

Subject: System Capacity Notification and Fire Protection Deficiency

To Whom It May Concern,

This letter serves as a formal and urgent reiteration of Parker County Special Utility District's (PCSUD) longstanding concerns regarding system capacity limitations and the alarming disregard shown for these constraints.

PCSUD is currently operating near the maximum capacity of our water distribution system. In several peripheral areas, including those potentially impacted around the Brock Independent School District's (BISD) new facility, we are only able to meet the **minimum capacity requirement of 0.6 gallons per minute per connection**, as mandated by **30 Texas Administrative Code (TAC) §290.45(b)(2)**. This requirement ensures that all public water systems have sufficient production and distribution capacity to serve their existing customers' average daily needs. PCSUD is not currently in a position to exceed this baseline, meaning there is little to no capacity available to support high-demand uses such as fire flow.

In addition, **30 TAC §290.44(d)** requires public water systems to maintain a minimum pressure of **35 psi at all points in the distribution system during normal operations**. PCSUD is already approaching this limit in several outlying areas, and any additional load threatens to drop pressures below this regulatory minimum. This would not only violate state regulations but directly jeopardize our ability to serve existing customers reliably.

To be explicitly clear: **PCSUD cannot and does not provide sufficient water capacity or pressure to support fire suppression for any existing or proposed structures in the area at this time.** The continued development of facilities, particularly multi-story educational buildings, without verified and functioning fire protection is a reckless gamble with public safety — especially for students, administrative staff, and first responders.

Further, the ability to operate the northern portion of our system is directly dependent on maintaining adequate levels at our Brock pump station. If we are unable to fill this critical facility due to system overdraw or unauthorized demand increases, **residents north of the Brock community will face low pressure, service interruptions, or total outages**. These are not speculative possibilities — they are operational certainties under current conditions if demand continues to increase beyond capacity.

Additionally, PCSUD has recently identified the installation of a booster pump station within the new Brock Independent School District's facility that was not disclosed or approved in prior plans. While we understand its purpose, it cannot be directly fed from PCSUD's main distribution system, as this creates unacceptable risks to system pressure stability and regulatory compliance.

To address the school's domestic water needs safely and in compliance with state regulations, PCSUD requires the installation of a properly sized onsite water storage tank. This tank will serve as the source for the booster pump and be filled during off-peak hours via a controlled inflow, thereby minimizing strain on the distribution network. It is important to emphasize that this booster pump and storage tank arrangement serves only domestic water requirements and does not provide or support fire flow capacity in any way.

Furthermore, PCSUD undertook a comprehensive engineering analysis in 2018–2019 and has since worked diligently to secure funding through the Texas Water Development Board (TWDB) for major infrastructure upgrades, including treatment plant improvements, larger transmission mains, and an elevated storage tank behind Brock High School. These upgrades are essential to meeting future demand and ensuring fire protection can be supported — but they are **not yet in place**. TWDB is expected to issue a notice to proceed next month, with an estimated construction timeline of **no less than 16 months**.

Despite our continued and direct communication with BISD regarding these critical limitations, our concerns have been largely dismissed. This is not simply a matter of administrative disagreement — it is a matter of **compliance with state law, operational feasibility, and public safety**. Moving forward with construction or occupancy of facilities that lack adequate fire flow and operate at the margins of system pressure and volume is a **conscious and indefensible decision** that PCSUD will not be complicit in.

PCSUD's foremost responsibility is to the integrity of our system and the safety of our existing customers. That includes ensuring that when a tap is opened — whether in a kitchen, a hospital, or a school — water is available. And when a fire suppression system is needed, it is backed by actual flow, not assumptions.

Until the necessary infrastructure is complete and online, **no new development should proceed on the assumption that sufficient water or fire flow is available**. PCSUD will not be held liable or responsible for any consequences—operational, legal, or otherwise—that result from any facility moving forward despite having been clearly informed of the current system's limitations.

Respectfully,



Dakota Tawater
General Manager
Parker County Special Utility District