



Texas and Southwestern Cattle Raisers Association

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The
Cattleman

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October 30, 2015

Dr. Sanjeev Kalaswad
Director, Conservation and Innovative Water Technologies
Texas Water Development Board
P.O. Box 13231
Austin, Texas 78711

RE: Preliminary comments on the implementation of House Bill 30

Dear Dr. Kalaswad:

The Texas and Southwestern Cattle Raisers Association (TSCRA) appreciates the opportunity to submit preliminary comments on the Texas Water Development Board's (TWDB) implementation of House Bill 30 relating to the development and designation of brackish groundwater production zones.

TSCRA is a 138-year-old trade association and is the largest and oldest livestock organization based in Texas. TSCRA has a membership of more than 17,000 beef cattle operations, ranching families and businesses. These members represent over 50,000 individuals directly involved in ranching and beef production that manage over four million head of cattle on more than 76 million acres of range and pasture land primarily in Texas and Oklahoma, but throughout the Southwest.

An overall issue of concern to TSCRA is the 1,000 milligrams total dissolved solids (TDS) per liter threshold. In many areas of the state, groundwater that is over the 1,000 milligrams TDS per liter threshold and in the slightly saline or moderately saline classifications is being used for domestic and livestock use. Also in many areas of the state, there is scientific and production-based evidence that fresh and brackish aquifers communicate with one another making it difficult to permanently classify them into a single category for the purpose of production zone designations. TSCRA would respectfully request that the TWDB take a conservative approach when designating brackish groundwater production zones in these areas as it could have severe impacts on landowners, livestock producers, and rural communities in the future.

In regards to the several issues that the TWDB requested specific feedback on regarding phrases such as "significant impact" and "significant source" in House Bill 30, TSCRA respectfully requests that the TWDB consult with local landowners, groundwater conservation districts, Texas State Soil and Water Conservation Board, and Texas A&M AgriLife Extension and Research to help make these determinations. As you know, these areas throughout Texas are very diverse and a one-size fits all approach and/or definition of these phrases is not practical. In addition, TSCRA respectfully requests that multiple public stakeholder meetings be held throughout these regions so that landowners and other stakeholders can be educated and also be given the opportunity to provide local and regional site specific information to the TWDB.

Thank you again for the opportunity to comment on this important issue. Please contact Jason Skaggs at 512-469-0171 or at jskaggs@tscra.org should you need further information from TSCRA.

Sincerely,


Pete Bonds
President