

**Kincaid, Charles T**

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**From:** Neil Hudgins [nhudgins@cbgcd.com]  
**Sent:** Monday, April 20, 2009 1:20 PM  
**To:** Kincaid, Charles T  
**Cc:** aquainfo@sbcglobal.net; 'Ronald Gertson'  
**Subject:** RE: Request for information on "desired future conditions" and "managed available groundwater"

Mr. Kincaid,

The Coastal Plains Groundwater Conservation District has been involved in the Groundwater Management Area Joint Planning process since 2005 just after HB 1763 was passed. All GCDs within our GMA 15 have met several times to discuss our possible Desired Future Conditions. There is a deadline to have our Desired Future Conditions to the Texas Water Development Board which is September 1, 2010. The GMA has not yet adopted a DFC but are required to by that date. Up to this point our GMA has been running the TWDB's Central Gulf Coast Groundwater Availability Model using different county-wide pumping scenarios to see what drawdown results would occur in each scenario.

Soon after HB 1763 was passed, the GMAs began to receive letters from our Regional Water Planning Groups informing us that if we desired to have our Manage Available Groundwater numbers in the next round of Planning we needed to do so by early 2008. We did not meet those deadlines given by the RWPGs due to delays in receiving model run results from the TWDB, so we informed the RWPGs that we were okay with them using the same numbers as were in the previous plan, in Matagorda's case, 49,221 ac ft. Once we adopt a Desired Future Condition and have received those resulting MAGs back from the Texas Water Development Board, the MAG numbers will also be delivered to the RWPGs to include in the following plan. We did not use the original 49,221 acre feet number for our GCD Mgmt Plan because we were required to; we just thought that was a sound estimate for the County since no other science or estimations were available to us at the time we were required to complete our Management Plan. We are required to update our Mgmt Plan this year and I assume until we receive our MAG, we will move forward using those same numbers for availability.

There also is a new groundwater availability model that has become available to us that we are considering using for the joint planning process. If we choose to switch directions and use that model instead of the current TWDB GAM, it might delay even more the submittal of our DFC to the Texas Water Development Board.

If you have any questions or need more information, please let me know.

**Neil Hudgins**

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**From:** Kincaid, Charles T [mailto:charley.kincaid@pnl.gov]  
**Sent:** Friday, April 17, 2009 10:53 AM  
**To:** nhudgins@cbgcd.com  
**Cc:** shorris@co.matagorda.tx.us; ^PNNL NRC South Texas COL; Prasad, Rajiv  
**Subject:** Request for information on "desired future conditions" and "managed available groundwater"

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17 April 2009

Mr. Neil Hudgins  
General Manager  
Coastal Plains Groundwater Conservation District (CPGCD)  
Bay City, Texas

Re: "Desired Future Conditions" and "Managed Available Groundwater"

You may recall that we met in February of last year when Rajiv Prasad (PNNL), Hosung Ahn (NRC) and I visited your offices in Bay City and met with Haskell Simon and you. Haskell and you were very generous with your time and briefed us on the CPGCD and groundwater in Texas. We appreciated the introduction to both topics.

Since then Rajiv Prasad and I have been working with Hosung Ahn (NRC) as we prepare the water sections of the Environmental Impact Statement and the Safety Evaluation Report for the proposed STP Units 3 & 4. I've found and mined the web sites of the TWDB, LCRA, and USGS for groundwater related documents. I came across a paper by Robert Mace and his colleagues entitled "A Streetcar Named Desired Future Conditions: The New Groundwater Availability for Texas" and found it very informative with regard to the changing landscape of Texas groundwater and the groundwater districts. I'm sure you've seen the paper and are familiar with the impact of Texas House Bill 1763 which was passed on September 1, 2005.

I'm sending this email in the hope of learning of progress the CPGCD has made in the definition of "desired future conditions" and "managed available groundwater." Mace et al mention that in order to impact ongoing state water planning efforts during the current five-year period of 2007-2012, the groundwater districts would need to provide TWDB with "desired future conditions" in late 2007 or early 2008. This would begin the iterative effort among the TWDB, the regional water planning group, and the groundwater districts to define a consensus value for "managed available groundwater" in each district.

We have proceeded as you and Haskell Simon suggested, and as good form requires, by relying on the published and accepted CPGCD Management Plan of 2004. That Plan includes the following values:

- o Amount of useable groundwater from the Gulf Coast aquifer in the District, 49,221 ac-ft/yr (the report notes that little science supports this value)
- o Average total groundwater used in the District, 30,233 ac-ft/yr
- o Estimate of projected groundwater supplies (based on existing infrastructure), 35,785 ac-ft/yr

However, the paper by Mace et al makes it clear that roles have been reversed, and the "managed available groundwater" value adopted by the district must now be adopted by the regional planning effort. I had the feeling that the District's 2004 plan adopted the 49,221 ac-ft/yr value from the regional water plan because it needed to do so. Now that roles are reversed, I'd like to know if the District has defined "managed available groundwater" and no longer supports the 49,221 ac-ft/yr value.

Anything you can tell me of the District's progress would be helpful. I assume that if "desired future conditions" have been communicated to the TWDB, I'd be able to reference a letter or an email response from you, and describe them in the EIS and SER. If the collaboration with the TWDB has progressed to the point of defining the "managed available groundwater" value, I'd like to use it also; however, I

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realize that it may be too early in the planning cycle (2007-2012) to have reached that decision, especially because of the needed coordination among groundwater districts in the same regional planning group. Any insight you have at this time on the eventual value of "managed available groundwater" would be appreciated.

Best regards,  
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