



P.O. Box 13231, 1700 N. Congress Ave.  
Austin, TX 78711-3231, [www.twdb.texas.gov](http://www.twdb.texas.gov)  
Phone (512) 463-7847, Fax (512) 475-2053

## AGENDA ITEM MEMO

**BOARD MEETING DATE:** August 15, 2024

**TO:** Board Members

**THROUGH:** Bryan McMath, Interim Executive Administrator  
Ashley Harden, General Counsel  
Rebecca Trevino, Chief Financial Officer  
Jessica Peña, DEA, Water Supply & Infrastructure

**FROM:** Marvin Cole-Chaney, Director, Program Administration & Reporting

**SUBJECT:** Texas Water Fund Prioritized Water Loss Mitigation Projects

### ACTION REQUESTED

Consider approving the prioritized list of projects to receive Texas Water Fund monies through the Rural Water Assistance Fund or Water Loan Assistance Fund.

### BACKGROUND

In 2023, the 88th Texas Legislature passed Senate Bill (SB) 28 and Senate Joint Resolution (SJR) 75 providing for the creation of the Texas Water Fund. In addition, SB 30 authorized a one-time, \$1 billion supplemental appropriation of general revenue to the Texas Water Fund, contingent on enactment of SB 28 and approval of SJR 75 by voters. Proposition 6 (the proposition for SJR 75), creating the Texas Water Fund to assist in financing water projects in Texas, passed on November 7, 2023, with more than 77 percent in favor.

On July 23, 2024, the Executive Administrator presented a Texas Water Fund implementation plan intended to meet statutory directives and be responsive to stakeholder feedback. Within the plan, several components were identified for distributing the \$1 billion supplemental appropriation. Of these components, one referenced providing funding through the Rural Water Assistance Fund and another providing funding through the Water Loan Assistance Fund for water conservation/water loss projects. The total amount proposed for those two funding programs was \$265 million.

To potentially meet the statutory directives in SB 28, in December 2023 the TWDB encouraged water and wastewater systems to submit Project Information Forms that included water conservation and water loss projects in response to the agency's Drinking

#### Our Mission : Board Members

Leading the state's efforts  
in ensuring a secure  
water future for Texas

Brooke T. Paup, Chairwoman | L'Oreal Stepney, P.E., Board Member  
Bryan McMath, Interim Executive Administrator

Water and Clean Water SRF State Fiscal Year 2025 solicitation. The TWDB received 68 Project Information Forms for water conservation and water loss projects, totaling over \$607 million, in response to the 2025 solicitation.

An opportunity was provided for public comment on the prioritized lists from July 24, 2024, to August 5, 2024. The comments received, along with responses from TWDB staff, are included in Attachment 3.

### **KEY ISSUES**

The prioritization criteria applied to the projects focused on five areas:

1. The service area's Annual Median Household Income (max 40 points),
2. The proposed project's Household Cost Factor (max 5 points),
3. Whether the project addresses a Real Water Loss (max 20 points),
4. Specifically, the type of water loss addressed (max 15 points), and
5. If the applicant was a rural entity (max 5 points).

There was an additional tiebreaker awarded to those systems that service the fewest number of service connections. The detailed list of criteria and points awarded to each are found in Attachment 2 to this item.

The list of projects received was divided into three separate lists based on the population served by the system; Less than 1,000 population served, Population between 1,000 and 10,000, and Population between 10,000 and 150,000. The prioritized project lists are found in Attachment 1 to this item. Following an approval of the prioritized lists, the TWDB will invite applicants to submit a full financial application following a pre-application conference.

### **RECOMMENDATION**

The Executive Administrator recommends approval of the three prioritized lists of projects set forth in Attachment 1 with the ability to make any changes to the projects' rank should there be any changes affecting the originally awarded points from the prioritization criteria. Projects will be invited in priority order, with the exception of those that are considered Construction-Ready.

Attachment(s):

1. TWF Combined Priority List of Projects
2. Water Loss Project Prioritization Criteria and Construction-Ready Reserve
3. TWDB Responses to Public Comments

**Texas Water Fund - Water Loss Mitigation Projects**  
**Draft Priority List of Projects - Less Than 1,000 Population Served**

