

GMA-9 Public comment

Public Comments Received (Unedited)

Summary of Comments:

Mr. John Hidore expressed concern regarding the proposed 2027 DFCs for the Trinity Aquifer, particularly the proposed 24-foot drawdown and the use of a 2008 baseline. Mr. Hidore referenced significant drawdown observed in some of CTGCD's 25 monitoring wells and questioned whether the proposed DFC is viable based on current groundwater conditions. He also expressed concern that the proposed DFCs were developed using an older groundwater availability model and recommended that the newer TWDB model released in January 2026 be run as soon as possible to compare and validate the proposed DFCs using the best available science. Mr. Hidore also requested information regarding when funding for the new model runs will be available and when the modeling will be conducted. Mr. Hidore also asked how CTGCD will monitor and manage groundwater levels to achieve the proposed DFC through 2080.

1st Comment (Unedited)

Dear CTGCD Representative,

I would like to post the comment below for consideration regarding the proposed 2027 DFCs.

Given the analysis of Comal Counties 25 monitoring wells, it is clear that many areas are already well below the proposed DFCs which are targeting a 24 ft (average) drawdown in each of the three Trinity aquifers by 2080, measured relative to the 2008 water level baseline.

Since initiation of monitoring which ranges from 2018 to 2025;

6 of 25 wells are already below that target, all of which have been monitored since 2018-2019

8 of 25 wells are exhibiting drawdown of 4 to 18 ft

8 of 25 wells exhibit no drawdown to an increase of 5 ft, most of which have only commenced monitoring since well after the inception of the drought

2 of 25 wells are up more than 10 ft

1 of 25 wells is deemed to have unreliable data

The average of these wells is a drawdown of 17 feet which is nearing the 24 ft target by 2080 and given that these are not measured from the 2008 model baseline.

When compared to a "baseline" potentiometric map for the Middle Trinity published from 2009 data by Hunt et al, the picture is grim. All 21 wells for which valid data could be extracted from the 2009 map have experienced drawdown with an average of -237 ft.

Only 3 of 21 wells indicate drawdown less than the targeted 24 ft DFC.

While I acknowledge that there may be considerable error in the potentiometric map, the magnitude of the potential drawdown relative to the "baseline" is concerning.

How is the CTGCD going to measure and manage drawdown in the Trinity aquifer to meet the objective 2080 DFC of 24ft of drawdown from the baseline which is still 2008 water levels in the aquifer?

John W. Hidore
Texas Certified PG

2nd Comment (unedited)

Dear CTGCD Representative,

I would like to post the comment below for consideration regarding the proposed 2027 DFCs.

Given that the proposed DFCs were established based on the old model, and there has recently been a newer model released by the TWDB as of January of 2026, I would like to know if and when the new model will be run for comparison and validation of the proposed DFCs.

As a Texas Certified PG I strongly recommend that new runs be made as soon as possible to validate or provide perspective on the viability of the proposed 2027 DFCs for Comal County. Given my analysis of drawdown in the Middle Trinity for the 25 current monitoring wells it seems there has been significant drawdown in some areas well below the 24 ft drawdown proposed for 2080.

I would like to know when funding will be released for new model runs and when said runs will occur so that the "best available science" can be utilized to evaluate the viability of the proposed DFCs for Comal County?

Best Regards,
John W. Hidore

A handwritten signature in blue ink that reads "Carl Haack". The signature is written in a cursive style and is positioned above a horizontal line.

Carl Haack, General Manager
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