



February 17, 2016

Via email to comments@lostpineswater.org

Mike Talbot, Lost Pines GCD Board President and Members
James Totten, General Manager
District and Board Counselors

RE: Agenda Item 9: Proposed Desired Future Conditions

Dear President Talbot, Board Members, General Manager Totten and Counselors,

Environmental Stewardship (ES) wishes to acknowledge that the District's approach to adopting desired future conditions (DFCs) for the aquifers under its jurisdiction is consistent with our position regarding this round of review and adoption of DFCs as a part of the Groundwater Management Area 12 process. As such ES supports your adoption of the proposed DFCs¹ (run PS6) being considered under item 9.

After review, ES has concluded that the GMA-12 groundwater availability model, and the other information available to the Districts at this time, are inadequate to enable a responsible review of the nine statutory considerations and has recommended that the previously adopted DFCs be re-adopted for this cycle. From our review of the pumping files associated with Lost Pines' proposed DFCs, we have concluded that the proposed DFCs being considered as agenda item 9 are consistent with our recommendation. Certainly there are minor adjustments to the pumping file that enable a better distribution of domestic exempt wells, and consideration of currently permitted pumping, and extension of the DFC period to 2070. However, the fact that the proposed DFCs are limited within the boundaries of the modeled available groundwater (MAG) for each aquifer that were estimated from the currently adopted DFCs provides pumping limits that are consistent with the past DFCs, your permitting practices, and our concerns.

Respectfully submitted,

Steve Box
Executive Director
Environmental Stewardship

cc: John Cyrier, District 17 Representative
Judge Paul Pape, Bastrop County
Judge Paul Fischer, Lee County

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) charitable organization. For more information visit our website at <http://www.envirostewardship.org/>.

¹ ES does not endorse the currently adopted DFCs or the proposed DFCs as being adequately and sustainably protective of the environment and the aquifers, but does recognize that this is the current legal standard and, as such, should not be changed until the GAM has been improved and better data are available on the nine factors for consideration prior to adopting changed DFCs. This footnote reference applies to all aquifers listed in this section. Further, ES retains the right to review the proposed DFCs of the other Districts and does not extend its conclusions to those District's proposed DFCs.