>Comments on “Acronyms”:</u></p> <ul style="list-style-type: none"> Change TPDES - Texas <i>Pollution</i> Discharge Elimination System” to “...Pollutant Discharge...” <p><u>Comments on “Executive Summary”:</u></p> <ul style="list-style-type: none"> In the first sentence of the Executive Summary, put the acronym for NCTCOG. Change “The WQMP is divided into 13 other sections, linked at the <i>blue bar</i> above.” to read “The WQMP is divided into 13 other sections, linked at the <i>green/light green bar</i> above. <p><u>Comments on “2024 Population Estimates”:</u></p> <ul style="list-style-type: none"> Change “Additionally, the map <i>below</i> shows the top ten cities/towns with the highest percent growth (in red) and largest absolute growth (in blue).” to “Additionally, the map to the left...” <p><u>Comments on “Water Quality Monitoring”:</u></p> <ul style="list-style-type: none"> Change “The North Central Texas region contains a robust network of water quality monitoring, provided and supported by state and local governments, and <i>citizen</i> scientists, who are trained in data collection methods.” to “...community scientists” Texas Stream Team is trying to move away from the term “citizen” and substitute with the term “community”. Not sure if that is fully in effect yet. <p><u>Comments on “Water Quality Overview”:</u></p> <ul style="list-style-type: none"> Change “This <i>plan</i> explores TMDLs and Watershed Protection Plans in the upcoming sections of this report.” To “This WQMP...” since I-Plan and WPP are mentioned throughout the paragraph. 	<p>Edit made.</p> <p>It is spelled out because it is the first use of the name in the text of the document. The WQMP update will use “NCTCOG” in other places throughout the document.</p> <p>Edit made.</p> <p>Edit made.</p> <p>The Meadows Center for Water and the Environment confirmed this change. Edit made.</p> <p>Edit made.</p>



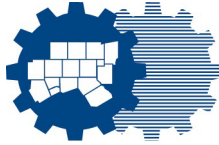
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		<ul style="list-style-type: none"> • Change “Volunteer organizations, such as the Texas Master Naturalist Program and Texas Stream Team, coordinate with <i>citizens</i> to monitor water quality” to “with community scientists...” • On the Village Creek Lake Arlington WPP pop-up window - http://serv.trinityra.org/basinplanning/VCLAWatershed/DraftWPP/VCLAWPPFinal.pdf link doesn’t work; use this instead: https://trinityra.org/basin_planning/village_creek-lake_arlington_wpp/index.php • WPP pop-up window– can you hyperlink the websites within the pop-up window? • Figure 7 - WPPs changes for 2024 pdf. The VCLA webpage link, links to the pdf of the WPP, not the website. You can update with the link provided in a previous comment. <p><u>Comments on “Wastewater Outfalls”</u></p> <ul style="list-style-type: none"> • The TCEQ layer does not differentiate between TPDES permits that are pending versus issued. I would suggest clarifying in the text that these don’t differentiate between pending and issued. <p><u>Comments on “Water Service Areas”</u></p> <ul style="list-style-type: none"> • What is considered “major”?; could also include TRA – our Tarrant County Water Supply Project provides service to Bedford, Colleyville, Euless, Grapevine, and North Richland Hills. What about Tarrant Regional Water District? I know they are a wholesale water provider, but that could be noted in a pop-up... <p><u>Comments on “Reservoirs, Water Reuse, and Water Conservation”</u></p> <ul style="list-style-type: none"> • The Water Reuse and Water Conservation font is hard to read. 	<p>The Meadows Center for Water and the Environment confirmed this change. Edit made.</p> <p>Edit made.</p> <p>Edits made.</p> <p>Edit made.</p> <p>The “Status” field in the pop-up window indicates whether the permit is pending or issued. “C”= Current permit. “P”= Pending permit. The text has been updated to clarify this point.</p> <p>Per guidance from the Water Resources Council, the map displays major raw water service providers and the text has been updated to clarify this point. “Major” is defined as providing raw water across county lines. Tarrant Regional Water District’s layer was turned off in error. It is visible on the map now.</p> <p>Edit made.</p>
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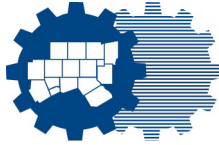
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6/28/24	Upper Trinity Regional Water District (UTRWD)	<p><u>Comments on “Wastewater System Overview”:</u> Upper Trinity Regional Water District’s legend labels the area as a “planning area” but no other layer has this designation.</p>	This was a result of differing symbologies across GIS layers. The UTRWD layer has been updated to match the others on the map.
