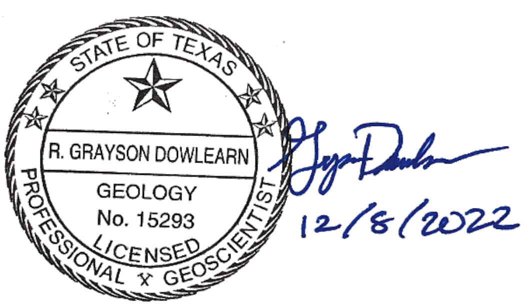
GAM RUN 21-014 MAG: MODELED AVAILABLE GROUNDWATER FOR THE AQUIFERS IN GROUNDWATER MANAGEMENT AREA 9

Grayson Dowlearn, P.G.
Texas Water Development Board
Groundwater Division
Groundwater Modeling Department
512-475-1552
December 8, 2022



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EXECUTIVE SUMMARY:

Groundwater Management Area (GMA) 9 adopted the desired future conditions for the Hickory and Ellenburger-San Saba aquifers, for the combined Trinity Aquifer and Trinity Group of the Edwards-Trinity (Plateau) Aquifer, and for the Edwards Group of the Edwards-Trinity (Plateau) Aquifer on November 15, 2021. Groundwater Management Area 9 submitted a Desired Future Conditions Explanatory Report (GMA 9 and others, 2021) and other supporting documents to the Texas Water Development Board (TWDB) on December 9, 2021. The TWDB determined that the explanatory report and other materials submitted by the district representatives were administratively complete on November 8, 2022.

Modeled available groundwater estimates are approximately 140 acre-feet per year for the Hickory Aquifer and approximately 60 acre-feet per year for the Ellenburger-San Saba Aquifer for the period between 2020 and 2080. Modeled available groundwater estimates range between a maximum of 90,264 acre-feet per year in 2020 and a minimum of 89,491 acre-feet per year in 2060 for the combination of Trinity Aquifer and Trinity group of the Edwards-Trinity (Plateau) Aquifer within Groundwater Management Area 9. Modeled available groundwater estimates are approximately 2,210 acre-feet per year for the Edwards Group of the Edwards-Trinity (Plateau) Aquifer for the period between 2020 and 2080. Modeled available groundwater estimates are provided in Tables 2 through 10.

Figure 1 provides the groundwater conservation district and county boundaries within Groundwater Management Area 9. Figure 2 provides the county, regional water planning area, and river basin boundaries within Groundwater Management Area 9.

REQUESTOR:

Mr. Ronald Fieseler, General Manager of Blanco Pedernales Groundwater Conservation District and Administrator of Groundwater Management Area 9.

DESCRIPTION OF REQUEST:

Mr. Ronald Fieseler provided the TWDB with the desired future conditions of the aquifers within Groundwater Management Area 9 on behalf of Groundwater Management Area (GMA) 9 in a letter dated December 9, 2021. Groundwater conservation district representatives in Groundwater Management Area 9 adopted desired future conditions for the aquifers within Groundwater Management Area 9 on November 15, 2021, as described in Resolution No. 111521-01 (Appendix D in GMA 9 and others, 2021). Desired future conditions are listed in Table 1 and represent average water level drawdowns across the specified area until the specified ending year.

TABLE 1. DESIRED FUTURE CONDITIONS FOR GROUNDWATER MANAGEMENT AREA 9 EXPRESSED AS AVERAGE DRAWDOWN (ADAPTED FROM SUBMITTED RESOLUTION).

Major or minor aquifer	Desired future condition
Trinity Aquifer and Trinity Group of the Edwards-Trinity (Plateau) Aquifer	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
Edwards Group of Edwards-Trinity (Plateau)	Allow for no net increase in average drawdown in Bandera and Kendall counties through 2080
Ellenburger-San Saba	Allow for an increase in average drawdown of no more than 7 feet in Kendall County through 2080
Hickory	Allow for an increase in average drawdown of no more than 7 feet in Kendall County through 2080

Additionally, Groundwater Management Area 9 voted to declare certain aquifers and/or portions of aquifers to be non-relevant for the purposes of joint planning, as shown in Table 2.

TABLE 2. AQUIFERS AND PORTIONS OF AQUIFERS WHICH WERE DECLARED NON-RELEVANT FOR THE PURPOSES OF JOINT PLANNING WITHIN GROUNDWATER MANAGEMENT AREA 9.

Major or minor aquifer	Non-relevant area
Edwards (Balcones Fault Zone) Aquifer	Entire aquifer (Bexar, Comal, Hays, and Travis counties)
Edwards Group of Edwards-Trinity (Plateau) Aquifer	Portion in Blanco and Kerr counties
Ellenburger-San Saba Aquifer	Portion in Blanco and Kerr counties
Hickory Aquifer	Portion in Blanco, Hays, Kerr, and Travis counties
Marble Falls Aquifer	Entire aquifer (Blanco County)

After reviewing the submitted documents, TWDB staff requested clarifications regarding the methodology and assumptions used in the definitions of desired future conditions. Appendix A includes the responses to these clarifications that Groundwater Management Area 9 provided to the TWDB on October 17, 2022.

METHODS:

Hickory and Ellenburger-San Saba Aquifers

The groundwater availability model for the minor aquifers of the Llano Uplift Region of Texas (Version 1.01; Shi and others, 2016a, 2016b) was used to calculate the drawdown and modeled available groundwater for the Hickory and Ellenburger-San Saba aquifers (Llano Uplift aquifers) within Groundwater Management Area 9. The predictive model files used in the evaluation were originally developed by the TWDB in the previous joint planning cycle for GAM Run 16-023 (Jones, 2017). The evaluation in GAM Run 16-023 only went to 2070, so the TWDB extended the model files to 2080 for this evaluation.

Pumping was distributed evenly across the Kendall County portion of the Llano Uplift aquifers and then varied until the desired future condition was achieved within the accepted tolerance defined by Groundwater Management Area 9. Modeled water levels were extracted for December 2010 (initial water levels equivalent to the final stress period of the historically calibrated model) and December 2080 (stress period 70). Drawdown was calculated as the difference in water levels between those two endpoints. Drawdown averages were calculated by aquifer for each area specified in the desired future conditions. The modeled available groundwater values were determined by extracting pumping rates by decade from the model results using ZONEBUDGET USG Version 1.00 (Panday and others, 2013).

Trinity Aquifer and Trinity Group of the Edwards-Trinity (Plateau) Aquifer

The groundwater availability model for the Hill Country Portion of the Trinity Aquifer (Version 2.01; Jones and others, 2011) was used to calculate the drawdown and modeled available groundwater values for the combination of Trinity Aquifer and Trinity Group of the Edwards-Trinity (Plateau) Aquifer within Groundwater Management Area 9. Predictive model files from TWDB GAM Task 10-005 (Hutchison, 2010) were used, as specified by Resolution No. 111521-01 (Appendix D in GMA 9 and others, 2021). GAM Task 10-005 (Hutchison, 2010) ran a predictive pumping scenario ("Scenario 6") under 387 different recharge conditions. For every model run, modeled water levels were extracted for December 2008 (initial water levels) and December 2060 (stress period 50), and drawdown was calculated as the difference in water level between those two endpoints. The drawdown average across Groundwater Management Area 9 was calculated as the average of the 387 scenarios. The TWDB confirmed that the desired future conditions adopted by Groundwater Management Area 9 are achievable using this methodology. The modeled available groundwater values were determined by extracting pumping rates by decade from each model run's results and then averaging the modeled pumping rates from the 387 scenarios using custom Fortran scripts developed by the TWDB for Task 10-005 (Hutchison, 2010).

