

GROUNDWATER MANAGEMENT AREA 9

JOINT PLANNING COMMITTEE MEETING

March 31, 2026

CLARIFICATION / DISCLAIMER

- GCDs in GMA 9 will determine DFCs, not the hydrogeologic consultant.
- Chapter 36 of the Texas Water Code contains concepts that blend legal and technical issues. AGS is not a law firm and we do not provide legal advice. Any statements relating to regulatory or legal issues shall not be considered legal advice.
- AGS may provide commentary based on our experience working with groundwater conservation districts, permitting, joint groundwater planning, GCD rules and management plans, water supply entities, and our general understanding of industry practices.

AGENDA ITEM 8

Discuss and possible action to propose non-relevant aquifer classifications, pursuant to Title 31, Texas Administrative Code § 356.31(c), and to propose desired future conditions for the relevant aquifers in GMA 9, pursuant to Texas Water Code § 36.108(d), with an associated resolution.

NON-RELEVANT AQUIFER CLASSIFICATIONS

- **Texas Administrative Code Chapter 356.31**
 - According to the TAC, a GMA may propose to classify an aquifer/portion of an aquifer as non relevant.
- **GCDs must submit the following:**
 - A description, location, and or map of the aquifer;
 - A summary of aquifer characteristics, demands, current use including TERS that support conclusions that DFCs in adjacent or hydraulically connected hydraulically relevant aquifer(s) will not be affected;
 - An explanation of why the aquifer or portion of the aquifer is non relevant for joint planning purposes.
- **Reviewed and discussed by GMA 9 on January 30, 2026**

NON-RELEVANT AQUIFER CLASSIFICATIONS

- Non-relevant classification means a DFC will not be required
- Non-relevant classification does not impact local GCD's ability or authority to manage aquifer within their boundaries
- Non-relevant aquifers still subject to GCD's enabling statute, rules, management plan, and programs
- Local relevance of non-relevant aquifers addressed in GCD's rules and management plans

PROPOSED NON-RELEVANT AQUIFER CLASSIFICATIONS (FOR JOINT PLANNING PURPOSES ONLY)

Non-Relevant Aquifer	Applicable Area(s) Within GMA-9
Edwards Aquifer (Balcones Fault Zone)	Bexar, Comal, Hays, and Travis counties
Edwards Group of Edwards-Trinity (Plateau)	Blanco and Kerr counties
Ellenburger-San Saba	Blanco County
Hickory	Blanco, Hays, Kerr, and Travis counties
Marble Falls	Blanco County (entire GMA)

- Only change from previous cycle is Ellenburger-San Saba Aquifer in Kerr County

GMA 9 ACTION TO ADOPT PROPOSED DESIRED FUTURE CONDITIONS

- **DFCs proposed for adoption for relevant aquifers within GMA after considering technical and other data and nine factors**
- **DFCs must provide balance between highest practicable level of groundwater production, and conservation, preservation, protection, recharging, and prevention of waste of groundwater and control of subsidence in GMA**
- **DCFs proposed under TWC § 36.108 (d) must be approved by two-thirds vote of all GCD representatives for distribution to GCDs in GMA**

DRAFT PROPOSED DESIRED FUTURE CONDITIONS

Major or Minor Aquifer	Desired Future Conditions
Trinity	Allow for an increase in average drawdown of approximately 30 feet through 2080 (throughout GMA 9), and as further specified below for each county within GMA 9, all consistent with “Scenario 6” in TWDB GAM Task 10-005:
	Bandera County - Allow for an increase in average drawdown of approximately 29 feet through 2080.
	Bexar County - Allow for an increase in average drawdown of approximately 46 feet through 2080.
	Blanco County - Allow for an increase in average drawdown of approximately 19 feet through 2080.
	Comal County - Allow for an increase in average drawdown of approximately 24 feet through 2080.
	Hays County - Allow for an increase in average drawdown of approximately 19 feet through 2080.
	Kendall County - Allow for an increase in average drawdown of approximately 29 feet through 2080.
	Kerr County - Allow for an increase in average drawdown of approximately 39 feet through 2080.
	Medina County - Allow for an increase in average drawdown of approximately 16 feet through 2080.
	Travis County - Allow for an increase in average drawdown of approximately 28 feet through 2080.