6/27/24	Private Citizen	<p><u>Comments to “Executive Summary”:</u> <i>This list of examples to address water quality seems very small and insignificant. What about recommending policies for requiring green infrastructure and more than just “gathering data” about OSSF’s. What about having a master wastewater system plan to reduce the number of OSSFs? Also fails to mention the defacto use of small package wastewater treatment plants for each development without sanitary sewer service typically part of a Municipal Utility District (MUD), financed by taxes on the new homeowners and run by private utility companies. These package plants are inefficient, and often have a relatively short time of quality operation before needing to be replaced or overalled. If the MUD’s residents have insufficient funds to rehabilitate the package plant, the nearest wastewater service provider may then be requested to assume the operation and rehab of the plant.</i></p> <p><u>Comments on “2024 Population Summary”</u> <i>“With the population in the 12-county MPA projected to grow 40% in just 22 years, from 8,146,788 in 2023 to 11,411,580 in 2045, how will the wastewater system expand to serve that demand in such a relatively short time, especially for new wastewater treatment plant siting and permitting?”</i></p> <p><i>“I believe a second table as part of Figure 5 for county population growth should be included to show Largest Percentage Population Change, as was done for Cities in Figure 4. This would highlight the fastest growing counties of Rockwall</i></p>	<p>Any policy recommendations made must come first through the gathering of data to understand the scope of the situation. NCTCOG will look into incorporating these suggestions in future WQMP updates.</p> <p>The NCTCOG region continues to develop Municipal Utility Districts to support regional growth and demand. During the current fiscal year, 11 MUDs have either been petitioned for or been granted an Order of Creation. Additionally, NCTCOG coordinates with local municipalities and water/wastewater service providers to support system expansion to meet the impending demand.</p> <p>Edits made to Figure 5 to include charts that highlight county absolute and percentage growth.</p>



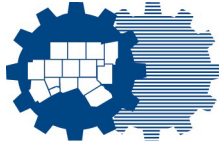
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	<p><i>and Kaufman in addition to Collin and Denton. Similarly other ring counties have great growth such as Wise, Parker, Johnson and Ellis. As the state legislation has restricted annexation and ETJ powers from cities, the unincorporated areas of these counties do not have typical water and wastewater services and rely on once rural Water Supply Corporations (WSC) and Special Utility Districts (SUD) to handle those services. The WSC's and SUD's typically do not even handle wastewater and lack a CCN to provide that service. See later notes on regionalization of wastewater and the fact that much of unincorporated areas lack wastewater service or even a provider's CCN."</i></p> <p><u>Comments on "Watershed Protection Plans"</u> <i>"The WPP's don't seem to cover a significant area of the fast growing areas. Wouldn't the region benefit from additional watershed protection plans, especially before dense development occurs and while preservation of green infrastructure is more viable?"</i></p> <p><u>Comments on "Wastewater System Overview"</u> <i>"See prior comment under Population Growth, in that much growth is occurring in unincorporated areas without wastewater systems or even a wastewater CCN. A regional wastewater master plan should be developed. The unnumbered figure showing the service areas of the seven wastewater joint system providers is an inaccurate depiction of the true wastewater service being provided or even the entities' CCN for wastewater. This map shows city boundaries of those members or entities served by the seven joint providers. It would be very informative to show the actual areas served with sanitary sewer systems and also show developed areas with OSSFs. It should also show the existing wastewater systems not within the seven joint systems. It also does not depict the proposed small wastewater systems proposed as part of MUDs or Water Control Improvement Districts</i></p>	<p>NCTCOG supports the continued development and implementation of Watershed Protection Plans where applicable and feasible.</p> <p>The map showing the regional wastewater connection is not meant to be comprehensive in nature and only provides an overview of the system at play. A map of developed areas with OSSFs can be found in the "On-Site Sewage Facility" section of the plan. NCTCOG, along with the Water Resources Council and the Texas Commission on Environmental Quality, will consider these suggestions for future WQMP updates as the data allows.</p>
