

LONE STAR GROUNDWATER CONSERVATION DISTRICT

April 7, 2021

MINUTES OF SPECIAL MEETING

The Board of Directors of the Lone Star Groundwater Conservation District (“District”) met in special session, open to the public, held in person in the Lone Star GCD – James B. “Jim” Wesley Board Room located at 655 Conroe Park North Drive, Conroe, Texas, and remotely via the publicly accessible webinar/telephone conference call within the boundaries of the District on April 7, 2021.

CALL TO ORDER:

President Hardman presided and called to order the regular Board of Directors meeting at 4:00 PM, announcing that it was open to the public.

ROLL CALL:

The roll was called of the members of the Board of Directors, to wit:

Jon Paul Bouché
Harry Hardman
Jonathan Prykryl
Larry A. Rogers
Jim Spigener
Janice Thigpen
Stuart Traylor

All members of the Board were present, thus constituting a quorum of the Board of Directors. In attendance at said meeting were Samantha Reiter, General Manager; Stacey V. Reese, District Counsel; James Beach, District Consultant; District staff; and members of the public. *Copies of the public sign-in sheets and comment cards received are attached hereto as Exhibit "A".*

PRAYER AND PLEDGES OF ALLEGIANCE:

President Hardman called on Director Rogers for the opening prayer and Director Thigpen to lead the Pledge of Allegiance and the Pledge of Allegiance to the state flag.

PUBLIC COMMENTS:

Councilman Duke Coon, representing the City of Conroe, expressed appreciation for the stance the LSGCD Board has taken on the subsidence issues of south county. He recommended that the subsidence in South Montgomery County should be managed by a regional partnership. He mentioned that SJRA operates 35 wells in Southern Montgomery County and calls on them to lower the pumpage amount and supply more surface water to Southern Montgomery County. He expressed hope a consortium could be created for the South Montgomery County/Northern Harris County team related to subsidence.

Suellen Myers, resident of The Woodlands, encouraged the Board to stop stalling and use the groundwater studies that were previously done. She pointed to an individual who she believes is having undue influence over this board and urged the Board to maintain a subsidence component in its management plan and to use a maximum drawdown figure with no more than 64,000 acre-feet.

John Bleyl, representing the City of Shenandoah, recounted a short historical review as he a past director of the LSGCD Board, serving on the board from 2011-2018. He noted that a Strategic Water Plan study was used to adopt a DFC and was unanimously approved by all 9 directors. Mr. Bleyl stated he had discussions with City of Shenandoah Public Works Director, Joseph Peart and City Administrator, Kathie Reyer. Subsidence is not an apparent issue in Shenandoah, wells are working properly and affirmed that the City of Shenandoah Council and staff are in support of this current board. Since subsidence is not an issue in Shenandoah, its Council is against the idea of a DFC being tied to an arbitrary and unscientific number.

Marty Jones spoke on behalf of Quadvest and Woodland Oaks, sharing that his clients can support a DFC based on Run "D" assuming that the Board continues with the understanding that it is a desired future condition. Quadvest and Woodland Oaks are opposed to a DFC that contains any subsidence component for Montgomery County and discourage using a production limit of 64,000 acre-feet. He contended that preventing groundwater owners from producing their constitutionally protected property will not benefit private interests and anticipates that everyone will do the right thing in honoring private property rights. He concluded he has no present plan to file a DFC appeal.

A few additional comments were submitted via email regarding the upcoming GMA 14 meeting, and copies made for each director to consider but were not read aloud. ***A copy of these comments is attached hereto as Exhibits "B & C".***

EXECUTIVE SESSION:

After a proper and legally sufficient announcement to the public by President Hardman, the Board of Directors recessed into a Closed Executive Session at 4:35 PM pursuant to Texas Government Code, Sections 551.071, to consult with the District's attorney regarding pending or contemplated litigation, settlement offers, personnel matters (§551.074), or on matters in which the duty of the attorney to the governmental body under the Texas Disciplinary Rules of

Professional Conduct of the State Bar of Texas clearly conflicts with the Texas Open Meetings Act, Chapter 551, Government Code.

RECONVENE IN OPEN SESSION:

Following Executive Session, the Board reconvened in Open Session and President Hardman declared it open to the public at 5:23 PM.

DISCUSS, CONSIDER, AND TAKE ACTION AS NECESSARY TO APPROVE PROPOSED DFCs FOR GMA 14 AND ANY RELATED ITEMS AND/OR PARTICIPATION RELATED TO GMA 14:

General Manager, Samantha Reiter, gave an overview of stakeholder meetings held over the past two months. Stakeholder meetings were convened with Porter SUD, The Woodlands Township, Southern Montgomery County MUD, Woodlands Water, City of Conroe and SJRA. Previously, she gave the board a summary of these stakeholder meetings. Consensus was that meetings went well with a lot of useful information exchanged. Cited was a need for long-term planning and better messaging, however the desire to work together remains a top priority. She also mentioned the stakeholders wish to partner on additional monitoring, including sites, CORS, PAM and future funding.

Director Bouché commented that he thought the meetings went very well and that these meetings are an avenue by which misconceptions can be clarified. He concluded the meetings very beneficial and in favor of having more of these type discussions.

Director Rogers emphasized that the stakeholders all wanted to work together with Lone Star.

Director Hardman spoke to the honest and candid conversations that were had and of the partnership Lone Star has with the stakeholders. He stressed the need for improved communication with the public and offered that as a best practice, to hold such stakeholder meetings bi-annually or quarterly.

Director Spigener stated agreement with the preceding assessments of the meetings, before adding that the normal channels of communication have proved inadequate. He echoed the sentiment for the need to have better communication with the community.