DRAFT PROPOSED DESIRED FUTURE CONDITIONS

Major or Minor Aquifer	Desired Future Conditions
Edwards Group of Edwards-Trinity (Plateau) – Bandera and Kendall Counties	Allow for no net increase in average drawdown in Bandera and Kendall counties through 2080.
Ellenburger-San Saba – Kerr and Kendall Counties	Allow for an increase in average drawdown of no more than 16 Feet in Kendall County and no more than 11 feet in Kerr County through 2080 consistent with Scenario 3 of the March 9, 2024 Technical Memorandum titled "Evaluation of Water Level Change Due to Potential Pumping in Ellenburger Unit in Blanco, Kendall, and Kerr Counties from End of 2010 to End of 2080 Using Llano Uplift Minor Aquifers Groundwater Availability Model."
Hickory – Kendall County	Allow for an increase in average drawdown of no more than 16 Feet in Kendall County through 2080 consistent with Scenario 3 of the March 9, 2024 Technical Memorandum titled "Evaluation of Water Level Change Due to Potential Pumping in Ellenburger Unit in Blanco, Kendall, and Kerr Counties from End of 2010 to End of 2080 Using Llano Uplift Minor Aquifers Groundwater Availability Model."

DRAFT PROPOSED DESIRED FUTURE CONDITIONS

- **Variance Statement for Inclusion in DFC Statements:** Solely for the purposes of calculating the MAGs, the GMA 9 Committee assumes the model results are consistent with the proposed DFCs if the average drawdowns calculated by the TWDB are within **five percent** of the proposed DFCs drawdown values.

GMA 9 GAM RUNS, TECHNICAL MEMORANDA, OR PRESENTATIONS

GAM Run, Technical Memorandum, or Presentation	Date (In Date Order)	Aquifer(s)	Issues Considered
GAM Task 10-005	September 3, 2010	Trinity / Edwards-Trinity Plateau	Seven pumping scenarios with pumping ranging from zero to 2X 2008 pumping via 387 50-year simulations incorporating precipitation estimates tree-ring study
GAM Task 10-031: Supplement to GAM Task 10-005	January 25, 2011	Trinity/ Edwards-Trinity Plateau	Additional results and water level contour maps related to four of the seven pumping scenarios (ranging from 2008 pumping, to 2X 2008 pumping) analyzed in GAM Task 10-005 for the Trinity Aquifer

GMA 9 GAM RUNS, TECHNICAL MEMORANDA, OR PRESENTATIONS

GAM Run, Technical Memorandum, or Presentation	Date (In Date Order)	Aquifer(s)	Issues Considered
Technical Memorandum - Evaluation of Water Level Change Due to Potential Pumping in Ellenburger Unit in Blanco, Kendall, and Kerr Counties from End of 2010 to End of 2080 Using Llano Uplift Minor Aquifers Groundwater Availability Model	March 9, 2024	Ellenburger-San Saba	Three scenarios evaluating the groundwater level change due to potential groundwater withdrawal in the Ellenburger Unit within the Blanco – Pedernales GCD, Cow Creek GCD, Headwaters GCD from the end of 2010 to the end of 2080

GMA 9 GAM RUNS, TECHNICAL MEMORANDA, OR PRESENTATIONS

GAM Run, Technical Memorandum, or Presentation	Date (In Date Order)	Aquifer(s)	Issues Considered
Summary Presentation of Results	October 21, 2025	Trinity	Re-run seven scenarios of GAM Task 10-005 with updated GCD pumping data (distributed geographically and vertically) averaged recharge 387 runs for each model grid block, creating a single recharge file used for each of the seven scenarios; Scenarios focused on Hays and Trinity counties for insight into sensitivity of drawdown to pumping
Summary Presentation of Results	December 16, 2025	Trinity	Review of data and modeling as related to DFCs for Hays and Travis counties

GMA 9 GAM RUNS OF TECHNICAL MEMORANDA, OR PRESENTATIONS

GAM Run, Technical Memorandum, or Presentation	Date (In Date Order)	Aquifer(s)	Issues Considered
Summary Presentation Results	January 30, 2026	Trinity	Differences between GAM Task 10-005 (September 2010) drawdown results of AGS October 2025 re-run of seven scenarios
Technical Memorandum - Using TWDB GAM Task 10-005 for the GMA 9 2080 Planning Horizon	March 4, 2026	Trinity	Technical justification for using 2060 average drawdown results from Scenario 6 of TWDB GAM Task 10-005 for the 2070 and 2080 decades