Edwards Group of the Edwards-Trinity (Plateau) Aquifer

The groundwater availability model for the Hill Country Portion of the Trinity Aquifer (Version 2.01; Jones and others, 2011) was also used to calculate the drawdown and modeled available groundwater for the Edwards Group of the Edwards-Trinity (Plateau) Aquifer within Groundwater Management Area 9. The predictive model files used in the evaluation were originally developed by the TWDB in the previous joint planning cycle for GAM Run 16-023 (Jones, 2017). The evaluation in GAM Run 16-023 only went to 2070, so the TWDB extended these model files to 2080 for this evaluation.

The TWDB created a predictive pumping scenario by copying “Scenario 6” from TWDB Task 10-005 and then varying Edwards Group pumping by a constant multiplier across Bandera and Kendall counties until the desired future condition was achieved within the accepted tolerance defined by Groundwater Management Area 9. The TWDB used these predictive model files to extract modeled water levels from December 1997 (initial water levels equivalent to the final stress period of the historically calibrated model) and December 2080 (stress period 83) and drawdown was calculated as the difference in water level between those two endpoints. The modeled available groundwater values were determined by extracting pumping rates by decade from the model results using ZONEBUDGET Version 3.01 (Harbaugh, 2009).

Modeled Available Groundwater and Permitting

As defined in Chapter 36 of the Texas Water Code (2011), “modeled available groundwater” is the estimated average amount of water that may be produced annually to achieve a desired future condition. Groundwater conservation districts are required to consider modeled available groundwater, along with several other factors, when issuing permits in order to manage groundwater production to achieve the desired future condition(s). The other factors districts must consider include annual precipitation and production patterns, the estimated amount of pumping exempt from permitting, existing permits, and a reasonable estimate of actual groundwater production under existing permits.

PARAMETERS AND ASSUMPTIONS:

Hickory and Ellenburger-San Saba aquifers

- Version 1.01 of the groundwater availability model for the minor aquifers of the Llano Uplift Region of Texas was the base model for this analysis. See Shi and others (2016a, 2016b) for assumptions and limitations of the historical calibrated model.
- In the previous joint planning cycle, the TWDB created predictive model files to extend the base model to 2070 for planning purposes. For the current analysis, these model files were extended an additional ten years to 2080 using the same assumptions used in the previous cycle. See GAM Run 16-023 (Jones, 2017) for assumptions and limitations of this predictive model simulation.
- The model has eight layers, which represent the Cretaceous age and younger water-bearing units (Layer 1), Permian and Pennsylvanian age confining units (Layer 2), the Marble Falls Aquifer and equivalent (Layer 3), Mississippian age confining units (Layer 4), the Ellenburger-San Saba Aquifer and equivalent (Layer 5), Cambrian age confining units (Layer 6), the Hickory Aquifer and equivalent (Layer 7), and Precambrian age confining units (Layer 8).
- To be consistent with assumptions made by Groundwater Management Area 9 (see GMA 9 and others, 2021), the TWDB assumed a tolerance of five percent of the drawdown when comparing desired future conditions to modeled drawdown results.

- The model was run with MODFLOW-USG (Panday and others, 2013).
- Drawdown averages and modeled available groundwater volumes were calculated based on the extent of the official TWDB aquifer boundary (Figures 3 and 4). The most recent TWDB model grid file dated August 23, 2022 (*lnup_grid_poly082322.csv*) was used to determine model cell entity assignment (county, groundwater management area, groundwater conservation district, river basin, regional water planning area).
- Drawdowns for cells that became dry during the simulation were excluded from the drawdown averages. Pumping in dry cells was excluded from the modeled available groundwater calculations.
- Estimates of modeled available groundwater from the model simulation were rounded to the nearest whole number.

Trinity Aquifer and Edwards-Trinity (Plateau) Aquifer

- Version 2.01 of the groundwater availability model for the Hill Country Portion of the Trinity Aquifer was the base model for this analysis. See Jones and others (2011) for assumptions and limitations of the historical calibrated model.
- The model has four layers which represent the Edwards Group of the Edwards-Trinity (Plateau) Aquifer (Layer 1), the Upper Trinity hydrostratigraphic unit (Layer 2), the Middle Trinity hydrostratigraphic unit (Layer 3), and the Lower Trinity hydrostratigraphic unit (Layer 4).
- The evaluation of the Trinity Aquifer and the Trinity Group of the Edwards-Trinity (Plateau) Aquifer used predictive model files created by the TWDB that extended the base model to 2060 for planning purposes and represented 387 different potential recharge scenarios. See GAM Task 10-005 (Hutchison, 2010) for the assumptions and limitations of these predictive model simulations.
- The evaluation of the Edwards Group of the Edwards-Trinity (Plateau) Aquifer used predictive model files created by the TWDB during the previous joint planning cycle that extended the base model to 2070 for planning purposes. For the current analysis, the TWDB extended these model files an additional ten years to 2080 using the same assumptions used in the previous cycle. See GAM Run 16-023 (Jones, 2017) for assumptions and limitations of this predictive model simulation.
- Although the base model (Jones and others, 2011) was only calibrated to 1997, the TWDB developed a subsequent steady-state version of the model representing observed conditions in the Trinity Aquifer as of 2008 (Chowdhury, 2010). Since that model provided the initial water levels for the GAM Task 10-005 (Hutchison, 2010) predictive model files, the reference year of 2008 can be used for drawdown calculations for the Trinity Aquifer and the Trinity Group of Edwards-Trinity (Plateau) Aquifer. Since this verification did not apply to the Edwards Group of the Edwards-Trinity (Plateau) Aquifer, the original reference year of 1997 from the base model was used for drawdown calculations in that unit.
- Drawdowns for cells that became dry during the simulation were excluded from the drawdown averages. Pumping volumes are reduced to zero if a cell becomes dry during the predictive model run. The modeled available groundwater values do not include dry cells for decades after the cell becomes dry.

- Drawdown averages and modeled available groundwater volumes were calculated based on the extent of active model cells, not the official TWDB aquifer boundary (Figures 5 and 6). The most recent TWDB model grid file dated August 15, 2022 (*trnt_h_grid_poly081522.csv*) was used to determine model cell entity assignment (county, groundwater management area, groundwater conservation district, river basin, regional water planning area).
- To be consistent with Groundwater Management Area 9's assumptions (see GMA 9 and others, 2021), a tolerance of five percent of the desired future condition drawdown was assumed when comparing desired future conditions to modeled drawdown results.
- The model was run with MODFLOW-96 (Harbaugh and McDonald, 1996)
- Estimates of modeled available groundwater from the model simulation were rounded to the nearest whole number.

