

**TWDB comments on the Initially Prepared 2021 Far West Texas
(Region E) Regional Water Plan**

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

1. Chapter 5 and the State Water Planning Database (DB22). The plan includes the following recommended water management strategies (WMS) by WMS type, providing supply in 2020 (not including demand management): one *aquifer storage and recovery*, 15 *groundwater wells & other*, four *groundwater desalination*, two *other direct reuse*, and two *other surface water*. **Strategy supply with an online decade of 2020 must be constructed and delivering water by January 5, 2023.**
 - a) Please confirm that all strategies shown as providing supply in 2020 are expected to be providing water supply by January 5, 2023. [31 § TAC 357.10(21); Contract Exhibit C, Section 5.2]
 - b) Please provide the specific basis on which the planning group anticipates that it is feasible that the *aquifer storage and recovery*, four *groundwater desalination*, and two *other surface water* WMSs will all actually be online and providing water supply by January 5, 2023. For example, provide information on actions taken by sponsors and anticipated future project milestones that demonstrate sufficient progress toward implementation. [31 § TAC 357.10(21); Contract Exhibit C, Section 5.2]
 - c) In the event that the resulting adjustment of the timing of WMSs in the plan results in an increase in near-term unmet water needs, please update the related portions of the plan and DB22 accordingly, and also indicate whether ‘demand management’ will be the WMS used in the event of drought to address such water supply shortfalls or if the plan will show these as simply ‘unmet’. If municipal shortages are left ‘unmet’ and without a ‘demand management’ strategy to meet the shortage, please also ensure that adequate justification is included in accordance with 31 TAC § 357.50(j). [TWC § 16.051(a); 31 § TAC 357.50(j); [31 TAC § 357.34(i)(2); Contract Exhibit C, Section 5.2]
 - d) **Please be advised that, in accordance with Senate Bill 1511, 85th Texas Legislature, the planning group will be expected to rely on its next planning cycle budget to amend its 2021 Regional Water Plan during development of the 2026 Regional Water Plan, if recommended WMSs or projects become infeasible, for example, due to timing of projects coming online.** Infeasible WMSs include those WMSs where proposed sponsors have not taken an affirmative vote or other action to make expenditures necessary to construct or file applications for permits required in connection with implementation of the WMS on a schedule in order for the WMS to be completed by the time the WMS is needed to address drought in the plan. [Texas Water Code § 16.053(h)(10); 31 TAC § 357.12(b)]

2. Chapter 1, Section 1.3.4, page 1-25. The definition of major water provider (MWP) presented in Section 1.3.4 refers to an old definition of a wholesale water provider. The correct definition of MWPs is presented in Section 2.2.1. Please update the Section 1.3.4 definition and list in the final, adopted regional water plan. *[31 TAC § 357.30(4)]*
3. Chapter 2, page 2-11, Table 2-3. Please revise the table header "Wholesale Water Provider" to "Major Water Provider" in the final, adopted regional water plan. *[31 TAC § 357.31(b)]*
4. Chapter 2, page 2-14, Table 2-5. Water demands presented for Terrell County-Other appear to be inconsistent with Board-adopted water demand projections. Table 2-5 presents Terrell County-Other decadal water demands as 100 ac-ft/year in 2020, 112 ac-ft/yr in 2030, 123 ac-ft/yr in 2040, 139 ac-ft/yr in 2050, 153 ac-ft/yr in 2060, and 166 ac-ft/yr in 2070. TWDB Board-adopted water demands for Terrell County-Other are 21 ac-ft/yr in 2020 and 2030 and 20 ac-ft/yr each decade from 2040 to 2070. Please include Board-adopted water demands for Terrell County-Other in the final, adopted regional water plan. *[31 TAC § 357.31(e)(1)]*
5. Pages 3-4 and 3-7. Total existing supplies presented in Table 3-2 for Culberson County and Region E Total appear to be inconsistent with total existing supplies reported in DB22. Please reconcile this information as necessary in the final, adopted regional water plan. *[31 TAC § 357.32(g)]*
6. Page 3-7, Table 3-3. Direct reuse and Hueco-Mesilla Bolson Aquifer supplies presented for El Paso Water appear to be inconsistent with existing supplies for the entity reported in Table 3-2 and in DB22. Please review direct reuse and Hueco-Mesilla Bolson Aquifer supplies for El Paso Water and reconcile as necessary in the final, adopted regional water plan. *[31 TAC § 357.32(g)]*
7. Page 3-7, Table 3-3. Please revise the column header "Wholesale Water Provider" to "Major Water Provider" in the final, adopted regional water plan. *[31 TAC § 357.32(g)]*
8. Section 3.4. It is not clear what methodology was used to calculate direct reuse supplies discussed in Section 3.4. Please provide a more detailed explanation of the methodology used to calculate reuse supplies in the final, including as relates to existing treatment capacity, in the final, adopted regional water plan. *[Contract Exhibit C, Section 3.4]*
9. Chapter 3, page 3-25. Table 3-6 does not appear to include the methodology for estimating the West Texas Bolson Aquifer (Wild Horse, Michigan, and Lobo) non-modeled available groundwater volumes for Jeff Davis County. Please include the methodology used to estimate availability for this source in the final, adopted regional water plan. *[Contract Exhibit C, Section 3.5.2]*
10. Chapter 3. Please include a summary with information on the Water Availability Model (WAM) version, WAM simulation date, and WRAP version used for surface