9 FACTORS TO CONSIDER

Aquifer Uses
or Conditions

June 18, 2024

Supply Needs &
Management
Strategies

March 26, 2024

Hydrological
Conditions

March 26, 2024

Environmental
Impacts

June 18, 2024

Subsidence
Impacts

March 26, 2024

Socioeconomic
Impacts

September 17, 2024

Private Property
Rights

June 18, 2024

DFC Feasibility

September 17, 2024

Other Relevant
Information

September 17, 2024

BALANCE TEST FOR DESIRED FUTURE CONDITIONS



Highest Practicable Level of
Groundwater Production



Conservation, Preservation,
Protection, Recharging, and
Prevention of Waste of
Groundwater, and Control of
Subsidence

BALANCE TEST FOR PROPOSED DESIRED FUTURE CONDITIONS

- Trinity and Edwards Group of Edwards-Trinity Plateau Aquifer DFCs:
 - Goal to strike equitable balance between all GMA 9 areas
 - Prudent, conservative, and appropriate to set DFC to meet current and projected exempt demands, and have some water for non-exempt use
 - Protect springflow from drawdowns in aquifer due to increased pumping
 - Help manage pumping and resulting impacts, while allowing some amount of water for growth
 - Majority of current and future pumping from exempt wells
 - DFCs acknowledge effects of exempt pumping and allow for some level of reasonable pumping from non-exempt wells
 - Strike a balance and consensus between GMA 9 GCDs – good of entire GMA and local GCDs and counties

BALANCE TEST FOR PROPOSED DESIRED FUTURE CONDITIONS

- Ellenburger-San Saba and Hickory Aquifer DFCs:
 - Acknowledge potential MAG amounts may be small
 - GMA 9 supports Cow Creek GCD and Headwaters GCD to balance possible groundwater production with efforts to conserve, preserve, and protect groundwater resources
 - Resulting MAGS may inform Regional Water Planning process, and support GCDs efforts to manage and monitor resources in response to board priorities

9 FACTORS TO CONSIDER

Aquifer Uses and Conditions Factor – June 18, 2024, GMA 9 Meeting:

- **Trinity Aquifer:**
 - Estimated water use survey (WUS) pumping for Trinity Aquifer (GMA 9 counties) in 2021 (acre-feet per year)
 - Use from Upper/Middle/Lower Trinity across GMA
- **Edwards-Trinity (Plateau) Aquifer:**
 - Estimated WUS pumping for Edwards-Trinity (Plateau) Aquifer (GMA 9 counties) in 2021 (acre-feet per year)
 - Did not include counties where aquifer proposed classification as non-relevant
- **Ellenburger-San Saba and Hickory Aquifers:**
 - Small public water supply system wells in Ellenburger in Kerr County
 - WUS does not contain data for aquifers in Kendall County
 - Aquifers proposed as non-relevant for other counties in GMA 9 – current planning round
- **Marble Falls Aquifer:**
 - Proposed as non-relevant – current planning round

9 FACTORS TO CONSIDER

Impacts of Proposed DFCs on Aquifer Uses and Conditions Factor:

- DFCs consider long-term average water level change in an aquifer as a whole
- Not designed to be compared to instantaneous measurements as metric of adequacy or reasonableness
- **Trinity Aquifer DFC –**
 - Hydrographs suggest Upper, Middle and Lower Trinity aquifers recover from sustained severe drought conditions*
 - Hydrographs suggest 30 ft DFC can be achieved in some locations when considering long-term average change in water levels
- **Edwards Group of Edwards-Trinity (Plateau) Aquifer DFC –**
 - No drawdown equals no impacts
- **Ellenburger-San Saba and Hickory aquifers DFCs –**
 - Water use surveys for 2021 indicate pumping only in Blanco County
 - Small public water supply system wells in Ellenburger in Kerr County
 - No estimates reported for any other county within GMA 9

**Exceptions noted by Hays Trinity GCD will be include in Explanatory Report*

9 FACTORS TO CONSIDER

- Water Supply Needs and Strategies Factor – March 26, 2024, GMA 9 Meeting:
 - Data from 2022 State Water Plan; data for entire counties
 - Water demand – annual volume WUGs require during DOR and not specific to surface water or groundwater
 - Existing supplies – amount of water physically and legally available; may be MAG limited; groundwater supplies based on factors such as permits, wells, well capacities, etc.
 - No specified methodology to calculate existing groundwater supplies – Regions calculate differently
 - Need – potential water supply shortfall based on difference between projected water demands and existing water supplies
 - Demands vary by decade
 - Needs vary by decade based on varying projected demands
 - Needs are calculated for each water user group
 - Needs are not addressed solely with groundwater and may not be met at all
 - Water management strategy – plan or specific project to meet a water need for additional water by WUG
 - Strategies may include expanding use of an existing supply or developing new supplies
 - Strategies are not restricted to that county's need
 - Water management strategies identified for Trinity Aquifer, Edwards-Trinity (Plateau) Aquifer, and Ellenburger- San Saba Aquifer

