GMA-9 Public Comment Form 90-Day Public Comment Period Proposed Desired Future Conditions

Dear Interested Member of the Public:

On September 28, 2015, the Groundwater Management Area 9 Joint Planning Committee (GMA-9) adopted proposed Desired Future Conditions (DFCs) for the Trinity, Edwards-Trinity (Plateau), Ellenburger-San Saba and Hickory aquifers within the management area. In addition, GMA-9 is proposing to classify certain aquifers or portions of those aquifers as non-relevant for the purposes of joint planning. As summary of these proposals follows:

MAJOR OR MINOR AQUIFER: POSSIBLE AUTHORIZED DESIRED FUTURE CONDITION OR NON-RELEVANT AQUIFER CLASSIFICATION

Edwards Aquifer (Balcones Fault Zone)

Non-Relevant Aquifer Classification (in Bexar, Comal, Hays and Travis Counties)

Edwards-Trinity (Plateau)

- Allow for No Net Increase in Average Drawdown in Bandera and Kendall Counties Through 2070
- Non-Relevant Aquifer Classification (in Blanco and Kerr Counties)

Ellenburger-San Saba

- Allow for An Increase in Average Drawdown of No More Than 2 Feet in Kendall County Through 2070
- Non-Relevant Aquifer Classification (in Blanco and Kerr Counties)

Hickory

- Allow for An Increase in Average Drawdown of No More Than 7 Feet in Kendall County Through 2070
- Non-Relevant Aquifer Classification (in Blanco, Hays, Kerr and Travis Counties)

Marble Falls

Non-Relevant Aquifer Classification (in Blanco County)

Trinity

Allow for An Increase in Average Drawdown of Approximately 30 Feet Through 2060 (Throughout GMA-9) Consistent With "Scenario 6" in TWDB GAM Task 10-005

On Wednesday, September 30, 2015, notice of these proposals was sent to each of the ten Groundwater Conservation Districts (GCDs) within GMA-9. Therefore, the official 90-day public comment period related to the proposed DFCs began on Thursday, October 1, 2015, and will close on Thursday, December 31, 2015. Public comments can be submitted directly to your local GCD at any time before the 90-day public comment closes. Also, each GCD will hold a public hearing regarding the proposed DFCs related to that GCD, as may be applicable. To find out the time, date and location for your local GCD's public hearing, please contact them directly as follows:

Groundwater Conservation District Contact Information

Bandera County River Authority and Groundwater District

GMA-9 Contact: c/o Bandera County River Authority and Groundwater District P.O. Box 177 Bandera, TX 78003 (830) 796-7260

Barton Springs/Edwards Aquifer Conservation District

GMA-9 Contact: c/o Barton Springs/Edwards Aquifer Conservation District 1124 Regal Row Austin, Texas 78748 (512) 282-8441

Blanco-Pedernales Groundwater Conservation District

GMA-9 Contact: c/o Blanco-Pedernales Groundwater Conservation District P.O. Box 1516 Johnson City, TX 78636 (830) 868-9196

Comal Trinity Groundwater Conservation District

GMA-9 Contact: c/o Comal Trinity Groundwater Conservation District P.O. Box 450 Bulverde, TX 78163 e-mail address: info@comaltrinity.com

Cow Creek Groundwater Conservation District

GMA-9 Contact: c/o Cow Creek Groundwater Conservation District 201 E. San Antonio Ave., Ste. 100 Boerne, TX 78006 (830) 816-2504

Edwards Aquifer Authority (EAA)

GMA-9 Contact: c/o/ Edwards Aquifer Authority 900 E. Quincy San Antonio, TX 78215 (210) 222-2204

Hays Trinity Groundwater Conservation District

GMA-9 Contact: c/o Hays Trinity Groundwater Conservation District P.O. Box 1648 Dripping Springs, Texas 78620 (512) 858-9253

Headwaters Groundwater Conservation District

GMA-9 Contact: c/o/ Headwaters Groundwater Conservation District 125 Lehmann Dr. Ste. 201 Kerrville, TX 78028 (830) 896-4110

Medina County Groundwater Conservation District

GMA-9 Contact: c/o Medina County Groundwater Conservation District 1607 Avenue K Hondo, TX 78861 (830) 741-3162

Trinity Glen Rose Groundwater Conservation District

GMA-9 Contact: c/o/ Trinity Glen Rose Groundwater Conservation District 6335 Camp Bullis Road, Suite 25 San Antonio, Texas 78257 (210) 698-1155 To help the GCDs give your comments their due consideration, GMA-9 developed this public comment form for your use in preparing and submitting comments during the 90-day public comment period. Every section of this public comment form reflects factors the GCDs must consider and document as we make these DFC decisions. To that end, we encourage you to complete as much of the public comment form as possible. You may also attach additional pages, if necessary. Please note, in accordance with Subsection 36.108 (d-2) of the Texas Water Code, the GCDs will only consider public comments that are determined to be relevant.

Completed public comment forms should be submitted to directly to your local GCD at the contact information listed above. Copies of your completed public comment forms, along with any other relevant public comments received during the 90-day public comment period, will be reviewed by your local GCD and will be reflected as part of the public comment summaries each GCD will prepare and submit to GMA-9.

Thank you for taking time to participate in this very important process. If you have any questions, please contact your local GCD representative at the contact information provided above.