| <b>Rank</b>   | <b>Entity/Applicant<br/>(Requestor)</b> | <b>PWS ID</b> | <b>Project Name</b>   | <b>Fund</b> | <b>Eligible Costs</b> | <b>Service<br/>Connections</b> | <b>Population</b> | <b>Rural<br/>Applicant</b> | <b>Pts WL<br/>Proj Type</b> | <b>Pts WL Type<br/>Addressed</b> | <b>Pts<br/>AMHI</b> | <b>Pts<br/>HCF</b> | <b>TOTAL<br/>POINTS</b> | <b>RANK</b> | <b>RWAF<br/>Eligible</b> | <b>WLAF<br/>Eligible</b> |
|---------------|---|---------------|---|-------------|-----------------------|--------------------------------|-------------------|----------------------------|-----------------------------|----------------------------------|---------------------|--------------------|-------------------------|-------------|--------------------------|--------------------------|
| 1             | Arimak WSC                              | TX1330135     | 2025 DWSRF Water System Improvements  | DWSRF       | \$ 955,000            | 35                             | 54                | 5                          | 20                          | 15                               | 30                  | 5                  | 75                      | 1           | Yes                      | Yes                      |
| 2             | Benjamin                                | TX1380011     | Automated Meter Reading (AMR) System and Water Service Line Replacement       | DWSRF       | \$ 400,000            | 118                            | 200               | 5                          | 20                          | 15                               | 30                  | 5                  | 75                      | 2           | Yes                      | Yes                      |
| 3             | Evant                                   | TX0500015     | Water System Improvements   | DWSRF       | \$ 1,263,000          | 240                            | 450               | 5                          | 20                          | 15                               | 30                  | 5                  | 75                      | 3           | Yes                      | Yes                      |
| 4             | Alba                                    | TX2500005     | Rehab Water Storage Tanks (EST & GST) and Generators                          | DWSRF       | \$ 1,817,000          | 376                            | 570               | 5                          | 20                          | 0                                | 30                  | 5                  | 60                      | 4           | Yes                      | Yes                      |
| 5             | Groveton                                | TX2280001     | City of Groveton Water Improvements   | DWSRF       | \$ 4,261,250          | 649                            | 918               | 5                          | 20                          | 0                                | 30                  | 5                  | 60                      | 5           | Yes                      | Yes                      |
| 6             | Strawn                                  | TX1820005     | Water System Improvements   | DWSRF       | \$ 367,500            | 382                            | 759               | 5                          | 0                           | 15                               | 30                  | 5                  | 55                      | 6           | Yes                      | Yes                      |
| 7             | D & M WSC                               | TX1740010     | D&M WSC Water System Improvements   | DWSRF       | \$ 4,276,407          | 226                            | 678               | 5                          | 20                          | 0                                | 20                  | 5                  | 50                      | 7           | Yes                      | Yes                      |
| 8             | Graford                                 | TX1820003     | Water Distribution Line Replacements, SCADA and Metering Systems Improvements | DWSRF       | \$ 555,000            | 354                            | 736               | 5                          | 20                          | 0                                | 20                  | 5                  | 50                      | 8           | Yes                      | Yes                      |
| 9             | Red River Authority                     | TX2440008     | RRA Lockett Water System Improvements   | DWSRF       | \$ 2,464,000          | 285                            | 705               | 5                          | 20                          | 15                               | 0                   | 0                  | 40                      | 9           | Yes                      | Yes                      |
| 10            | Grantwoods WSC                          | TX1010130     | Waterline upgrade and rehabilitation  | DWSRF       | \$ 244,000            | 26                             | 78                | 0                          | 20                          | 15                               | 0                   | 0                  | 35                      | 10          | No                       | Yes                      |
| 11            | Mooreville WSC                          | TX0730015     | Mooreville WSC Water System Improvements                                      | DWSRF       | \$ 4,606,000          | 72                             | 199               | 5                          | 20                          | 15                               | 0                   | 0                  | 40                      | 11          | Yes                      | Yes                      |
| 12            | Penelope WSC                            | TX1090026     | Water Distribution System Improvements  | DWSRF       | \$ 300,000            | 95                             | 206               | 5                          | 20                          | 15                               | 0                   | 0                  | 40                      | 12          | Yes                      | Yes                      |
| 13            | Chappell Hill WSC                       | TX2390003     | Water System Capital Improvements Projects                                    | DWSRF       | \$ 4,056,503          | 220                            | 704               | 5                          | 20                          | 15                               | 0                   | 0                  | 40                      | 13          | Yes                      | Yes                      |
| 14            | Matador WD                              | TX1730001     | Matador WD 2024 Water System Improvements                                     | DWSRF       | \$ 13,657,000         | 398                            | 607               | 5                          | 20                          | 15                               | 0                   | 0                  | 40                      | 14          | Yes                      | Yes                      |
| 15            | Tom Green Co FWSD # 2                   | TX2260004     | Water System Improvement  | DWSRF       | \$ 400,000            | 282                            | 440               | 5                          | 0                           | 0                                | 20                  | 5                  | 30                      | 15          | Yes                      | Yes                      |
| 16            | East Medina Co SUD                      | TX1630029     | Creekwood - Interconnection with PWS 1630020                                  | DWSRF       | \$ 2,128,400          | 165                            | 450               | 5                          | 20                          | 0                                | 0                   | 0                  | 25                      | 16          | Yes                      | Yes                      |
| 17            | Winkler WSC                             | N/A           | Winkler WSC Meter Replacement Project   | CWSRF       | \$ 402,000            | 446                            | 956               | 5                          | 0                           | 15                               | 0                   | 0                  | 20                      | 17          | Yes                      | Yes                      |
| <b>Total:</b> |   |               |   |             | <b>\$ 42,153,060</b>  |                                |                   |                            |                             |                                  |                     |                    |                         |             |                          |                          |

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Pts WL Type Addressed – Points awarded to Water Loss Projects that address the type of water loss identified as above the threshold (31 TAC 358.6(e)) in the water loss audit.

Pts AMHI – Points awarded based on a system’s service area Annual Median Household Income compared to the State’s Annual Median Household Income.

Pts HCF – Points awarded based on a system’s service area Household Cost Factor compared to the agency’s 2.00% threshold.

RWAF or WLAF Eligible – Represents preliminary eligibility under either of these programs. A final eligibility determination for either of these programs will take place once a completed financial assistance application is received.

**Texas Water Fund - Water Loss Mitigation Projects**  
**Draft Priority List of Projects - 1,000 to 10,000 Population Served**