9 FACTORS TO CONSIDER

Impacts of Proposed DFCs on Water Supply Needs and Water Management Strategies Factor:

- Trinity Aquifer and Edwards Group of Edwards-Trinity (Plateau) Aquifer DFCs –
 - DFCs being re-adopted and resulting MAGs will remain un-changed
- Ellenburger-San Saba Aquifer and Hickory Aquifer DFCs –
 - New DFC and resulting MAG in Kerr County could potentially impact available supply from Ellenburger Aquifer for water supplies or water management strategies
 - No water supplies or management strategies in Kendall County, so no impacts from DFCs

9 FACTORS TO CONSIDER

Hydrological Conditions Factor – March 26, 2024, GMA 9 Meeting:

- Aquifers:
 - Trinity Aquifer (Major) – Primary aquifer; groundwater produced from different units in different parts of GMA – Lower, Middle, and Upper Trinity
 - Edwards-Trinity (Plateau) Aquifer (Major) – Primarily in western part of GMA 9; consists of Edwards and associated limestones and underlying Trinity sands
 - Hickory Aquifer (Minor) – Mostly downdip; some outcrop in Blanco County; consists of Hickory Sandstone
 - Ellenburger-San Saba Aquifer (Minor) – Llano Uplift aquifer; Mostly downdip, some outcrop in Blanco; consists of sequence of limestone and dolomite that outcrop around Llano Uplift and dip radially away from the center
 - Marble Falls Aquifer (Minor) – Outcrop area in Blanco County, downdip extent unknown, occurs in limestones of Marble Falls Formation; May be hydraulically connected to Ellenburger
- Total Estimated Recoverable Storage (TERS)
- Annual Recharge, Inflows, and Discharge
 - Provided by TWDB in GAM Run reports in support of management plan development
 - Results provided by county and aquifer within each GCD

9 FACTORS TO CONSIDER

Impacts of Proposed DFCs on Hydrological Conditions Factor:

- Trinity Aquifer DFC –
 - Re-adoption of GAM Task 10-005 Scenario 6 results in no changes to MAGs
- Edwards Group of Edwards-Trinity (Plateau) Aquifer DFC –
 - No drawdown equals no impacts
- Ellenburger-San Saba and Hickory DFCs –
 - DFCs not expected to have significant impacts

9 FACTORS TO CONSIDER

Other Environmental Impacts Factor – June 18, 2024, GMA 9 Meeting:

- GCDs must consider annual volume of water discharging from aquifer to springs and any surface water bodies including lakes, streams and rivers in developing management plans
- Texas Aquifers Study: Groundwater Quantity, Quality, Flow, and Contributions to Surface Water (TWDB, 2016)
- Estimated annual discharge from to springs and any surface waterbody reviewed for all aquifers

9 FACTORS TO CONSIDER

Impacts of Proposed DFCs on Other Environmental Impacts Factor:

- **Trinity Aquifer and Edwards Group of Edwards-Trinity (Plateau) Aquifer DFCs –**
 - GCDs continue to consider potential DFC impacts to aquifer users, along with environmental and other impacts
 - Management strategy or DFC other than prohibiting all pumping could have detrimental environmental impacts
 - Significantly restricting or prohibiting well drilling and pumping would have negative impacts on private property rights and restrict GMA 9's ability to meet the "balance test"
- **Ellenburger-San Saba and Hickory Aquifer DFCs –**
 - Potential MAGs amounts resulting from DFCs will likely result in very small groundwater availability amounts, and therefore minimal impacts

9 FACTORS TO CONSIDER

Subsidence Impacts Factor – March 26, 2024, GMA 9 Meeting:

- Factor not applicable in GMA 9 GCD management plans due to either “low risk” or no observations of subsidence
- All aquifers occur in structurally sound geologic formations that do not exhibit significant compaction due to pumping