James Beach, district consultant, reviewed the rules of Chapter 36 Texas Water Law in which there is a balancing test between the highest practicable level of groundwater production and conservation, preservation, protection, recharging and prevention of waste of groundwater. He reviewed the 9 factors to achieve a DFC and summarized some of steps in the work that the GMA 14 has remained focused on. He highlighted Run D with a 100,00 acre-feet volume that was derived from the LSGCD Strategic Planning Study, while discussing the three different runs which are being considered in conjunction with formulating a DFC. He reviewed each scenario but summarized that Run D was reasonable and justified for several reasons, citing North Harris County's 1 foot subsidence from 2000-2016. He indicated that subsidence was not the limiting

factor but rather the remaining available drawdown. *A copy of the presentation is attached hereto as Exhibit "D".*

Stacey Reese, District Counsel, presented an update on the development of DFCs with GMA 14 voting districts. She examined the next steps in the DFC formation, as the voting is scheduled at the next meeting GMA 14 meeting on April 9, 2021. The next step will be the District to hold a hearing on the proposed DFCs and a 90-day public comment period, as January 5, 2022 is the deadline for the final DFCs to be adopted. Ultimately, the DFC and explanatory report are submitted to Texas Water Development Board and each GCD must adopt their DFC. One slide illustrated the DFC process and Ms. Reese explained the resolution of the two main issues from the 2016 DFC Petition. Further she discussed LSGCD Board Policy and its Management Plan and Mission. She mentioned that there are concerns that approving a subsidence DFC statement would not protect property rights of users in Montgomery County. She cited Wade Oliver's statement that metrics used in a DFC statement must be measured and meaningful. It is his opinion that subsidence is not a meaningful metric for a DFC statement, as the District does not have sufficient monitoring equipment to properly measure subsidence accurately throughout the entire county. She cited also that a new model is being developed for consideration in the next round of DFC discussions. *A copy of the presentation is attached hereto as Exhibit "E".*

Director Bouché made a motion, on behalf of the DFC Committee, that LSGCD accept the DFC Committee's recommendation of using Run "D" well file with 70% remaining available drawdown and that while LSGCD does not have a subsidence metric in its DFC, it does not oppose a subsidence element. Director Rogers seconded. Motion carried. President Hardman offered a secondary motion with the inclusion that authorizes GM to represent LSGCD in the GMA 14 vote for the above-described DFC option.

Additional comments from Director Bouché focused on the investment LSGCD has made in studying subsidence. President Hardman added his support in funding more measuring devices for subsidence in the county.

DISCUSS, CONSIDER, AND TAKE ACTION AS NECESSARY ON A CONSULTING SERVICES AGREEMENT WITH A STRATEGIC COMMUNICATIONS FIRM:

President Hardman prefaced this agenda item by affirming the need for LSGCD to be represented by a strategic communications group. The Communication Committee researched and interviewed several firms. Director Prykryl, committee member, agreed with accepting the proposed Mach I Group as LSGCD's representatives. Director Prykryl motioned to engage the Mach I Group for LSGCD strategic communication along with adopting their Master Services Agreement. Director Bouché seconded. Motion carried.

NEW BUSINESS:

No new business.

ADJOURN:

There being no further business, Director Rogers motioned to adjourn the meeting and Director Spigener seconded. The meeting was adjourned at 6:37 PM.

PASSED, APPROVED, AND ADOPTED THIS 11th DAY OF MAY 2021.



Jennifer Thayer, Assistant Board Secretary

April 7, 2021 Board Meeting Zoom Online Attendees

Panelist:

Jon Bouché

Stuart Traylor

Attendees:

Chris Meeks

Neil Gaynor

Douglas Miller

George Newman

John Ellis

Suellen Myers

Penny Bradshaw

Andrew Vree

Laura Norton

Marty Jones

Bob Rehak

Claude Humbert

Ron Kelling

Ed Shackelford

Cynthia Bowman

Bill Hutchison

Duke Coon

Emily Foxhall

Matthew Corley

Mark Unland

Bob Leilich

Heather Ramsey-Cook

William D Dwyer

Jonathon Smith

John Yoars

Kelsey Seeker

Exhibit "B"

From: [Dorothy Welch](#)
To: [Samantha Reiter](#)
Subject: Support Private Property Rights for Groundwater Pumping in Montgomery County
Date: Wednesday, March 17, 2021 10:50:15 AM

Dear General Manager Stried Reiter,

Water bills have more than doubled in Montgomery County since groundwater pumping restrictions were put in place in 2015 and if the Groundwater Management Area 14 (GMA 14) places additional restrictions on groundwater pumping, water bills will continue to rise. I am a resident of Montgomery County and am writing to you as a representative of GMA 14. I appreciate your service to GMA 14 and recognize the important role you play in managing groundwater in our region. Representatives of GMA 14 are in the process of adopting Desired Future Conditions (DFCs) for the Gulf Coast Aquifer System. I understand there will be a meeting on March 31, 2021 to discuss and adopt new DFCs.

I am concerned that GMA 14 representatives have recently discussed DFCs that include limits on groundwater pumping in Montgomery County for the purpose of limiting subsidence. Some discussions at GMA 14 have attempted to define prevention of subsidence as a property right, but it is not. Texas case law protects groundwater as a constitutionally protected property right, including the right to pump it. No such protection exists against subsidence.

The move to limit groundwater production in Montgomery County so there is zero subsidence is contrary to policy in other areas of the GMA 14 region. Within GMA 14, two subsidence districts accept continued subsidence of up to three feet into the future with production from the Gulf Coast Aquifer that is a multiple of the production of the proposed DFCs. Without changes in policy by the two subsidence districts, subsidence will continue in southern Montgomery County.

Limiting groundwater pumping in Montgomery County by Lone Star Groundwater Conservation District (LSGCD) has been litigated. An appeal to LSGCD's DFCs through the State Office of Administrative Hearings determined the pumping limits were not reasonable. A District Court Judge then found the pumping limits invalid from the beginning. Continued efforts to limit groundwater pumping in Montgomery County through GMA 14's DFCs invites further litigation, raising water bills for Montgomery County residents even higher.

I urge GMA 14 adopt DFCs that allow Montgomery County private property rights to produce groundwater in amounts as generous as allowed in Harris and surrounding counties by their governing districts.

