



September 22, 2026

Public Hearing on the Proposed Desired Future Conditions [DFCs]

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

- [POSGCD - Tuesday, September 30, 2026 @ 5:30pm](#)

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

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 modelled by the GAM.

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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 total estimated 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?

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.**

You can remind the POSGCD board that 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."**

Important note about using the word "Sustainable"

Five years ago, when commenting on the 2021 proposed DFCs, SAWDF urged the GCDs to pursue "sustainable Desired Future Conditions." While a worthy goal, the use of the word "sustainable" is problematic.

Two statewide conferences on water policy this year held panels the topic of Sustainable DFCs. The most recent was a discussion at Texas Alliance of Groundwater Districts [TAGD] on the question, "Can DFCs be both sustainable and meet the state's needs for water?" All the lawyers in the room pointed out that the word "sustainable" is not in Chapter 36 of the Texas Water Code, and if a GCD makes any decision(s) using the word — regardless how you define it — the GCD may end up in court.

However, all the panelists noted that if a GCD pursues "conservation, preservation, recharging, prevention of waste & subsidence", achieving these goals addresses the long-term health of the aquifers. SAWDF's recommendation is to avoid using the word "sustainable" in your comments regarding the DFCs. Your GCD cannot *legally* act on those comments, short of litigation. Instead, talk about "conservation, preservation, recharging, and prevention of waste & subsidence". Your GCD is *legally required* to consider these factors in achieving a balanced DFC.

Important note about the word "Mitigation"

The Texas Water Code, Chapter 36.207 states a GCD may use funds it receives to *"maintain the operability of wells significantly affected by groundwater development to allow for the highest practicable level of groundwater production while achieving the desired future conditions established under Section 36.108."* We call this "mitigation."

SAWDF and domestic/livestock well owners across the state welcomed this 2023 legislation that explicitly stated GCDs may mitigate wells failing due to regional pumping.

However, mitigation is not "preservation", or "conservation", or *"protection, recharging, and prevention of waste of groundwater and control of subsidence"* Mitigation only restores "access" to groundwater. Mitigation does not protect the long-term health of the aquifer!

In other words, mitigation sits on the “production” side of the DFC balance. If a GCD proposes an increase in pumping and/or mitigation, then the GCD must also increase the counter-balancing factors. Here is what that might look like conceptually.



If you read the comments on the proposed DFCs [submitted by large-scale permit holders](#), they equate “mitigation” with balancing the scales. That is clearly not the case. Make sure your GCD knows the difference!

Attend the 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.

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