



ROBERTSON COUNTY WATER SUPPLY CORPORATION

P.O. Box 875
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Franklin, Texas 77856
979 828 4721

October 10, 2025

Dear GMA 12 Representatives,

On behalf of Robertson County Water Supply Corporation (RCWSC), I respectfully request that GMA 12 consider and take formal action to incorporate the Brazos Valley Groundwater Conservation District's (BVGCD) PS4-3 best estimate Groundwater Availability Model (GAM) Run into the initial adoption of the Desired Future Condition (DFC) for the Simsboro Aquifer.

RCWSC owns and operates water wells exclusively within Robertson County under CCN 10960. We are entirely dependent on groundwater to meet the needs of our customers. We do not have access to alternative water sources, and any curtailment of groundwater production would have significant and potentially devastating impacts on our ability to operate.

As the population of Robertson County continues to grow, it is essential that rural public water supply entities such as RCWSC have access to sufficient quantities of groundwater. Maintaining the current DFC will disproportionately harm small water systems like ours. Unlike entities wholesaling water, larger municipal suppliers or industrial users, rural systems only pump based on customer demand and have no contractual obligations to pump fixed volumes. Moreover, rural systems are not supported by a tax base and have limited access to grant funding. Our only source of revenue is water sales.

Long-term curtailment would place an unsustainable burden on RCWSC, impacting our ability to meet customer needs, maintain regulatory compliance, and support ongoing economic and residential growth in our part of the Brazos Valley—one of the state's most dynamic and growing regions.

We commend BVGCD's efforts in developing the PS4-3 pumping scenario. This scenario is based on projected demands outlined in the 2022 State Water Plan and the draft Region G Plan through 2080. BVGCD also sought stakeholder input across municipal, industrial, irrigation, power generation, and domestic and livestock uses to accurately assess future groundwater demand. Importantly, BVGCD coordinated closely with other GCDs in GMA 12 to ensure regional alignment.

We believe that PS4-3 represents a scientifically and economically balanced approach to aquifer management. It aligns with all nine statutory factors outlined in Chapter 36 of the Texas Water Code, including:

- Consideration of aquifer uses and conditions specific to Brazos and Robertson Counties;
- Projected water supply needs and strategies from the State Water Plan;
- Socioeconomic impacts of potential curtailment;
- Protection of private property rights;
- And the feasibility of achieving the DFC without compromising aquifer health.

Given the substantial growth in both population and industry in our area, especially with the increasing footprint of high-tech industries, adoption of PS4-3 is not only reasonable but necessary for sound regional water planning.

We respectfully request that GMA 12 include the consideration and vote on the PS4-3 GAM Run, as proposed by BVGCD, as an agenda item for the next GMA 12 meeting.

Thank you for your attention to this critical matter and for your continued service in protecting Texas's groundwater resources.

Sincerely,



John Elliott
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