



Kerr County Engineering

3766 Hwy. 27
Kerrville, Texas 78028

Gwen Ricco
MC 205, Office of Legal Services
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

June 24, 2024

RE: Rule Project Number 2024-006-230-OW
Chapter 230 – Groundwater Availability Certification for Platting
Written Comments Submittal

Dear Gwen,

This letter is in response to the above referenced Rule Project Number 2024-006-230-OW, Chapter 230 – Groundwater Availability Certification for Platting, and serves as written comments for same. If you have any questions, or if I can be of further assistance, please do not hesitate to contact me at 830-896-9046, or chastings@co.kerr.tx.us. I hope this helps.

Respectfully,

A handwritten signature in blue ink that reads "Charlie Hastings".

Charlie Hastings, P.E., CFM
Kerr County Engineer

June 24, 2024

Written Comments Submittal

Chapter 230 – Groundwater Availability Certification for Platting

Rule Project Number 2024-006-230-OW

§230.2. Definitions – Definitions needed for: “expansion of an existing public water supply system” and “groundwater under the subdivision” [see also §230.4, §230.5(5)(A), §230.8(a)]

§230.4(3),(4),(5) - The Office of the Kerr County Engineer questions the necessity of obtaining facsimile numbers as the industry standard in this day and age has become email.

§230.5(6), paragraph 1, line 4, word 6 – grammar, delete the word “which”

§230.8(a), paragraph 1, line 9, word 2 – add “(TCEQ-20982)”

§230.8(a) – Question: It is clear that the intent of Chapter 230 Groundwater Availability Certification is to conduct aquifer stress tests to ascertain and certify the availability of aquifer groundwater 10-30 years following the full development of a platted subdivision, however, in the case where “expansion of an existing public water supply system or installation of a new public water supply system is the proposed method of water distribution for the proposed subdivision, site-specific groundwater data must be developed under the requirements of Chapter 290, Subchapter D of this title (relating to Rules and Regulations for Public Water Systems)”. Chapter 290, Subchapter D does not require the use of an observation well, nor are there requirements surrounding the use of previous pump tests. Furthermore, site-specific data generated from a Chapter 290, Subchapter D pump test allows one to calculate a transmissivity value, but without an observation well, one cannot calculate a storativity value. What is TCEQ’s intent in requiring site-specific groundwater data to be developed under Chapter 290, Subchapter D for when expansion of an existing public water supply system or installation of a new public water supply system is the proposed method of water distribution for the proposed subdivision?