water simulations in the final, adopted regional water plan. *[Contract Exhibit C, Section 3.2.1]*

11. Chapter 4. The plan does not appear to include identified water need volumes for MWPs reported by category of use including municipal, mining, manufacturing, irrigation, steam electric, mining, and livestock. Please report the results of the needs analysis for MWPs by categories of use as applicable in the region in the final, adopted regional water plan. *[31 TAC § 357.33(b)]*
12. Chapter 4. The plan does not appear to include a secondary needs analysis for MWPs. Please present the results of the secondary needs analysis by decade for MWPs in the final, adopted regional water plan. *[31 TAC § 357.33(e)]*
13. Page 4-4. Table 4.3 does not report secondary water needs for El Paso County steam electric power and manufacturing as compared to the secondary needs reported in DB22. Please reconcile these items in the final, adopted regional water plan. *[31 TAC § 357.33(e)]*
14. Section 5.2.6, Tables 5-2 to 5-4, and Appendix 5A appears to present inconsistent information on recommended and alternative WMSs for El Paso Water from what is reported in the DB22. For example, Section 5.2.6 notes seven alternate WMSs for El Paso Water, Tables 5-2 to 5-4 and Appendix 5A present six alternate WMSs for El Paso Water, and data reported in DB22 includes three alternate WMSs for El Paso Water. Please reconcile this information as necessary and ensure that all recommended or alternative strategies and projects are entered into DB22 in the final, adopted regional water plan. *[31 TAC § 357.35(g)(1)]*
15. Pages 5-13, 5-15, and 5A-20. The strategy evaluation for E-25 reflects placeholder text “XXX” or provides no information in the description of quantity, reliability, and cost. Please provide this information in Appendix 5A, Table 5-2, and Table 5-3 in the final, adopted regional water plan. *[Contract Exhibit C, Section 5.6]*
16. Section 5A-1.1, page 5A-3. The evaluation for strategy E-2 makes clear that the project is primarily to reduce flooding and will not provide reliable supply during severe drought conditions. Please either remove the strategy from the plan as presented since it clearly does not meet the requirement in 31 § TAC 357.34(b), or modify the strategy to provide reliable water supply during severe drought conditions and present the reliable yield and unit cost along with calculations showing the basis for the reliable yield calculation in the final, adopted regional water plan. *[31 TAC § 357.34(b)]*
17. Section 5A-11, page 5A-34. Based on the information presented in the plan for strategy evaluation E-44, it is not clear if the 5,000 acre-ft yield is a net quantity of water saved from delivery efficiencies or a total delivery volume that may include existing supplies. Please clarify whether or not the reported yield includes existing supplies. If the yield includes existing supplies, please present the net yield produced from the strategy in the final, adopted regional water plan and make any associated adjustments to DB22. *[31 TAC § 357.34(e)(3)(A)]*