9 FACTORS TO CONSIDER

Impacts of Proposed DFCs on Subsidence Factor:

- **Trinity and Edwards Group of Edwards-Trinity (Plateau) Aquifer DFCs –**
 - Based on geologic and hydrogeologic characteristics of aquifers in GMA 9, water level declines (DFCs proposed by GMA 9), and estimates of subsidence risk in TWDB report, proposed DFCs are deemed to be reasonable for potential impact on subsidence
- **Ellenburger and Hickory Aquifer DFCs –**
 - Highly improbable proposed DFCs will have any impact on any potential form of subsidence

9 FACTORS TO CONSIDER

Private Property Rights Factor – June 18, 2024, GMA 9 Meeting:

- Texas Legislature defined ownership of groundwater, recognizing landowner owns groundwater below surface of landowner's land as real property right
- Texas Water Code § 36.002 does not prohibit GCD from regulating groundwater production as authorized under Water Code § § 36.113, 36.116, and 36.122 or specials law governing GCD
- Any management strategy can have an impact of private property rights
- DFCs impacts depend upon on how GCDs incorporate DFCs/MAGs into management plans and rules
- DFCs established to accommodate groundwater users – to strike a “balance”
- DFCs offer positive implications – set regional long-term goals to manage and preserve groundwater resources
- Expectations of existing and future well owners to recover reasonable investments in their water wells and properties
- All interests, both conservation and production, have property rights implications

9 FACTORS TO CONSIDER

Impacts of Proposed DFCs on Private Property Rights Factor:

- Trinity Aquifer, Edwards Group of Edwards-Trinity (Plateau) Aquifer, and Ellenburger-San Saba Aquifer DFCs –
 - Impact of DFCs will depend upon way in which GMA 9 GCDs incorporate resulting MAGs into their GMPs, rules, and permitting decisions
 - Because of inherent conflict in private property rights interests, GMA 9 proposes DFCs to accommodate all groundwater users, and strike required balance
 - Positive implications for private property rights that result from setting regional, long-term goals
- Hickory Aquifer DFCs –
 - Localized implementation of water management strategies by Cow Creek GCD more likely to balance private property rights impacts as pumping from aquifer develops

9 FACTORS TO CONSIDER

Socioeconomics Impact Factor – September 17, 2024, GMA 9 Meeting:

- DFCs do not guarantee social or economic stability or conditions
- Many approaches and metrics to consider in discussing socioeconomic impacts
- Short-term fluctuations in water levels in private wells not direct result of DFC but more result of localized pumping demands, weather patterns, and hydrogeological
- Regional DFCs are not singular factor in evaluating potential economic or social impacts of water planning on user community
- Localized implementation of water management initiatives, rules, and management plan at GCD level more likely to result in direct economic impacts on user community
- Positive and negative socioeconomic impacts may occur from DFCs that are “too lax” or “too restrictive”

9 FACTORS TO CONSIDER

Impacts of Proposed DFCs on Socioeconomic Factor:

- Trinity Aquifer, Edwards Group of Edwards-Trinity (Plateau) Aquifer, Ellenburger-San Saba Aquifer and Hickory Aquifer DFCs –
 - Difficult to assess direct socioeconomic impacts likely to occur
 - Other factors, including drought and demographic shifts, equally influential to economic and social outcomes of water management practices
 - Localized implementation of water management initiatives at GCD level may be more likely to result in direct socioeconomic impacts

9 FACTORS TO CONSIDER

DFC Feasibility Factor – September 17, 2024, GMA 9 Meeting:

- TWC and TAC do not provide guidance on how GMAs and GCDs are to consider factor
- Is it feasible to physically achieve aquifer DFC?
 - GAMs help ensure that DFCs are generally physically achievable and represent best available science according to TWDB
 - DFC compliance determined by assessing actual aquifer conditions
- Is it feasible to achieve DFC from regulatory standpoint?
 - GCD Rules and Management Plans help support DFCs can achieved
 - DFCs may be less likely to be achieved in areas without GCDs
- Chapter 36 gives GCDs authority to manage aquifers and collect data and improve science and understanding
- GCDs have monitoring plans and well networks to track aquifer status as compared to DFCs
- GCDs set goals and objectives in TWDB-approved management plans
- Based on best available science (approved GAM or other quantitative tools), DFCs are physically possible

9 FACTORS TO CONSIDER

Impacts of Proposed DFCs on DFC Feasibility Factor:

