

PUBLIC COMMENTS

SB 152

HOUSE COMMITTEE ON NATURAL RESOURCES

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Hearing Date: April 27, 2021 8:00 AM

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Thomas Bradfield

Thomas Bradfield. Veterinarian

Austin, TX

I am opposed to any additional control by the water districts .

Jan Jensen

Self

Austin, TX

I oppose this bill. We don't need the burden of higher fees and meters on our groundwater, no matter when the well was built!

Carlos Rubinstein

Self/Belding Farms and Cockrell Investment Partners

Austin, TX

Mr. Chairman and Members of the Committee,

My name is Carlos Rubinstein. I am Principal of RSAH2O LLC, an environmental consulting firm focused on Texas water issues, and also assist Belding Farms and Cockrell Investment Partners on sustainable water management concerns. I am submitting comments FOR SB 152 by Senator Perry.

The rule making petition process included in SB 152 will provide a person with a real property interest in groundwater to petition a groundwater conservation district (GCD) to adopt or modify an existing rule.

Petitions must be from in-district property owners.

The proposed rulemaking petition process requires that a GCD act on such a request within 90 days by denying the petition or initiate rulemaking as requested.

In denying a petition the GCD would be required to explain why the same was denied.

GCDs are the preferred method of the state to manage groundwater. Providing in statute specific and clear rulemaking authority and a much-needed petition process gives greater local control to those most impacted by GCD decisions.

Effective rulemaking could assist in addressing change conditions between adoption of desired future conditions, the adoption of desired future conditions process itself and address groundwater management deficiencies within a district.

SB 152 also provides for specific notice requirements that also increase transparency and awareness of actions that may impact existing users of water.

Together, these changes can provide for a more sustainable management of limited groundwater resources.

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For all of the reasons stated, I respectfully submit these comments in support of SB 152.

Carlos Rubinstein, Principal  
RSAH2O, LLC  
April 26, 2021