

Wimberley Valley Watershed Association
501 Old Kyle Road, Wimberley, TX 78676
January 5, 2026

Kinney County Groundwater Conservation District
Board of Directors
P.O. Box 567, Brackettville, TX 78832



Subject: Joint Planning Benefits Kinney County and Protects Spring Flows—Opposition to “Non-Relevant” Designation

Dear Members of the Board,

The Watershed Association (WA) writes to express our significant concern regarding the draft recommendation to declare the Edwards-Trinity (Plateau) Aquifer in Kinney County as “non-relevant” for joint planning in Groundwater Management Area 7. While we are based in Hays County, we understand that groundwater does not follow political boundaries. The Edwards Aquifer connects us all—from Kinney County to Del Rio to Central Texas springs and the surrounding contributing zone. We believe that remaining an active participant in regional joint planning is not only a benefit to Kinney County but is essential for the long-term protection of Las Moras Spring, San Felipe Springs, and the broader aquifer system.

How does joint planning benefit the Kinney County Groundwater Conservation District?

Shared Science and Resources: By participating in Groundwater Management Area 7 planning, Kinney County gains access to regional data, modeling, and expertise. This strengthens your district’s ability to make informed, defensible decisions. In our region, it allows us to calibrate and share models that factor in spring flows and areas of unique drawdown more accurately.

Political and Legal Leverage: Inclusion in regional planning ensures Kinney County has a voice in decisions that affect your water resources, especially as external pressures for water supply increase statewide, as we are seeing in East Texas. Local control of groundwater is foundational to the system in Texas.

Better Management: Joint planning allows for coordinated management with neighboring districts, helping to prevent cross-boundary impacts and conflicts. Joint planning groups provide access to specialized studies, state agency support, and peer learning that individual districts cannot replicate alone. By declaring your aquifer “non-relevant,” your district may inadvertently step away from stronger data collection efforts and shared knowledge resources—tools that are essential for adaptive management in a changing climate.

How does joint planning benefit the Springs?

It provides a holistic understanding of flow systems. Las Moras and San Felipe springs are part of a connected groundwater system. Isolating Kinney County from regional planning ignores hydraulic connections and risks unintended consequences for spring flows as well as groundwater levels, both of which could see impacts with significant Edwards drawdown. We know from experience that climate and pumping are both important, and in fact, in low rainfall years, our average household use has increased significantly, along with commercial pumping. While climate variability affects spring flow, groundwater pumping also plays a critical role—especially during drought. **More data is required to understand ground and surface water interactions at Las Moras springs. By declaring non-relevancy at this time, you step away from the opportunity to better understand and manage your aquifer.**

Here in the Hill Country, we have seen firsthand the value of targeted groundwater management through tools like Groundwater Management Zones (GMZs). These zones allow us to manage growth mindfully, protect sensitive spring flows, and sustain the local economy, which historically has depended on healthy rivers and springs. This level of thoughtful management is often possible through active participation in regional planning and data-sharing. We encourage Kinney County to consider how similar frameworks could benefit your springs and local water security.

Friese and Nichols' suggestion to declare non-relevancy and withdraw from joint planning based on the aquifer's "relatively small and localized role" could be short-sighted and requires more inquiry. In the words of Robert Mace, PHD "if an aquifer is relevant enough for a district to permit use from, it's a relevant aquifer". Moreover, declaring the aquifer "non-relevant" could set a precedent that might eventually be used to undermine groundwater management elsewhere in the Edwards region, especially as it relates to spring flows.

We strongly urge the Kinney County GCD to:

- Reject the "non-relevant" designation for the time being.
- Continue to participate fully in GMA 7 joint planning.
- Support further data collection and science-based desired future conditions that protect spring flow as well as groundwater supply.

Thank you for considering our perspective. We are committed to working collaboratively across basins to ensure sustainable water management for all.

Sincerely,

Zane Porterfield

Policy and Outreach Coordinator, Watershed Association