- Trinity Aquifer, Edwards Group of Edwards-Trinity (Plateau) Aquifer, Ellenburger-San Saba Aquifer and Hickory Aquifer DFCs –
 - Reasonable to conclude GMA 9 is in position to achieve proposed DFCs
 - GCDs have developed methods of comparing water level measurements with 2008 baseline year and model predictions made during initial DFC development, and continue to discuss and refine these methods
 - Diligent monitoring and expansion of toolsets and knowledge enable GCDs to assess challenges that may require DFC modification in future DFC joint-planning cycles

9 FACTORS TO CONSIDER

“Other Factors” Factor – September 17, 2024, GMA 9 Meeting:

9 FACTORS TO CONSIDER

Impacts of Proposed DFCs on “Other Factors” Factor:

POLICY AND TECHNICAL JUSTIFICATIONS

- Trinity Aquifer DFC –
 - GCDs tracked status of MAGs and pumping and disconnect between observed water levels versus model results
 - Concerns about whether GCDs able to achieve DFC
 - GMA 9 discussed setting separate DFCs for Upper, Middle, and Lower Trinity Aquifers
 - Potential use and timing of new STGAM versus use of existing HCTGAM
 - GCDs discussed drafting individual DFCs for GMA 9 consideration
 - New STGAM not available until early 2026, so GMA 9 opted to use existing HCTGAM
 - After additional GAM analysis and given current DFC monitoring drawdown observations, GMA 9 selected to re-adopt 2021 DFCs, with updated planning horizon, for Trinity and Edwards Group of the Edwards-Trinity (Plateau) aquifers
 - New STGAM to be utilized early in next planning cycle to re-evaluate DFCs, including considering separate DFCs for Upper, Middle, and Lower Trinity aquifers

POLICY AND TECHNICAL JUSTIFICATIONS

- Edwards Group of Edwards-Trinity (Plateau) Aquifer DFC –
 - DFCs long-term targets (50-year time-period)
 - DFC compliance should be determined over time with sufficient data
 - Severe drought, extreme wet conditions and average weather conditions occurred since DFCs initially adopted; data and information, along with new STGAM critical in assessing DFCs in next round of planning
 - Selected DFC balance MAG quantity to allow for some additional demand and reasonably protect spring flow and base flows to creeks and rivers

POLICY AND TECHNICAL JUSTIFICATIONS

- Proposed Ellenburger-San Saba Aquifer and Hickory Aquifer DFCs –
 - Technical Memorandum – “Evaluation of Water Level Change Due to Potential Pumping in Ellenburger Unit in Blanco, Kendall, and Kerr Counties from End of 2010 to End of 2080 Using Llano Uplift Minor Aquifers Groundwater Availability Model” (Shi, March 2024)
 - Blanco-Pedernales GCD (Blanco County), Cow Creek GCD (Kendall County), and Headwaters Groundwater GCD(Kerr County)
 - Three predictive groundwater flow model runs to evaluate groundwater level change due to potential groundwater withdrawal in Ellenburger Unit (2010 – 2080)
 - Three pumping scenarios and model results outlined in Technical Memorandum
 - Based upon model results, Cow Creek (Ellenburger and Hickory) and Headwaters (Ellenburger) GCDs selected Scenario 3 average drawdown results as DFCs

GMA 9 UPCOMING SCHEDULE

Date	Description
March 31, 2026	GMA 9 adopts proposed DFCs and proposed non-relevant aquifer classifications for public comment
April 10, 2026 – July 9, 2026	90-Day public comment period; GCDs hold public hearings per notice requirements in Texas Water Code § 36.108 (d-2)
July- August 2026	GCDs prepare public comment summary reports and GMA 9 responses
September 2026	GMA 9 meets to consider GCD public comment summary reports
October 2026	AGS incorporates public comment summary reports into ER and finalizes draft report
November 2026	GMA 9 adopts final DFCs and proposed non-relevant classifications
December 2026	GMA 9 Chairman submits DFCs and all required information, including Explanatory Report, to TWDB

AGENDA ITEM 9

Discuss and possible action on the public comment and hearing process for the proposed desired future condition, pursuant to Texas Water Code § 36.108(d-2).