18. Page 5A-13, Strategy E-15. The plan does not appear to present separately the land costs associated with the reservoir. Please include separated reservoir-associated land costs or, if appropriate, indicate that land acquisition costs are not applicable, and why to this strategy in the final, adopted regional water plan. *[Contract Exhibit C, Section 5.5]*
19. Page 5A-39, Strategy E-53. The strategy is indicated to be a conservation strategy and represented as demand reduction in DB22, even though the description states the WMS is to replace an old pipeline that needs major repair and includes a booster station and pumping station. The plan also states that the estimated water loss is only 3.8 percent. The primary purpose of water loss conservation WMSs must result in an immediate reduction in use or water loss, per contract guidance. Infrastructure costs primarily associated with maintenance are not allowed to be included in the plan. Please ensure that only infrastructure costs that are required to increase the volume of water supply are included in the final, adopted regional water plan and that operation and infrastructure maintenance projects and costs are not included. *[Contract Exhibit C, Section 5.5.3]*
20. Page 5A-45. Please include a generally defined delivery point for water in the strategy evaluation for E-65, Additional Wells in the Edwards-Trinity (Plateau) Aquifer, in the final, adopted regional water plan. *[Contract Exhibit C, Section 5.7]*
21. Appendix 5A. The plan in several instances, for example, evaluations E-45, E-47, E-49, E-57, and E-64, presents mining conservation strategies with zero costs and yet also notes an assumption that there are strategy costs and that these are assumed to be paid back within a year. Please report the initial one-time costs for these strategies against which cost savings are based in the final, adopted regional water plan. *[31 TAC § 357.34(e)(3)(A); Contract Exhibit C, Section 5.5]*
22. Appendix 5A. The plan in some instances appears to include infrastructure components that are not directly required to increase the treated water supply either as new supply or through demand reduction. For example, E-1 appears to include costs for installation of an irrigation system and E-17 appears to include costs for rehabilitation of existing wells which is not allowed per contract guidance. Please ensure that only infrastructure costs that are required to increase the volume of water supply are included in the final, adopted regional water plan and that operation and infrastructure maintenance costs are not included. *[Contract Exhibit C, Section 5.5.3]*
23. Page 5A-6. The evaluation for strategy E-8 notes that wells and booster stations are in critical need of system upgrades and alternate power supplies, in addition to old and undersized distribution lines. It is not clear if these items are included as project components and how maintenance of this existing equipment would directly increase the water supply volumes. Please provide a breakout of project components with capital costs and do not include any costs for maintenance of, or upgrades to, or rehabilitation to existing equipment that do not directly increase the

volumetric water supply in the final, adopted regional water plan. *[Contract Exhibit C, Section 5.5.3]*

24. Page 5A-20. The evaluation for strategy E-25 appears to present a project to address distribution system pressurization requirements. Distribution-level projects are not appropriate for inclusion in the regional water plans per Contract Exhibit C, Section 5.5.3. Please ensure projects not required to increase the volume of water supply that is delivered to a WUG (e.g., via transmission) are omitted from the final, adopted regional water plan. *[Contract Exhibit C, Section 5.5.3]*
25. Chapter 5. The plan presents the documented process for identifying potentially feasible WMSs but does not appear to include the description of the process of selecting recommended WMS and WMS projects. Please include documentation of the process of selecting recommended WMSs and WMS projects in the final, adopted regional water plan. *[Contract Scope of Work, Task 5A subtask 5]*
26. Chapter 5. Please include documentation of why seawater desalination was not selected as a recommended WMSs in the final, adopted regional water plan. *[TWC § 16.053(e)(5)(j); Contract Exhibit C, Section 5.2; 31 § TAC 357.34(g)]*
27. Chapter 5. It is not clear from the plan what methodology was used to estimate the amount of future direct reuse water available from such sources. Please describe the methodology in the final, adopted regional water plan. *[Contract Exhibit C, Section 3.4]*
28. Chapter 5. It is not clear from the plan if or how environmental flow criteria were taken into account in the evaluation of the Riverside Regulating Reservoir strategy. Please confirm whether there would be a new appropriation of surface water required for this strategy, and if so, please clarify how environmental flow criteria were considered in strategy evaluations and document this information in the final, adopted regional water plan. *[31 TAC § 357.34(e)(3)(B); 31 TAC § 358.3(22); 31 TAC § 358.3(23)]*
29. Chapter 5. It is not clear if third-party social and economic impacts resulting from voluntary redistributions of water, including impacts of moving water from rural and agricultural areas, were considered in the evaluation of potentially feasible WMSs. Please clarify how these impacts were considered (or clarify if there are no impacts) in the final, adopted regional water plan. *[31 TAC § 357.34(e)(7)]*
30. Chapter 5. The plan does not appear to present management supply factors for MWPs. Please present management supply factors for MWPs by entity and decade in the final, adopted regional water plan. *[31 TAC § 357.35(g)(2)]*
31. Appendix 5A. The plan in some instances, presents WMSs as providing supplies in a given planning decade but notes the strategy is not expected to come online until after the initial year of the decade. For example, strategy evaluations E-1, E-2, E-13, E-14, appear to come online after the initial decade year they are shown as providing supply in. Please modify the online decade of these strategies to ensure

that WMSs shown as providing supply in a planning decade come online in or prior to the initial decade year in the final, adopted regional water plan. In the event that the resulting adjustment of the timing of WMSs in the plan results in an increase in near-term unmet water needs, please update the related portions of the plan and DB22 accordingly [31 TAC § 357.10(21); Contract Exhibit C, Section 5.2]