Sincerely,

Sincerely,

Dorothy Welch
25231 Goodson Rd
Splendora, TX 77372
welchdorothylee@yahoo.com

Exhibit "C"

From: melderbw@aol.com <melderbw@aol.com>
Sent: Tuesday, April 6, 2021 10:14 PM
To: Samantha Reiter <sreiter@lonestargcd.org>
Cc: hhardman@gmail.com
Subject: Fwd: Letter to lsgcd regarding GMA meeting April 9, 2021

ATT: SAMANTHA REITER, G.M.-LSGCD

To: LSGCD Board

For the record, my name is Webb Melder. I am a 58 year resident of Montgomery County, past Mayor of Conroe, previously an appointed Director and then an elected director wherein I served as President of the Lone Star Groundwater Conservation District (LSGCD).

I provide you and others with the following thoughts and history for your consideration as you and others approach adopting Desired Future Conditions (DFCs) in Groundwater Management Area 14 (GMA 14). I trust you will find these thoughts follow right along with my previous public comments provided to you at the LSGCD Board meeting in February of this year.

First a little history, in May of 2015 while serving as Mayor, the City of Conroe provided GMA 14 a lengthy letter (see attachment) identifying a few key issues of concern in the adoption of DFCs. Although some of the issues identified in the letter have been resolved, such as the dissolution of the LSGCD District Regulatory Plan based on a pumping limit of 64,000 acre-feet per year, other issues still remain as a concern of mine and others.

Specifically and as outlined in the letter, a primary issue is the adoption of DFCs on a county-by-county basis rather than developing DFCs for the common reservoirs on a regional basis. County-by-county DFCs undoubtedly will discriminate among owners of groundwater within the region. I trust everyone will acknowledge the aquifers do not recognize the county boundaries; and county boundaries do not discern differences in use or conditions of the common, subsurface reservoirs. This holds true for all GMA's, not just GMA 14.

Instead, if LSGCD and GMA 14 will chose to identify each common reservoir boundary considering:

- 1) the patterns of current use and the potential for future use,
- 2) the productive capability of the reservoirs, and
- 3) the extents of the regional effect of such production on reservoir conditions,

then the regional DFCs that result from these efforts can provide an honest science based foundation for regulatory programs that are able to support private property rights and provide fair share opportunity for each owner of groundwater in the common subsurface reservoirs identified. We need long term planning surety in regulatory programs, not constant changes every time their is a new GWD board, or GMA 14 planning cycle.

By adopting common reservoir based DFCs, not county-based DFCs, the management standards and regulatory programs could be formed avoiding discrimination between different owners of the same reservoir and openly assist owners to know what their rights truly are.

The LSGCD Board has recently taken an important first step in adopting a management plan that states the "District's mission includes honoring and protecting private property rights by affording an opportunity for a fair share to every owner of each common, subsurface reservoir underlying, in whole or in part, in Montgomery County." My self and others thank you for this. I encourage the LSGCD board to not shortcut or waiver from your stated goal and efforts, instead continue to strive to provide leadership in formulating long-term management standards for the region. The results can be to better support long-term planning, minimize litigation, and maximize the benefits of groundwater supplies to the entire region.

Exhibit "C"

Thank you again for your public service in this challenging endeavor.

Respectfully submitted,

Webb Melder

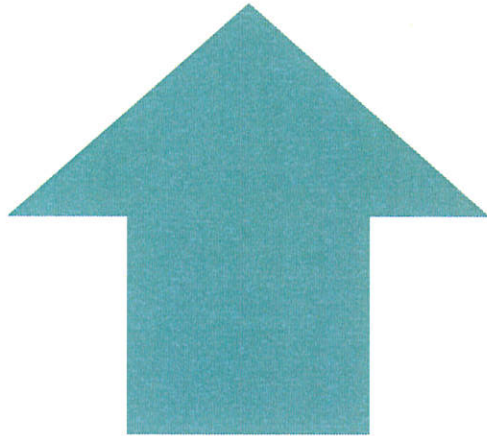
Exhibit "D"

Lone Star Groundwater Conservation District

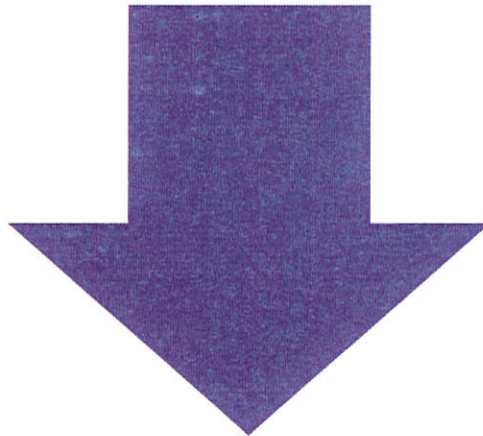
**SPECIAL
BOARD
MEETING**

APRIL 7, 2021

CHAPTER 36 BALANCING TEST



highest practicable level of
groundwater production



conservation,
preservation, protection,
recharging, and prevention
of waste of groundwater
and control of subsidence

CONSIDERATION OF FACTORS

1. Aquifer uses or conditions
2. Water supply needs and management strategies
3. Hydrological conditions
4. Other environmental impacts
5. Impact on subsidence
6. Socioeconomic impacts
7. Impact on private property rights
8. Feasibility of achieving the DFC
9. Any other relevant information

GMA 14 SUMMARY

- Common reservoir approach was used to address 1 of 2 petition issues
- Multi-metric simulations were employed to assess certain factors:
 - Private property rights
 - Socioeconomic impacts
 - Subsidence
- 3 scenarios were assessed by GMA 14
- LSGCD stakeholder meetings

STAKEHOLDER MEETING SUMMARY

- Subsidence is an important long-term concern
- Will support LSGCD in funding good data collection and science (e.g. – funding for extensometer)
- Competing objectives (subsidence versus water rates)
- Competing opinions among ratepayers
- Understand LSGCD dilemma, because they face similar conflicts among rate payers
- Understand that the rules have changed, and we need to continue to navigate the planning horizon
- Understand that LSGCD needs to fix the petition issues
- Understand new data and model are coming, as well as a new round of planning, and agree that LSGCD needs to use good science to plan and manage
- Protestants oppose a subsidence metric/DFC statement for Montgomery County