| Rank | Entity/Applicant<br>(Requestor) | PWS ID    | Project Name   | Fund  | Eligible Costs | Service<br>Connections | Population | Rural<br>Applicant | Pts WL<br>Proj Type | Pts WL Type<br>Addressed | Pts<br>AMHI | Pts<br>HCF | TOTAL<br>POINTS | RANK | RWAF<br>Eligible | WLAF<br>Eligible |
|------|---------------------------------|-----------|--|-------|----------------|------------------------|------------|--------------------|---------------------|--------------------------|-------------|------------|-----------------|------|------------------|------------------|
| 1    | Paducah                         | TX0510001 | Paducah 2024 Water System Improvements   | DWSRF | \$ 22,711,000  | 590                    | 1,186      | 5                  | 20                  | 15                       | 40          | 5          | 85              | 1    | Yes              | Yes              |
| 2    | Corrigan                        | TX1870001 | New Water Well, GST and Pump Station, Line Work  | DWSRF | \$ 3,957,600   | 686                    | 1,852      | 5                  | 20                  | 15                       | 30          | 5          | 75              | 2    | Yes              | Yes              |
| 3    | Honey Grove                     | TX0740003 | 2025 DWSRF Honey Grove Water System Improvements   | DWSRF | \$ 4,196,000   | 852                    | 1,715      | 5                  | 20                  | 15                       | 30          | 5          | 75              | 3    | Yes              | Yes              |
| 4    | Daingerfield                    | TX1720001 | Water System Upgrades  | DWSRF | \$ 3,465,000   | 1,347                  | 2,522      | 5                  | 20                  | 15                       | 30          | 5          | 75              | 4    | Yes              | Yes              |
| 5    | Hamilton                        | TX0970001 | City of Hamilton Water Distribution System Improvements                                      | DWSRF | \$ 2,532,337   | 1,497                  | 3,200      | 5                  | 20                  | 15                       | 30          | 5          | 75              | 5    | Yes              | Yes              |
| 6    | Stamford                        | TX1270003 | Stamford 2025 Water System Improvements  | DWSRF | \$ 4,479,000   | 1,532                  | 2,941      | 5                  | 20                  | 15                       | 30          | 5          | 75              | 6    | Yes              | Yes              |
| 7    | Winters                         | TX2000003 | City of Winters Water Distribution System Improvements                                       | DWSRF | \$ 3,750,500   | 1,918                  | 2,580      | 5                  | 20                  | 15                       | 30          | 5          | 75              | 7    | Yes              | Yes              |
| 8    | Cleveland                       | TX1460001 | Cleveland Water Line Improvements Project  | DWSRF | \$ 14,615,000  | 3,100                  | 7,756      | 5                  | 20                  | 15                       | 30          | 5          | 75              | 8    | Yes              | Yes              |
| 9    | Bandera                         | TX0100012 | City of Bandera Water Supply Improvements  | DWSRF | \$ 2,755,800   | 1,070                  | 3,066      | 5                  | 20                  | 0                        | 40          | 5          | 70              | 9    | Yes              | Yes              |
| 10   | Weimar                          | TX0450004 | New Water Well 11 and Associated Water System Improvements                                   | DWSRF | \$ 5,620,000   | 1,082                  | 2,076      | 5                  | 0                   | 15                       | 40          | 5          | 65              | 10   | Yes              | Yes              |
| 11   | Jefferson                       | TX1580001 | Drinking Water System Improvements   | DWSRF | \$ 6,040,000   | 1,325                  | 1,883      | 5                  | 20                  | 15                       | 20          | 5          | 65              | 11   | Yes              | Yes              |
| 12   | Ames-Minglewood WSC             | TX1460005 | AMES - Minglewood WSC - Water System Improvements  | DWSRF | \$ 4,045,000   | 568                    | 1,704      | 5                  | 20                  | 0                        | 30          | 5          | 60              | 12   | Yes              | Yes              |
| 13   | Santa Anna                      | TX0420002 | Water 2025 Distribution Improvements   | DWSRF | \$ 7,511,000   | 772                    | 1,014      | 5                  | 20                  | 0                        | 30          | 5          | 60              | 13   | Yes              | Yes              |
| 14   | Red River Co WSC                | TX1940008 | Water System Facility Improvements   | DWSRF | \$ 12,793,280  | 2,606                  | 6,541      | 5                  | 20                  | 0                        | 30          | 5          | 60              | 14   | Yes              | Yes              |
| 15   | Mineola                         | TX2500002 | Phase 1 Water System Improvements  | DWSRF | \$ 5,500,000   | 2,718                  | 4,515      | 5                  | 20                  | 0                        | 30          | 5          | 60              | 15   | Yes              | Yes              |
| 16   | Harris Co FWSD # 1A             | TX1010082 | Smart Meters & Smart Fire Hydrants   | DWSRF | \$ 649,000     | 1,106                  | 2,166      | 0                  | 0                   | 15                       | 30          | 5          | 50              | 16   | No               | Yes              |
| 17   | Keene                           | TX1260008 | Water Supply and Distribution System Improvements  | DWSRF | \$ 3,523,000   | 2,293                  | 6,266      | 5                  | 20                  | 0                        | 20          | 5          | 50              | 17   | Yes              | Yes              |
| 18   | Brady                           | TX1540001 | Brady 2024 Water System Improvements   | DWSRF | \$ 4,701,000   | 3,262                  | 5,371      | 5                  | 20                  | 0                        | 20          | 5          | 50              | 18   | Yes              | Yes              |
| 19   | East Medina Co SUD              | TX1630030 | Unit 3 - Interconnect with Unit 1 along FM 1343 to UPRR                                      | DWSRF | \$ 3,759,000   | 463                    | 1,474      | 5                  | 20                  | 15                       | 0           | 0          | 40              | 19   | Yes              | Yes              |
| 20   | Lexington                       | TX1440002 | Smart Metering System  | DWSRF | \$ 1,370,000   | 764                    | 1,217      | 5                  | 0                   | 0                        | 30          | 5          | 40              | 20   | Yes              | Yes              |
| 21   | East Medina Co SUD              | TX1630020 | Unit 2 - Plant 4 Elevated Storage Tank   | DWSRF | \$ 1,957,000   | 783                    | 2,406      | 5                  | 20                  | 15                       | 0           | 0          | 40              | 21   | Yes              | Yes              |
| 22   | East Medina Co SUD              | TX1630020 | Unit 2 - Interconnect with Unit 1 along SH 173   | DWSRF | \$ 7,533,000   | 783                    | 2,406      | 5                  | 20                  | 15                       | 0           | 0          | 40              | 22   | Yes              | Yes              |
| 23   | Corix Utilities                 | TX2390043 | Corix NEWC Water Systems Improvements  | DWSRF | \$ 71,942,000  | 1,119                  | 3,357      | 5                  | 20                  | 15                       | 0           | 0          | 40              | 23   | Yes              | Yes              |
| 24   | Big Lake                        | TX1920001 | Big Lake 2025 DWSRF Water System Improvements  | DWSRF | \$ 1,818,500   | 1,400                  | 2,936      | 5                  | 20                  | 15                       | 0           | 0          | 40              | 24   | Yes              | Yes              |
| 25   | Stephens Regional SUD           | TX2150007 | SRSUD 2025 Water System Distribution Improvements  | DWSRF | \$ 13,310,000  | 1,603                  | 3,173      | 5                  | 0                   | 0                        | 30          | 5          | 40              | 25   | Yes              | Yes              |
| 26   | Springtown                      | TX1840003 | City of Springtown-Water System Improvements   | DWSRF | \$ 6,200,000   | 1,833                  | 3,232      | 5                  | 20                  | 15                       | 0           | 0          | 40              | 26   | Yes              | Yes              |
| 27   | East Medina Co SUD              | TX1630010 | Unit 1 - Complete Loop on FM 1343 and Interconnect with Unit 2                               | DWSRF | \$ 7,442,500   | 1,978                  | 5,942      | 5                  | 20                  | 15                       | 0           | 0          | 40              | 27   | Yes              | Yes              |
| 28   | Hitchcock                       | TX0840004 | Hitchcock Water System Improvements Project  | DWSRF | \$ 25,240,000  | 2,700                  | 7,341      | 5                  | 20                  | 15                       | 0           | 0          | 40              | 28   | Yes              | Yes              |
| 29   | McCoy WSC                       | TX0070023 | McCoy WSC rehabilitation, repair and adding new water storage capacity to address new growth | DWSRF | \$ 11,975,000  | 3,266                  | 9,798      | 5                  | 20                  | 15                       | 0           | 0          | 40              | 29   | Yes              | Yes              |
| 30   | Chatt WSC                       | TX1090020 | Chatt WSC Water Meter Replacements   | DWSRF | \$ 521,475     | 363                    | 1,089      | 5                  | 0                   | 0                        | 20          | 0          | 25              | 30   | Yes              | Yes              |
| 31   | New Summerfield                 | TX0370028 | New Water Well, Elevated Storage Tank, Line Work / System Improvements                       | DWSRF | \$ 3,915,000   | 507                    | 1,441      | 5                  | 20                  | 0                        | 0           | 0          | 25              | 31   | Yes              | Yes              |
| 32   | Crescent Heights WSC            | TX1070016 | New Water Well and pressure facilities   | DWSRF | \$ 4,053,500   | 645                    | 1,935      | 5                  | 20                  | 0                        | 0           | 0          | 25              | 32   | Yes              | Yes              |
| 33   | Grandview                       | TX1260004 | Water Distribution Improvements  | DWSRF | \$ 4,263,000   | 700                    | 1,841      | 5                  | 20                  | 0                        | 0           | 0          | 25              | 33   | Yes              | Yes              |
| 34   | View Caps WSC                   | TX2210004 | View-Caps WSC 2024 DWSRF Water System Improvements   | DWSRF | \$ 6,023,000   | 807                    | 2,421      | 0                  | 20                  | 0                        | 0           | 0          | 20              | 34   | No               | Yes              |
| 35   | Mount Vernon                    | TX0800001 | City Wide Water Distribution System Improvements and Raw Water Supply Improvements           | DWSRF | \$ 10,703,090  | 1,238                  | 2,662      | 5                  | 20                  | 0                        | 0           | 0          | 25              | 35   | Yes              | Yes              |
| 36   | South Freestone WSC             | TX0810005 | South Freestone County WSC Freestone Area Improvements                                       | DWSRF | \$ 1,387,507   | 1,284                  | 3,762      | 5                  | 20                  | 0                        | 0           | 0          | 25              | 36   | Yes              | Yes              |
| 37   | Abernathy                       | TX0950001 | Water System Improvements  | DWSRF | \$ 2,532,050   | 1,312                  | 2,865      | 5                  | 20                  | 0                        | 0           | 0          | 25              | 37   | Yes              | Yes              |
| 38   | Hawley WSC                      | TX1270006 | Hawley WSC 2025 DWSRF Water System Improvements  | DWSRF | \$ 26,764,000  | 2,610                  | 7,830      | 5                  | 20                  | 0                        | 0           | 0          | 25              | 38   | Yes              | Yes              |
| 39   | Hardin Co WCID # 1              | TX1000016 | Hardin County WCID No. 1 - Water System Improvements Project                                 | DWSRF | \$ 4,138,000   | 430                    | 1,290      | 5                  | 0                   | 0                        | 0           | 0          | 5               | 39   | Yes              | Yes              |
| 40   | Millsap WSC                     | TX1840007 | Water System Improvements  | DWSRF | \$ 983,500     | 494                    | 1,477      | 5                  | 0                   | 0                        | 0           | 0          | 5               | 40   | Yes              | Yes              |
|      |                                 |           |  |       | <b>Total:</b>  | <b>\$ 330,675,639</b>  |            |                    |                     |                          |             |            |                 |      |                  |                  |