32. Chapter 5. The plan does not include the WMS project costing tool's output report for projects or analogously present the capital cost for each project component. Please submit the costing tool's standardized cost output report or present capital cost estimates for each project component for each WMS evaluated in the final, adopted regional water plan. [31 TAC § 357.34(f); 31 TAC § 358.3(21); Contract Exhibit C, Section 5.5.1]
33. Chapter 5 and Appendix 5A. From the information presented in the plan, it is not clear that all required capital cost components were evaluated for each strategy. For example, capital costs should consider the following as applicable: construction costs, engineering and feasibility studies, legal assistance, financing, bond counsel and contingencies, permitting and mitigation, land purchase not associated with mitigation, easement costs, and purchases of water rights. Please clarify the cost elements that were included in the strategy evaluations in the final, adopted regional water plan. [Contract Exhibit C, Section 5.5]
34. Units costs reported in DB22 appear notably high for the Hudspeth County - Hudspeth Co. WCID #1 - Replace Water Supply Line from Van Horn WMS. Unit costs are reported as \$37,282 in 2020 and 2030. Please confirm that the calculated unit costs are correct in DB22 and that costs were considered in WMS recommendations in the final, adopted regional water plan. [31 TAC § 357.34(e)(2)]
35. Page 5A-28. The plan appears to indicate that strategies E-37, E-38, and E-39 are intended to provide supplies for El Paso County-Other Vinton Hills Estates and County-Other Vinton Hills Subdivision. In DB22, strategy supplies for E-37, E-38, and E-39 appear to be assigned only to El Paso County-Other Vinton Hills Estates, leaving El Paso County-Other Vinton Hills Subdivision with unmet needs. Please reconcile the information presented in Table 4-4, Section 5A-10, and DB22 as necessary for the final, adopted regional water plan. [31 TAC § 357.40(c)]
36. Page 5-11. Section 5.2.7 notes that sufficient WMS supplies are recommended to meet the identified water needs of all WUGs except for irrigation needs in El Paso County. Table 4-4 and DB22 report unmet needs for several other WUGs including El Paso and Terrell County Mining and Culberson County Irrigation. Please reconcile this information as necessary in the final, adopted regional water plan. [31 TAC § 357.40(c)]
37. Section 5.4.7. The plan states that needs are met for all WUGs, however data reported in DB22 reflects unmet needs for Horizon Regional MUD and County-Other, Vinton Hills Subdivision. Please reconcile this data as necessary in DB22 or provide an adequate justification of unmet needs for municipal WUGs as outlined in

rule and contract guidance in the final, adopted regional water plan. [31 TAC § 357.50(j); Contract Exhibit C, Section 6.3]