RUN D FROM LSGCD STRATEGIC PLANNING STUDY

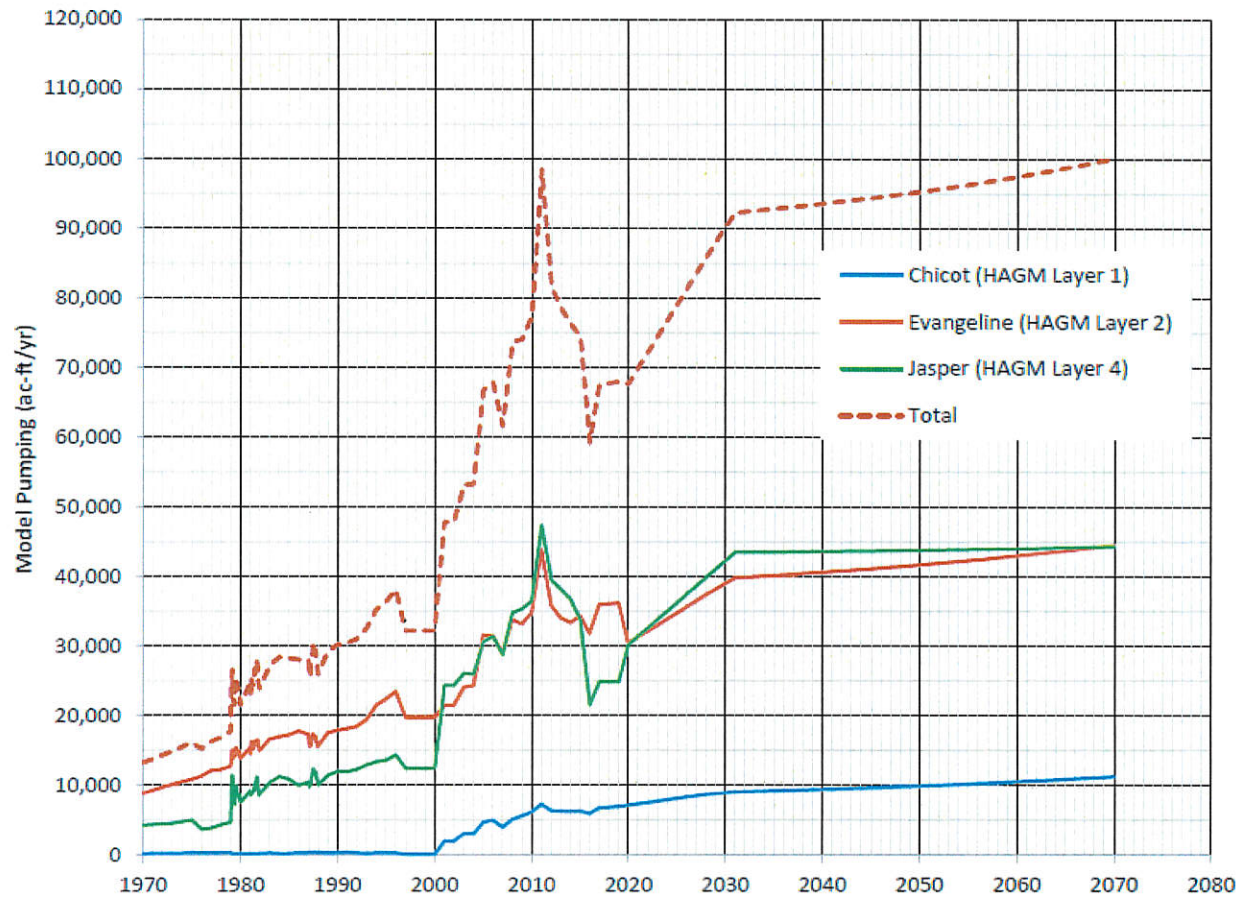


Figure 12. LSGCD Pumping Included in Run D

RUN D WELL FILE IS REASONABLE AND JUSTIFIED

- Run D well file is reasonable and justified because it was studied in Strategic Plan, used to resolve petition, and demand is documented in 2021 Regional Water Plan.
- Strategies identified in the State Water Plan to meet demands (e.g., groundwater, surface water, ASR, brackish groundwater, etc.) are plans, and they can be delayed or changed.

2021 Regional Water Plan Water Demand Projections by County for 2020-2070 in Acre-Feet

Total Water Demand for MONTGOMERY County

County	Category	2020	2030	2040	2050	2060	2070
MONTGOMERY	IRRIGATION	5,642	5,642	5,642	5,642	5,642	5,642
MONTGOMERY	LIVESTOCK	537	537	537	537	537	537
MONTGOMERY	MANUFACTURING	2,135	2,413	2,413	2,413	2,413	2,413
MONTGOMERY	MINING	1,453	1,363	1,077	921	806	728
MONTGOMERY	MUNICIPAL	101,024	125,960	152,557	184,295	224,165	272,018
MONTGOMERY	STEAM ELECTRIC POWER	4,845	4,845	4,845	4,845	4,845	4,845
MONTGOMERY County Total		115,636	140,760	167,071	198,653	238,408	286,183

