SAWDF Update

Simsboro Aquifer Water Defense Fund

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September 12, 2026

Public Hearings on the Proposed Desired Future Conditions [DFCs]

There are two remaining Public Hearings on the **Proposed Desired Future Conditions (DFCs)** for aquifers within Groundwater Management Area 12 [GMA-12]**.**

- **POSGCD - Tuesday, September 15, 2026** @ 5:30pm
- **LPGCD - Wednesday, September 16, 2026** @ 3:30pm

Claire Marks from LPGCD was quoted about the DFC process in the August 13 Gidding Times & News: *The DFCs we set today help answer an important question: What do we want our aquifers to look like in 50 years? Your voice plays a role in that answer… we encourage you to stay informed, attend a hearing, and be part of the conversation about the future of groundwater in our region.*

Each GCD board must review the comments received and compose a general **response** to them as to whether they made changes to the proposed DFCs, why, and why not. **This is an opportunity for you to hold your GCD accountable for protecting the long-term viability of our Texas aquifers.**

In addition to the Lost Pines GCD, GMA-12 includes Post Oak Savannah GCD, Brazos Valley GCD, Fayette County GCD, and the Mid-East Texas GCD.

The DFCs must be measurable and represent an aquifer condition over a specified time period. **In GMA-12 the DFCs are expressed as the predicted *feet of average drawdown across the District* for each relevant aquifer/formation and are measured from 2011 to 2079.**

GMA- 12 Proposed DFCs

Aquifer	BVGCD	FCGCD	LPGCD	METGCD	POSGCD
Sparta	57	57	22	22	46
Queen City	46	96	31	19	30
Carrizo	83	140[1]	134[1]	45[1]	146[1]
Calvert Bluff	119	NR	141	58	189
Simsboro	330[2]	NR	261	85	288[1]
Hooper	146	NR	147[1]	74[1]	190[1]

[1] *Computer model indicates drawdown may be deeper*

[2] *Computer model indicates drawdown may be less*

LPGCD worked hard to maintain average drawdowns almost identical to the 2021 DFCs. LPGCD set a goal to maintain an average of at least 50% of *remaining available drawdown* by 2079 so our children and grandchildren will still be able to access their groundwater in the future. The average drawdowns in most formations translate into 60% or more of remaining available drawdown by 2079, except for the Carrizo formation. The Carrizo is closer to 50% because of impacts from outside the District; i.e. the Vista Ridge project to the northeast and GBRA/ARWA project to the south in Gonzales County. The table below calculates the difference between the *proposed* DFCs and the *current* DFCs. Remember, this includes an additional 10 years of pumping.

Difference in avg drawdown [10 yrs additional pumping] *increase* *decrease*

Aquifer	BVGCD	FCGCD	LPGCD	METGCD	POSGCD
Sparta	-4	-14	0	3	-14
Queen City	-2	-23	-3	1	0
Carrizo	1	-33	-5	3	0
Calvert Bluff	-8	NR	-9	-1	-33
Simsboro	-68	NR	-21	-9	-10
Hooper	21	NR	-9	-5	-12

GMA-12 started this five-year planning process with a goal to maintain the current DFCs from 2021. As you can see in the chart above, the majority of GCDs achieved this goal. Post Oak Savannah and Brazos Valley GCDs did relatively well when you consider these numbers include 10 years of additional pumping and several large-scale permits coming online.

Unfortunately, **the proposed DFCs for POSGCD are circumspect.** Some of the proposed numbers are just not supported by "best available science," the Groundwater Availability Model [GAM]. When you evaluate the actual pumping estimated by each GCD to occur over the next 50 years, the results are a little more sobering. The Table below shows the deeper POSGCD drawdowns modeled by the GAM.

PS4-2-Final-v8.wel

Aquifer	BVGCD	FCGCD	LPGCD	METGCD	POSGCD
Sparta	57	57	22	22	46
Queen City	46	96	31	19	30
Carrizo	83	173	134	45	**170**
Calvert Bluff	119	NR	141	58	189
Simsboro	283	NR	261	85	**369**
Hooper	146	NR	157	76	**236**

POSGCD plans to submit a new pumping file that supports the proposed numbers. That new pumping file will have to show significant reductions in estimated pumping over the next 50 years.

The table below shows the Total pumping [measured in acre-feet per year] that each GCD estimates will occur over the next 50 years.

GMA- 12 Proposed DFCs [2011-2079] - TOTAL PUMPING [AFY]

Aquifer	BVGCD	FCGCD	LPGCD	METGCD	POSGCD
Sparta	13,152	2,851	3,200	4,302	5,474
Queen City	1,268	2,811	1,841	2,133	1,241
Carrizo	5,495	5,152	12,358	4,243	15,169
Calvert Bluff	1,724	NR	3,780	6,436	2,337
Simsboro	190,150	NR	53,194	4,297	95,166
Hooper	2,137	NR	2,251	1,950	1,763