NEXT STEPS

- **90-Day Public Comment Period**

- GMA 9 letter to GCDs with formal notification of action to adopt proposed DFCs and non relevant aquifer classifications
- GCDs hold public hearings during 90-day comment period – DFCs relevant to GCD
- Sample GCD public hearing agenda item meeting notice
- AGS to provide ShareFile link to GCDs for documents for 90-day public comment period
- Public comment form?
- GCDs prepare summaries of relevant comments received and any suggested changes to DFCs with supporting materials; submit to GMA 9

GMA 9 PROPOSED NON-RELEVANT AQUIFER CLASSIFICATIONS AND DESIRED FUTURE CONDITIONS-90-DAY PUBLIC COMMENT/PUBLIC HEARING PROCESS AND TIMELINE

Date	Description
April 10, 2026	Notices of adopted proposed desired future conditions and non-relevant aquifer classifications mailed to GCDs
April 10, 2026	90-Day public comment period begins
April 10, 2026 – July 9, 2026	GCDs hold public hearings per notice requirements in Texas Water Code § 36.108 (d-2)
July 9, 2026	90-day public comment period ends
July - August 2026	GCDs prepare public comment summary reports and GMA 9 responses
September 2026	GMA 9 meets to consider GCD public comment summary reports
October 2026	AGS incorporates public comment summary reports into ER and finalizes draft report

AGENDA ITEM 10

Discuss aquifer DFC changes from prior five-year DFC joint planning cycle.

DFC CHANGES FROM PRIOR FIVE-YEAR JOINT PLANNING CYCLE

- DFC Changes in Current Round of Planning –
 - Ellenburger-San Saba Aquifer and Hickory Aquifer DFCs in Kendall County –
 - Ellenburger increased from 7 feet of average drawdown, to 16 feet of average drawdown
 - Hickory increase from 7 feet of average drawdown, to 11 feet of average drawdown
- Rationale –
 - New GAM available
 - Three predictive groundwater flow model runs to evaluate groundwater level change due to potential groundwater withdrawal in Ellenburger Unit (2010 – 2080)
 - Proposed DFCs based on model results

DFC CHANGES FROM PRIOR FIVE-YEAR JOINT PLANNING CYCLE

- **New DFCs Current Round of Planning –**
 - Ellenburger-San Saba Aquifer DFCs in Kerr County –16 feet of average drawdown
- **Rationale –**
 - City of Kerrville has one active public water system well producing from Ellenburger Aquifer at 700 gpm
 - Some City of Kerrville existing wells are producing from Ellenburger Aquifer rather than Lower Trinity based on observed communication between those existing wells and new Ellenburger Aquifer well
 - City of Kerrville intends to complete one more new public water system well in Ellenburger Aquifer
 - Aqua Texas has one active public water system well that produces from Ellenburger Aquifer at 290 gpm
 - Aqua Texas intends to add future Ellenburger Aquifer wells in strategic locations where high radionuclides concentrations exist in Middle Trinity production wells
 - Headwaters GCD has one Monitor Well completed in Ellenburger Aquifer, one Monitor Well expected to be completed in 2026, and plans to drill third Ellenburger Monitor Well by end of 2027

AGENDA ITEM 11

Discussion and possible action related to the identification of interim values for the adopted DFCs for time periods not to exceed ten (10) years solely to assist the Districts in monitoring interim progress in achieving the DFC's adopted for the 50-year planning period.

DRAFT PROPOSED GMA 9 DESIRED FUTURE CONDITIONS - INTERIM VALUES

Major or Minor Aquifer	Desired Future Condition Area of Applicability	2030	2040	2050	2060	2070	2080
Trinity	Throughout GMA 9	30	30	30	30	30	30
	Bandera County	29	29	29	29	29	29
	Bexar County	46	46	46	46	46	46
	Blanco County	19	19	19	19	19	19
	Comal County	24	24	24	24	24	24
	Hays County	19	19	19	19	19	19
	Kendall County	29	29	29	29	29	29
	Kerr County	39	39	39	39	39	39
	Medina County	16	16	16	16	16	16
Travis County	28	28	28	28	28	28	
Edwards Group of Edwards-Trinity (Plateau)	Bandera County	No Net Increase	No Net Increase	No Net Increase	No Net Increase	No Net Increase	No Net Increase
	Kendall County	No Net Increase	No Net Increase	No Net Increase	No Net Increase	No Net Increase	No Net Increase
Ellenburger-San Saba	Kerr County	11	11	11	11	11	11
	Kendall County	16	16	16	16	16	16
Hickory	Kendall County	16	16	16	16	16	16

THANK YOU
QUESTIONS?