

Brazos Valley GCD Groundwater Management Plan

Pre-Review #2 Recommendation Report

12/27/2015 (SA, DT, NV)

This recommendation report lists two types of changes: **required**, to meet the test of administrative completeness, and **suggested**, to improve readability, accuracy, or understanding. If a district disagrees with any of the **required** elements please contact us to discuss. If a district disagrees with any of the **suggested** items they are free to disregard them. Contact information: Rima Petrossian, rima.petrossian@twdb.texas.gov (512) 936-2420 or Stephen Allen, stephen.allen@twdb.texas.gov (512) 463-7317.

The following items are required changes to the groundwater management plan (listed by checklist item). The checklist can be seen here:

<http://www.twdb.texas.gov/groundwater/docs/GCD/GMPChecklist0113.pdf>

NO REQUIRED CHANGES. PLEASE CHECK SUGGESTED CHANGES.

The following items are suggested changes. They are not required for TWDB approval but are intended to improve readability and /or accuracy of the plan.

1. On page 7, Figure 3, please consider changing the order of the Yegua Outcrop and the Jackson Outcrop in the legend. The Jackson Outcrop should be presented above the Yegua Outcrop. **You mentioned you would have your consultant do this.**
2. On page 10, last paragraph, second to last line of text, please consider changing “Central Queen City Aquifer” to “Central Queen City and Sparta Aquifers.” **You did this but you left off the reference: (Kelley and others, 2004).**
3. On page 11, Table 1, please consider indicating somewhere that the Yegua-Jackson date range is not 2000 – 2059 like the other aquifers but 2010 – 2060. And, please consider adding a reference for these DFCs above or below the table. These are:
 - A. *Resolution to Adopt Desired Future Conditions, August 12, 2010, letter from Gary Westbrook, General Manager, Post Oak Savannah GCD to Kevin Ward, Executive Administrator, Texas Water Development Board (Sparta, Queen City, Carrizo, Upper Wilcox, Middle Wilcox, Lower Wilcox).*
 - B. *Resolution to Adopt Desired Future Conditions, July 26, 2011, letter from Gary Westbrook, General Manager, Post Oak Savannah GCD to Melanie Callahan, Executive Administrator, Texas Water Development Board (Yegua-Jackson).***You did this but consider increasing the font size of the text in the references by one or two sizes so they can be read more easily**
4. On page 11, Table 1, please consider changing the heading of the second column from “Artesian Head (ft)” to “Average drawdowns (ft)” to match how you have described these data in the paragraph preceding the table.
5. Please consider adjusting the footnote items (date and page number) so that they are more centered and very clearly displayed outside and below the main text.
6. Please consider lining up the page numbers in the table of contents. See the attached Colorado County GCD plan as an example.
7. From one data table to the next please consider consistently presenting the values either with or without the thousands separator and also either centering all values or right-justifying all the values.
8. On page 14, table 3, the title should read “GAM Recharge and Discharge Estimates” since discharge values are also presented in it.

9. On page 15, please consider relocating the footnote for table 4 so that it appears directly under the table rather than embedded within the projected surface water supply section.

Submittal Format and Requirements (for submitting the final version)

For all pre-reviews, the TWDB encourages districts to submit their management plans for subsequent preliminary reviews following the revisions we recommend. This helps to ensure that no items were missed during the review process. We will let you know when we believe you are ready to submit an official adopted plan that is free of errors.

Please remember to include the following items with your submission for an **Official review**. Submissions for a preliminary review do not require these items. (Checklist Items 10, 11, 12, and 13)

- A copy of the District’s rules or include a web link to them within the text of the plan [TWC §36.1071(e)(2)]. If a link is included, it is usually placed in the section titled “Actions, Procedures, Performance, and Avoidance Necessary to Effectuate the Management Plan.” Staff recommend including an internet link when possible in order to increase the ease with which a district constituent can obtain a copy of the District’s rules.
- One hard copy of the adopted management plan delivered to the Executive Administrator [TWC §36.1072(a-1) and 31TAC §356.53(a)(1)]. The address to submit the plan to is:

Kevin Patteson
Executive Administrator
Texas Water Development Board
1700 North Congress Avenue
P. O. Box 13231
Austin, TX 78711-3231.

Once received, the plan will be recorded in the TWDB mail log before being forwarded to the Groundwater Resources Division.

- One electronic copy of the adopted management plan (can include it on a CD or email it) [31TAC §356.53(a)(2)]
- Evidence that the plan was adopted after notice posted in accordance with Texas Government Code Chapter 551, including a copy of the posted agenda, meeting minutes, and copies of the notice printed in the newspaper or publisher’s affidavit [31TAC §356.53(a)(3) and TWC §36.1071(a)].

Surface Water Management Entity Coordination Section (if applicable)

- Evidence that **following** notice and hearing the District coordinated with all surface water management entities on a regional basis [31TAC §356.51 and TWC §36.1071(a)]. Surface Water Management Entities are [as defined by TAC §356.10(23)] as: “Political subdivisions as defined by Texas Water Code, Chapter 15, and identified from Texas Commission on Environmental Quality records which are granted authority to store, take, divert, or supply surface water either directly or by contract under Texas Water Code, Chapter 11, for use within the boundaries of a district.” A ‘Political Subdivision’ is further defined as:
“...a **city, county, district or authority** created under Article III, Section 52, or Article XVI, Section 59, of the Texas Constitution, any other political subdivision of the state, any interstate compact commission to which the state is a party, and any **nonprofit water supply corporation** created and operating under Chapter 67.” [TWC §15.001(5)]

Examples of evidence provided usually include copies of letters or emails addressed to surface water management entities that deliver a copy of the District's management plan for review and comment after the plan has been adopted by the District.