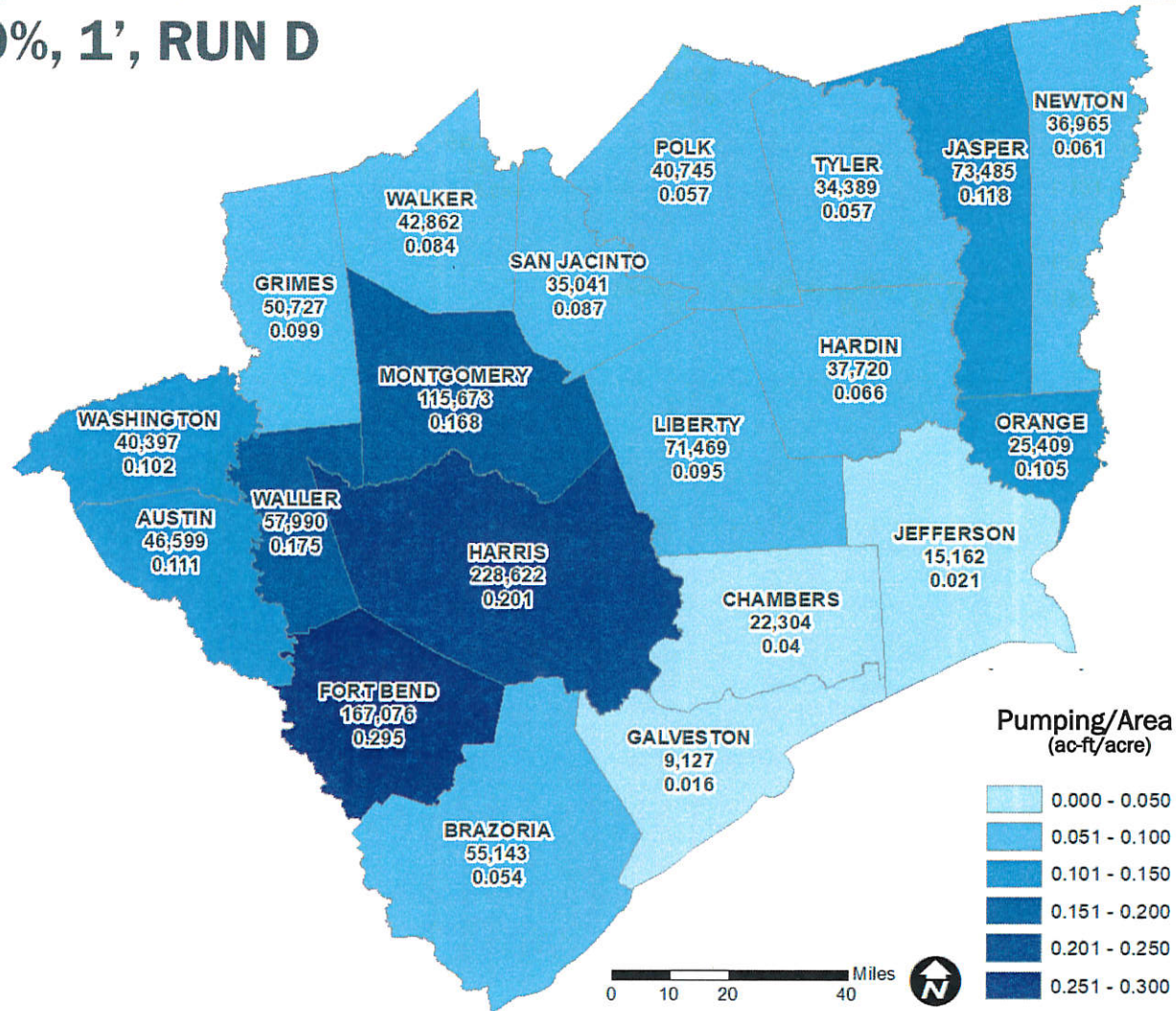
THREE SCENARIOS

- **Constrained by 80% remaining available drawdown in 2080, or 1-foot average subsidence**
 - Limiting factor was remaining available drawdown
 - 61,573 AFY
 - Does not cover current pumping
- **Constrained by 70% remaining available drawdown in 2080 (2016 well file), or 1-foot average subsidence**
 - Limiting factor was remaining available drawdown
 - 97,012 AFY
 - does not account for LSGCD Strategic Planning Study
- **Constrained by 70% remaining available drawdown in 2080 (Run D well file), or 1-foot average subsidence**
 - Limiting factor was remaining available drawdown
 - LSGCD Strategic Planning Study evaluated the pumping distribution; supported by Protestants and key stakeholders
 - The production that is yielded by this scenario (115,673 AFY) is warranted by:
 - Montgomery County demands
 - Chapter 36 balance
 - consideration of 9 factors

INCLUSION OF SUBSIDENCE METRIC?

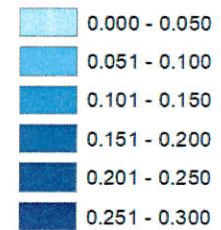
- From a hydrogeologic perspective, LSGCD supports other Chapter 36 GCDs in adopting the metrics they choose
- All three modeling scenarios indicate that the 1-foot average subsidence constraint is not the limiting factor in Montgomery County
- Modeling shows that subsidence is not the limiting factor, but rather remaining available drawdown
- Subsidence is 1 of 9 factors that Chapter 36 districts must consider
- If LSGCD can't measure it appropriately, it is difficult to manage appropriately
- LSGCD is still developing better subsidence data and science in Montgomery County
- North Harris County has experienced 1 foot of subsidence from 2000-2016. LSGCD can't fully control subsidence at southern border of Montgomery County
- A new groundwater model will be available in the next round of planning

SCENARIO 70%, 1', RUN D



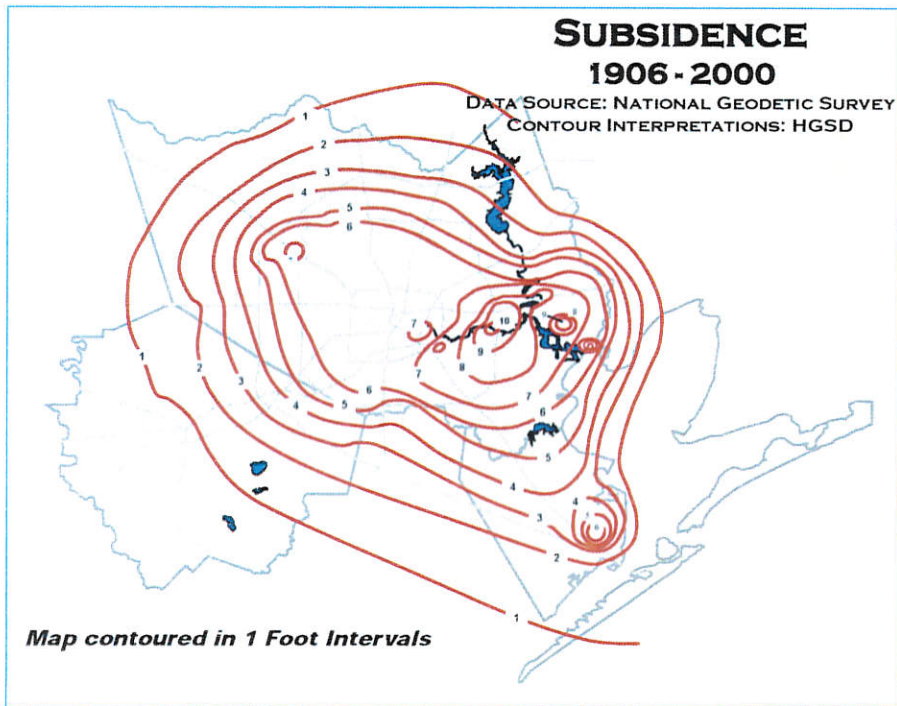
Scenario
Available Drawdown:
70% Remaining
Average Subsidence:
1.0 foot
Run D Base Well File

