

August 29, 2022

To:
The GMA 12

Re: Desired Future
Conditions (DFCs)for area
aquifers within GMA 12
under 36.108, Texas Water
Code

Thank you for the opportunity to give my comments regarding Desired Future Conditions (DFCs) planning. I have previously given my comments bringing to the GMA 12's attention of why the DFCs are really not adequate in planning because they do not include actual figures when calculating the aquifers' conditions for future planning.

I find so much reliance just on projections and graphs alone is already corrupting the document to begin with. To quote Bobby Bazan, Jr, the Water Resources Management Specialist at the August 18th POS Summit, *good science must have good data*. So if the data does not include reality, it is not good data. There is a reason the desires never match what is happening. I humbly offer below:

1. Included in formulating the DFCs are hydrologist reports; proposed recharging of the aquifer, predicted elements of nature (and still is a guess as who can predict draught, years of plentiful rain, etc?). Yes, indicators, but until it actually happens, it is only a prediction.

To be fair, I have been told that "some" actual data is now being included; however, there is still so much more that must be added to get a true reading of what is happening to the aquifers.

The tremendous loss of water in my well alone are not included; nor are anyone else's in the Lee and Burleson Counties since Vista Ridge's beginning. I realize in the past, actual information as to water level losses have not been included in the DFCs because there was not actual data available, in that the huge drawdowns by Vista Ridge had not begun. That is not the case now. We have experienced the ravages of major drawdowns in Lee County, as well as Burleson; and those losses are from ONE permit (San Antonio); and they have caused devastating loss.

Looming in the shadows are huge permits getting ready to come on line to pump more water from the aquifer. There are articles in news media describing massive developments - one of which is Samsung coming to central Texas. To read how much water they will require is hard to wrap one's mind around.

Projected businesses within the area of provision (Samsung in Taylor-Williamson County and all the other businesses needed to support Samsung) are not included in formulating DFCs. DFCs are again "desired" conditions.

Yet, the anticipation of supplying this massive amount of water is not even considered in planning.

To not consider the above is insanity to put credence in such a flawed report based on fantasyland and has no place in a plan for future conditions.

2. DFCs are calculated on "regions" which reflect the general water level loss spread out over a particular area. It does not define a particular problem area; i.e., those experiencing major water losses. So the information is flawed.

I liken this "region" calculation as grading on the curve. In my situation, I am experiencing dramatic losses in the Carrizo-wilcox aquifer, but someone at a different location whose well is also in the Carrizo-wilcox is experiencing no loss. A DFC zone would capture this information in certain areas, and I would think allow better forecasts of water wells and aquifer levels. In other words, specific details of the impact major pumping has caused; the areas affected and the pattern of losses for the future.

#3. Proposed recharging of the aquifer is, just what it says, "proposed" and based on computer modules by former DFCs. This is not a true reflection the rate the aquifers are recharging. It bears no proof and no guarantee our aquifer will be recharged - at least in my lifetime. Once the aquifer is compromised, there will be no turning back. So it would seem to me the way of calculating recharge isn't working.

A quote from Dr. Robert Mace, Director of the Meadows Foundation for Water and the Environment, in his published report of November 2021 titled Five Gallons in a Ten Gallon Hat: Groundwater Sustainability in Texas, his opening sentence states:

Despite the hopes and desires of scientists, engineers, and planners, the projected future of groundwater production in Texas is unsustainable.

I would ask, how many times are warnings such as these going to be intentionally ignored? And again, to ignore these warnings just further corrupts any creditability of the DFCs.

REALITY must be included in preparing a DFC. To do otherwise, is be asking for failure, and do we have the luxury of getting it wrong?

Finally, I leave you with a quote from author, Ayn Rand

We can choose to ignore reality but we can't ignore the consequences of ignoring reality.

Sincerely,

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