38. Page 4-6, Table 4-4 and page 5-11, Section 5.2.7. It appears that identified unmet water needs are presented in Chapters 4 and 5 of the IPP. Please present discussion of unmet needs in Chapter 6 of the final, adopted regional water plan. [31 TAC § 357.40(c)]
39. Chapter 6. The plan does not appear to include a description of third-party social and economic impacts resulting from voluntary redistributions of water, including analysis of third-party impacts of moving water from rural and agricultural areas. Please include this information (or clarify if there are no impacts) in the final, adopted regional water plan. [31 TAC § 357.40(b)(4)]
40. Chapter 6. Please include a description of major impacts of recommended WMSs on key parameters of water quality in Chapter 6 of the final, adopted regional water plan. [31 TAC § 357.40(b)(5)]
41. Chapter 7, Section 7.3, page 7-20. The plan appears to include potential emergency interconnects in Table 7-2 but does not appear to include existing emergency interconnects or the methodology used to collect such information. Please include, at a minimum, a description of the methodology used to collect the information and the number of existing and potential interconnects, including who is connected to whom, in the final, adopted regional water plan. [31 TAC § 357.42(d)]
42. Section 7.4, page 7.21. Please confirm whether the entities evaluated for emergency responses to local drought conditions or loss of municipal supply were assumed to have 180 days or less of remaining supply. [Contract Exhibit C, Section 7.4]
43. Page 7-36, Section 7.5.4. The plan does not appear to include copies of the model drought contingency plans, and the referenced online link to the model plans do not appear to link to the referenced documents at the time of plan review. Please ensure operational links to the model plans if they are to be included only by online reference in the final, adopted regional water plan. [31 TAC § 357.42(j)]
44. Chapter 7. Model drought contingency plans were not provided for review. Please ensure that model drought contingency plans submitted with the final, adopted regional water plan at a minimum have triggers and responses to 'severe' and 'critical/emergency' drought conditions. [Contract Exhibit C, Section 7.6]
45. Chapter 7. The plan does not appear to include a discussion of whether drought contingency measures have been recently implemented in response to drought conditions. Please describe this in the final, adopted regional water plan. [Contract Scope of Work, Task 7, subtask 3]
46. Section 8.4, page 8-7. The plan describes stream segments that were recommended as ecologically unique in previous planning periods. Many of these stream segments have already been designated as unique by the Texas Legislature. Of the segments

included in the plan, please clearly distinguish between those segments that have already been designated and those segments which remain as recommended for designation in the final, adopted regional water plan. *[31 TAC § 357.43(b); Contract Exhibit C, Section 8.1]*

47. Section 8.4, Page 8-7. It is not clear whether the planning group is intending to recommend unique stream sites that were recommended in a previous plan but not designated by the legislature (i.e. Alamito Creek in the Trans Pecos Water Trust and Terlingua Creek in Big Bend National Park (2017 State Water Plan, Chapter 2)). If the planning group is recommending these sites for consideration by the TWDB and potentially the legislature, a recommendation package must be submitted to Texas Parks and Wildlife Department (TPWD) for their written evaluation. A copy of the recommendation package, the status of the submittal, and TPWD's response to the request, must be included in the final, adopted regional water plan. *[31 TAC § 357.43(b)]*
48. Chapter 10. The plan notes that all meetings were held in accordance with the Texas Open Meetings Act but does not discuss compliance with the Texas Public Information Act. Please address how the planning group complied with the Texas Public Information Act in the final, adopted regional water plan. *[31 TAC §357.21; 31 TAC §357.50(f)]*
49. Chapter 11, Table 11-1. The plan did not include implementation survey data collected to date. Please ensure that the template and data used for the implementation survey in the final, adopted regional water plan are based on the survey template and data that the TWDB provided in June 2019. *[31 TAC § 357.45(a)]*
50. Page 11-6, Table 11-4. Groundwater source availability and total source supply values presented for the 2021 Plan in Table 11-4 appear to be inconsistent with availabilities presented in Table 3-1 and DB22. Please reconcile these items as necessary in the final, adopted regional water plan. *[31 TAC § 357.45(c)(3)]*
51. Pages 11-9 through 11-11. Existing supply information presented in Table 11-6 for Brewster County, El Paso County, and Far West Texas total existing supplies appear to be inconsistent with total existing supplies presented in Table 3-2 and DB22. Please reconcile these items as necessary in the final, adopted regional water plan. *[31 TAC § 357.45(c)(3)]*
52. Page 11-12, Table 11-8. Needs reported in Table 11-8 for Culberson County irrigation, El Paso Water, Paseo Del Este MUD 1, and El Paso County irrigation appear to be inconsistent with needs reported in Table 4-1 and DB22. Please reconcile these items as necessary in the final, adopted regional water plan. *[31 TAC § 357.45(c)(3)]*
53. Section 11.2.6 and Section 5.2.5. The text in these sections present a total capital cost of all recommended WMSs in the 2021 Plan as \$2,169,328,445.00. This appears inconsistent with the reported total capital cost in DB22 of \$1,926,613,983. Please

reconcile these numbers as necessary in the final, adopted regional water plan. [31 TAC § 357.45(c)(4)]

54. Chapter 11, Section 11.2.6. Please provide a brief summary of how the 2016 Plan differs from the 2021 Plan with regards to alternative WMSs and WMS *projects* in the final, adopted regional water plan. [31 TAC § 357.45(c)(4)]
55. ES-Appendix. The plan includes some DB22 reports that appear blank due to the region not having relevant data for these reports. Please provide a cover page to the DB22 report appendix indicating the reason for these report contents being blank. [Contract Exhibit C, Section 13.1.2]