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**Texas Water Fund - Water Loss Mitigation Projects**  
**Draft Priority List of Projects - 10,000 to 150,000 Population Served**

| <u>Rank</u>   | <u>Entity/Applicant</u><br><u>(Requestor)</u> | <u>PWS ID</u> | <u>Project Name</u>   | <u>Fund</u> | <u>Eligible Costs</u> | <u>Service</u><br><u>Connections</u> | <u>Population</u> | <u>Rural</u><br><u>Applicant</u> | <u>Pts WL</u><br><u>Proj Type</u> | <u>Pts WL Type</u><br><u>Addressed</u> | <u>Pts</u><br><u>AMHI</u> | <u>Pts</u><br><u>HCF</u> | <u>TOTAL</u><br><u>POINTS</u> | <u>RANK</u> | <u>RWAF</u><br><u>Eligible</u> | <u>WLAF</u><br><u>Eligible</u> |
|---------------|---|---------------|---|-------------|-----------------------|--------------------------------------|-------------------|----------------------------------|-----------------------------------|--|---------------------------|--------------------------|-------------------------------|-------------|--------------------------------|--------------------------------|
| 1             | Breckenridge                                  | TX2150001     | Breckenridge 2025 Water System Improvements                                     | DWSRF       | \$ 5,727,000          | 3,419                                | 10,616            | 5                                | 20                                | 15                                     | 30                        | 5                        | 75                            | 1           | No                             | Yes                            |
| 2             | Bonham  | TX0740001     | City of Bonham - 2025 TWDB Water System Improvements                            | DWSRF       | \$ 14,444,100         | 5,732                                | 10,408            | 5                                | 20                                | 15                                     | 20                        | 5                        | 65                            | 2           | No                             | Yes                            |
| 3             | East Rio Hondo WSC                            | TX0310096     | ERHWSC North Cameron Regional Distribution Transmission Main                    | DWSRF       | \$ 17,115,170         | 11,425                               | 34,275            | 0                                | 20                                | 15                                     | 20                        | 5                        | 60                            | 3           | No                             | Yes                            |
| 4             | Denison                                       | TX0910003     | City of Denison Water Distribution Improvements Project For Disadvantaged Areas | DWSRF       | \$ 16,950,000         | 10,000                               | 24,872            | 0                                | 20                                | 0                                      | 30                        | 5                        | 55                            | 4           | No                             | Yes                            |
| 5             | Harlingen Water Works System                  | TX0310002     | Jefferson St. Raw Water Pipeline Upgrade  | DWSRF       | \$ 8,805,000          | 25,648                               | 73,354            | 0                                | 20                                | 0                                      | 20                        | 5                        | 45                            | 5           | No                             | Yes                            |
| 6             | Harlingen Water Works System                  | TX0310002     | N. 1st St. Water Main Replacement Program                                       | DWSRF       | \$ 8,305,000          | 25,648                               | 73,354            | 0                                | 20                                | 0                                      | 20                        | 5                        | 45                            | 6           | No                             | Yes                            |
| 7             | Splendora                                     | TX1700087     | Water Main Improvements   | DWSRF       | \$ 10,481,800         | 3,212                                | 10,920            | 0                                | 20                                | 15                                     | 0                         | 0                        | 35                            | 7           | No                             | Yes                            |
| 8             | G-M WSC                                       | TX2020067     | Water Distribution Improvements   | DWSRF       | \$ 5,152,640          | 3,516                                | 11,220            | 5                                | 20                                | 15                                     | 0                         | 0                        | 40                            | 8           | No                             | Yes                            |
| 9             | Harlingen Water Works System                  | N/A           | AMI & Meter Upgrade Program   | CWSRF       | \$ 21,435,000         | 25,648                               | 73,354            | 0                                | 0                                 | 0                                      | 20                        | 5                        | 25                            | 9           | No                             | Yes                            |
| <b>Total:</b> |   |               |   |             | <b>\$108,415,710</b>  |                                      |                   |                                  |                                   |  |                           |                          |                               |             |                                |                                |

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# Attachment 2: Water Loss Project Prioritization Criteria and Construction-Ready Reserve

| <u>Criteria</u>  | <u>Points</u> |
|--|---------------|
| 1. Annual Median Household Income (AMHI)   |               |
| Service Area AMHI is less than or equal to 50% of the State AMHI.....  | 40            |
| Service Area AMHI is less than or equal to 65% but not less than 50% of the State AMHI.....  | 30            |
| Service Area AMHI is less than or equal to 75% but not less than 65% of the State AMHI.....  | 20            |
| Service Area AMHI is greater than 75% of the State AMHI.....   | 0             |
| 2. Household Cost Factor   |               |
| Household Cost Factor of the project is equal to or above 2%.....  | 5             |
| Household Cost Factor of the project is below 2%.....  | 0             |
| 3. Project Addresses Real Water Loss   |               |
| Project addresses any real water loss.....   | 20            |
| 4. Type of Water Loss Addressed  |               |
| Project addresses the type of water loss identified as above the threshold (31 TAC § 358.6 (e))<br>in the water loss audit .....   | 15            |
| 5. Rural Applicants  | 5             |
| (A) a nonprofit water supply or sewer service corporation created and operating under Chapter 67 of the Texas Water Code or a district or authority created under Section 52, Article III, or Section 59, Article XVI, Texas Constitution, no part of the service area of which is located in an urban area with a population of more than 50,000; |               |
| (B) a municipality:  |               |
| (i) with a population of 10,000 or less no part of the service area of which is located in an urban area with a population of 50,000 or more; or   |               |
| (ii) located wholly in a county in which no urban area has a population of more than 50,000;   |               |
| (C) a county in which no urban area has a population of more than 50,000; or   |               |
| (D) an entity that:  |               |
| (i) is a nonprofit water supply or sewer service corporation created and operating under Chapter 67 of the Texas Water Code, a district or authority created under Section 52,   |               |

Article III, or Section 59, Article XVI, Texas Constitution, a municipality, county, or other political subdivision of the state, or an interstate compact commission to which the state is a party; and

(ii) demonstrates in a manner satisfactory to the Board that the entity is rural or the area to be served by the project is a wholly rural area despite not otherwise qualifying under Paragraph (A), (B), or (C).

