SIMSBORO AQUIFER WATER DEFENSE FUND
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To: Groundwater Management Area 12
From: Andy Wier, Executive Director, Simsboro Aquifer Water Defense Fund [SAWDF]
Date: July 31, 2024
Re: Comments on Agenda item #8, DFC Expression(s)

The Simsboro Aquifer Water Defense Fund offers the following comments with accompanying PowerPoint slides:

Slide 1
Chapter 36 of the Texas Water Code offers the GMA a wide range of expressions for describing the Desired Future Condition of the aquifers within the GMA. SAWDF recommends that GMA-12 change the expression for the Sparta, Queen City and Carrizo-Wilcox aquifers—the aquifers included in the current GAM.

Slide 2
What if you accompanied me on a hike at Big Bend National Park to the top of the Chisos Mountains?

Slide 3
As we near top we stop and

Slide 4
I put a blindfold on you.

Slide 5
In this situation, "Which expression is more helpful to you?"

- In the next 50 seconds you will walk an average of 150 feet toward the cliff.

Slide 6

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- In the next 50 seconds you will walk an average of 25% of the distance to the cliff.

Slide 7
Which expression helps you to decide if you want to keep walking toward the edge?

- In the next 50 seconds you will walk an average of 150 feet toward the cliff.
- In the next 50 seconds you will walk an average of 25% of the distance to the cliff.

Slide 8
GMA-12 currently expresses the Desired Future Condition as the average drawdown in a formation across the District. This is an illustration of average Simsboro drawdown across each district. The average drawdown expression leaves me wondering, just how far down is that? How close are water levels dropping in relation to the top of the aquifer and the saturated sands?

GMA-12 has effectively increased the average drawdown three times in response to permitted production, but there has been little discussion as to where is a reasonable and healthy limit.

Slide 9
SAWDF recommends changing the expression for the DFC to the average Percent of Remaining Drawdown across the District. Here is an illustration of the same data previously displayed but expressed differently. The use of the GAM to evaluate the DFC is not changed.

However, SAWDF does not want GMA-12 to take the same "permit based" approach as last planning session and just select the resulting "average percentage of remaining drawdown" generated by the GAM. SAWDF urges each District to genuinely discuss and select a number that represents the best balance between conservation, preservation, recharge and production.

Slide 10
One last factor to incorporate. Springs and seeps cannot be mitigated like a water well. You may notice in the previous slide the red areas where available drawdown is minimal, or desaturation is taking place. Some Districts have or will establish Management Zones to address these issues. How can the DFC expression support the use of Management Zones by a GCD, especially in conserving surface waters?

Thank you.

Expressing the Desired Future Condition

Designed by pch.vector / Freepik

Which expression is more helpful?

In the next 50 seconds you will walk an average of 150 feet toward the cliff.

Which expression is more helpful?

In the next 50 seconds you will walk an average

of 25% of the distance to the cliff.

Which expression helps you decide
if you want to keep walking toward the edge?

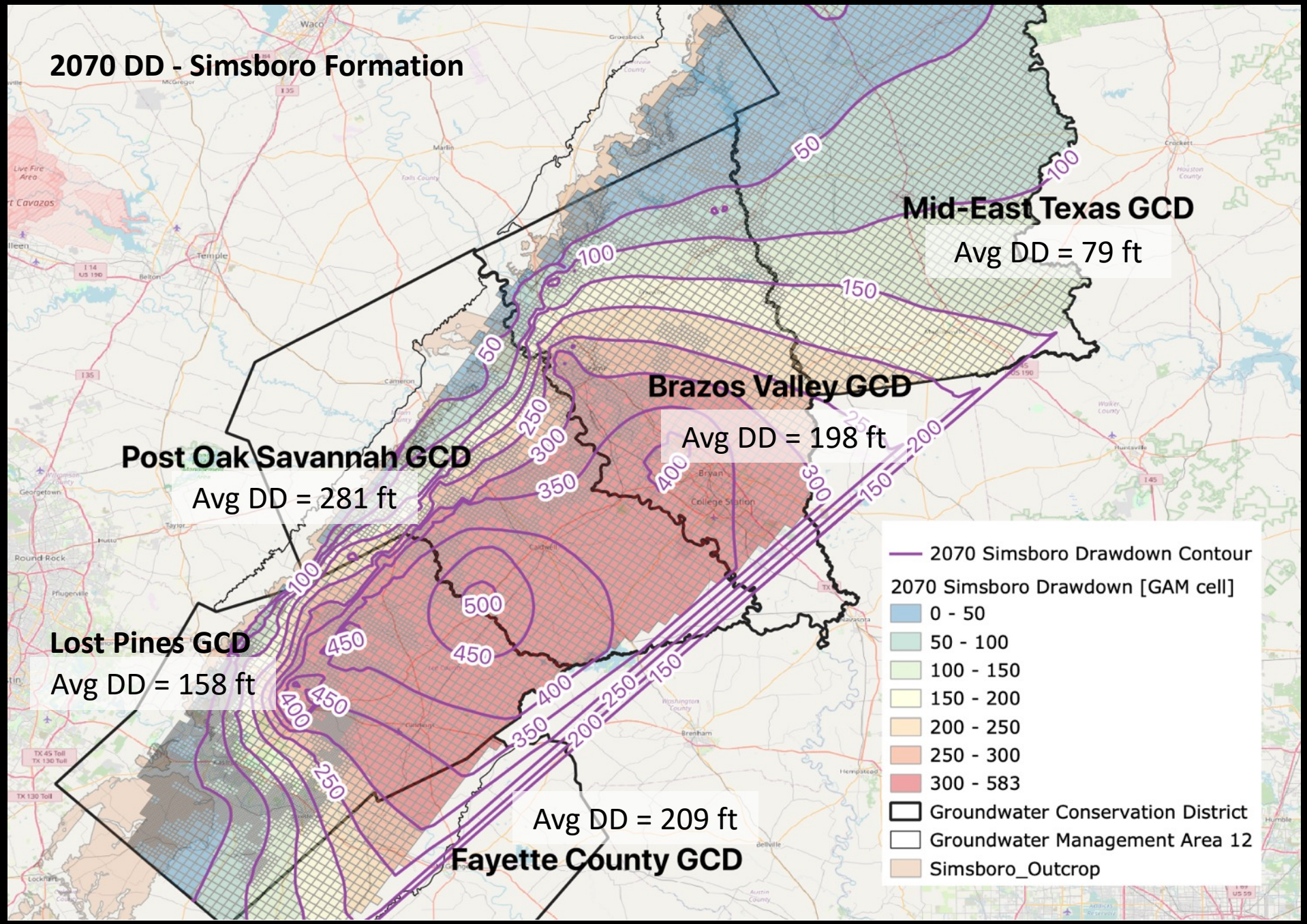
In the next 50 seconds you will walk an average