RESULTS:

The modeled available groundwater estimates that achieve the desired future conditions adopted by Groundwater Management Area 9 are as follows:

- Hickory Aquifer: 140 acre-feet per year (summarized by county and groundwater conservation district in Table 3 and by county, regional water planning area, and river basin in Table 4).
- Ellenburger-San Saba Aquifer: Approximately 60 acre-feet per year for the that (summarized by county and groundwater conservation district in Table 5 and by county, regional water planning area, and river basin in Table 6).
- Combined Trinity Aquifer and Trinity Group of the Edwards-Trinity (Plateau) Aquifer: Ranges from a maximum of 90,264 acre-feet per year in 2020 and a minimum of 89,491 acre-feet per year in 2060 (summarized by county and groundwater conservation district in Table 7 and by county, regional water planning area, and river basin in Table 8).
- Edwards Group of the Edwards-Trinity (Plateau) Aquifer: 2,210 acre-feet per year (summarized by county and groundwater conservation district in Table 9 and by county, regional water planning area, and river basin in Table 10).

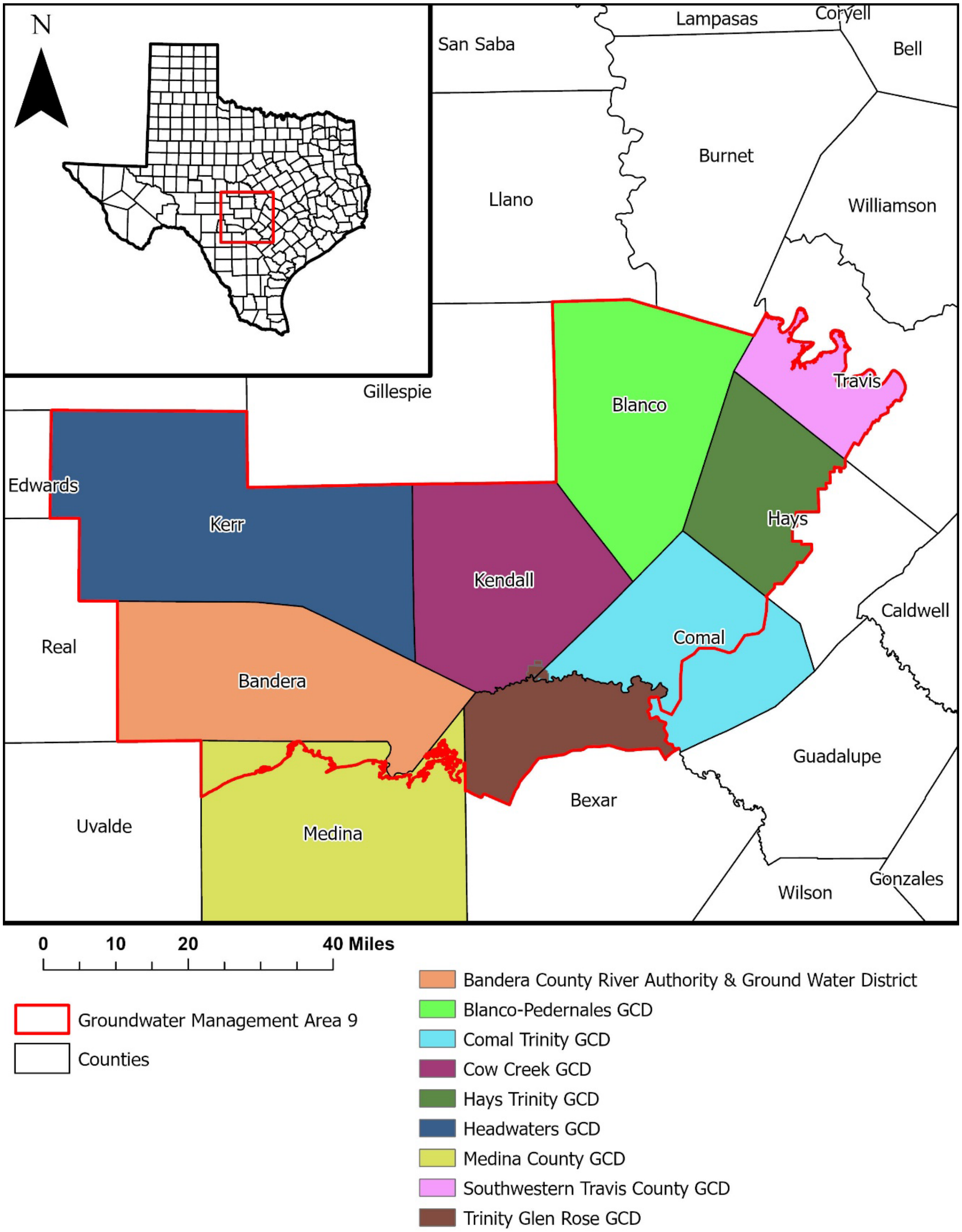

FIGURE 1. MAP SHOWING GROUNDWATER MANAGEMENT AREA 9, GROUNDWATER CONSERVATION DISTRICTS (GCD), AND COUNTY BOUNDARIES.