## **Maximum Number of Points**

**85**

### **6. Tiebreaker**

In the event of a tie in the scoring, priority will be given to the system serving the fewest number of service connections.

## **Construction-Ready Reserve**

Projects are considered construction-ready if

1. an applicant requests funding only for construction activities (i.e., they are not seeking planning and design funding from the TWDB) and can submit an approvable Engineering Feasibility Report (EFR) with their financial application; or,
2. an applicant has all applicable permitting aspects of the project (e.g., acquisition of water rights, Certificate of Convenience and Necessity (CCN), TCEQ approval and completion of piloting for the project, TCEQ wastewater discharge permit for wastewater treatment plant construction or wastewater reuse authorization) and an environmental review has been substantially completed<sup>1</sup>.

The Board may bypass a higher scoring project, if necessary, to fulfill this allocation goal. If an applicant's financial application does not meet this definition of construction-ready, and the project was brought in under this bypass provision, TWDB staff will hold completing the application review of this project until other higher scoring projects have been invited to apply are committed. The project will be reconsidered in priority order, provided funds remain available.

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<sup>1</sup> Applicant will submit sufficient information with the financial application to support one of the three potential responses: 1) a Finding of No Significant Impact (FNSI), Categorical Exclusion (CE), a Record of Decision (ROD), or an environmental determination prepared by another entity; 2) the project meets the criteria to receive a categorical exclusion in compliance with TWDB rules; or 3) the applicant can submit an environmental report that documents coordination with other agencies has proceeded sufficiently to determine that no major issues remain.

**Texas Water Development Board**  
**Response to Comments on the Texas Water Fund – Water Loss Mitigation**  
**Project Prioritization Lists**

The following provides a summary of the public comments received during the public comment period from July 24, 2024, to August 5, 2024, the Texas Water Development Board (TWDB) responses, and changes to the draft Texas Water Fund – Water Loss Mitigation Project Prioritization Lists.

**General Comments**

**Comment submitted by:** Angie Ramos

**Comment Date:** July 25, 2024

**Comment:**

While I can appreciate what the Texas Water Fund Project is trying to do, I don't understand why the age of the system isn't a consideration but median household income is. Our neighborhood once had a couple hundred houses; however, due to flooding most of those houses were bought out by the flood district. Now we have 22 houses with water distribution lines over 50 years that routinely bust and leak. That significantly increases the cost per household to replace the lines. I feel like giving weight to projects by income penalizes our small community.

As a lay person trying to understand all the minutia for selecting projects is difficult, so I might be missing something. Am I wrong to think that the age of a water distribution system isn't a factor that is considered? Or even the number of service connections?

**Response:**

Thank you for comment regarding the Texas Water Fund – Water Loss Mitigation Project Prioritization Lists.

Age of the water system was not a factor taken into consideration for this project prioritization. Many water systems in Texas are quite old, but the degree of deterioration varies greatly based on maintenance, investments into the systems, soil types, extreme weather events and several other factors. It is also difficult to determine the specific “age” of a water system, as different areas of the system are generally built and replaced at different times. While your suggestion is understood, the reporting and validation of system age, and the usage of that information for prioritization purposes would be very difficult and at times inaccurate.

**Change:**

None



**Comment submitted by:** Mike Sandefur

**Comment Date:** July 26, 2024

**Comment:**

I strongly support the prioritization of using the funding to assist rural water districts. It is very hard to maintain the infrastructure of rural areas that do not have the density or revenue stream to support maintenance, much less required upgrades. Ever-increasing federal and other regulatory standards put continued pressure on rural utility service without sufficient ability to fund compliance. Rural rate structures are typically higher than average to start with, and cannot support infrastructure costs without help from the TWDB. Our rural areas are important, and such directed funding is the least our state can do.

**Response:**

Thank you for comment regarding the Texas Water Fund – Water Loss Mitigation Project Prioritization Lists.

**Change:**

None

**Comment submitted by:** Stephen Thornhill

**Comment Date:** July 30, 2024

**Comment:**

Due to the goal of reducing water loss, I support this project.

**Response:**

Thank you for comment regarding the Texas Water Fund – Water Loss Mitigation Project Prioritization Lists.

**Change:**

None

**Comment submitted by:** John Asbury

**Comment Date:** August 3, 2024

**Comment:**

With the surface water resources of Texas approaching their maximal use and the ground aquifer extraction any many areas far exceeding the natural recharge amount of the aquifer good conservation projects are needed. The update of leaky infrastructures situation are necessary for sure. Funding new conservation of water usage is always a good idea. Encouraging high water user to locate in the eastern part of the state is to be encouraged. Use of salt water along the coast to cooling tower water may be a good way to use funds. Limiting irrigation to crops that can be grown elsewhere should be

encourage. Cotton, sorghum, and corn is better than rice. Fund education program for this activity. One of the biggest water sources in Texas that is being neglected is the excess water flows in Texas rivers during wet event times, ie: this spring in the eastern half of the state from the Brazos River eastward. Having facilities in place to return this water to the aquifers in a rapid low-cost manner for future use is needed. Complex as it will require a rapid decision process to decide when and where to recharge the aquifers is good quality water will be necessary. If is put there we will use it sooner or later. Deep aquifer storage water average several thousand years old. Have to meet downstream requirements before injecting the water into the aquifer. In central Texas, from Lakes Whitney, Waco, Stillhouse and Belton released over 800,000 acre feet of water to return the over full lakes to conservation level. This amount of water far exceeded any downstream requirements. It flowed into the Gulf of Mexico. It takes a water molecule 3000 years in the ocean to evaporate back into the atmosphere from the gulf to then fall as rain on Texas. The Texas Water Board has a plan to recommend how many feet a year the aquifers in Texas may be drawn down. Desire future condition which means there is less water in the aquifers each year. Let's see if we can fund a program to see how much water Texas has had historically and does have now to recharge certain aquifers with this unused water in a cost effective manner. Each year we wait, the lower the aquifer gets. It's sustainable like buying a big bag of Cheetos at Buckeye to last until the next Buckeyes but end up with less water in Texas aquifers for future Texans. We also do the same dern thing with our national debt. We are used water treatment plants to additional water with the motto "Flush twice for more Texas water'. Have a good day, John Asbury , Temple, Texas

**Response:**

Thank you for comment regarding the Texas Water Fund – Water Loss Mitigation Project Prioritization Lists.

