



City of Lytle

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October 20, 2025

Jorge Paramo
Pr. Regulatory Compliance Coordinator
900 E. Quincy
San Antonio, Texas 78215

RE: **Updated Counter-Offer Letter** - Notice of EAA General Manager Settlement Offer – Related to exceeding annual authorized groundwater withdrawals in 2024 from your Edwards Aquifer Well

Mr. Paramo:

On July 2, 2025, the City of Lytle ("City") received a letter from the Edwards Aquifer Authority ("EAA") regarding a review of the City's 2024 Groundwater Use Reporting Form, in which EAA determined that the City exceeded the annual groundwater withdrawal amount authorized by EAA. The letter indicated that the City reported withdrawing 947.660 acre-feet in 2024, thus exceeding its annual authorization by 441.389 acre-feet. According to the settlement offer provided in the letter, the City has a few options to mitigate the fine incurred for exceeding its authorized water withdrawal for 2024. This letter is the City's response to the settlement offer and notice that the City wishes to exercise Option D (Counter-Offer Proposal) in response.

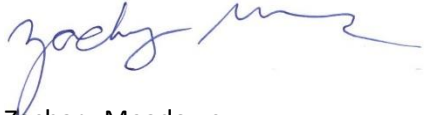
Settlement Option D allows the City to provide evidence of infrastructure issues that can be associated with the overpumping of our system and not related to the allowance by individuals to consume water in excess of the City's annual authorized withdrawal amount. As we have indicated the committee and the board previously, since at least 2023 the City has experienced significant leaks and breaks in our system that have resulted in pumping more water than was needed to supply its customers, and the City's public works team have worked diligently to identify and remedy leaking or broken water lines.

However, based on the amount that was withdrawn over the city's allowance, it is understandable the reluctance by the committee or the board to come to some resolution on the matter. However in reviewing past occurrence by other entities it appears that in addition to any maintenance costs that may have been paid out, several entities were willing to pay an amount similar to what the aquifer management fees would be for the over-pumpage amount. As such the City of Lytle is providing an updated settlement offer in the amount of **\$38,850.00**. This amount is calculated by taking the 441.389 Acre Feet and multiplying the Aquifer Management Fee Rate of \$88.00 per Acre Feet.

Additionally Mr. Paramo informed myself that the City of Lytle, has not submitted critical period monthly reports as required during drought phasing periods. Also has not updated its groundwater conservation plan. I have asked Mr. Paramo to provide references to each of these so that we can make the commitment to comply with these standards and compliance with Edwards Policies and Procedures under the municipal permit to pump water from the aquifer.

We sincerely hope that these renewed commitments and paying our fair share of management fees for the amount pumped will provide the Committee and the overall Board with the City of Lytle's confidence to ensuring we are partners in conservation of our precious commodity, the aquifer.

Sincerely,

A handwritten signature in blue ink, appearing to read "Zachary Meadows", with a stylized flourish extending to the right.

Zachary Meadows
City Administrator
City of Lytle