



January 31, 2025

Via email to AMcCleary@sgs-austin.org

Audra McCleary
Archangel Catholic School of Austin
3000 Barton Creek Blvd.
Austin, TX 78735

RE: Administrative Completeness Review of Production Authorization Application Submitted by Archangel Catholic School of Austin for Authorization to Produce Groundwater from the Lower Trinity Aquifer for Non-agricultural Irrigation Use

Dear Audra McCleary:

The purpose of this letter is to notify you that District staff has reviewed the Production Authorization Application submitted by Archangel Catholic School of Austin ("Applicant") seeking an Operating Permit to produce up to 9,850,000 gallons (30.23 acre-feet) annually from the Lower Trinity Aquifer for Non-agricultural Irrigation Use. For an application to be considered administratively complete under District Rules, it must include all information required by District Rule 3.4(A) and be accompanied by the appropriate permit application fee. On the basis of staff review, the District has determined that the following items have not been satisfied:

1. **Rule 3.4(A)(5)(d)** requires a water conservation plan and a drought contingency plan.

Applicant submitted a User Conservation Plan (UCP) and User Drought Contingency Plan (UDCP) using forms provided by the District (Application pgs. 98-108 and 109-127, respectively). However, the submitted UCP did not include a descriptive statement that addresses the requirements listed on the User Conservation Plan Checklist for Irrigation Water Use (UCP pg. 8, Application pg. 105). To satisfy this requirement, please submit a descriptive statement that addresses each of the requirements listed on the User Conservation Plan Checklist for Irrigation Use (copied below).

User Conservation Plan Checklist - Irrigation Water Use	
Provide a descriptive statement that addresses each of the requirements.	
Requirement	Details
1. Description of Irrigation Use Process	Describe overall irrigation processes including all water sources, overall distribution, and turf/vegetation type and irrigation area.
2. Description of Irrigation Method or System	Describe the existing irrigation system including system layout and design, specifics on the control system, controllers, valves, and irrigation heads, and average run times.

3. Measuring Device/Water Accounting	Describe the methods or devices which will be used to measure and account for water used for irrigation including all meter locations within the system.
4. Specific 5- and 10-Year Water Conservation Goals	Describe specific 5- and 10-year water conservation goals for the site.
5. Water Conserving Irrigation Equipment and Operations	Describe all water conserving equipment and operations utilized including specifics on turf grass and landscaping management practices.
6. Irrigation System Monitoring and Maintenance	Describe all irrigation system maintenance and monitoring practices used to ensure optimum performance including leak detection and repair, and equipment and system maintenance regimes.
7. Irrigation Testing and Scheduling	Describe all irrigation testing and scheduling procedures including scheduling procedures to be utilized in the application of water (night/day), and winterization and spring startup procedures.
8. Equipment Upgrades	Describe any and all equipment upgrades installed in the last two years.
9. Future Conversions	Describe any future plans to incorporate additional water conserving equipment and operations.
10. Alternative Water Supplies	Describe alternative water supplies being utilized on site including any direct reuse and/or recycling practices.

2. **Rule 3.4(B)** – No application for a non-exempt well requesting an annual pumpage volume of more than 1,000,000 gallons will be administratively complete until the applicant has provided proof to the District that notice of the application has been mailed to all persons who own property located within a ¼-mile radius of the proposed well site by certified mail, return receipt requested. The District will provide the type of information that must be contained in the notice that the applicant must mail to adjoining property owners.

Applicant submitted a public notice contact list and map showing properties located within ¼-mile of the well site (Application pgs. 370-371). However, Applicant has not provided proof that notice of the application has been mailed to all property owners within ¼-mile of the well site. To satisfy this requirement, please provide proof to the District that notice of the application has been mailed by certified mail, return receipt requested, to all public water suppliers and persons who own property located within a ¼-mile radius of the well site. I have enclosed a letter template that contains the information that must be included in the mailed notice.

Please provide the above requested information within 180 days of the date of this letter. Once all information has been received and the requirements described above have been satisfied, the application will be deemed administratively complete and a letter indicating such will be provided with further instructions. If you have any questions or need clarification regarding the requested information, please feel free to contact my office by phone at 512-276-2875 or by e-mail at generalmanager@swtcgcd.org.

Sincerely,



Lane Cockrell
General Manager/Hydrogeologist
Southwestern Travis County GCD

Archangel Catholic School of Austin

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Enclosures: Enclosure 1 – Example Notice of Application

Cc: Bryan Boyd, bboyd@bbaengineering.com
Craig Bennett, cbennett@bbaengineering.com
Audra McCleary, AMcCleary@smcprep.org
Virginia Smith, staff@swtcgcd.org

Enclosure 1:
Example Notice of Application

EXAMPLE NOTICE OF APPLICATION

[Insert Date]

[Insert Recipient Name]

[Insert Recipient Street Address]

[Insert Recipient City, State, Zip Code]

Re: Public Notification of a Production Authorization Application to Produce from [Insert Number of Wells] [Insert “Existing” or “Proposed,” as applicable] [Insert “Middle Trinity” or “Lower Trinity,” as applicable] Well(s)

Dear [Insert Recipient Name],

[Insert Applicant Name], (mailing address: [Insert Applicant Mailing Address]) filed a Production Authorization application on [Insert Filing Date], with the Southwestern Travis County Groundwater Conservation District (“District”) to withdraw up to [Insert Requested Volume, in gallons per year] gallons of water annually from [Insert Number of Wells] [Insert “Existing” or “Proposed,” as applicable] [Insert “Middle Trinity” or “Lower Trinity,” as applicable] well(s). [Insert Description of the Nature and Purpose of Proposed Use(s)]. The requested permit volume is commensurate with an estimate of reasonable demand for the intended use and, upon approval, would be required to comply with drought curtailments and provisions for a [Insert Permit Type (e.g., Non-Agricultural Operating Permit)]. The [Insert “Existing” or “Proposed,” as applicable] well(s) are located at [Insert Physical Well Address] (approximate well coordinates: [Insert Coordinates of Well Location(s), in decimal degrees]).

The application will be reviewed by District staff to confirm that all application requirements have been met. Within 60 days of the date on which the District determines that an application is administratively complete, the District will schedule and hold a public hearing under the provisions of District Rule 6.5 to consider the application and the proposed action on the application. At least 10 days prior to the scheduled public hearing, notice will be published in a newspaper of general circulation in Travis County (e.g., Austin American Statesman), and the District will post notice on the District’s website and at the District office. Copies of the completed application will be available at the District office and on the District’s website at least 10 days before the hearing. Interested parties may submit written comments about the application to the District prior to the scheduled meeting at which the application will be considered by the Board or may attend the meeting and submit written comments or make oral comments. Parties interested in formally participating in the hearing should refer to District Rule 6.5.

For further information, please contact the District by mail at PO Box 340595, Austin, Texas 78735, by phone at (512) 286-2875, or by email at generalmanager@swtcgcd.org. You may also contact the applicant’s representative, [Insert Representative Name(s) and Contact Information].

Best regards,

[Insert Name of Sender]