The funding of these water loss mitigation projects is just one component of the Texas Water Fund. Other components, which we believe address some of your comments regarding education about water conservation and finding alternative sources of water supply, are listed below.

Statewide Public Awareness Program: A newly created account that will direct funds toward a statewide public awareness program. This program can help to create educational materials and provide outreach to educate residents of this state about water. The program shall take into account the difference in water needs of various geographic regions of the state and shall be designed to complement and support existing local and regional water education or awareness programs.

New Water Supply for Texas Fund: a special fund in the state treasury administered by the TWDB. The fund may be used for the following purposes:

(1) To provide financial assistance to political subdivisions of the state to develop water supply projects that create new water sources for the state, including:

- desalination projects, including marine and brackish water desalination;
- produced water treatment projects, other than projects that are only for purposes of oil and gas exploration;
- aquifer storage and recovery projects; and
- the development of infrastructure to transport water that is made available by these types of projects.

(2) To make transfers to

- the State Water Implementation Fund for Texas,
- or the Texas Water Development Fund II.

(3) To make transfers to the Texas Water Bank Account, which was established to facilitate the transfer, sale, or lease of water and water rights throughout the state, including purchasing, holding, and transferring water rights in the TWDB's name.

The TWDB is directed to undertake the financing of projects through the New Water Supply Fund for Texas that will lead to 7 million acre-feet of new water supplies by December 31, 2033.

**Change:**

None

**Comment submitted by:** Tom Entsminger, National Wildlife Federation

**Comment Date:** August 5, 2024

**Comment:**

I am pleased to submit the attached comments on behalf of Texas Living Waters, a collaboration of conservation groups working to ensure Texas has the water it needs for thriving communities and abundant fish and wildlife. We appreciate your hard work on SB28 implementation and the opportunity to comment on the prioritization of water loss projects. Please feel free to contact me if you have any questions or would like to discuss any of our comments in further detail.

On behalf of Texas Living Waters, this letter presents formal comments on the prioritization of water loss projects for financial assistance through the Texas Water Fund. The \$1 billion appropriation to this new fund is a historic investment in our state's water infrastructure, and we appreciate the emphasis the TWDB placed on public engagement while deliberating how the funds would be utilized. The decision to invest heavily in water loss mitigation reflects a commitment to distribute the funds in a manner that is responsive to the needs of water systems in Texas.

Focusing on water loss mitigation is important for all Texas communities, regardless of size, geography, or socioeconomic characteristics. The cost of implementing a water loss control program can be a hurdle for economically disadvantaged communities with limited utility revenue and we support TWDB prioritizing systems with lower annual median household income (AMHI) as a method for allocating these funds. We also support providing financial support in the form of grants to these communities, which will help protect water affordability and will help ensure that these communities will have more reliable water supplies in the future. This straightforward project selection method also has the benefit of allowing water loss projects to be pulled from State Revolving Fund Intended Use Plans (SRF IUPs) without entities being asked to submit additional documentation. We recognize the procedural benefits of this approach and appreciate its focus on equitable distribution of limited public assistance.

While we support the high-level goals of the prioritization system and recognize the TWDB's efforts to distribute the funds in a timely and efficient manner, we look forward to opportunities for continued public engagement as the agency contemplates how future appropriations might be administered. For example, research continues to be published on the numerous potential causes of water loss and the most cost-effective solutions, with insights that may be helpful to identify projects that are likely to deliver the greatest benefit for each dollar spent. We recommend that the TWDB formally re-evaluate its project selection policies with each new Texas Water Fund appropriation to ensure they reflect the current state of the industry and address the needs expressed by utilities through the public comment process.

Since effective water loss mitigation is impossible without accurate data, we applaud the use of SRF set-aside dollars for the new Technical Assistance in Water Loss Control Enhanced (TAWLCEnhanced) technical assistance and outreach program which will aid utilities in completing or improving their water loss audits. We encourage the TWDB to continue supporting technical assistance and consider increasing funds allocated for these activities whenever possible. Technical assistance to support water loss mitigation can also extend beyond the completion of audits: additional resources that would be helpful for utilities (regardless of whether they have received Texas Water Fund or SRF assistance) include tools to support effective utility operations after water loss control programs have been implemented. These could include training and resources related to leak detection, pressure monitoring, community engagement, and planning for regular maintenance and other technical interventions.

The inaugural Texas Water Fund appropriation is a victory for water infrastructure in Texas, but we are not alone in our conviction that substantial additional investments will be necessary in the near future. Water loss remains a problem for water utilities and should continue to be addressed with public financial assistance. We are encouraged by the priorities reflected in the TWDB's management of this initial funding, and we look forward to participating in opportunities to support the optimal use of future appropriations.

Jennifer Walker and Tom Entsminger  
Texas Coast and Water Program  
National Wildlife Federation

Bob Stokes  
President  
Galveston Bay Foundation

Evgenia Spears  
Water Program Coordinator  
Sierra Club Lone Star Chapter

Marie Camino  
Government Relations Manager  
The Nature Conservancy in Texas

Katherine Romans  
Executive Director  
Hill Country Alliance

**Response:**

Thank you for comment regarding the Texas Water Fund – Water Loss Mitigation Project Prioritization Lists. The TWDB will continue to evaluate prioritization criteria through a process that encourages public participation and stakeholder feedback.

**Change:**

None

## **Project Specific Comments**

### **Red River Authority Lockett System**

**Comment submitted by:** Fabian Heaney

**Comment Date:** July 25, 2024

**Comment:**

I support all funding being put into the Rural Water Assistance Fund, that the Red River Authority of Texas system TX2440008 RRA Lockett Water System Improvements Project should be approved for funding, and that the Rural Water Assistance Fund be primarily grant or grant matching based. Loans alone do not provide the needed assistance in these rural areas.

As listed on the TWDB site, projects serving 1000 customers or less should receive priority over any other category, given that these system are: 1) the most rural, when compared to miles of line per connection, and 2) are the least able to provide the resources to bring the project to fruition. Miles of line per connection should factor into a

rural water program. Additionally, no project rating is given for those areas in enforcement, and those projects should receive the highest priority. I do not support cities with a population over 25,000 being classified as rural. Without knowing where the cutoff of funding will take place, I support the listing as long as Red River Authority makes the cutoff.

**Response:**

Thank you for comment regarding the Texas Water Fund – Water Loss Mitigation Project Prioritization Lists.

The Texas Water Fund Implementation Plan and the prioritization of projects were the results of a statewide solicitation for public feedback and are in accordance with the legislation authorizing the fund. A system being under enforcement by the Texas Commission on Environmental Quality, or the U.S. Environmental Protection Agency were not part of the prioritization criteria for this funding – emphasis was placed on water loss data collected and whether the proposed project addresses that water loss. The rural definition utilized for these lists is provided in Texas Water Code (TWC § 15.001).