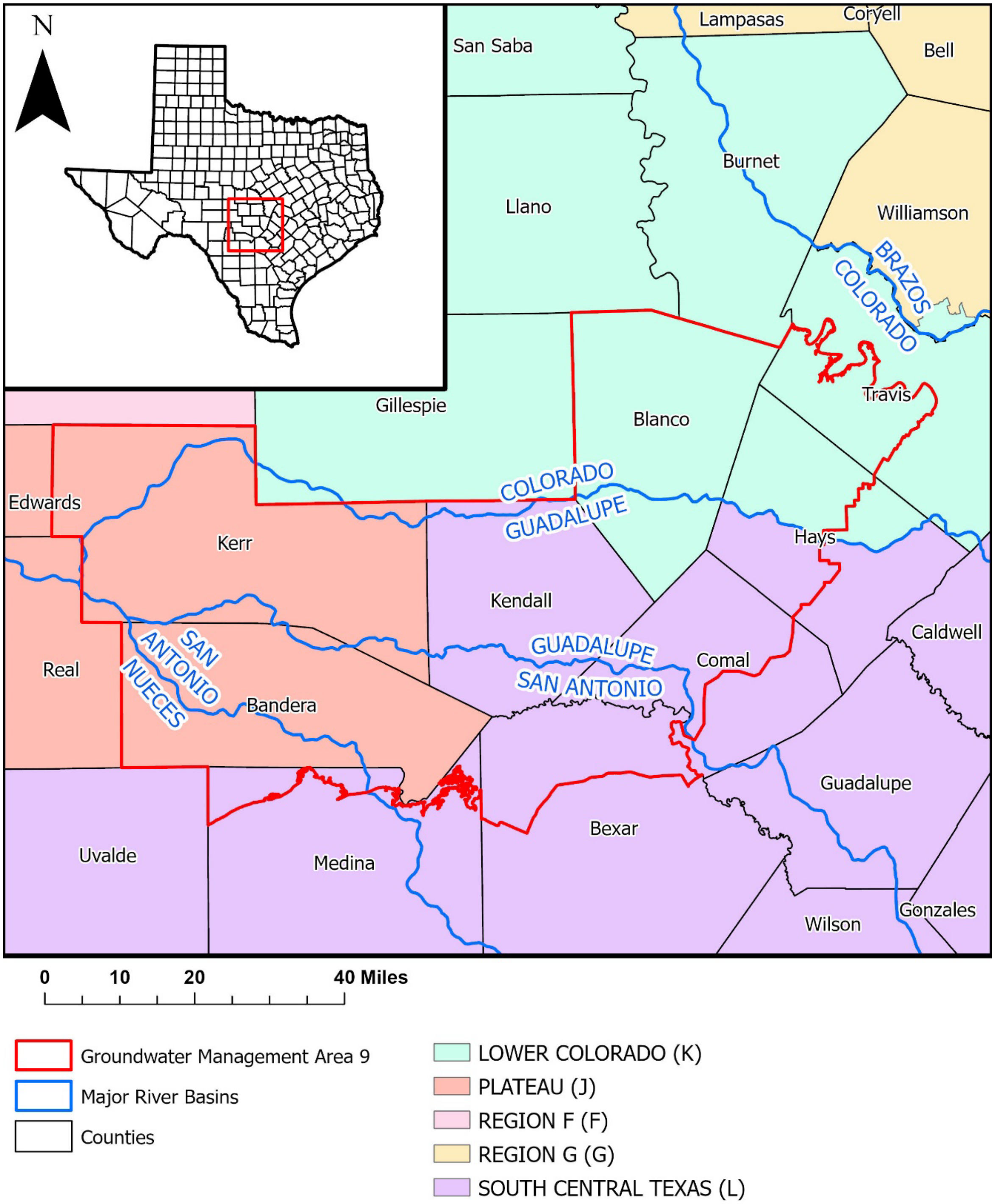

FIGURE 2. MAP SHOWING GROUNDWATER MANAGEMENT AREA 9, REGIONAL WATER PLANNING AREAS, RIVER BASINS, AND COUNTY BOUNDARIES.

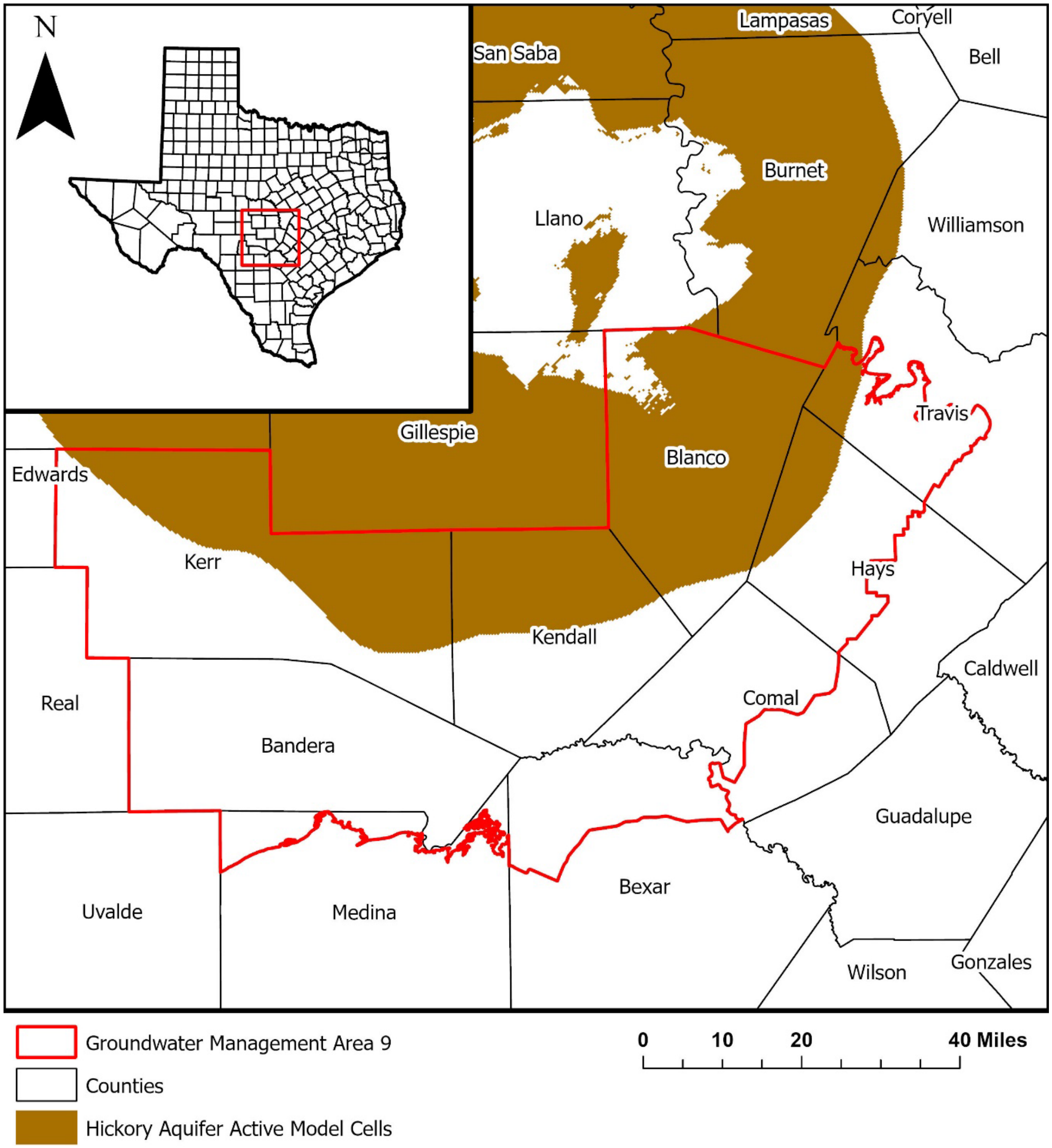

FIGURE 3. MAP SHOWING THE ACTIVE MODEL CELLS REPRESENTING THE HICKORY AQUIFER (LAYER 7) IN THE MINOR AQUIFERS OF THE LLANO UPLIFT REGION OF TEXAS GROUNDWATER AVAILABILITY MODEL IN RELATION TO GROUNDWATER MANAGEMENT AREA 9.

