

Dr. Sanjeev Kalaswad (VIA Email: sanjeev.kalaswad@twdb.texas.gov)
Director of Conservation & Innovative Water Technologies
Texas Water Development Board
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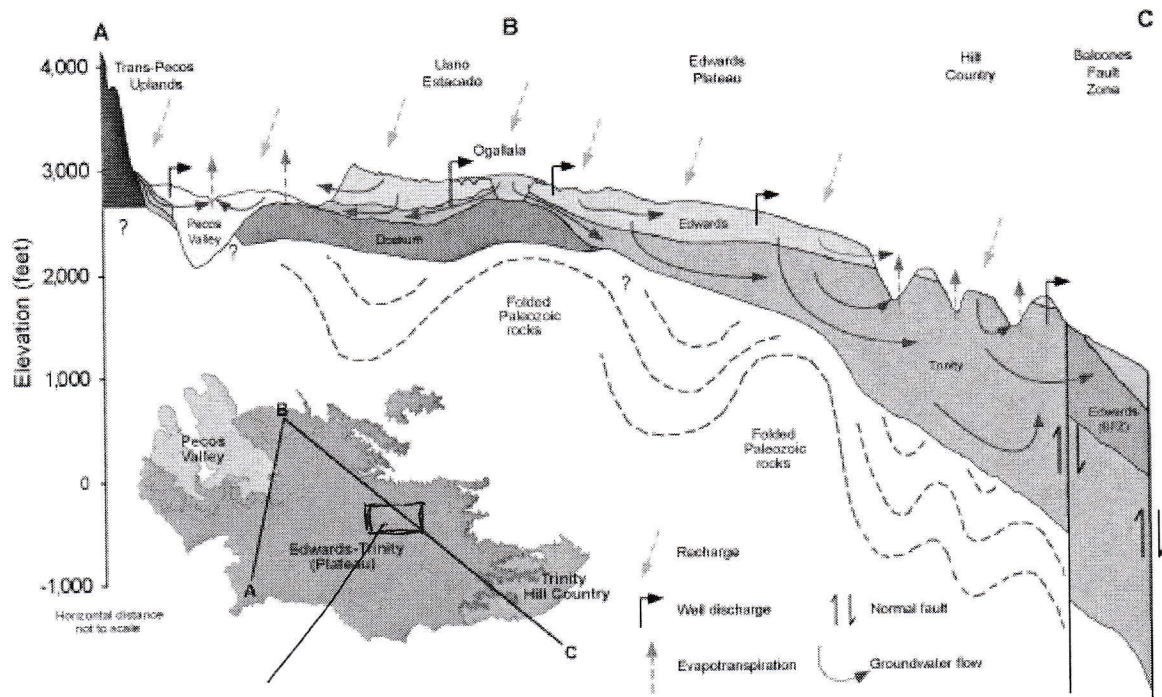
Dear Dr. Kalaswad,

The Plateau UWC&SD is pleased to offer this public input on House Bill 30. The legislation directs the Texas Water Development Board (TWDB) to identify and designate brackish groundwater production zones and work with groundwater conservation districts (GCD's) and stakeholders when identifying and designating brackish groundwater production zones.

Dr. Robert Mace's power point presentation at the public hearing on October 26, 2015 indicated that in the first year, the TWDB will focus on the Blaine, Carrizo-Wilcox, Gulf Coast and Rustler aquifers. In year two, the focus would be on the Blossom, Nacatoch, and the Trinity aquifers.

Our GCD manages the Edwards -Trinity Plateau aquifer within Schleicher County, the Edwards being the more shallow and under 1000 TDS water, with the Trinity deeper and above 1000 TDS (but not much above in the few samples we have tested). We have about 40 permitted wells in the district including irrigation wells, water stations, and municipal wells. All these combined pumped about 2500 ac. ft. in 2014. Estimated exempt use is about another 2500 ac. ft. Except for a relatively few wells in the far western part of the district, where University Lands requires oil & gas companies to use the deeper water, this is all fresh water well under 1000 TDS. Well reports on the deeper Trinity wells show fairly modest volumes in the 50-70 gpm range.

Our concern regarding Trinity water withdrawals is whether it would impact our fresh water, and should such impacts occur, find that it is not considered significant, and in any case, beyond local control.



Plateau UWC&SD

Modified from Anaya and Jones, 2004, 2009

Plateau UWC&SD is willing and able to support our comments with the best available scientific research developed, in-house water quality screening, source aquifer status reports, annual production reports by permit holders, and exempt estimates of use for the last five years. Plateau UWC&SD believes that we have sufficient evidence necessary to assist the TWDB to better understand that the aquifers in our jurisdiction are a “*significant source*” of groundwater for beneficial use within our jurisdiction.

Plateau UWC&SD respects that prior to identifying and designating brackish groundwater production zones, the TWDB is appropriately requesting input on the following questions from GCD’s and stakeholder interests:

- How should the TWDB define “significant impact”?
- How should the TWDB define “separated by hydrogeological barriers sufficient to prevent significant impacts”?
- How should the TWDB define significant source of water supply for municipal, domestic or agricultural purposes?; and
- Is there a distance from existing use that a brackish groundwater production zone could be designated?

Because of the vastly known differences between aquifer conditions and regional characteristics across the state, and the subjectivity of the aforementioned questions, Plateau UWC&SD

strongly recommends the TWDB seek to define of what constitutes a “*significant impact*”, “*significant source*”, or a sufficient “*definition of separation of a hydrogeological barrier*” on an area by area basis with direct input from local GCD’s as well as local municipal, rural water suppliers, domestic and agricultural stakeholders located within a proposed brackish groundwater zone prior to final designation. We adamantly believe there is not a one-size fits all definition to the proposed questions.

Additionally, Plateau UWC&SD strongly recommends the TWDB hold a minimum of two stakeholder meetings in each of the proposed areas prior to the final designation of a zone in order to receive local input from residents and landowners as it relates to the defining questions, the economic impact of designating a brackish groundwater production zone and the impact if any to private property rights.

We believe if the TWDB reaches out to local residents and landowners in their respective home areas, and afford them the ability to provide input in the identification and designation process of brackish groundwater production zones, this will incentivize the utilization of brackish groundwater furthermore reducing the use of fresh groundwater resources.

Plateau UWC&SD sees the added importance of TWDB effectively reaching out to GCD’s for groundwater information which can be incorporated in the facilitation of identifying and designating brackish groundwater production zones. GCD’s have a wealth of data and information, evidenced by our submittals with these comments. We strongly recommend the TWDB utilize direct input from local GCD’s and input from local stakeholder groups as they work to identify and designate brackish groundwater production zones.

Thank you for the opportunity and your consideration of these comments. If you have any questions please contact us.

Sincerely,

Jon Cartwright, Manager
Plateau Underground Water Conservation & Supply District

A handwritten signature in black ink that reads "Jon Cartwright". The signature is written in a cursive, flowing style with a large, prominent "J" and "C".