Pumping/Area
(ac-ft/acre)



PLANNING AND IMPLEMENTATION TAKE TIME

Subsidence in 2000



Subsidence in 2016

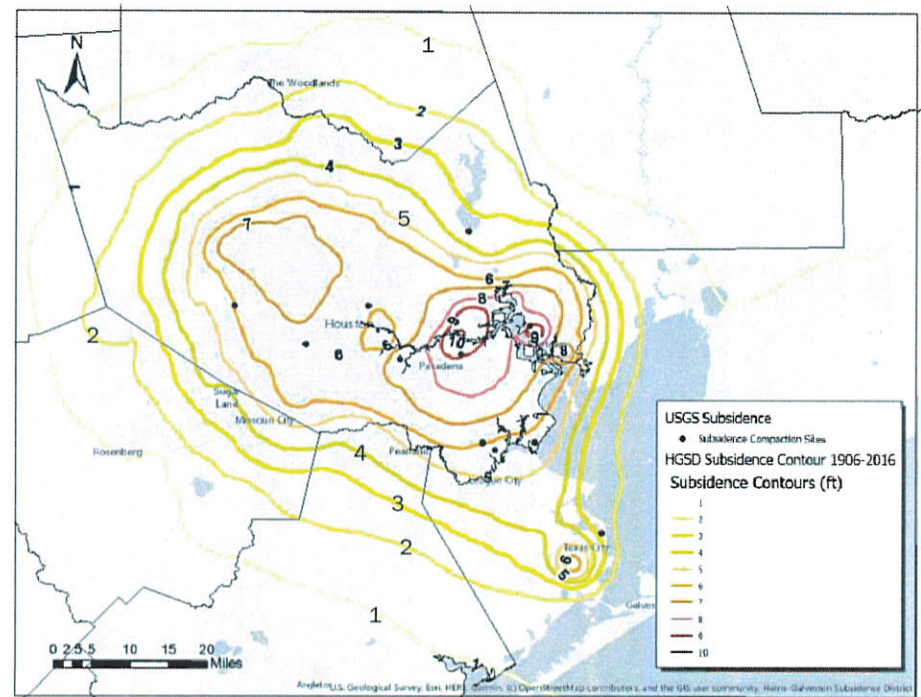


Exhibit "D"

COMPARISON OF HISTORIC AND PREDICTED SUBSIDENCE

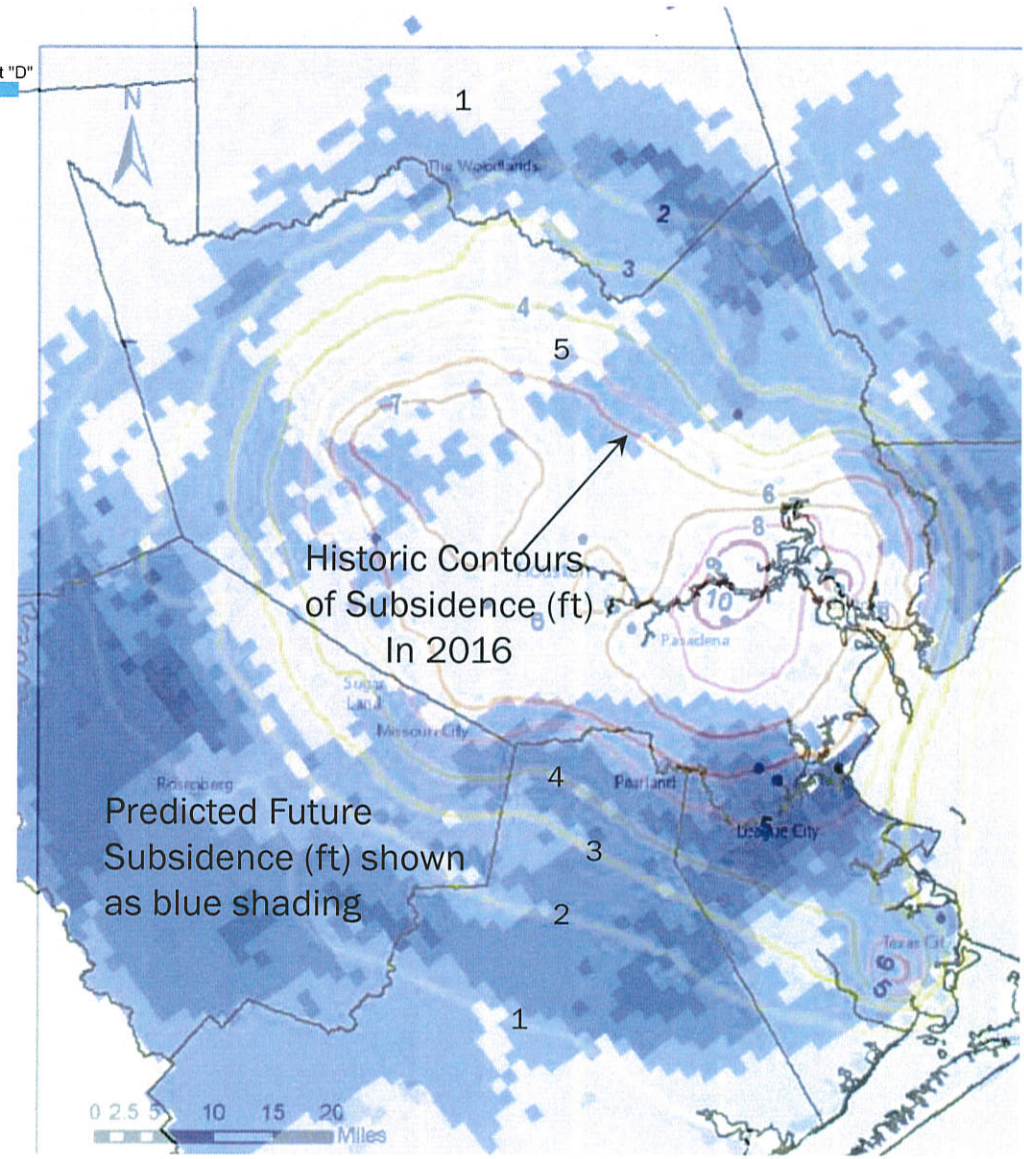
Predicted Future (Modeled) Subsidence (INTERA)