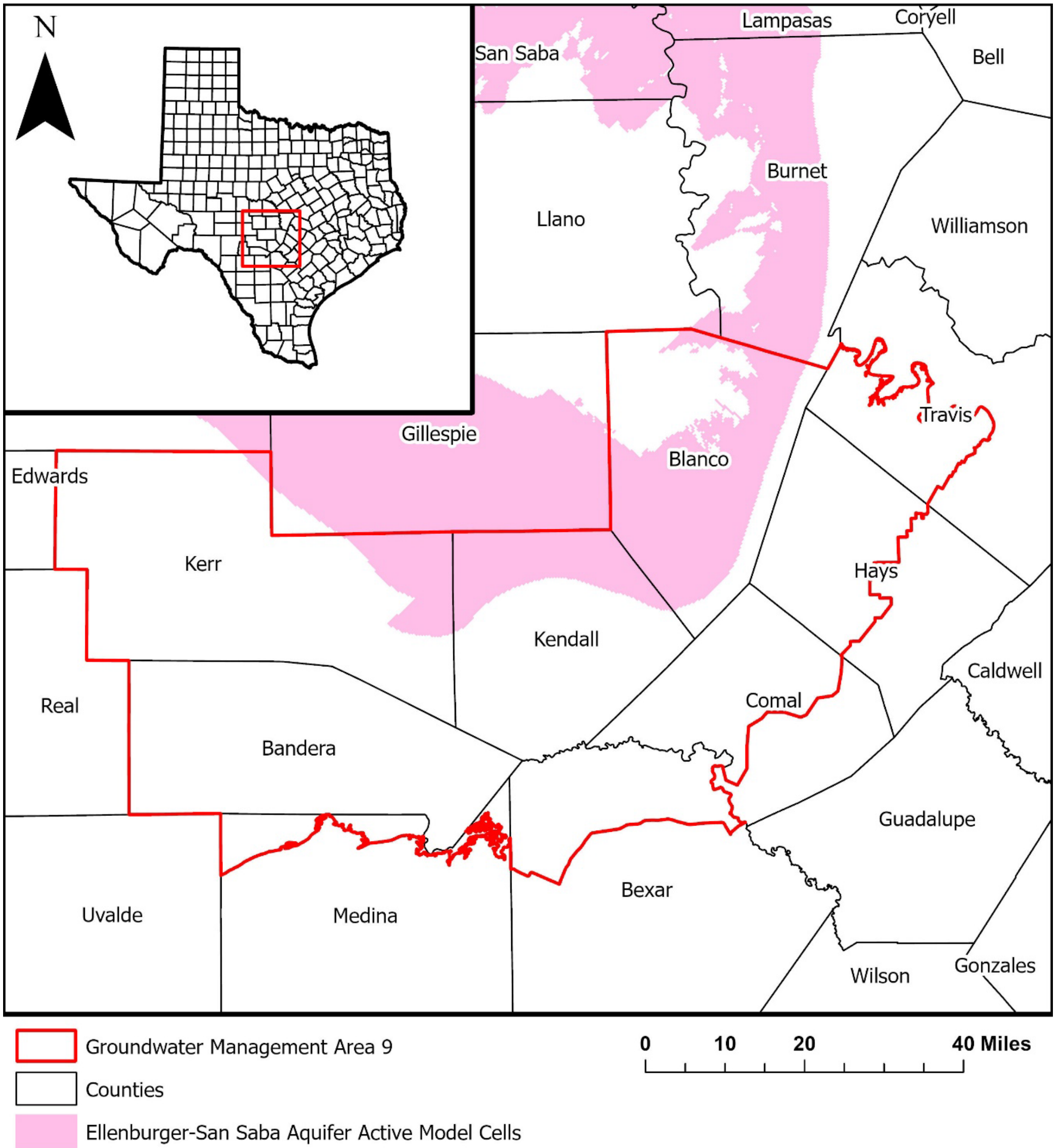

FIGURE 4. MAP SHOWING THE ACTIVE MODEL CELLS REPRESENTING THE ELLENBURGER-SAN SABA AQUIFER (LAYER 5) IN THE MINOR AQUIFERS OF THE LLANO UPLIFT REGION OF TEXAS GROUNDWATER AVAILABILITY MODEL IN RELATION TO GROUNDWATER MANAGEMENT AREA 9.

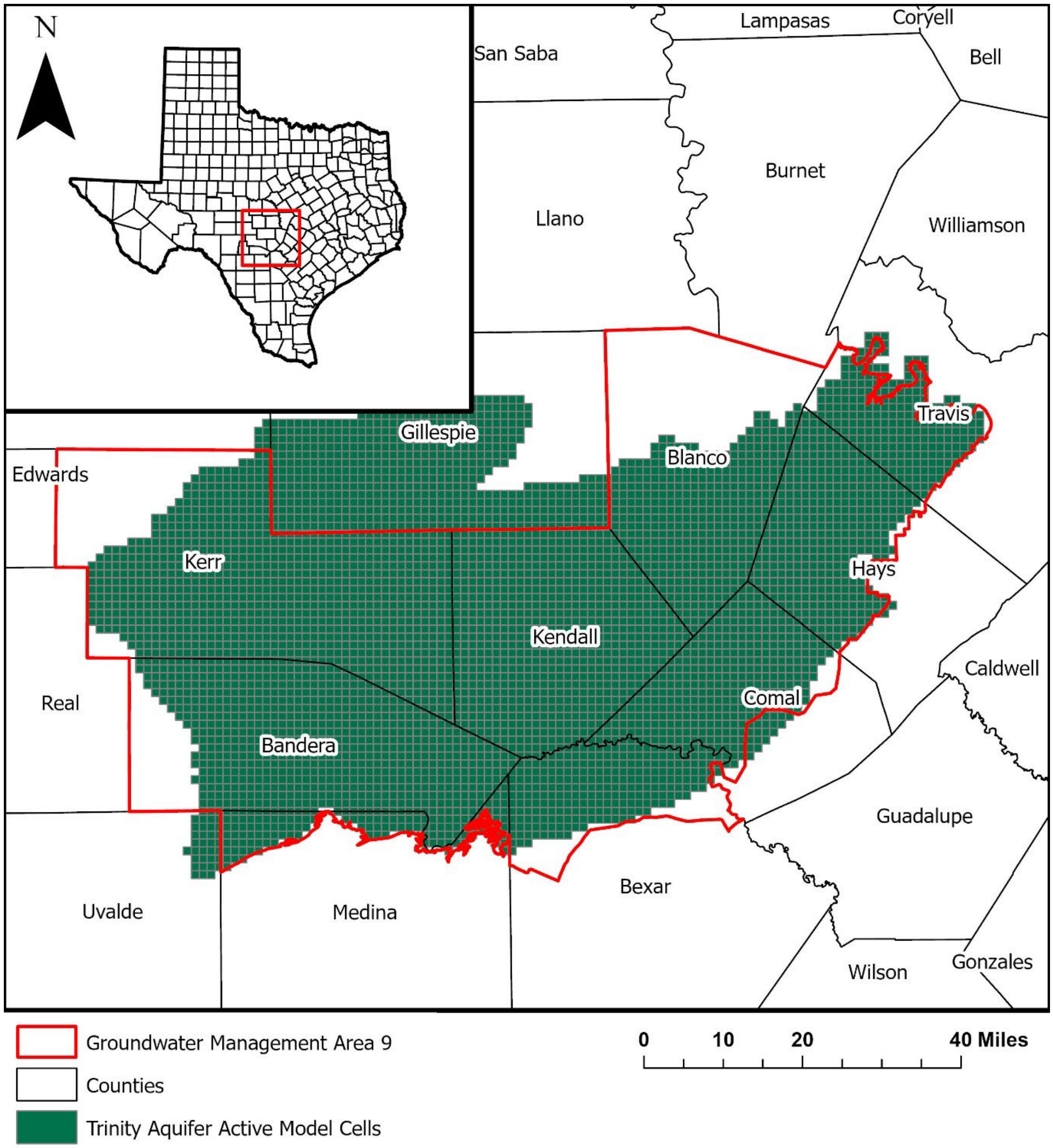

FIGURE 5. MAP SHOWING THE ACTIVE MODEL CELLS REPRESENTING THE TRINITY AQUIFER AND TRINITY GROUP OF THE EDWARDS-TRINITY (PLATEAU) AQUIFER (LAYERS 2, 3, AND 4) IN THE HILL COUNTRY PORTION OF THE TRINITY AQUIFER GROUNDWATER AVAILABILITY MODEL IN RELATION TO GROUNDWATER MANAGEMENT AREA 9.