of 150 feet toward the cliff.

of 25% of the distance to the cliff.

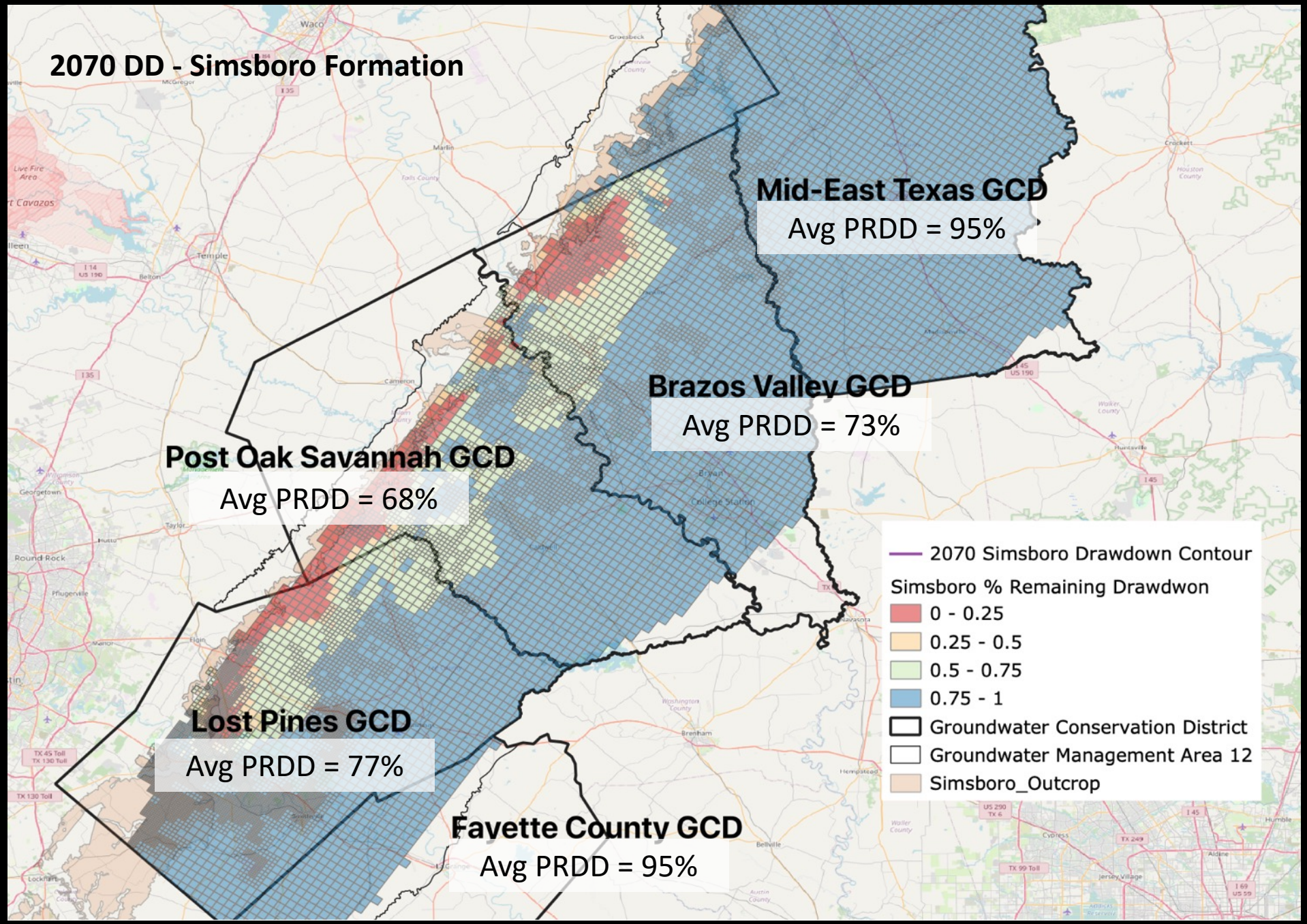
Desired Future Condition

Expressed as Average Drawdown across the District



Desired Future Condition

Expressed as Average Precent of Remaining Drawdown [PRDD]



Other factors to incorporate

- Springs & seeps cannot be mitigated like a water well.
  - How can the DFC expression support the use of Management Zones by a GCD to conserve surface waters?
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