Scenario
Available Drawdown:
70% Remaining
Average Subsidence:
1.0 foot
Run D Base Well File

<1	4-5
1-2	5-6
2-3	6-7
3-4	

Historic Measured Subsidence (HGSD)

Contour map from: RGWSP SAC Phase 1 Report Figure 1. Estimated subsidence in feet from 1906-2016 using measured land surface elevation change at benchmarks surveyed in 2000 and estimated annual subsidence rates from 2011-2016 at HGSD GPS subsidence network assuming a constant rate of subsidence from 2010-2016. Image credit: (Houston Advanced Research Center 2020); Data source: (Harris-Galveston Subsidence District 2019).



THANK YOU
QUESTIONS?

UPDATE ON THE DEVELOPMENT OF DFCs WITH GMA 14 VOTING DISTRICTS

LONE STAR GROUNDWATER CONSERVATION DISTRICT

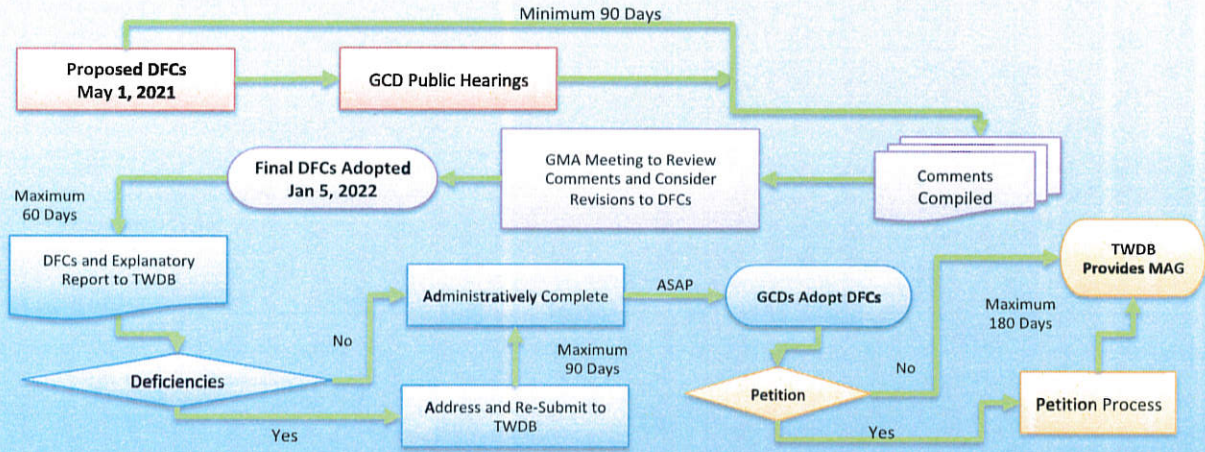
April 7, 2021 Special Board Meeting

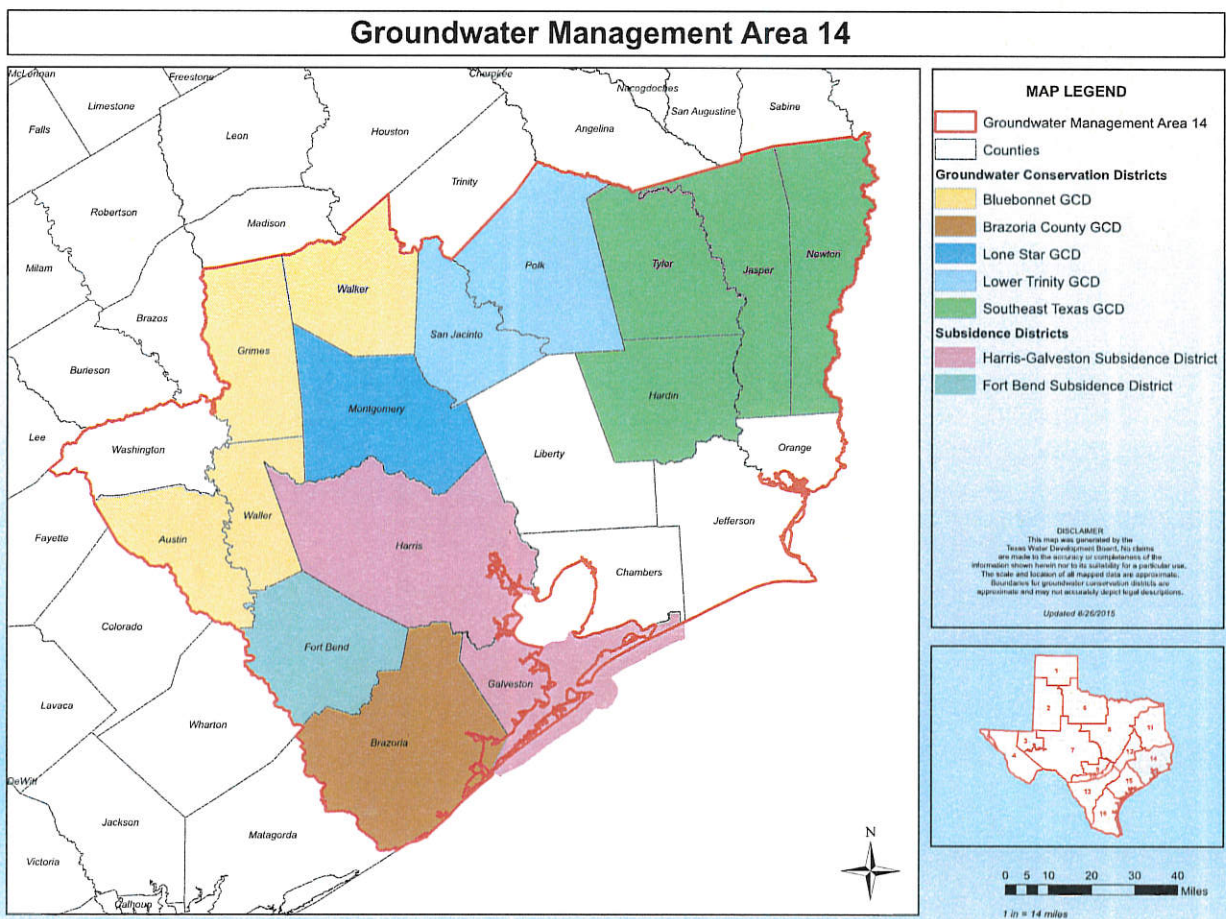


Next Steps

1. ~~Meet with stakeholders to address ongoing comments.~~
2. DFC Committee will make recommendation.
3. Board will vote on proposed DFCs for GM to take to voting GCDs in GMA 14.
4. Voting GCDs in GMA 14 will vote on proposed DFCs (on 4/9/21).
5. District will hold a hearing on the proposed DFCs with a 90 day comment period. All comments from each GCD's hearing will be compiled, shared at GMA 14 and addressed in the voting GCDs' explanatory report.
6. Final DFCs must be adopted by the voting GCDs by January 5, 2022.
7. Final DFCs and explanatory report provided to TWDB; once deemed administratively complete, each GCD must adopt their DFCs.

DFC PROCESS





Legal Considerations

The DFCs proposed and ultimately adopted for LSGCD this round must:

- 1. Resolve the issues from the successful petition in last round;**
 - Represent the balance between the highest practicable level of production & other factors;
 - Be developed using the best available data and science including utilizing a common reservoir approach;
- 2. Be consistent with LSGCD Board policy; and**
- 3. Be measurable, feasible and reasonable.**

Resolution of Issues from DFC Petition

Two main issues with successful petition of 2016 DFCs:

1. DFCs were not developed using a “common reservoir” approach (begin with aquifer condition(s) that can be monitored/measured independent of a model across GMA); and
2. DFCs did not represent balance between the highest practicable level of production & other factors.

One Scenario Addresses Both Issues:

- 70% remaining available drawdown Using Run D well file addresses both issues in petition; utilizes Run D pumping distribution from Strategic Planning Study with stakeholder support.
- All three scenarios utilize common reservoir approach and TWDB approved model.
- 80% remaining available drawdown does NOT represent balance.

GMA 14 & other GMAs historically have had different DFC statements for GCDs.

- The 2016 DFC petition was not about BGCD having a subsidence statement and other GCDs having a water level statement.

LSGCD Board Policy

1. Management plan:

- has goals and objectives with regard to subsidence but does not authorize or contemplate a subsidence metric for a DFC.

2. The Board has a mission to use the best available data & science to inform its management.