Age of the water system was not a factor taken into consideration for this project prioritization. Many water systems in Texas are quite old, but the degree of deterioration varies greatly based on maintenance, investments into the systems, soil types, extreme weather events and several other factors. It is also difficult to determine the specific “age” of a water system, as different areas of the system are generally built and replaced at different times. While your suggestion is understood, the reporting and validation of system age, and the usage of that information for prioritization purposes would be very difficult and at times inaccurate.

**Change:**

None.

**Red River Authority Lockett System**

**Comment submitted by:** Daniel Carpenter

**Comment Date:** July 25, 2024

**Comment:**

I am in favor of needed improvements to the Lockett water supply system. These improvements are long overdue.

**Response:**

Thank you for comment regarding the Texas Water Fund – Water Loss Mitigation Project Prioritization Lists.

**Change:**

None

## **Red River Authority Lockett System**

**Comment submitted by:** Lowell Cobb

**Comment Date:** July 24, 2024

### **Comment:**

I have lived at my current address for 77 Years. Public system was put in around 55 years ago. The system constantly breaks causing water shut off. The residents live with constant concern not if but when the next break will happen. To replace the system will be wonderful!!!!

As a customer of the RRA Lockett system, I fully support the Red River Authority of Texas System TX2440008 RRA Lockett Water System Improvements Project, and it should be approved for grant funding.

I support all allocated funding from the Texas Water Fund under this proposal being put into the Rural Water Assistance Fund. Rural Water Assistance Funds should be primarily grant or grant-matching based. Loans alone do not provide the needed assistance in these rural areas.

As listed on the TWDB site, projects serving 1000 customers or less should receive priority over any other category, given that these systems are: 1) the most rural, when compared to miles of line per connection, and 2) are the least able to provide the resources to bring the project to completion. Miles of line per connection should factor into a rural water program, but it does not appear that it does at this time.

### **Response:**

Thank you for comment regarding the Texas Water Fund – Water Loss Mitigation Project Prioritization Lists.

Age of the water system was not a factor taken into consideration for this project prioritization. Many water systems in Texas are quite old, but the degree of deterioration varies greatly based on maintenance, investments into the systems, soil types, extreme weather events and several other factors. It is also difficult to determine the specific “age” of a water system, as different areas of the system are generally built and replaced at different times. While your suggestion is understood, the reporting and validation of system age, and the usage of that information for prioritization purposes would be very difficult and at times inaccurate.

### **Change:**

None

## **Red River Authority Lockett System**

**Comment submitted by:** Jonathan Haseloff

**Comment Date:** July 26, 2024

**Comment:**

The system is in critical need of an upgrade. It is way past it's original service life.

**Response:**

Thank you for comment regarding the Texas Water Fund – Water Loss Mitigation Project Prioritization Lists.

**Change:**

None

## **Red River Authority Lockett System**

**Comment submitted by:** Conrad Masterson

**Comment Date:** July 31, 2024

**Comment:**

As a customer of the Red River Authority Lockett system, I support the Red River Authority of Texas System TX2440008 RRA Lockett Water System Improvements Project, and it should be approved for grant funding. Additionally, I support all allocated funding from the Texas Water Fund under this proposal being put into the Rural Water Assistance Fund. Rural Water Assistance Funds should be primarily grant or grant-matching based. Loans alone do not provide the needed assistance in these rural areas.

As listed on the TWDB site, projects serving 1000 customers or less should receive priority over any other category, given that these systems are: 1) the most rural, when compared to miles of line per connection, and 2) are the least able to provide the resources to bring the project to completion. Miles of line per connection should factor into a rural water program, but it does not appear that it does at this time.

Thank you for providing the opportunity to comment on how these funds are to be used and the importance of the project for my area.

**Response:**

Thank you for comment regarding the Texas Water Fund – Water Loss Mitigation Project Prioritization Lists.

Age of the water system was not a factor taken into consideration for this project prioritization. Many water systems in Texas are quite old, but the degree of deterioration varies greatly based on maintenance, investments into the systems, soil types, extreme weather events and several other factors. It is also difficult to determine the specific



“age” of a water system, as different areas of the system are generally built and replaced at different times. While your suggestion is understood, the reporting and validation of system age, and the usage of that information for prioritization purposes would be very difficult and at times inaccurate.

**Change:**

None

**Red River Authority Lockett System**

**Comment submitted by:** Jessica Russell

**Comment Date:** July 29, 2024

**Comment:**

As a customer of the RRA Lockett system, I fully support the Red River Authority of Texas System TX2440008 RRA Lockett Water System Improvements Project, and it should be approved for grant funding.

I support all allocated funding from the Texas Water Fund under this proposal being put into the Rural Water Assistance Fund. Rural Water Assistance Funds should be primarily grant or grant-matching based. Loans alone do not provide the needed assistance in these rural areas.

As listed on the TWDB site, projects serving 1000 customers or less should receive priority over any other category, given that these systems are: 1) the most rural, when compared to miles of line per connection, and 2) are the least able to provide the resources to bring the project to completion. Miles of line per connection should factor into a rural water program, but it does not appear that it does at this time.

Thank you for providing the opportunity to comment on how these funds are to be used, and the importance of the project for my area.

**Response:**

Thank you for comment regarding the Texas Water Fund – Water Loss Mitigation Project Prioritization Lists.

Age of the water system was not a factor taken into consideration for this project prioritization. Many water systems in Texas are quite old, but the degree of deterioration varies greatly based on maintenance, investments into the systems, soil types, extreme weather events and several other factors. It is also difficult to determine the specific “age” of a water system, as different areas of the system are generally built and replaced at different times. While your suggestion is understood, the reporting and validation of system age, and the usage of that information for prioritization purposes would be very difficult and at times inaccurate.

**Change:**

None

## **Red River Authority Lockett System**

**Comment submitted by:** Joe L. Ward

**Comment Date:** August 1, 2024

**Comment:**

As a Board member of the Red River Authority of Texas it is imperative that we receive additional funding for the benefit of so many of our customers. In many cases, we are the only option for water.

Please consider allocating funding from the Texas Water Fund into the Rural Assistance Fund to support the RRA System TX 440008 Lockett System.

**Response:**

Thank you for comment regarding the Texas Water Fund – Water Loss Mitigation Project Prioritization Lists.

**Change:**

None

## **City of New Summerfield**

**Comment submitted by:** James Houghton

**Comment Date:** August 5, 2024

**Comment:**

The city's population is only 843 as per the 2020 census. We have been put in the wrong category for prioritization. As far as the median household income, I believe it to be much lower than what is reported at \$63,879. Looking at the school district's enrollment of being 90% minority and 86.8% being economically disadvantaged, the median income cannot possibly be accurate.

**Response:**

Thank you for comment regarding the Texas Water Fund – Water Loss Mitigation Project Prioritization Lists.