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	<p><i>(WCID). Why do all the fast growing counties surrounding Dallas and Tarrant Counties, except Denton, have very limited coverage of wastewater treatment from the seven? I think this again highlights the need for a regional master plan for wastewater service”</i></p> <p><u>Comments on “Wastewater Outfalls”</u> <i>“The map showing the wastewater outfalls regulated by TCEQ with a TPDES permit would be more informative if the outfalls were color coded to differentiate those outfalls that are for the seven wastewater joint system providers, those that are for other municipalities and those that are for MUD’s, WCID’s and other non-municipal systems. It may also be informative to show their associated CCN, and give a better depiction of the areas without wastewater service. Without a regional wastewater system, it would be expected new developments would continue to fill the void with more small systems typical of MUDs or low density development served by OSSFs. These low density developments are 1 acres residential lots, although variances can allow 0.6 acre minimums. This demonstrates the correlation between availability of wastewater service and future land use. Do we want our fast growing counties without land use controls having to deal with primarily large lot residential tracts? Lack of service is also a disincentive for commercial, industrial and retail uses that support a tax base for municipal services. It may also be considered that large residential lots use a greater amount of water for landscape irrigation, putting even greater demand on the water supply system.”</i></p> <p><u>Comments on “Water Service Areas”</u> <i>“The map of the major water providers oversimplifies the complex system of water systems in the region. The TCEQ map of the water CCN’s will demonstrate that. It may also be good to reference the Texas Water Plan for Region C being updated for 2026. Could it be considered that wastewater systems provide a benefit to</i></p>	<p>The data included in this map comes directly from TCEQ’s data. NCTCOG, along with the Water Resources Council and the Texas Commission on Environmental Quality, will consider these suggestions for future WQMP updates as the data allows.</p> <p>The map is meant to depict an overview of regional water service providers and does not claim to be comprehensive in nature. NCTCOG plans to look into incorporating this suggestion into future WQMP updates as the data allows. The 2021 Region C Water Plan, the most</p>
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	<p><i>water supply through water capture for reuse, aquifer storage or groundwater recharge? Development of large lots using OSSFs does not provide the ability for wastewater capture.”</i></p> <p><u>Comments on “On-Site Sewage Facilities”</u> <i>“In Texas, there are over 2 million OSSFs and these systems are installed in approximately 20% of the state’s residential new builds.”</i></p> <p><i>“In Texas, estimates show that an average of about 13% of OSSFs are failing.”</i> <i>“These two statements reinforce the need for a regional wastewater master plan. The lack of mapping for the large and fast growing counties of Dallas, Rockwall, Ellis and Collin also speaks to the limited controls over OSSFs and their impact on our regions [sic] current and future water quality.”</i></p> <p><u>Comments on “Reservoirs, Water Reuse, and Water Conservation”</u> <i>“According to the 2021 Region C Water Plan, the reuse of treated wastewater effluent is becoming an increasingly important source of water in Region C. Reuse is projected to comprise 31% of the 2070 water supply for the Region C water planning area.”</i></p> <p><i>“The Legislative action predicts that creation of a direct potable reuse project in Region C of the TWDB Water Planning Area has the potential to yield sufficient water supply to region residents while alleviating the depletion of already scarce resources.”</i></p> <p><i>“As noted before, could it be considered that wastewater systems provide a benefit to water supply through water capture for reuse, aquifer storage or groundwater recharge?”</i></p>	<p>current plan available for review, is referenced in the “Reservoir, Water Reuse, and Water Conservation” section of the WQMP.</p> <p>NCTCOG, along with the Water Resources Council and the Texas Commission on Environmental Quality, will consider these suggestions for future WQMP updates.</p> <p>The omission of any OSSF data is due to its availability status at the time of publication. NCTCOG collects OSSF data year-round and continually expands its network with the region’s Authorized Permitting Agents.</p> <p>Wastewater systems are an integral part of water reuse efforts. Data is still being collected regarding the suitability of aquifer storage activities in Region C¹, but the strategy is being explored, along with groundwater recharge through the seven Groundwater Conservation Districts present in Region C. The text has been updated to mention these efforts.</p>
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¹ Texas Water Development Board. (2021) *2021 Region C Water Plan*, pg. 5A.9.