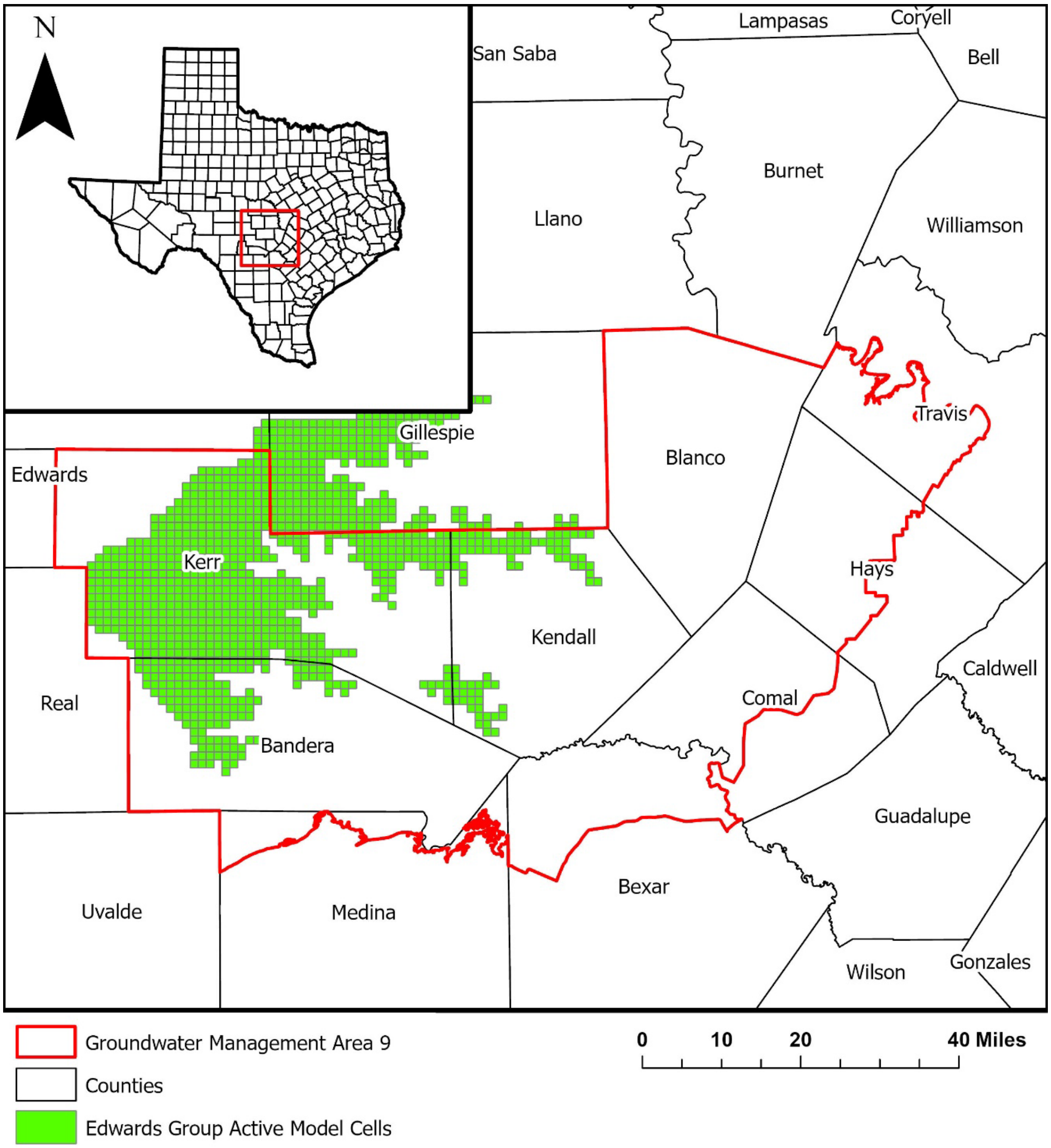

FIGURE 6. MAP SHOWING THE ACTIVE MODEL CELLS REPRESENTING THE EDWARDS GROUP OF THE EDWARDS-TRINITY (PLATEAU) AQUIFER (LAYER 1) IN THE HILL COUNTRY PORTION OF THE TRINITY AQUIFER GROUNDWATER AVAILABILITY MODEL IN RELATION TO GROUNDWATER MANAGEMENT AREA 9.

TABLE 3. MODELED AVAILABLE GROUNDWATER FOR THE HICKORY AQUIFER IN GROUNDWATER MANAGEMENT AREA 9 SUMMARIZED BY GROUNDWATER CONSERVATION DISTRICT AND COUNTY FOR EACH DECADE BETWEEN 2020 AND 2080. VALUES ARE IN ACRE-FEET PER YEAR.

Groundwater Conservation District (GCD)	County	Aquifer	2020	2030	2040	2050	2060	2070	2080
Cow Creek GCD	Kendall	Hickory	141	140	141	140	141	140	141

TABLE 4. MODELED AVAILABLE GROUNDWATER FOR THE HICKORY AQUIFER IN GROUNDWATER MANAGEMENT AREA 9. RESULTS ARE SUMMARIZED BY COUNTY, REGIONAL WATER PLANNING AREA (RWPA), AND RIVER BASIN FOR EACH DECADE FROM 2030 TO 2080. VALUES ARE IN ACRE-FEET PER YEAR.

County	RWPA	Basin	Aquifer	2030	2040	2050	2060	2070	2080
Kendall	L	Colorado	Hickory	12	12	12	12	12	12
Kendall	L	Guadalupe	Hickory	128	128	128	128	128	128
Groundwater Management Area 9 Total			**Hickory**	**140**	**140**	**140**	**140**	**140**	**140**

TABLE 5. MODELED AVAILABLE GROUNDWATER FOR THE ELLENBURGER-SAN SABA AQUIFER IN GROUNDWATER MANAGEMENT AREA 9 SUMMARIZED BY GROUNDWATER CONSERVATION DISTRICT AND COUNTY FOR EACH DECADE BETWEEN 2020 AND 2080. VALUES ARE IN ACRE-FEET PER YEAR.

Groundwater Conservation District (GCD)	County	Aquifer	2020	2030	2040	2050	2060	2070	2080
Cow Creek GCD	Kendall	Ellenberger-San Saba	62	62	62	62	62	62	62

TABLE 6. MODELED AVAILABLE GROUNDWATER FOR THE ELLENBURGER-SAN SABA AQUIFER IN GROUNDWATER MANAGEMENT AREA 9. RESULTS ARE SUMMARIZED BY COUNTY, REGIONAL WATER PLANNING AREA (RWPA), AND RIVER BASIN FOR EACH DECADE FROM 2030 TO 2080. VALUES ARE IN ACRE-FEET PER YEAR.

County	RWPA	Basin	Aquifer	2030	2040	2050	2060	2070	2080
Kendall	L	Colorado	Ellenberger-San Saba	9	9	9	9	9	9
Kendall	L	Guadalupe	Ellenberger-San Saba	53	54	53	54	53	54
Groundwater Management Area 9 Total			**Ellenberger-San Saba**	**62**	**63**	**62**	**63**	**62**	**63**

TABLE 7. MODELED AVAILABLE GROUNDWATER FOR THE TRINITY AQUIFER AND TRINITY GROUP OF THE EDWARDS-TRINITY (PLATEAU) AQUIFER IN GROUNDWATER MANAGEMENT AREA 9 SUMMARIZED BY GROUNDWATER CONSERVATION DISTRICT (GCD) AND COUNTY FOR EACH DECADE BETWEEN 2020 AND 2060. VALUES ARE IN ACRE-FEET PER YEAR.

