

Act Now Comal  
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 Neighborhoods for Clean Water  
Cibolo Center for Conservation  
Citizens for the Protection of Cibolo Creek  
Comal Conservation  
Comfort Neighbors  
Congregation of Divine Providence  
Environment Texas  
First Universalist Unitarian Church of SA  
Fitzhugh Neighbors  
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  
Hays Residents for Land & Water Protection  
Headwaters at Incarnate Word  
Helotes Heritage Association  
Hill Country Alliance  
Kerr County Water Alliance  
Kendall County Well Owners Association  
Las Moras Springs Association  
Leon Springs Business Association  
Llano River Watershed Alliance  
Native Plant Society of Texas -- NB  
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  
River Aid San Antonio  
San Antonio Audubon Society  
San Antonio Conservation Society  
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 (SAFE)  
SEED Coalition  
Signal Hill Area Alliance  
Solar San Antonio  
Texans for Environmental Awareness  
Texas Cave Management Association  
Trinity Edwards Spring Protection Assoc.  
Water Aid -- Texas State University  
Watershed Association  
Wildlife Rescue & Rehabilitation

February 26, 2025

The Honorable Armando Walle, Chair  
The Honorable John Lujan, Vice-Chair  
The Honorable Members Barry, Collier, Garcia Hernandez, Harrison, & Villalobos  
House Committee on Appropriations – S/C on Articles VI, VII, & VIII

Submitted online via <https://comments.house.texas.gov/home?c=c014>

**Re: Article VI – Natural Resources, Texas Water Development Board (TWDB), House Bill 1 Budget and Exceptional Item Requests (EIRs)**

The [Greater Edwards Aquifer Alliance](#) (GEAA) appreciates the opportunity to submit these comments on behalf of the sixty-two member groups of GEAA that are allied to advocate for the preservation of our ground and surface water resources in twenty-one counties within Central and South Texas.

GEAA supports the base budget and the EIRs of the TWDB. GEAA especially supports EIRs 1, 2, 5, 6, 8, 9, and 10:

1. Increase to Agency FTE Limit and Associated Funding - \$8,074,200 – 50 FTEs
2. Targeted Salary Adjustments - \$7,259,466
5. Capitalization Grant Matching Funds for State's DWSRF & CWSRF - \$142,933,000
6. Agricultural Water Conservation Fund - \$6,795,118 – 3 FTEs
8. Groundwater Data Collection and Analysis - \$745,121 – 2 FTEs
9. Surface Water Data Collection and Analysis - \$1,612,368 – 2 FTEs
10. TexMesonet Coverage - \$1,880,000

In addition to these supported EIRs, GEAA makes the following recommendations for the Texas Water Development Board:

**Permanent funding for water infrastructure, water projects, and flood control**

To meet the water challenges facing Texas – increasing demand, diminishing supply, and increasing droughts and flood events – the Texas Water Fund, Flood Infrastructure Fund, and state flood and water planning processes should be funded through a dedicated and sustainable source of state funding rather than one-time appropriations each legislative session. It is expected that between \$2.5 billion and \$5.0 billion will be dedicated this session to the Texas Water Fund. GEAA recommends appropriating the full \$5 billion to more adequately address pressing water concerns.

**Investment in resilient water supplies**

Any investment in new or existing water supplies should ensure that the chosen strategies are safe, protective of human health and the environment, sustainable, and resilient. The following are recommended water supply strategies that meet these benchmarks while remaining viable and relatively cost-effective. These strategies should take precedence in any discussion of funding for new water supplies and water infrastructure:

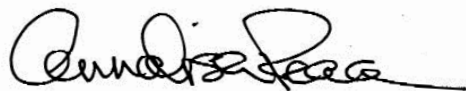
- **Water Loss Mitigation:** According to a Texas Living Waters Report,<sup>1</sup> Texas water systems lose at minimum 572,000 acre-feet of water per year, enough to meet the combined total annual municipal water needs of Austin, El Paso, Fort Worth, Laredo, and Lubbock. Addressing water loss should be one of the state's highest priorities.
- **Water Reuse:** Using wastewater treated for beneficial use as an additional potable or non-potable supply eases pressures on existing supplies and reduces the need to obtain additional, more expensive water supplies. It is a secure and relatively drought-proof source of water for Texas communities and is integral to the State Water Plan.<sup>2</sup> Many Texas cities and towns have successfully implemented water reuse.
- **Aquifer Storage and Recovery (ASR):** ASR has been implemented successfully in multiple Texas communities and is rightfully growing in popularity. It allows for water to be stored in periods of excess in preparation for periods of strain on a community's water supply. ASR water does not face evaporative loss like surface reservoirs do, and the strategy eliminates the need to submerge valuable agricultural and conserved lands.
- **Conservation:** Conserving water is often the lowest cost strategy to effectively secure water supplies. Texas communities should implement strategies to use water more efficiently and should do so in addition to any other adopted strategy.
- **Brackish Groundwater Desalination:** This strategy can produce potable water that can be blended in with a water supplier's other water sources. Brackish groundwater desalination has fewer environmental impacts than seawater desalination, has proven effective, and is part of many communities' long term water supply plans.<sup>3</sup>

### **Investment for Water Availability reporting and certifications**

Groundwater Conservation Districts (GCDs) and counties are often understaffed and often do not have the appropriate technical expertise to ensure the accuracy of Groundwater Availability Certifications submitted during the subdivision platting process, putting water supplies and communities at risk. TWDB should receive authorization to oversee the groundwater availability reporting and certification process. TWDB has the expertise to ensure the data, models, and projections used in the reporting and certification process are accurate and can make recommendations to the appropriate GCD or county based on their review of the groundwater availability report submitted by the developer. TWDB should receive additional funding and FTEs necessary to undertake this process.

GEAA also recommends that the TWDB budget include funds for dedicated TWDB staff and to purchase leak detection equipment to aid rural and disadvantaged communities to audit their water infrastructure, identify leaks and needed repairs, and prepare budgets for grants or loans for water infrastructure repairs.

Thank you for your consideration. Please consider GEAA as a resource that is at your disposal. We look forward to working with you on this issue.



Annalisa Peace  
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Greater Edwards Aquifer Alliance



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Greater Edwards Aquifer Alliance

<sup>1</sup> <https://texaslivingwaters.org/deeper-dive/water-loss/>

<sup>2</sup> <https://www.twdb.texas.gov/waterplanning/swp/>

<sup>3</sup> <https://www.saws.org/your-water/management-sources/brackish-groundwater-desalination/>