

From: Hays Trinity Groundwater Conservation District (HTGCD)

To: Groundwater Management Area 9

RE: Summary of Relevant Comments received by the Hays Trinity GCD during a Public Hearing and written comment period on GMA 9 Proposed Desired Future Conditions and Proposed Non-Relevant Aquifer Designations. Meeting was duly posted and held on June 4, 2026, within the 90-day public comment period in accordance with Texas Water Code Chapter 36.108

During the Public Hearing held on June 4, 2026, the HTGCD Board of Directors received one oral public comment and by the July 20, 2026 deadline, had received 2 written public comments.

Overall Summary

- Old model is known to be flawed/should not be used
- New model should be tested and used *now* instead of waiting full 5 years for next cycle
- Districts have enough data to make better decisions
- Using old model and same DFC builds inaccurate data into State Water Plan, especially harmful for rural communities

Individual Comment summaries:

Jim Doyle San Marcos, Texas

- The transient-model evaluation by Chowdbury doesn't support the chosen model as being a useful tool for managing a 30 ft DFC.
- No evaluation of Task 10-005 results for the past 16 years has been presented to demonstrate the suitability of keeping the DFCs unchanged.
- GMA 9 and HTGCD should plan on immediate use of the model under development, if it is suitable, rather than waiting five years.
- Using a simulation rather than estimation approach should be retained.
- Recharge in aquifer simulations should be based on simulated annual precipitation drawn from and matching statistics from the most current tree-ring and speleothem data and with pumping based on expected water demand from current projections of population increase.

Trinity Edwards Springs Association/Trinity Edwards Science and Policy Alliance and Doug Wierman (TESPA):

- Adopting the proposed DFC using the old model will continue to send an inaccurate and overstated MAG to the state regional planning groups (Regional K & L) for inclusion in the state water plan.
- Management dilemma created by the GMA and the model: The GCDs of GMA 9 have reported the current DFC has been exceeded across the GMA, while the modeled available groundwater (MAG) has not been exceeded. These conditions have emerged within just 15 years of a 70-year planning horizon.
- Population growth and drier than normal climatic conditions have significantly outpaced the assumptions underlying the 2010 DFC that continues to govern GMA 9 today.
- Proposed DFC wording allows exceedance to exist without violation until 2080.
- The statement of the DFC must contain some safeguards and intermediate check points such that the 30 feet of average drawdown is not exceeded for any significant length of time.
- The old model being used fails to adequately address surface water – groundwater interactions, underestimates drawdown and overestimates the MAG.
- TWDB developed the Southern Trinity GAM (new model), to represent “best available science.”
- TESPAs encourages GMA9 to immediately begin using the new model instead of waiting for the next five-year planning cycle.
- GMA 9 should move forward with best available science and address the inadequacies of the old model.