Groundwater Conservation District	County	Aquifer	2020	2030	2040	2050	2060
Bandera County River Authority & Ground Water District	Bandera	Trinity	7,284	7,284	7,284	7,284	7,284
Blanco-Pedernales GCD	Blanco	Trinity	2,573	2,573	2,573	2,573	2,573
Comal Trinity GCD	Comal	Trinity	9,383	9,383	9,383	9,383	9,383
Cow Creek GCD	Kendall	Trinity	10,622	10,622	10,622	10,622	10,622
Hays Trinity GCD	Hays	Trinity	9,074	9,071	9,070	9,070	9,070
Headwaters GCD	Kerr	Trinity	14,918	14,845	14,556	14,239	14,223
Medina County GCD	Medina	Trinity	2,340	2,340	2,340	2,340	2,340
Southwestern Travis County GCD	Travis	Trinity	8,559	8,542	8,530	8,515	8,485
Trinity Glen Rose GCD	Bexar	Trinity	24,856	24,856	24,856	24,856	24,856
	Comal	Trinity	138	138	138	138	138
	Kendall	Trinity	517	517	517	517	517
Trinity Glen Rose GCD Total		**Trinity**	**25,511**	**25,511**	**25,511**	**25,511**	**25,511**
Groundwater Management Area 9 Total		**Trinity**	**90,264**	**90,171**	**89,869**	**89,537**	**89,491**

TABLE 8 MODELED AVAILABLE GROUNDWATER FOR THE TRINTY AQUIFER AND TRINITY GROUP OF THE EDWARDS-TRINITY (PLATEAU) AQUIFER IN GROUNDWATER MANAGEMENT AREA 9. RESULTS ARE SUMMARIZED BY COUNTY, REGIONAL WATER PLANNING AREA (RWPA), AND RIVER BASIN FOR EACH DECADE FROM 2030 TO 2060. VALUES ARE IN ACRE-FEET PER YEAR.

County	RWPA	Basin	Aquifer	2030	2040	2050	2060
Bandera	J	Guadalupe	Trinity	76	76	76	76
Bandera	J	Nueces	Trinity	903	903	903	903
Bandera	J	San Antonio	Trinity	6,305	6,305	6,305	6,305
Bexar	L	San Antonio	Trinity	24,856	24,856	24,856	24,856
Blanco	K	Colorado	Trinity	1,322	1,322	1,322	1,322
Blanco	K	Guadalupe	Trinity	1,251	1,251	1,251	1,251
Comal	L	Guadalupe	Trinity	6,252	6,252	6,252	6,252
Comal	L	San Antonio	Trinity	3,269	3,269	3,269	3,269
Hays	K	Colorado	Trinity	4,707	4,706	4,706	4,706
Hays	L	Guadalupe	Trinity	4,364	4,364	4,364	4,364
Kendall	L	Colorado	Trinity	135	135	135	135
Kendall	L	Guadalupe	Trinity	6,028	6,028	6,028	6,028
Kendall	L	San Antonio	Trinity	4,976	4,976	4,976	4,976
Kerr	J	Colorado	Trinity	318	318	318	318
Kerr	J	Guadalupe	Trinity	14,056	13,767	13,450	13,434
Kerr	J	Nueces	Trinity	0	0	0	0
Kerr	J	San Antonio	Trinity	471	471	471	471
Medina	L	Nueces	Trinity	1,575	1,575	1,575	1,575
Medina	L	San Antonio	Trinity	765	765	765	765
Travis	K	Colorado	Trinity	8,542	8,530	8,515	8,485
Groundwater Management Area 9 Total			**Trinity**	**90,171**	**89,869**	**89,537**	**89,491**

TABLE 9 MODELED AVAILABLE GROUNDWATER FOR THE EDWARDS GROUP OF THE EDWARDS-TRINITY (PLATEAU) AQUIFER IN GROUNDWATER MANAGEMENT AREA 9 SUMMARIZED BY GROUNDWATER CONSERVATION DISTRICT (GCD) AND COUNTY FOR EACH DECADE BETWEEN 2020 AND 2080. VALUES ARE IN ACRE-FEET PER YEAR.

GCD	County	Aquifer	2020	2030	2040	2050	2060	2070	2080
Bandera County River Authority & Ground Water District	Bandera	Edwards	2,009	2,009	2,009	2,009	2,009	2,009	2,009
Cow Creek GCD	Kendall	Edwards	200	200	200	200	200	200	200
Groundwater Management Area 9 Total		**Edwards**	**2,209**	**2,209**	**2,209**	**2,209**	**2,209**	**2,209**	**2,209**

TABLE 10 MODELED AVAILABLE GROUNDWATER FOR THE EDWARDS GROUP OF THE EDWARDS-TRINITY (PLATEAU) AQUIFER IN GROUNDWATER MANAGEMENT AREA 9. RESULTS ARE SUMMARIZED BY COUNTY, REGIONAL WATER PLANNING AREA (RWPA), AND RIVER BASIN FOR EACH DECADE FROM 2030 TO 2080. VALUES ARE IN ACRE-FEET PER YEAR.

County	RWPA	Basin	Aquifer	2030	2040	2050	2060	2070	2080
Bandera	J	Guadalupe	Edwards	81	81	81	81	81	81
Bandera	J	Nueces	Edwards	38	38	38	38	38	38
Bandera	J	San Antonio	Edwards	1,890	1,890	1,890	1,890	1,890	1,890
Kendall	L	Colorado	Edwards	69	69	69	69	69	69
Kendall	L	Guadalupe	Edwards	130	130	130	130	130	130
Groundwater Management Area 9 Total			**Edwards**	**2,208**	**2,208**	**2,208**	**2,208**	**2,208**	**2,208**

LIMITATIONS:

The groundwater model used in completing this analysis is the best available scientific tool that can be used to meet the stated objectives. To the extent that this analysis will be used for planning purposes and/or regulatory purposes related to pumping in the past and into the future, it is important to recognize the assumptions and limitations associated with the use of the results. In reviewing the use of models in environmental regulatory decision making, the National Research Council (2007) noted:

> *"Models will always be constrained by computational limitations, assumptions, and knowledge gaps. They can best be viewed as tools to help inform decisions rather than as machines to generate truth or make decisions. Scientific advances will never make it possible to build a perfect model that accounts for every aspect of reality or to prove that a given model is correct in all respects for a particular regulatory application. These characteristics make evaluation of a regulatory model more complex than solely a comparison of measurement data with model results."*

A key aspect of using the groundwater model to evaluate historic groundwater flow conditions includes the assumptions about the location in the aquifer where historic pumping was placed. Understanding the amount and location of historic pumping is as important as evaluating the volume of groundwater flow into and out of the district, between aquifers within the district (as applicable), interactions with surface water (as applicable), recharge to the aquifer system (as applicable), and other metrics that describe the impacts of that pumping. In addition, assumptions regarding precipitation, recharge, and streamflow are specific to a particular historic time period.

Because the application of the groundwater model was designed to address regional scale questions, the results are most effective on a regional scale. The TWDB makes no warranties or representations relating to the actual conditions of any aquifer at a particular location or at a particular time.

It is important for groundwater conservation districts to monitor groundwater pumping and groundwater levels in the aquifer. Because of the limitations of the groundwater model and the assumptions in this analysis, it is important that the groundwater conservation districts work with the TWDB to refine this analysis in the future given the reality of how the aquifer responds to the actual amount and location of pumping now and in the future. Historic precipitation patterns also need to be placed in context as future climatic conditions, such as dry and wet year precipitation patterns, may differ and affect groundwater flow conditions.

