



11 February, 2010

Boards of Directors
Groundwater Conservation Districts
c/o Groundwater Management Area-12
310 East Ave. C
Milano, Texas 76556

Re: Implications of Hutchison data on groundwater-surface water interaction in GMA-12 during calibration period 1980-1999 for desired future conditions.

Dear Boards of Directors:

This letter is to urge the Groundwater Management Area 12 Boards to consider the implications of the data presented by Mr. Bill Hutchinson of the Texas Water Development Board (TWDB) regarding the impacts of groundwater pumping for the period of 1980-1999 on the surface water outflows in the GMA-12 region of the Carrizo-Wilcox and other minor aquifers.

In addition we are requesting that the GMA-12 request that the same information be reported for the desired future conditions model run for the period from 2000-2060 so that we can be fully aware of the implications regarding planned future pumping on these groundwater and surface water resources. To provide adequate guidance this information should be further subdivided to separately indicate the impacts on the Colorado and Brazos river basins.

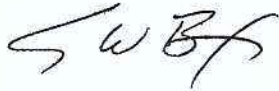
Attached is a graph that depicts the changes in pumping and surface water outflows from Mr. Hutchison's presentation to the LPGCD Board. While the pumping increased a modest 31% from 1980 to 1999, the surface water outflow has decreased 50%, spring outflow has decreased 36% and evapotranspiration outflow has decreased 52% (as indicated by the GAM model). **These are significant changes in groundwater – surface water interaction. The anticipated impact on the Colorado River is likely a predictor of a significant change in the ecological relationships as pumping accelerates in the region over the next 20-50 years.**

Based on the information presented by Mr. Hutchinson, it appears that the GAM run that is being prepared for GMA-12 desired future conditions will likely indicate a significant decrease in base-flows to the Colorado and Brazos rivers, streams, and springs. As such, we encourage you to work with the TWDB and the other groundwater districts in GMA-12 to fully evaluate the implications of this information for the Colorado and Brazos river basins (individually).

Since the statutes of the Texas Constitution and Texas Water Code require that Groundwater Management Areas set the desired future conditions of groundwater resources in a manner that protects the rivers, streams and springs; and since Robert Mace's April 9, 2009 letter (provided June 24, 2009) indicates the TWDB will be required to consider "the environmental impacts including, but not limited to, impacts to spring flow or other interactions between groundwater and surface water" in relation to any petition challenging the reasonableness of an adopted desired future condition; it would seem prudent for the GMA-12 Districts to likewise consider these same environmental impacts in setting the desired future conditions for the groundwater resources under their collective jurisdictions.

Environmental Stewardship respectfully requests that the Board of Directors of each of the five Groundwater Conservation Districts consider the implications of these findings. We further request that the desired future conditions include monitoring and triggers that provide adequate warning to protect these resources from the damage that might occur if over-pumping goes unchecked.

Respectfully submitted,
Environmental Stewardship

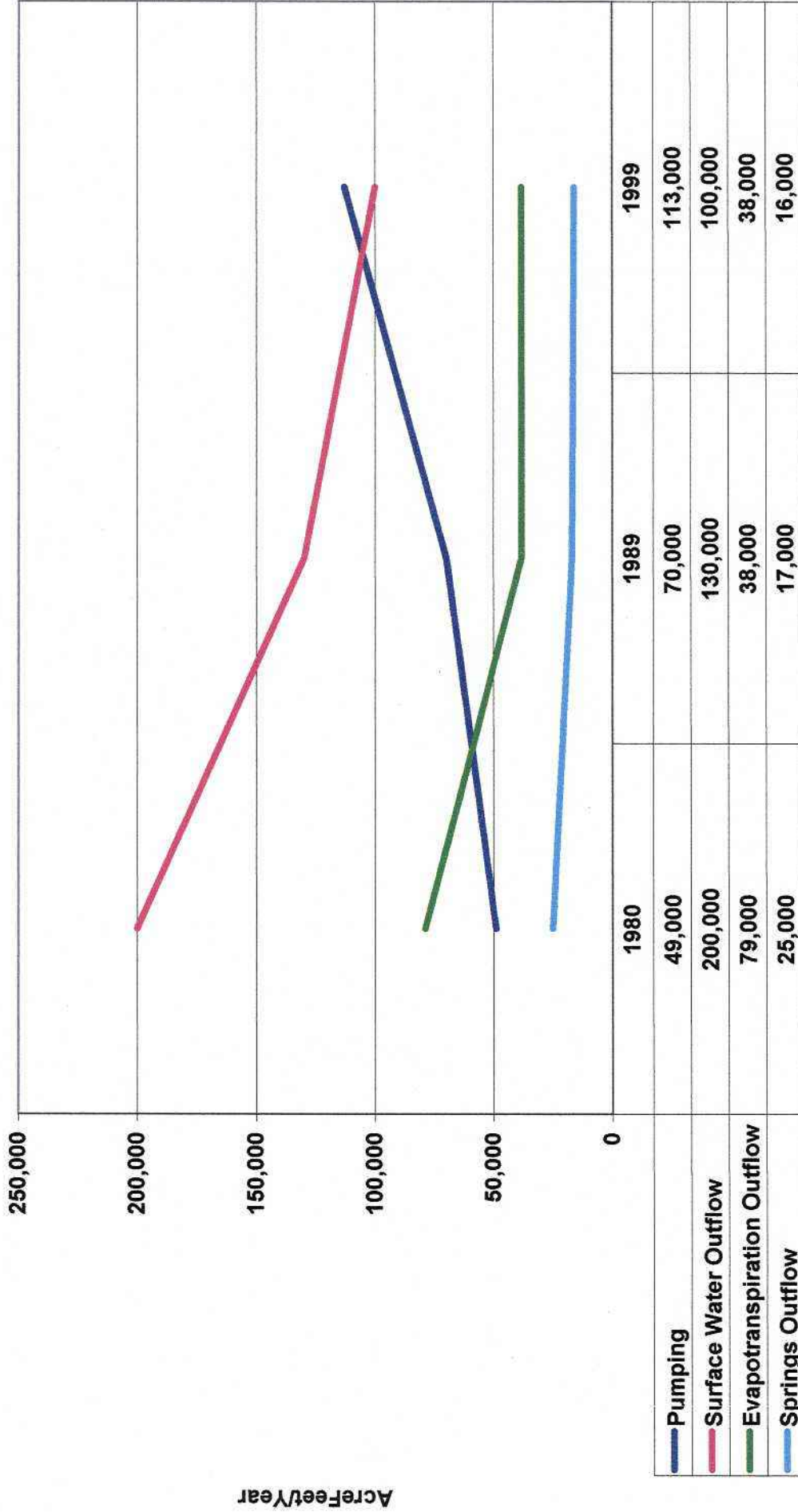


Steve Box
Executive Director

Environmental Stewardship is a charitable nonprofit organization whose purposes are to meet current and future needs of the environment and its inhabitants by protecting and enhancing the earth's natural resources; to restore and sustain ecological services using scientific information; and to encourage public stewardship through environmental education and outreach. We are a Texas nonprofit 501(c)(3) public charity headquartered in Bastrop, Texas. For more information visit our website <http://Environmental-Stewardship.org/>.

GMA-12 GAM Calibration Results

(Data from Bill Hutchison Presentation to LPGCD November 18, 2009)



AcreFeet/Year

— Pumping
 — Surface Water Outflow
 — Evapotranspiration Outflow
 — Springs Outflow