- Run D/Strategic Water Planning Study utilized TWDB approved model.
- TWDB approved model predicts remaining available drawdown is limiting factor.
- Board commissioned subsidence study to obtain better data and science for Montgomery County.
 - Is imposing a subsidence metric for a DFC premature with study pending?
- A new groundwater model will be available in next round of planning.

LSGCD Board Policy Cont'd

3. Mission and goal to protect property rights of all users in Montgomery County.

- 70% remaining available drawdown using Run D well file honors property rights/provides balance.
- There are concerns that approving a subsidence DFC statement would not protect property rights of users in Montgomery County because pumping by other counties has significant impacts on subsidence in Montgomery County (much is not within LSGCD's control).

4. Mission to follow the law.

- The DFC must be measurable, feasible and reasonable.

5. Rules authorize management zones for local issues if need be.

- Stakeholder meetings revealed competing objectives for permit holders with regard to water planning;
 - permit holders and water suppliers may resolve concerns without need for regulation.
 - Good given that many permit holders/water suppliers relied on LSGCD's now-invalidated regulation.

Measurable, Feasible and Reasonable

- **Law does not require a subsidence DFC statement.**
 - Law requires GCDs to consider impacts on subsidence which GCDs have done through model simulations.
 - Only one GCD in whole state has subsidence DFC statement (uncommon)
- **Metrics in DFC statements must be meaningful.**
 - Per Wade Oliver that means that the metric can be monitored, measured and actually captures the limiting factor.
 - Model shows subsidence is never limiting factor for Montgomery County rendering it not a meaningful metric for a DFC statement per Mr. Oliver's definition.
- **Measurability and Feasibility- Feasibility is one of 9 factors**
 - District does not have sufficient monitoring equipment to properly measure subsidence accurately throughout the entire county at this time.
 - HARC review acknowledges that monitoring equipment is "sparse."
 - The Subsidence Study will evaluate current monitoring system.
 - Impacts on subsidence outside of LSGCD's control (i.e., impacts on subsidence in Montgomery County caused by pumping in Harris County) raise quantitative and measurable concerns.
- **Subsidence Districts do not have subsidence metric or standard.**
 - North Harris County has experienced 1 foot of subsidence in last 16 years; metric being proposed would limit subsidence to average of 1 foot over 70-80 year planning period. Reasonable?

Run D Well File is Reasonable and Justified

- Run D well file is reasonable and justified because it was studied in Strategic Plan, used to resolve petition, and demand is documented in 2021 Regional Water Plan.

2021 Regional Water Plan Water Demand Projections by County for 2020-2070 in Acre-Feet

Total Water Demand for MONTGOMERY County

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QUESTIONS?