

Charles Ring
15410 CR 600
Sinton, Texas 78387
361-813-0899
mcraggie77@aol.com

October 30, 2015

Dr. Sanjeev Kalaswad
Director of Conservation & Innovative Water Technologies
Texas Water Development Board
P.O. Box 13231
Austin, TX 78711-3231

RE: Comments on TWDB implementation of HB 30

Dr. Kalaswad:

As President of the San Patricio County Groundwater Conservation District, I appreciate the opportunity to comment on the Texas Water Development Board's implementation of House Bill 30 which requires the designation of brackish groundwater production zones.

I understand TWDB is seeking public input to help answer the following three questions:

1. How to define "significant impact."
2. How to define "separated by hydrogeologic barriers sufficient to prevent significant impacts."
3. How to define "significant source" of water supply for municipal, domestic, or agricultural purposes.

The October 30, 2015 deadline for submitting comments does not provide sufficient time for me to prepare adequate responses on these important questions. However, all of us who depend upon groundwater for our homes and businesses along the Texas Gulf Coast are well aware that increased pumping of brackish water has an adverse impact on water quality by producing higher concentrations of dissolved solids in our water. Contrary to the statement made by Dr. Robert Mace at the stakeholder meeting on October 26, 2015 that pumping brackish water draws fresh water toward the well and thus has little or no impact on fresh water quality, we can and will document that pumping brackish water in our coastal areas causes greater incursion of salt water.

I believe the groundwater conservation districts, along with other affected parties, in the region of the Gulf Coast Aquifer need to form a working group to develop data on water quality as well as the municipal, domestic and agricultural uses of brackish groundwater to help TWDB and its contractor avoid designating production zones that would adversely affect our region.

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I am sure you are aware the Gulf Coast Aquifer is massive, stretching over 430 miles from Louisiana to Mexico and underlying all or portions of more than 45 Texas counties. I have serious doubts that a thorough study of the location, quality and uses of brackish groundwater in every part of this aquifer (with the exception of Harris and Fort Bend counties) can be conducted by your deadline of August 31, 2016. I know TWDB must attempt to comply with the requirements of HB 30 no matter how flawed and unreasonable that legislation may be. To produce the best outcome under these circumstances, I strongly recommend that the TWDB direct its chosen contractor to work as closely as possible with the conservation districts that have the statutory responsibility for managing groundwater from the Gulf Coast Aquifer.

I will provide whatever assistance I can to the TWDB staff and its contractor as this process moves forward over the coming year.

Sincerely,
Charles Ring