**MENARD COUNTY UNDERGROUND WATER DISTRICT**

**P. O. Box 1215**

**Menard, Texas 76859**

**325-396-3670**

30 October 2015

Dr. Sanjeev Kalaswad (VIA Email: [sanjeev.kalaswad@twdb.texas.gov](mailto:sanjeev.kalaswad@twdb.texas.gov))

Director of Conservation & Innovative Water Technologies

Texas Water Development Board

P.O. Box 13231

Austin, Texas 78711-3231

Re: Comments on House Bill 30

Dear Dr. Kalaswad,

In my role as consulting manager of the Menard County Underground Water District and the Hickory Underground Water Conservation District No. 1. I am submitting input on the legislature directive in HB 30 for the 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.

The two above-mention Districts have jurisdiction over the Edwards-Trinity (Plateau), Hickory and Ellenburger-San Saba Aquifers within their respective boundaries. I understand that the TWDB will take up consideration of the Blaine, Carrizo-Wilcox, Gulf Coast and Rustler aquifers in the first year and the Blossom, Nacatoch, and the Trinity aquifers the second year, so my comments may be quite premature, but it is my understanding that input is requested on all the state’s aquifers, at least the major ones.

The Edwards-Trinity (Plateau) Aquifer, especially in the eastern part of GMA 7, is shallow, has little or no storage, and high transmissivity. There are few non-exempt wells in the district, as most wells have average yields or 5-10 gpm or less, and 90% of the wells are produced solely for domestic and livestock use. The most recent GAM run for the district Management Plan shows that most of the recharge from precipitation and lateral inflows from other aquifers discharges to the streams and rivers in the district. Surface water comprises 80% of our total water use in the district and our DFC for the aquifer was adopted with the primary objective of protecting spring- and stream flows. In those respects the Edwards-Trinity (Plateau) shares common characteristics with the karst Edwards Aquifer in the Edwards Aquifer Authority and Barton Springs Edwards Aquifer Conservation District and should similarly be exempted from consideration of identifying and designating brackish water zone as those two GCDs are.

The Menard County Underground Water District can support its comments with TWDB and other aquifer studies, including studies undertaken for GMA 7 and for the District itself, well-yield maps, well registration reports and other data.

Because of the great differences in conditions and characteristics of the Edwards-Trinity (Plateau) across our GMA, our District strongly recommends that the TWDB defines 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.

As to the Llano Uplift Aquifers, they are, as you know, very complex, little studied and the initial Groundwater Availability Model is only now nearing completion. We have every reason to believe that the fresh water in the outcrop zones is hydrologically connected to the brackish downdip zones and that extensive pumping of the downdip zones would cause degradation of the fresh water supply. We think these aquifers should undergo a lot more study before any designations of brackish water zones are contemplated.

The Menard County Underground Water District and Hickory Underground Water Conservation District No. 1. strongly recommend that 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.

The two Districts believe it is crucial for the TWDB to reach out to GCD’s for groundwater information which can be incorporated in the identification and designation of brackish groundwater production zones. GCD’s have a wealth of data and information, evidenced by our submittals with these comments to develop brackish groundwater zones without impairing fresh water supplies.

Thank you for your consideration of these comments. If you have any questions please contact me.

Sincerely,

Caroline R. Runge, Consulting manager