



**NECHES & TRINITY VALLEYS
GROUNDWATER CONSERVATION DISTRICT**

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August 25, 2026

Public Comment Period for Desired Future Conditions for GMA-11

To: Board of Directors of GMA-11

The Neches & Trinity Valleys Groundwater Conservation District held a public comment period that ran from May 1, 2026 through July 31, 2026 to receive comments on the Desired Future Conditions as proposed by GMA-11. A public hearing was held on June 18, 2026.

The district received numerous comments from the public during the comment period in support of keeping Scenario 33 for the district and against changing the DFCs from the prior 5 year period.

Among the comments received were written comments submitted on behalf of Wayne-Sanderson Farms LLC ("WSF") dated April 27, 2026 (to GMA-11) and June 17, 2026 (to the district). WSF holds two operating permits from the district authorizing 3,000 acre-feet per year from the Carrizo-Wilcox Aquifer in Anderson County to supply its Palestine production complex, which employs over 1,200 people and is supported by more than 80 contract farms. A summary of WSF's comments follows.

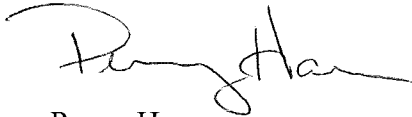
WSF supports Scenario 33 as the final DFCs for the district. WSF states that Scenario 33 reflects consideration of all nine statutory factors under Texas Water Code Section 36.108(d), including private property rights, socioeconomic impacts, Total Estimated Recoverable Storage (TERS), and the water supply needs and strategies in the State Water Plan, and that the blended proposal (Scenario 33 for the district and Scenario 26.1 for the other GCDs) reduces 2080 drawdown in every county compared to the currently adopted DFCs.

WSF opposes Scenario 26.1, or any similar iteration, for the district. WSF states that Scenario 26.1 would reduce Carrizo-Wilcox pumping in Anderson County by 72 percent, below existing 2023 use, and would result in an estimated 40 percent curtailment of its permitted production. WSF estimates the resulting impacts at approximately \$236 million in annual revenue loss to the company, \$23 million in annual revenue loss to its growers, \$27 million in lost annual payroll, and corresponding losses to the local tax base and agricultural supply chain.

WSF also raises legal and technical objections to Scenario 26.1. Legally, WSF contends the GMA-11 Consultant dismissed or de-emphasized statutory factors such as TERS and the State Water Plan, did not analyze private property rights or socioeconomic impacts, and relied on terms such as "sustainable yield" that are not defined in Chapter 36. Technically, WSF contends that the 10 percent dry well threshold is arbitrary, undocumented, and applied inconsistently; that the dry well analysis omitted over 21,000 wells drilled in the last 25 years; that the GMA-11 groundwater availability model is not calibrated to evaluate groundwater and surface water interaction, as noted by the Trinity River Authority; and that the "unofficial" storage estimates used in place of TERS have not been peer reviewed. WSF further contends Scenario 26.1 disproportionately reduces pumping and drawdown in the district compared to the other GCDs.

It is the desire of the Neches & Trinity Valleys GCD that the Desired Future Conditions be adopted as presented to the GMA-11 Board of Directors.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Penny Hanson', with a stylized, flowing script.

Penny Hanson
General Manager
Neches & Trinity Valleys GCD