

To: GMA-9 Board Committee

June 30, 2010

From: Andrew Backus
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RE: Public Input On GMA-9 Desired Future Condition of Trinity Aquifer

Thank you to Mr. Fieseler and other GMA-9 Board members for continuing to work on this challenging and important policy matter..

I encourage GMA-9 to adopt an initial DFC of “no additional drawdown over existing levels through 2060. I don’t believe the GMA-9 committee has enough understanding of the consequences of their decisions to make any decision other than ‘no net increase’ for the following reasons:

- 1) Board members are inappropriately being asked to consider DFCs (drawdown scenarios) without having any data that allows them to evaluate the economic or financial impact of their choice. For example, the following questions remain completely unanswered: How many pumps may be lowered to meet the projected lower water-table conditions and at what cost? How many wells will need to be deepened or replaced and at what cost due to the choice made? What will be the number and cost of supplemental wells for ag producers to make up for reductions in spring in stream flow that result from lowered water table? What is the impact to tourist economies that are enhanced by flowing springs and streams when a lowered water table will result in more days of the years with ‘no-flow’ in surface water courses? What is the incremental cost for individuals and the region of increased energy that will be needed to lift well water from greater depths in the aquifer? What areas will need to find alternatives to well water and at what cost?
- 2) The ‘groundwater availability model’ (GAM) is useful but imperfect and therefore the output should be treated cautiously until observational data confirms the model predictions. The GAM’s output is a best estimate of the current understanding of the regional groundwater budget.
- 3) Time, data, funding and cooperation of the GCDs within GMA-9 are needed to better integrate the GAM with a surface water model to refine the resolution, and reliability of the model within each GCD so that the consequences of decisions may be better understood.
- 4) This process is supposed to be about agreeing on a “Desired Future Condition” (DFC) for the aquifer. To a great extent the process has devolved into one of adopting the perceived “Inevitable Future Condition” (IFC) based merely on population growth projections, expected demand and estimates of a regional water budget model. This was not the intent of the law but working through and publicizing the IFC may be all that is politically achievable at this time. The intent

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- of the process was for the stakeholders to make a conscious decision about the future conditions of the aquifer not to merely make a decision just to accommodate growth projections to avoid making tough decisions.
- 5) In areas where production is dominated by production from “exempt wells” it is not possible to achieve a “DFC” it merely allows the rule of capture to prevail and the IFC should be estimated and publicized so the public may be informed.
 - 6) the law requires the DFC to be updated at least every 5-years, it will be politically easier to make more water available in the future than it will be to make less water available. Not many of us would teach our teenagers learning to drive to drive more aggressively when they are in foggy condition on a road they are unfamiliar with. Therefore, my advise is the same for GMA-9 as it wrestles with a DFC, be conservative you can always be more aggressive when the visibility improves with time, data, and funding.

Sincerely,



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