

Alamo, Austin, and Lone Star chapters of
the Sierra Club
Bexar Audubon Society
Bexar and Travis-Austin Green Parties
Bexar Grotto
Boerne Together
Bulverde Neighborhood Alliance
Bulverde Neighbors for Clean Water
Cibola Center for Conservation
Citizens for the Protection of Cibola Creek
Comal County Conservation Alliance
Environment Texas
First Universalist Unitarian Church of SA
Friends of Canyon Lake
Friends of Castroville Regional Park
Friends of Dry Comal Creek
Friends of Government Canyon
Fuerza Unida
Green Society of UTSA
Guadalupe Riverkeepers
Guadalupe River Road Alliance
Guardians of Lick Creek
Headwaters at Incarnate Word
Helotes Heritage Association
Hill Country Alliance
Kendall County Well Owners Association
Kinney County Ground Zero
Leon Springs Business Association
Native Plant Society of Texas – SA
Northwest Interstate Coalition of
Neighborhoods
Pedernales River Alliance – Gillespie Co.
Preserve Castroville
Preserve Lake Dunlop Association
Preserve Our Hill Country Environment
RiverAid San Antonio
San Antonio Audubon Society
San Antonio Conservation Society
San Geronimo Valley Alliance
San Marcos Greenbelt Alliance
San Marcos River Foundation
Save Barton Creek Association
Save Our Springs Alliance
Scenic Loop/Boerne Stage Alliance
Securing a Future Environment
SEED Coalition
Signal Hill Area Alliance
Sisters of the Divine Providence
Solar San Antonio
Texas Cave Management Association
Trinity Edwards Spring Protection Assoc.
Water Aid – Texas State University
Wildlife Rescue & Rehabilitation
Watershed Association
PO Box 15618, San Antonio, Texas 78212

February 27, 2023

Senate Committee on Water, Agriculture & Rural Affairs

RE: Comments on funding for the Texas Water Development Board's
Regional Flood Planning Process

Chairman Perry and Honorable Members of the Senate Water, Agriculture & Rural
Affairs Committee,

These comments are submitted on behalf of the 55 member groups of the Greater
Edwards Aquifer Alliance. We would like to preface these remarks by
complementing the State, under the auspices of the Texas Water Development
Board (TWDB), for implementing an intelligent and robust process in convening
Regional Flood Planning Groups (RFPG) to address flooding by watershed.

GEAA staff serves on the RFPG 11 (Guadalupe) and RFPG 12 (San Antonio).
Both of these watersheds lie within “Flash Flood Alley” where storm clouds bump
against the Balcones escarpment and dump historic amounts of stormwater with
notable occurrences of catastrophic results. This natural phenomenon is being
exacerbated by climate change, most notably changes to the El Nino/La Nina
cycles¹.

We therefore urge the members of the Texas Legislature to allocate additional
funding to the TWDB to address flooding. Current allocations will mostly be used
to mitigate existing flood hazards. We believe that funding another round of
allocations aimed at flood prevention is needed.

Some river authorities, most notably the San Antonio River Authority, are
developing cutting edge modeling to predict where low cost green infrastructure
could be sited to prevent flooding as this rapidly growing region adds impervious
cover in urbanizing areas. Green infrastructure² - nature based solutions for
stormwater - employs a menu of techniques to maintain the natural hydrology of a
landscape, slowing and infiltrating stormwater into the ground. We should take
advantage of opportunities to locate sites where we might slow water in
increments or funnel water into recharge dams and otherwise enhance
groundwater supplies. Likewise, multiple benefits, including improving water
quality, can be achieved by preserving strategically located lands for the purpose
of flood mitigation. For example, flood detention areas might also serve as parks
within high growth areas.

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1. <https://www.khou.com/article/weather/el-nino-could-mean-more-flash-flooding-for-central-texas-through-next-year/285-148497794>
 2. <https://agrilife.org/gift/>

We believe that funding for additional modeling, and for implementation of nature based solutions as indicated by these models, should be made available for all Texas watersheds, and especially for those watersheds within "Flash Flood Alley".

Demographics indicate that average income of populations within these watersheds decline in proportion to their proximity to the gulf coast. The volume, velocity, and force of floodwaters originating at the upper end of the watersheds increase, with often devastating effects on downstream communities. Compounding these effects is the fact that low income Texans are less likely to carry flood insurance. These are concerns that should not be ignored.

Through the Regional Flood Planning Groups, Texas has brought together a host of dedicated stakeholders who have an impressive range of experience and expertise to advise how State funding can be put to best use. I am grateful to our state for convening the RFPG's and to the many members whose recommendations to the state should be appreciated and taken seriously. Without additional funding to complete this process and plan proactively to address the very real prospect of flooding accelerated by growth and climate change, however, I am afraid that we will be chasing a moving target in our efforts to keep the citizens of Texas safe.

Thank you for the opportunity to submit these comments.

Respectfully,

Annalisa Peace
Executive Director
Greater Edwards Aquifer Alliance
and
Member, Regional Flood Planning Group 11