

**High Plains  
Underground Water  
Conservation District**

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October 30, 2015

Sanjeev Kalaswad, PhD.  
Director of Conservation & Innovative Water Technologies  
Texas Water Development Board  
P.O. Box 13231  
Austin, TX 78711-3231

**RE: Request for Public Input on House Bill 30**

Dear Dr. Kalaswad:

The High Plains Underground Water Conservation District (HPWD) is pleased to offer this public input on House Bill 30. This legislation seeks to identify and designate local or regional brackish groundwater production zones in areas of the state with moderate to high availability and productivity of brackish groundwater that can be used to reduce the use of fresh groundwater.

**Identification and Designation of Brackish Groundwater Production Zones**

Prior to identifying and designating brackish groundwater production zones, the TWDB has requested input on the following questions from groundwater conservation districts (GCD) and stakeholder interests:

- \* How should the TWDB define "significant impact"?
- \* How should the TWDB define "separated by hydrogeological barriers sufficient to prevent significant impacts"?
- \* How should the TWDB define "significant source of water supply for municipal, domestic or agricultural purposes?" and
- \* Is there a distance from existing use that a brackish groundwater production zone could be designated?

Because of the vast differences between aquifer conditions and regional characteristics across the state, as well as the subjectivity of the aforementioned questions, HPWD strongly recommends the TWDB solicit direct input from local GCDs prior to designation. Also, the local water users should be consulted prior to designating a brackish groundwater production zone.

We adamantly believe there is not a one-size-fits-all definition to the proposed questions.

Dr. Sanjeev Kalaswad

October 30, 2015

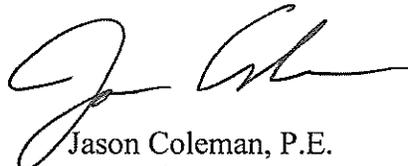
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Additionally, HPWD strongly recommends that the TWDB hold a minimum of two stakeholder meetings in each of the proposed areas prior to the designation of a zone. Those meetings should provide transparency and education to local residents and landowners regarding the economic impact of designating a brackish groundwater production zone and the impact, if any, to private property rights.

We believe the TWDB should reach out to local residents and landowners in their respective home areas, and request input in the identification and designation of brackish groundwater production zones. With local participation, incentives for the utilization of brackish groundwater should prove successful.

Thank you for the opportunity and your consideration of these comments. If you have any questions, please contact us.

Sincerely,



Jason Coleman, P.E.  
General Manager

JC