The population used for these prioritization lists was based on the information submitted in the Project Information Forms (PIF) for the State Fiscal Year 2025 Drinking Water State Revolving Fund and Clean Water State Revolving Fund Intended Use Plans. The PIF submitted for New Summerfield (PIF # 15797) indicated a population served of 1,441 and total household connections of 507. It should be noted that the population and connections served by a system does not always match up to the Census population, as many water systems serve customers that are outside of the Census designated area. To ensure consistency and fairness, the information from the PIFs is used to score and prioritize projects.

The AMHI used for prioritizing these projects is based on the information submitted in the PIFs when possible, and if the PIF did not include AMHI, the data was gathered from the American Community Survey (ACS)– 2022 5-Year Estimates data. The PIF for New Summerfield did not include an AMHI for the service area, so the AMHI data was acquired from the ACS 2022 5-Year Estimates, which show an AMHI of \$63,897 for the City of New Summerfield census designated area.

**Change:**

None

**City of New Summerfield**

**Comment submitted by:** Jane Barrow, Mayor

**Comment Date:** August 5, 2024

**Comment:**

Our census shows us as having a population of 843. Why are we on the list of population served from 1,000 to 10,000? We also feel that the median household income is not correct. Our population is approximately 90% Hispanic with 86.8 of students economically disadvantaged. We feel that many people did not answer questions because of a language barrier.

**Response:**

Thank you for comment regarding the Texas Water Fund – Water Loss Mitigation Project Prioritization Lists.

The population used for these prioritization lists was based on the information submitted in the Project Information Forms (PIF) for the State Fiscal Year 2025 Drinking Water State Revolving Fund and Clean Water State Revolving Fund Intended Use Plans. The PIF submitted for New Summerfield (PIF # 15797) indicated a population served of 1,441 and total household connections of 507. It should be noted that the population and connections served by a system does not always match up to the Census population, as many water systems serve customers that are outside of the Census designated area. To ensure consistency and fairness, the information from the PIFs is used to score and prioritize projects.

The AMHI used for prioritizing these projects is based on the information submitted in the PIFs when possible, and if the PIF did not include AMHI, the data was gathered from the American Community Survey (ACS)– 2022 5-Year Estimates data. The PIF for New Summerfield did not include an AMHI for the service area, so the AMHI data was acquired from the ACS 2022 5-Year Estimates, which show an AMHI of \$63,897 for the City of New Summerfield census designated area.

**Change:**

None

## **City of New Summerfield**

**Comment submitted by:** Casey Davis

**Comment Date:** August 5, 2024

### **Comment:**

The City of New Summerfield is on the incorrect list of projects. Based on the 2020 US Census the population of New Summerfield is 843. The City should be on the list of projects for less than 1,000 population served instead of 1,000 to 10,000 population served list.

The City of New Summerfield is contesting the median household income that was used for scoring the AMHI. The City believes the the median household income that was used based on the 2020 census is incorrect, and should be below the state median. The City of New Summerfield is 77% Hispanic based on Census data, and we feel the Census did not get accurate data when conducting the survey mainly because the census was taken during the COVID-19 pandemic, and also because of the cities demographics, language barriers, and people, immigrants, being afraid to communicate with the Census burro. The correlation between the Census data and the New Summerfield ISD is not justifiable either. The school district is 90% Hispanic, with 86.6% of students being economically disadvantaged. With that many students being economically disadvantaged we don't see how the Census median household income of \$63,879 in New Summerfield could be accurate. We feel strongly that New Summerfield should fall below the state median, and the city should have more points for the AMHI.

### **Response:**

Thank you for comment regarding the Texas Water Fund – Water Loss Mitigation Project Prioritization Lists.

The population used for these prioritization lists was based on the information submitted in the Project Information Forms (PIF) for the State Fiscal Year 2025 Drinking Water State Revolving Fund and Clean Water State Revolving Fund Intended Use Plans. The PIF submitted for New Summerfield (PIF # 15797) indicated a population served of 1,441 and total household connections of 507. It should be noted that the population and connections served by a system does not always match up to the Census population, as many water systems serve customers that are outside of the Census designated area. To ensure consistency and fairness, the information from the PIFs is used to score and prioritize projects.

The AMHI used for prioritizing these projects is based on the information submitted in the PIFs when possible, and if the PIF did not include AMHI, the data was gathered from the American Community Survey (ACS)– 2022 5-Year Estimates data. The PIF for New Summerfield did not include an AMHI for the service area, so the AMHI data was acquired from the ACS 2022 5-Year Estimates, which show an AMHI of \$63,897 for the City of New Summerfield census designated area.

**Change:**  
None

### **City of New Summerfield**

**Comment submitted by:** Robert Haberle  
**Comment Date:** August 5, 2024

**Comment:**

US Census Total Population for the City of New Summerfield is currently reported as 843. The Draft Priority List of Projects has the population at 1441. This error should be corrected and place the City of New Summerfield in the category of projects for populations of <1000.

Source: US Census - <https://data.census.gov/all?q=new%20summerfield%20texas>

**Response:**

Thank you for comment regarding the Texas Water Fund – Water Loss Mitigation Project Prioritization Lists.

The population used for these prioritization lists was based on the information submitted in the Project Information Forms (PIF) for the State Fiscal Year 2025 Drinking Water State Revolving Fund and Clean Water State Revolving Fund Intended Use Plans. The PIF submitted for New Summerfield (PIF # 15797) indicated a population served of 1,441 and total household connections of 507. It should be noted that the population and connections served by a system does not always match up to the Census population, as many water systems serve customers that are outside of the Census designated area. To ensure consistency and fairness, the information from the PIFs is used to score and prioritize projects.

**Change:**  
None

### **Stryker Lake Water Supply Corporation**

**Comment submitted by:** Lia Clark  
**Comment Date:** August 1, 2024

**Comment:**

Project PIF 15997 serves a population of 702 and requests \$1.7M to upgrade/replace deteriorated lines on 3288. The system is aging and deals with very high pressures due to the rolling hill topography, which is wearing out the piping structure and causing a lot of leaks. There is a second benefit beyond the water loss mitigation to these projects which is getting these lines brought up to modern construction standards with materials

that are appropriately pressure-rate to handle the challenges of the topography of the area. Per the system's 2023 Water Loss Audit, the system has about 25% water loss. This part of the system sees 40 leaks per year with at least \$3-4k per leak lost in water and repair costs. We believe that this project should be added to the priority list for the Texas Water Fund - Water Loss Mitigation program. Water Finance Exchange is working with Stryker Lake WSC and submitting this request on their behalf.

**Response:**

Thank you for comment regarding the Texas Water Fund – Water Loss Mitigation Project Prioritization Lists.

The projects included on this prioritization list were selected by first conducting a review of the Project Information Forms (PIF) that were submitted for the State Fiscal Year 2025 Drinking Water State Revolving Fund and Clean Water State Revolving Fund Intended Use Plans to determine which projects had water loss mitigation or conservation components. A survey was sent out to the contact people that were listed on the PIF to get additional information needed for the prioritization ranking. Due to unresponsiveness to the survey request (sent three times), this project was not included on this priority list. This project will still be considered for funding through the Drinking Water State Revolving Fund for State Fiscal Year 2025.

**Change:**

None