



November 11, 2021

Mr. Gary Westbrook
General Manager
Post Oak Savannah GCD
310 E. Ave. C
Milano, TX 76556

Dear Mr. Westbrook:

The Brazos River Authority (BRA) manages surface water resources within the Brazos River Basin and is currently evaluating the groundwater supply resource from aquifers within the Groundwater Management Area 12 (GMA-12). As an invested stakeholder within GMA-12, BRA's consultant was tasked with the review of the proposed revisions to the DFC/MAG simulations and provide comments. The comments provided on our behalf are as follows:

On November 8, 2021, the LPGCD Board members proposed a 75% decrease in simulated pumpage from the Simsboro aquifer within the LPGCD from the original proposed DFC proposed in May 2021. We feel that this amount of change is more than just a "suggested revision" per Chapter 36.108 and constitutes a major change that should require a 90-day public comment period.

Background

In May 2021, GMA-12 proposed that the modeled aquifer declines associated with Scenario S-12 be adopted as DFCs. Per Chapter 36.108, S-12 was provided to the public for a 90-day review and comment period at that time. In the months following the comment period, several changes to the S-12 pumpage inputs have been proposed, and until very recently, rejected by the GMA-12 board members.

During the GMA-12 meeting on October 13, 2021, LPGCD proposed that a new DFC simulation (Scenario S-19) be formulated such that the resulting Simsboro DFC drawdown would be limited to approximately 240 feet within LPGCD. Scenario S-19 includes significant changes to the DFC and subsequent MAG for the Simsboro in GMA 12, which are summarized by:

- Removal of approximately 44,000 ac-ft/yr of Simsboro model input pumpage from sites within LPGCD. This change represents a 35% reduction in LPGCD Simsboro pumpage from S-12 and effectively represents a 44,000 ac-ft/yr reduction in the Simsboro MAG in LPGCD.
- The reduced model input pumpage (MAG) results in 24% decrease in the Simsboro DFC in LPGCD from 313 feet to 239 feet. The reduction also results in a decrease in the POSGCD Simsboro DFC from 336 feet to 277 feet (18% decrease from S-12).

During their November 8, 2021 board meeting, LPGCD authorized the creation of yet another model scenario (Scenario S-20) that includes even greater changes to the Simsboro pumpage inputs and subsequent DFCs:

- Removal of an additional 48,000 ac-ft/yr (92,000 ac-ft/yr total) of Simsboro model input pumpage from sites within LPGCD. This change represents a 74% reduction in LPGCD Simsboro pumpage from S-12 and is equivalent to a 92,000 ac-ft/yr reduction in the Simsboro MAG in LPGCD.
- The reduced model input pumpage (MAG) results in 42% decrease in the Simsboro DFC in LPGCD from 313 feet to 183 feet. The reduction also results in a decrease in the POSGCD Simsboro DFC from 336 feet to 257 feet (24% decrease from S-12).

Summary

Given these major changes in the modeled Simsboro pumpage and impacts, it is clear that Scenarios S-19 and S-20 represent significant re-definitions of the DFCs. The Scenario S-19 and S-20 model files have only been available for a few days and have not been fully reviewed or checked for accuracy by GMA-12 hydrogeologic consultants or BRA's hydrogeologic consultants. The changes proposed in Scenarios S-19 and S-20 are significant and require a reasonable period of time for public review and comment. As of the GMA-12 meeting on November 12, 2021, there will be 54 days before the DFC approval deadline of January 5th, 2022. There is insufficient time to evaluate the merits of either scenario and, consequently, it is inappropriate for GMA-12 to consider them as potential DFC/MAG simulations during this round of regional planning.

If you have any questions, please contact Jon King, Special Projects Manager, at 254-761-3167 or via email at jon.king@brazos.org

Sincerely,



DAVID COLLINSWORTH
General Manager/CEO