

From: Mark Key
Sent: Monday, October 14, 2019 3:40 PM
To: Rick Broun <manager2@haysgroundwater.com>
Subject: Proposed rule changes

Mr. Broun,

I respectfully offer the following comments on the HTGCD proposed rule changes. I am making these comments as an individual property owner in District 4 of the HTGCD and not as a director of the Dripping Springs Water Supply Corporation. Water supply comments will come via our general manager.

Rule 13: Drought Triggers (13.2), there is no reason to change the current drought triggers unless the district is trying to find triggers that are far more sensitive than the established triggers and create a faux emergency to drive the entire HTGCD into unnecessary drought stage reduction.

1. In regards to the Skipton well, not enough history exists on it to reliability use it as a trigger.
2. The Blanco river flow has a much wider variation than the Pedernales, and should not be used alone.
3. The 2017 baseline production (13.1.2) is an exercise in folly. It allows a board to fore go science and put each permit into the hands of changing boards and gets boards overly involved in situations that should be handled at the administrative level. The chance for abuse, both for and against the permittees is high.

In regards to Rule 15, I'm not sure if the comment period is over or not. But as a prior board member, I was frequently told by members of C.A.R.D. that all voices matter. With that in mind I offer my comments on those proposed rule changes.

1. The pandering to the Wimberley Valley Watershed association is unwise. David Baker's mismanagement of funds is legendary, to the extent that the County had to buy the well, after already giving Mr. Baker \$3,000,000 for its purchase and management.
2. This rule change as a whole is anti property owner and anti business and will no doubt lead to a slew of law suits in the coming years.

In conclusion, the current board was given a high functioning, well funded organization, but seems intent to throw it all away in a over regulated, law suit inviting haze.

Respectfully, Mark Key