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April 6, 2023

Hays Trinity Groundwater Conservation District  
P.O. Box 1648  
Dripping Springs, TX 78620  
Via email: [staff3@haysgroundwater.com](mailto:staff3@haysgroundwater.com)

**Re: Agenda item # 8. Aqua Texas -- Woodcreek Phase II Aquifer Test Variance Request**

Hays Trinity Groundwater Conservation District Directors and Staff:

The Watershed Association supports a variance request to allow an Aqua Texas Woodcreek Phase II Aquifer Test during drought for the following reasons:

1. The Watershed Association supports any effort to reduce pumpage in the Jacob's Well Groundwater Management zone. Aqua Texas has stated this is their intention with the two new test wells; however, a pumping agreement is advised to formalize this intention.
2. The two Aqua Test Wells (Numbers) **could** provide a water supply that does not impact Jacob's Well spring flow and existing groundwater users, if they have been completed in a section of the aquifer that isolated from Jacob's Well. It is imperative that this be tested by a robust, coordinated monitoring effort during an aquifer test.
3. The two Aqua Test Wells (numbers) are adjacent to the Jacob's Well Groundwater Management Zone (JWGMZ) and within the Tom Creek Fault Block. This fault block is known to have complex, karst groundwater dynamics. While policy established the boundary of the GMZ, it is critical to test and measure potential impacts of pumpage in that area on Jacob's Well and surrounding wells.
4. Drought conditions and pumping above permit and drought curtailment limits are currently occurring, these conditions would allow measurement of pumping impacts during the most important times—low to no flow at Jacob's Well and exceptionally low groundwater levels in the surrounding Middle Trinity aquifer. Scientifically, timing the aquifer test during these conditions would provide valuable data.

Jacob's Well spring flow is proven to be impacted by drought and groundwater pumping. In 2022, the Jacob's Well flow record shows there were only 13 days above 6 cfs (flow threshold for drought declarations in the JWGMZ); there were 283 days below 3 cfs (lowest drought threshold for the JWGMZ), of which 35 of those days had zero flow. Cypress Creek was added to the TCEQ's 303d list of impaired streams in 2022 because of low dissolved oxygen and poor aquatic habitat—both flow-related parameters. Both Jacob's Well Natural Area and Blue Hole Regional Park had to suspend swimming due to water quality concerns associated with low flow.

Drought restrictions for the JWGMZ are designed to minimize effects of pumping spring flow and protect water availability for our groundwater-dependent community. We believe the established District-declared drought reductions are an effective and essential tool to coordinate conservation.



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Moving pumpage outside the GMZ and closely adhering to drought reductions are imperative to protecting water supplies, aquatic habitat, economy, and the way of life in the Wimberley Valley.

These comments are being submitted on behalf of the Watershed Association.  
Thank you,

Robin Gary  
Director of Watershed Protection and Conservation Science

## Jacobs Well Spg nr Wimberley, TX - 08170990

January 1, 2022 - April 6, 2023

Streamflow, ft<sup>3</sup>/s ⓘ