<p>Level 2: Comments and suggestions for consideration that may improve the readability and overall understanding of the regional water plan.</p>
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1. Page ES-12. The plan states "new to this 2016 plan..." Please consider updating the reference from the 2016 plan to the 2021 plan and update the information on recommended unique stream segments as appropriate.
2. Page 1-42. Table 1-2 does not appear to include data for all of the utilities provided in TWDB water loss audit reports. Please review the water loss audit report information provided by the TWDB and consider presenting information for all utilities with 2015-2016 water loss audit reports. Please also consider utilizing data from the 2017 water loss audit reports in the final plan.
3. Chapter 2, page 2-11, Table 2-3. Please consider explaining what the percentages mean, as assigned to some entities in the Receiving Entity column, in the final plan.
4. Pages 2-17 and 5-28. The plan appears to inconsistently present the total percent of water used for irrigated agriculture in the region in Sections 2.2.4 and 5.2.7. Please consider revising this information as necessary in the final plan.
5. Page 3-25. The methodology presented in Table 3-6 for Other Aquifer (Balmorhea Alluvium) in Jeff Davis County appears to contain the following typo "22017 reported use by GCD". Please consider revising as necessary in the final plan.
6. Page 3-25, Table 3-6 notes the methodology for the Edwards-Trinity (Plateau) and Rustler aquifers as "GCD (non-relevant) TWDB modeled". Please consider clarifying if this includes pumping from the associated modeled available groundwater run that was compatible with the DFC, which was provided to planning groups for consideration.
7. Page 3-25, Table 3-6. Please consider providing additional information on the methodology used to determine Hueco-Mesilla Aquifer availability by, for example, naming or citing models or reports used to determine aquifer availability. This could

be similar to the methodology information presented in item 14 of the 2018 Region E Technical Memorandum.

8. Section 5.2.7, page 5-11. Please consider including discussion of the unmet mining needs in the final plan.
9. Page 5A-4 states that the Study Butte Terlingua Water System is not an official WUG for regional water planning purposes, so that demand projections were not developed for them by TWDB. Please consider adding clarification that Study Butte Terlingua Water System is planned for, and demand projections accounted for under the Brewster County-Other WUG.
10. Page 5A-9 states that reuse is considered a conservation strategy by the TWDB. While the TWDB acknowledges that the municipal conservation best practices guide includes reuse, for regional water planning purposes reuse is considered its own water source and should not be classified as conservation (with the exception of onsite mining recycling). Please consider clarifying this statement in the final, adopted regional water plan. [*Contract Exhibit C, Section 5.6*]
11. Chapter 5, pages 5A-19 to 5A-20, WMS E-24. The plan recommends Public Conservation Education as a conservation strategy with a capital cost but does not provide detail on what would be included in such a cost. Please consider specifying the capitalized costs for this strategy.
12. Chapter 5. In the electronic version of the plan, Section headings in Subchapter 5.5 appear to relate to Subchapter 5.3. Please review the section numbering in Subchapter 5.5 and revise as necessary to correspond with the appropriate subchapter.
13. Page 5-22. Please consider including that all entities with 3,300 or more connections and/or a financial obligation with TWDB greater than \$500,000 are also required to submit water conservation plans.
14. Chapter 7. Please consider including all of the potential emergency interconnects noted in Table 7-2 in the list of potential emergency interconnects in Table 7-3, if appropriate.
15. Table of Contents. The section title for Section 5.2 in the table of contents has a typo. Please consider correcting EVAULATION to EVALUATION in the final plan.
16. Table of Contents. The table of contents appears to contain inconsistent references for the contents of Section 5.2 in the draft plan. Please review and revise as necessary in the final plan.
17. The GIS files submitted for WMS projects do not adhere to the contractually required naming convention. Please rename the GIS files following the naming convention outlined in Contract Exhibit D, Section 2.4.5 in the final GIS files submitted. [*Contract Exhibit D, Section 2.4.5*]

18. The GIS files submitted for WMS projects do not include all of the required attribute fields listed in Table 1 of Contract Exhibit D, Section 2.4.5. Please include the following attribute fields in all submitted WMS project GIS data with the final GIS files submitted: Sponsor, Name, Location Description, Project Components, and Datum. *[Contract Exhibit D, Section 2.4.5]*