



October 9, 2025

Groundwater Management Area 12
c/o Gary Westbrook
General Manager
P.O. Box 92
Milano, Texas 76556

Re: Request for GMA to Take Formal Action

The Cities of Bryan and College Station 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. This action is needed to avoid impairing the Cities' ability to meet projected water demands and stifling economic growth in the area.

Bryan and College Station currently provide drinking water to more than 200,000 people in Brazos County and are predicted to need to provide drinking water to more than 400,000 people by 2070. The source of this water is the Simsboro Aquifer. Bryan and College Station own and operate 18 existing Simsboro wells, with 7 additional wells under construction. In total, the Cities have combined permitted capacity of 74,289 acre-feet per year in the Simsboro Aquifer. According to the most recent regional planning data, Bryan and College Station will need 86,256 acre-feet per year of water by 2080. To meet their projected increase in demand, the Cities will need the ability to access all of their permitted Simsboro rights, which would be significantly impaired if the Desired Future Condition for GMA 12 is arbitrarily set at a level that forces BVGCD to curtail pumping by the Cities. Such curtailment would be inconsistent with regional planning, impair the Cities' obligations to their customers and stifle economic growth in the region.

In developing PS4-3, BVGCD evaluated projected demands in Brazos and Robertson Counties from the 2022 State Water Plan, the draft Region G Plan through 2080, and through discussions with BVGCD's many stakeholders including the Cities. From its evaluation of local (and regional) demand projections, BVGCD developed the pumping estimates for its proposed pumping scenario (PS4-3). This scenario is consistent with sound water planning for the region and not harmful to the aquifers of the District or surrounding districts.

Texas Water Code §36.109(d) sets out the nine factors the GMA is to consider in adopting a DFC. The proposed PS4-3 scenario addresses these considerations and provides the ideal balance of the

highest practicable production while providing for the conservation and preservation of the aquifer. Specifically, PS4-3 addresses:

- (1) aquifer uses and conditions in Brazos and Robertson counties, which differ substantially from other areas of GMA 12 because of the large in-district population, industry and increasing high tech industry growth;
- (2) the water supply needs and water management strategies included in the state water plan, which assume the Cities will be able to fully produce their permitting Simsboro rights;
- (3) the productivity of the Simsboro Aquifer, including the estimated amount of produceable groundwater;
- (4) the correlated socioeconomic impacts reasonably expected to occur if the Cities are curtailed; and
- (5) the feasibility of achieving the desired future condition.

The Cities request that GMA 12 formally adopt the PS4-3 GAM Run, as proposed by BVGCD, for the purpose of establishing the initial DFC for the Simsboro Aquifer. The use of PS4-3 is not only reasonable but necessary for sound regional water planning. The aquifer is capable of producing the pumping anticipated by the scenario, and that pumping is critical to meeting the substantial growth in demand forecast for the Cities and the rest of Brazos and Robertson Counties.

Sincerely,

CITY OF BRYAN

CITY OF COLLEGE STATION

Kean Register

Kean Register
City Manager

Bryan C. Woods

Bryan Woods
City Manager