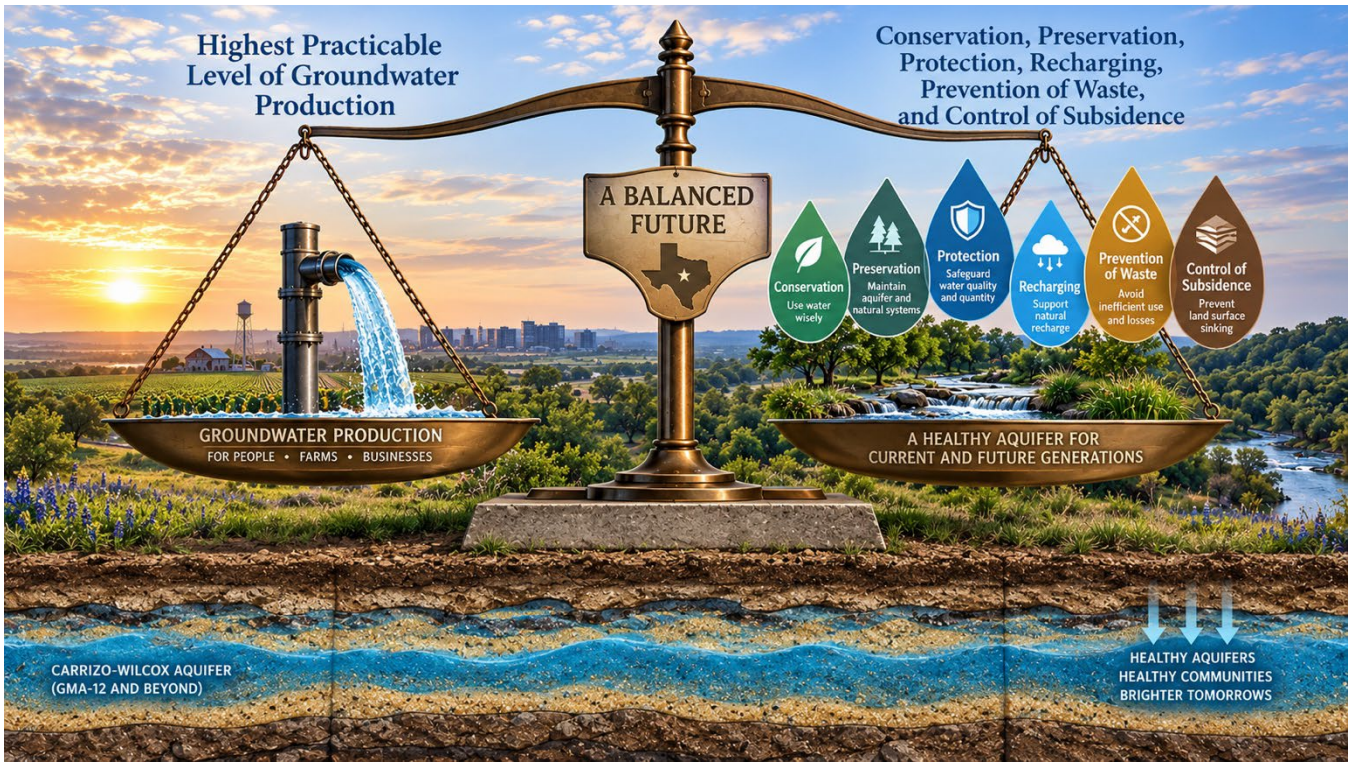
The estimated total pumping is significant. It hints at what the Texas Water Development Board (TWDB) will later calculate as the Modeled Available Groundwater [MAG]. The MAGs are shared with Regional Water Planning Groups who are also looking 50-years into the future to meet their water needs. A DFC with deep drawdowns results in a larger MAG which is like advertising the GCD has fresh water available for Texas' population and business growth. The water planning process is a never-ending cycle that, unfortunately, leads to deeper and deeper drawdown of Texas' aquifers.

The only apparent solution is to reduce estimated future pumping or basically planning for future curtailment of permitted production. That is the route that LPGCD has taken during this round of joint planning. It may lead to future litigation from large-scale permit holders. **LPGCD deserves support for their courage to break the cycle of deeper and deeper drawdowns.**

What can We Contribute to the DFC Planning Process?

The Texas Water Code, Chapter 36.108 states: "The desired future conditions proposed under Subsection (d) must 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."

I asked an AI chatbot to illustrate the statute above. The image below aligns with how I think about the balance test of the DFCs. There are multiple factors that counterbalance the highest practicable production. Yet, these important factors are rarely discussed by representatives at GMA-12, and they are certainly never quantified, like production and drawdown are in the tables above.



Where is the table that lists the acre-feet per year set aside for conservation and preservation of the aquifer? How will the GCD or the GMA increase aquifer recharge? How much “waste” or municipal water loss will the GCD or GMA target in the next 50 years?

State and Regional Water Plans address conservation and system water loss. For example, before submitting a new water supply strategy, a Water User Group [WUG] must identify the gallons per year that will be conserved by customers and gallons recovered by reducing system water loss. GCDs and GMAs should address these factors in regard to the proposed Desired Future Conditions.

Attend a Public hearing on the DFCs. Ask your GCD to quantify, monitor, and report their progress on the “conservation, preservation, protection, recharging, and prevention of waste of groundwater and control of subsidence” within the GCD.

Thank you for all your support.
Be Informed, Get Involved, and Donate!