

## Anthony Stambaugh

Attached, please find stakeholder comments from the Lower Rio Grande Water District Managers' Association regarding TCEQ's proposed rule changes identified for potential improvement through the TREO.

# Lower Rio Grande Valley Water District Managers' Association

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*Dr. Antonio Uresti*  
PRESIDENT

*Juan Martinez*  
VICE-PRESIDENT

*Oscar O. Gonzalez, Jr.*  
SECRETARY

Via Electronic Submission: TCEQ's Smart Comment portal  
(<https://tceq.commentinput.com/?id=t4Tx29FYWG>)

July 15, 2026

**RE: Stakeholder Comments – Potential TCEQ Rule Changes through the Texas Regulatory Efficiency Office**

To Whom It May Concern:

The Lower Rio Grande Valley Water District Managers' Association (Association) would like to thank the Texas Commission on Environmental Quality (TCEQ) for the opportunity to provide stakeholder comments on agency rules that have been identified for potential improvement through the Texas Regulatory Efficiency Office's rule review process. Agriculture holds about 90% of all the water rights in the Lower Rio Grande Valley, in which our members, water districts, hold a vast majority of these rights. Our Association represents twenty-three water districts spread across Cameron, Hidalgo, and Willacy Counties that control over 1.2 million acre-feet of irrigation water rights. For over a century, irrigation districts have served as the backbone of water deliveries for our region not only to agricultural users but also industries and municipal water suppliers, often times being the sole source of raw water for municipal water suppliers.

Our Association offers the following comments:

- The Notes/Justification for the following rule changes are not descriptive enough to ascertain the proposed revisions:
  - 30 TAC Chapter 288, Subchapter A & B.
  - 30 TAC §295.51 (a)(6).
  - 30 TAC §295.7.
  - 30 TAC §297.71.
- We are in favor of the following rule changes:
  - 30 TAC §295.2.
  - 30 TAC §303.11(d).
  - 30 TAC Chapter 303, Subchapter I.

We would like to thank TCEQ for their proactive engagement during this stakeholder comment period.

Sincerely,



Dr. Antonio Uresti  
President