

BRAZOS G

WATER PLANNING GROUP

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BRAZOS RIVER AUTHORITY, Administrative Agent
P.O. Box 7555 • Waco, Texas 76714-7555
(254) 761-3100 • Fax (254) 761-3204
BrazosGinfo@brazos.org
www.brazosgwater.org

March 3, 2025

Mr. John Maurer
Project Manager
Texas Water Development Board
1700 North Congress Avenue
P.O. Box 13231
Austin, Texas 78711-3231

*Received 3/3/25 11:00AM
EM*

Subject: 2026 Brazos G Initially Prepared Plan

Dear Mr. Maurer:

The Brazos G Regional Water Planning Group (BGRWPG) is pleased to submit the 2026 Brazos G Initially Prepared Plan (IPP) for agency review and comment. This letter serves to certify that this IPP is complete and was adopted by the BGRWPG at its regular meeting on February 13, 2025.

Throughout the planning process leading to the IPP, the BGRWPG has met all requirements under the Texas Open Meetings Act and Public Information Act in accordance with 31 TAC §357.12 and 357.21.

Included as part of this submittal are two (2) bound double-sided copies of the IPP (Volumes I, II, and Appendices), as well as a digital deliverable containing electronic model input/output, a table providing details of models used, and a GIS geodatabase mapping the recommended and alternative strategies preliminarily identified within the IPP.

The BGRWPG established a Water Policy Committee to discuss various issues concerning State water policy and to formulate proposed positions for the planning group to consider for recommendation to the Texas Water Development Board (TWDB) and the Texas Legislature. As the population and economic demands grow, water supplies become more stressed. These developments coupled with recent drought conditions make it increasingly important for water planning groups to consider diverse water management strategies.

The BGRWPG promotes water development policies that support efforts to protect both groundwater and surface water sources by encouraging sound practices that will not adversely affect water supply or quality. We support other agencies and organizations in their efforts to encourage responsible land management and water stewardship. Maintaining our watershed health, economic sustainability, and community viability are all critical elements in our water planning efforts. Protecting source water and sensible stewardship of the areas adjacent to and around river basins, sensitive sub-basins, aquifers, and recharge zones is essential for maintaining these resources for present and future needs.

Within this Plan, the BGRWPG has adopted a number of recommendations for consideration, including:

- The BGRWPG recommends the Texas Legislature direct all State and local agencies involved in planning, reviewing, and/or permitting water projects to develop defined outcomes and measures of the process for evaluating, approving, permitting, coordinating, and funding in order to allow timely project implementation.
- The BGRWPG is committed to working cooperatively with Groundwater Conservation Districts (GCDs) as the State's "preferred method of groundwater management" and Groundwater Management Areas (GMAs) when developing the Regional Water Plan. The BGRWPG supports the continued management of fresh, brackish, and saline groundwater by GCDs and the joint planning effort of the GMAs. TWDB and GCDs should continue to improve and advance the best available science for use in the development and conservation of all groundwater resources. Coordination and cooperation among GCDs, GMAs, the RWPG, and other stakeholders are paramount to successful and accurate planning.
- GMAs are tasked with the joint planning of groundwater resources as prescribed in Texas Water Code Chapter 36.108 by adopting desired future conditions (DFCs). "Desired future condition" means a quantitative description of the desired condition of the groundwater resources in a management area at one or more specified future times. DFCs proposed provide a balance between the highest practicable level of groundwater production and the conservation, preservation, protection, recharging, and prevention of waste of groundwater and control of subsidence in the management area. DFCs are policy decisions, not physical facts.

Regional water plans are required to consider the Modeled Available Groundwater (MAG) amounts in place at the time of adoption of TWDB's state water plan in the next regional water planning cycle or, at the option of the regional water planning group, established subsequent to the adoption of the most recent plan. GCDs may issue permits in excess of the MAG amount. Any such exceedance should not be deemed to violate any regional water plan guideline. The BGRWPG encourages and recommends the TWDB amend its rules concerning use of MAG as the limiting factor in accounting of water availability for groundwater projects to be included in the Regional Plan. Unlike management of surface water, MAG is only one of several factors, along with property rights, required to be considered by GCDs in permitting. In order for the planning group to accurately plan and predict needs, a more flexible approach in the use of MAG is necessary.

- The BGRWPG recommends the regional water planning process be changed to separate non-residential and residential water use and look at both independently. The current practice of using a WUG's overall gallons per capita per day (GPCD) does not take into account the variation of land use or density of WUG service areas. Adopting better definitions and metrics for water planning beyond the limitations of GPCD would improve the water supply planning process.

Other recommendations proffered by the BGRWPG are reflected in the Executive Summary and Chapter 8 of this IPP.

We appreciate the opportunity to continue in this important process with the Texas Water Development Board. If there are any questions, please contact Mr. Tony L. Smith, P.E., the manager for the BGRWPG's technical consultant team.

Sincerely,

Wayne Wilson

Chair

Enclosures: 2 bound, 2 electronic copies of IPP, 1 .pdf, 1 .docx, digital deliverables

cc: Mr. Tony Smith
Ms. Pam Hanneman