REFERENCES:

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APPENDIX A: CLARIFICATIONS

Groundwater Management Area 9 Joint Planning Committee

Bandera County River Authority and Groundwater District
Blanco-Pedernales Groundwater Conservation District
Comal Trinity Groundwater Conservation District
Cow Creek Groundwater Conservation District
Hays-Trinity Groundwater Conservation District
Headwaters Groundwater Conservation District
Medina County Groundwater Conservation District
Trinity Glen Rose Groundwater Conservation District
Southwestern Travis County Groundwater Conservation District

Mr. Micah Voulgaris, GMA 9 Planning Committee Chairman P.O. Box 1557 Boerne, Texas 78006

October 17, 2022

Stephen Allen, P.G., Geoscientist
Groundwater Technical Assistance Team
Groundwater Resources
Texas Water Development Board
P. O. Box 13231
1700 North Congress Avenue
Austin, Texas 78711-3231

Re: Acknowledgement of clarifications needed for the Texas Water Development Board to declare the Groundwater Management Area 9 Desired Future Conditions submittal administratively complete

Mr. Allen,

This letter is in response to your email sent to me on Tuesday, October the 11th.

It was the intent of the Groundwater Management Area 9 Joint Planning Committee to adopt Desired Future Conditions that produced drawdown values consistent with the previous two planning cycles.

GMA 9 acknowledges and accepts all ten of the "other clarifications" and the two "optional clarifications" as outlined in the attached document sent by the TWDB.

Please let us know if you need additional information or if further action is required.

Thank you,
Groundwater Management Area 9

Micah Voulgaris
GMA 9 Chairman

Enclosure: *GMA09_Clarifications_v1*

FIGURE A1: PAGE 1 OF CORRESPONDENCE BETWEEN GROUNDWATER MANAGEMENT AREA 9 AND THE TWDB RELATED TO CLARIFIACTIONS (LETTER FROM GROUNDWATER MANAGEMENT AREA 9 ACKNOWLEDGING AND ACCEPTING CLARIFICATIONS)

Critical Clarifications *(need additional files or an update to Legal DFC Resolution)***:**

- None, unless the GMA disagrees with clarifications and assumptions below.

Other Clarifications (*TWDB will only need acknowledgement for administratively complete*)**:**

Trinity Aquifer:

1. Please confirm that the phrase *"average drawdown of approximately 30 feet through 2060 consistent with Scenario 6 in TWDB GAM Task 10-005"* in the DFC Resolution means *"no more than 30 feet of average water level decline in 2060, as compared to 2008 water levels, averaged over all TWDB GAM Task 10-005 Scenario 6 model iterations."*[1] This method produces drawdown values consistent with the DFC values provided in the Explanatory Report and is consistent with the methodology used in the previous planning cycle.
2. Please confirm that the GMA accepts the following assumptions for calculating modeled drawdown: 1) exclude all cells that become dry and 2) use all active model cells even if they do not fall within the official TWDB aquifer boundary. This method produces drawdown values consistent with the DFC values provided in the Explanatory Report and is consistent with the methodology used in the previous planning cycle.
3. As in the previous planning cycle, we will only provide MAG values calculated within the extent of the TWDB Trinity (Hill Country) Aquifer GAM. Since this model does not extend across the entire GMA, these MAG values will not include any pumping that might occur outside the model extent. Please confirm that this methodology is acceptable to the GMA. Otherwise, please contact TWDB to request additional MAG value calculations.

Edwards Group of the Edwards-Trinity (Plateau) Aquifer:

4. Please confirm that the phrase *"no net increase in average drawdown through 2080"* in the DFC Resolution means *"no average water level decline in 2080, as compared to 1997 water levels."*[2] This method produces drawdown values consistent with the DFC values provided in the Explanatory Report and is consistent with the methodology used in the previous planning cycle.
5. Since the GMA did not provide predictive model files, TWDB used the predictive model files *[based on Trinity (Hill Country) Aquifer GAM]* developed by TWDB during the previous planning cycle (see GAM Run 16-023) and extended them to 2080 by assuming the same recharge rates and the same percentage increase in pumping rates as was used in the previous planning cycle. Please confirm that this methodology is acceptable to the GMA.
6. Please confirm that the GMA accepts the following assumptions for calculating modeled drawdown: 1) exclude all cells that become dry and 2) include all active model cells even if they do not fall within the official TWDB aquifer boundary. This method produces drawdown values consistent with the DFC values provided in the Explanatory Report and is consistent with the methodology used in the previous planning cycle.
7. As in the previous planning cycle, we will only provide MAG values calculated within the extent of the TWDB Trinity (Hill Country) Aquifer GAM. Since this model does not extend across the entire GMA, these MAG values will not include any pumping that might occur outside the model extent.

[1] 2008 is the last calibrated water level available from the TWDB GAM Task 10-005 model
[2] 1997 is the last calibrated water level available from the TWDB Trinity (Hill Country) Aquifer GAM

FIGURE A2: PAGE 2 OF CORRESPONDENCE BETWEEN GROUNDWATER MANAGEMENT AREA 9 AND THE TWDB RELATED TO CLARIFIACTIONS (OTHER CLARIFICATIONS NUMBERS 1 TO 7)

Please confirm that this methodology is acceptable to the GMA. Otherwise, please contact TWDB to request additional MAG value calculations.

Ellenburger-San Saba & Hickory Aquifers:

8. Please confirm that the phrase "*average drawdown of no more than 7 feet in Kendall County through 2080*" in the DFC Resolution means "*average water level decline of no more than 7 feet in 2080, as compared to 2010 water levels.*"[3] This method produces drawdown values consistent with the DFC values provided in the Explanatory Report and is consistent with the methodology used in the previous planning cycle.
9. Since the GMA did not provide predictive model files, TWDB used the predictive model files *[based on Llano Uplift GAM]* developed by TWDB during the previous planning cycle (see GAM Run 16-023) and extended them to 2080 by assuming the same recharge rates and the same pumping rates and distribution as was used in the previous planning cycle. Please confirm that this methodology is acceptable to the GMA.
10. Please confirm that the GMA accepts the following assumptions for calculating modeled drawdown: 1) only include active model cells within the official TWDB aquifer boundary. This method produces drawdown values consistent with the DFC values provided in the Explanatory Report and is consistent with the methodology used in the previous planning cycle.

Optional Clarifications *(Clerical corrections to Explanatory Report)*[4]:

Edwards Group of the Edwards-Trinity (Plateau) Aquifer:

– baseline year for DFC incorrectly listed as 2008 rather than 1997 *(see Clarification #4)*

Ellenburger-San Saba & Hickory Aquifers:

– baseline year for DFC incorrectly listed as 2008 rather than 2010 *(see Clarification #8)*

[3] 2010 is the last calibrated water level available from the TWDB Llano Uplift GAM.

[4] Since TWDB considers the legal DFC Resolution documents, rather than the Explanatory Report, as the official definition of DFCs, TWDB does not officially require corrections to the Explanatory Report. However, because the Explanatory Report is often used as a simplified, more-readable summary of the legal DFC Resolution documents, we recommend correcting the Explanatory Report to match the DFC Resolutions to avoid confusion.

FIGURE A3: PAGE 3 OF CORRESPONDENCE BETWEEN GROUNDWATER MANAGEMENT AREA 9 AND THE TWDB RELATED TO CLARIFIACTIONS (OTHER CLARIFICATIONS NUMBERS 8 TO 10 AND OPTIONAL CLARIFICATIONS)