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The Watershed Association (WA) is pleased to present comments on the HTGCD proposed rule changes. WA requests these comments be placed in the hearing record. We understand some of the changes reflect administrative revisions required by state law and therefore have no comments on the state mandated revisions. The following presents WA’s comments on the revisions to Rules 3, 4, 9 and 13.

Rule 3.5.2(m) states *a study and other information showing the impacts of the proposed use of the well on water availability, existing groundwater and surface water resources, and on other permittees and groundwater users.* The rule should explicitly state that the proposed use of the well on water availability be evaluated during drought conditions as well as average conditions.

Rule 4.3: WA concurs with the proposed spacing distances between property line and existing wells. For consistency, the District should consider replacing the pump capacity values with permitted ac-ft/year as wells are typically permitted by ac-ft/year, not average gallons per minute.

Proposed Permitted Amount in Daily Average Gallons per Minute	Minimum Horizontal Distance Between Proposed Well and Existing Wells	Minimum Horizontal Distance Between Proposed Well and Adjacent Property Lines
Exempt Well (up to 17.36 gpm)	150 feet	100 feet
Non-exempt Well <1 - 25 ac-ft/year (up to 40 gpm)	300 feet	150 feet
Non-exempt Well 25 – 100 ac-ft/year (40 to 161 gpm)	750 feet	375 feet
Non-exempt Well 100 -150 ac-ft/year (161 to 240 gpm)	1,200 feet	600 feet
Non-exempt Well >150 ac-ft/year (>240 gpm)	1,500 feet	750 feet

Rule 9.1.1 should specifically address line loss above industry norms as waste. Line loss accounts a large amount of loss/waste in some of the municipal water systems in the district and is a correctable problem.

The District's proposed changes to Rule 13 Drought Management acknowledges that more proactive drought management is necessary and the WA agrees with addition of a Conservation Stage curtailment. The WA also feels the rule should state that to be effective, curtailments should be calculated from total pumped volumes, not total permitted volumes. Systems operating below their permitted capacity have no incentive to curtail pumpage.

The term "landscape irrigation" used in 13.3.3 A is vague and needs further definition. WA suggests that landscape irrigation be replaced with *turf grass irrigation* as turf grass irrigation is by far the largest single water use in the District. Minor outdoor watering, such as containerized plants and drip irrigation should be allowed.

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