

Joe Reynolds, Legal Division
Texas Water Development Board
P. O. Box 13231
Austin, Texas 78711-3231

November 28, 2011

Dear Mr. Reynolds:

I am submitting this statement on behalf of the fifty member organizations of the Greater Edwards Aquifer Alliance (GEAA), our Board of Directors, and our many individual members, who have united behind a comprehensive plan to protect the Edwards and Trinity karst aquifer systems. The latest studies indicate that these aquifers are interrelated, and that the Edwards Aquifer depends partly on the Blanco River and other Wimberley area streams and springs for the recharge of water into the Edwards Aquifer. Additional studies are needed to determine the relations of ground and surface water interaction within the Edwards and Trinity aquifer systems. To significantly alter the system before such studies can be conducted, as the GMA 9 DFC proposes, would be irresponsible and could result in unanticipated consequences that threaten the integrity of both groundwater systems.

At the GMA 9 hearing in Wimberley on November 16th, Dr. Rene Barker testified that approximately 12,000 acre feet per year of water would not be recharged into the Edwards Aquifer if the 30 ft. drawdown is upheld as the Desired Future Condition (DFC) of the Trinity. His estimate was based on an extremely general model, and there are indications that such a generous drawdown of the Trinity Aquifer system might have even more severe consequences to the Edwards Aquifer. In addition, please anticipate the drilling of additional exempt wells in the Trinity when determining a sustainable Desired Future Condition for GMA 9.

The Edwards recharge during years of drought is only 44,000 acre feet per year, so this 12,000 acre foot loss would have a major impact at the most precarious of times, according to Dr. Barker. GEAA is one of the stakeholders in the EARIP (Edwards Aquifer Recovery Implementation Program). The work of the EARIP was predicated on conditions that could be drastically altered should the DFC for GMA 9 allocate the drawdown of an additional 30 feet. The Edwards computer models done in the last 4 years during the EARIP process by a subcommittee of respected scientists did not consider this additional draw down of the Trinity, and consequent loss of recharge to the Edwards. Four million dollars has been spent to devise a plan for preserving the springflows at San Marcos and Comal springs. Hence, by allowing an additional 30 ft. drawdown of the Trinity Aquifer in Hays County, we face the prospect that the plan of the EARIP will fail to provide minimum springflow during times of drought needed to protect federally listed and threatened species at Comal and San Marcos springs.

It is the duty of the Texas Water Development Board to provide rational guidance on the allocation of our water resources. While GEAA recognizes that new development will occur to accommodate the growth in population predicted for our region, we also call on our governmental agencies to insure that growth occurs in a sustainable manner, and that our water resources are allocated with a mind to maintaining the ecosystem that make the Hill Country region unique and desirable. The Wimberley petitioners have provided a number of sobering reasons why the additional 30 ft. drawdown is not sustainable, as well as testimony on the economic and ecological fallout

that would result from over allocation of the Trinity Aquifer in Hays County. As we have seen during the EARIP process, the needs of all stakeholders should be considered before large permits for increased pumping are dispensed by the groundwater districts. It would be very difficult to take back a pumping permit, so it makes sense to be cautious right now about how much water is permitted to be pumped from the Trinity. We strongly support the findings of the Wimberley Valley Watershed Association, and we strongly support their effort to have a Trinity DFC that would keep Jacob's Well and other springs in the Wimberley area flowing to maintain the integrity of this complicated system of surface and groundwater flows.

Please consider the impacts that the proposed additional drawdown of 30 feet would have on the Edwards Aquifer, and realize how serious any interruption in recharge to the Edwards would be to the entire Edwards region, our natural resources and our economy. Please consider, as well, the impacts that the drawdown would have on a community that has amply demonstrated that they value the flows from Jacob Well through their efforts to preserve this watershed, the springs and Cypress Creek. Imposing a rational and sustainable limit to the drawdown of the Trinity Aquifer would sustain so much of what we treasure about the Hill Country of Central Texas while providing the basis for an economically vibrant future for this region – from Uvalde to Austin.

Thank you for this opportunity to submit these comments. Please rely on GEAA as a resource should you require additional information on this issue.

Sincerely,

Annalisa Peace
Executive Director