Contact Information

Name: Charlie Flatten Address: 15315 Highway 71 West, Bee Cave, Texas 78738 Phone: 512/694.1121 Email: Charlie@HillCountryAlliance.org Representing: Hill Country Alliance

Proposed Desired Future Condition(s)

Please be as detailed as possible in describing your proposed DFC. Include the quantifiable value and a description of the method for measuring or calculating the value. Please attach additional pages, if needed.

Aquifer

Proposed DFC and Measuring/Calculating Method

Aquifer Relevancy to Regional Planning Purposes: Hill Country Alliance recognizes that every Hill Country aquifer is communication with one or more neighboring aquifers and is therefore - to some degree - connected. In addition, all Hill Country aquifers contribute to spring or base flow of streams and rivers. That is not to say that every aquifer in specific GCDs has a surface relationship, however, aquifers do not recognize GCD boundaries, and all water is hydrologically connected. *Hill Country Alliance recommends that every fresh and saline aquifer should be considered relevant for planning purposes.*

Desired Future Condition: Hill Country Alliance membership recognizes the ecological value of spring and base flows into Hill Country waterways, and the economic need for well production consistency. When planning for the future health and productivity of an aquifer, the vision of a <u>Desired</u> Future Condition should not be equated with, or substituted for, an <u>Inevitable</u> Future Condition. It is the <u>Desire</u> of Hill Country Alliance's membership and the majority of the citizens of the Hill Country for a planning goal that does no further harm to spring-flow or water well levels. *Hill Country Alliance recommends a Desired Future Condition of zero drawdown*.

Desired Future Condition Calculation Methodology: To quantify a preferred zero DFC, Hill Country Alliance recommends that calculations of historic aquifer and spring levels from 1950 be established by this GMA as a baseline. *Hill Country Alliance recommends a methodology that utilizes monitor well*

level data to measure annual average aquifer levels in combination with minimum spring discharge rates suitable to maintain base-flows capable of sustaining the riparian flora and fauna naturally found in the receiving stream.

Consideration of Proposed Desired Future Condition(s)

The Texas Water Code requires that GMA-9 develop DFCs that "provide a balance between the highest practicable level of groundwater production and the conservation, preservation, protection, recharging, and prevention of waste of groundwater and control of subsidence in the management area." In the space below, or on additional attached pages, please provide your considerations with regard to the nine items that must be considered, per the Texas Water Code, for the proposed DFC(s).

Consideration 1 – "Aquifer uses or conditions within the management area, including conditions that differ substantially from one geographic area to another:"

The thinly bedded and heterogeneous major GMA-9 aquifers have never been easy to plan within. Flow-rates and permeability conditions vary greatly within GMA-9's geographic extent. Population densities vary to an extraordinary degree across GMA-9. These circumstances should not inhibit the success of changing to a zero-foot drawdown.

Consideration 2 – "The water supply needs and water management strategies included in the state water plan:"

- A change in DFC to a zero-foot drawdown is consistent with the State Water Plan's mandate that groundwater sourced Water Management Strategies not exceed established Managed Available Groundwater numbers.
- There are no active State Water Plan Water Management Strategies that would be affected by a zero-foot drawdown.
- Future growth would need to comply with a zero-foot drawdown or show the ability to provide its water needs through enhanced conservation, Low Impact Design, or rainwater harvesting.

Consideration 3 – "Hydrological conditions, including for each aquifer in the management area the total estimated recoverable storage as provided by the executive administrator, and the average annual recharge, inflows, and discharge:"

- HCA recognizes the limited value of quantifying a total aquifer storage volume in terms of numerical data for water planning purposes. Furthermore, any assertion that a **total estimated recoverable storage** (TERS) value represents a consistent volume of water that one may expect to recover from an aquifer is mistaken. Indeed, the irrelevance of a TERS value in aquifer planning cannot be overstated.
- A change in DFC to a zero-foot drawdown would bring most aquifers in GMA-9 into hydrologic balance and (except under extraordinary drought conditions) increase and discharge to the benefit of surface flows across the region.

Consideration 4 – "Other environmental impacts, including impacts on spring flow and other interactions between groundwater and surface water:"

A change in DFC to a zero-foot drawdown would have significant beneficial impact on springflow and on every other surface and groundwater interaction.

Consideration 5 – "The impact on subsidence:"

HCA would not consider subsidence to be a normal effect of a DFC changed from thirty feet to zero feet.

Consideration 6 - "Socioeconomic impacts reasonably expected to occur:"

HCA recognizes that the economy of the Hill Country is intrinsically linked to healthy hydrologic systems. Managed depletion of our groundwater resources is a very certain way to degrade real and attached property values and significantly harm the business climate that fuels our economic engine.

- Negative economic impact:
 - Speculative developers without a realistic understanding of the carrying capacity of a semi-arid environment
- Neutral economic impact:
 - Tens of thousands of current water well owners
 - New users who take advantage of rainwater harvesting rather than drilling a new well
- > Beneficial economic impact from increased surface flow:
 - The many well owners who are looking at near-term pump lowering
 - Regional surface water irrigators
 - Ranchers
 - Agriculture
 - Riparian oriented businesses
 - o Tourism
 - Bay and estuary commercial fisheries
 - Fish and wildlife interests
 - Regional municipalities reliant on surface water