



David Baker, Executive Director
Malcolm Harris, President
Pokey Rehmet, Treasurer
Jason Pinchback, Secretary
Scott Price
Dorothy Knight
Parc Smith
Vanessa Puig-Williams

COMMENTS OF WIMBERLEY VALLEY WATERSHED ASSOCIATION ON HAYS TRINITY GROUNDWATER CONSERVATION DISTRICT'S DRAFT RULE 15 - MANAGEMENT ZONE

Wimberley Valley Watershed Association (WVWA) appreciates the opportunity to comment on the District's draft Rule 15. WVWA generally supports the adoption of Sections 15.1.1, 15.1.2, 15.1.3, 15.1.4 and 15.1.5. In addition, WVWA supports Section 15.2 drought curtailments for the Jacob's Well Groundwater Management Zone (JWGMZ).

Draft Rule 15 is a culmination of extensive research for the development of the JWGMZ in Hays County, Texas. The evaluation included contributions from six professional geologists and extensive input from a stakeholder advisory committee. There can be no question but that Rule 15 is crucially necessary to maintain healthy flows into Jacob's Well.

With respect to draft Rule 15.1.3(1), WVWA strongly encourages the Board to modify the draft Rule to require an applicant to make a showing by clear and convincing evidence that a waiver is warranted.

Draft Rule 15.1.5 seems to imply a replacement well must be completed in the same production zone. WVWA suggests a well owner should be allowed to drill a replacement well in a formation that will not impact flows into Jacob's Well. WVWA comments that a replacement well drilled within the Jacob's Well Groundwater Management Zone must be subject to a well performance test and/or an aquifer test under the District's Rule 11.

With respect to draft Rule 15.2.2, WVWA has an inquiry which is whether existing permits in the JWGMZ currently include monthly baseline production amounts. If this is not the case, all existing permits need to be amended by the District to include the monthly baseline production amount.

WVWA supports the adoption of Rule 15 with the caveats and comments set forth herein.

A handwritten signature in black ink, appearing to read 'David Baker', is positioned above the typed name.

David Baker
Executive Director
Wimberley Valley Watershed Association