



Donna Campbell, M.D.

Texas State Senator
District 25

February 24, 2026

The Honorable Brooke T. Paup
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Re: Legislative Oversight Request – Canyon Lake Watershed Review

Chairwoman Paup and Commissioners:

Pursuant to my legislative oversight responsibilities, and in response to concerns expressed by constituents throughout Senate District 25, I request that the Texas Commission on Environmental Quality conduct a formal, watershed-level evaluation of incremental nutrient and wastewater effluent loading within the Canyon Lake watershed and determine whether existing regulatory measures adequately prevent gradual degradation under projected growth and hydrological stress.

Canyon Lake is designated as a public water supply reservoir with high aquatic life use and primary contact recreation use under 30 TAC Chapter 307. It serves as a critical drinking water source and supports downstream ecological and economic activity. Rapid population growth in Comal County and surrounding upstream communities has resulted in increased wastewater discharge applications. While current monitoring reflects generally acceptable nutrient and dissolved oxygen levels, recurring multi-year drought conditions reduce inflows and increase the relative impact of cumulative effluent loading.

Under Texas Water Code Chapters 5 and 26, and 30 TAC Chapters 305 and 307, the Commission possesses clear and existing statutory authority to protect high-quality waters. This authority includes initiating watershed-specific rulemaking, imposing more stringent nutrient limitations, requiring advanced treatment standards, applying antidegradation protections, conducting cumulative impact modeling, and amending the Texas Administrative Code where scientifically justified. The Highland Lakes protections codified in 30 TAC Chapter 311 were adopted through administrative rulemaking pursuant to existing statutory authority and did not require additional legislative enactment.

Accordingly, no additional legislative authorization is required for the Commission to evaluate and, if warranted, exercise its existing authority to strengthen watershed protections for Canyon Lake. As part of this review, I request that the Commission specifically evaluate whether Canyon Lake's designation, water supply function, and projected cumulative loading conditions warrant consideration of watershed-specific protections comparable in structure or scope to those adopted under 30 TAC Chapter 311 for similarly designated reservoirs.

I therefore request that the Commission:

1. Conduct a cumulative watershed impact assessment addressing projected growth and drought scenarios;
2. Evaluate whether current permitting standards sufficiently protect against incremental degradation; and
3. Determine whether enhanced regulatory measures, including potential watershed-specific rulemaking under existing authority, are warranted.



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If the Commission concludes that it lacks authority to undertake such review or action under existing statutes and rules, please provide a written explanation detailing the specific legal basis for that determination.

I respectfully request a written response within 30 days of receipt of this letter outlining the Commission's intended course of action or anticipated timeline for further review.

Respectfully,

A handwritten signature in black ink that reads "Donna Campbell".

Senator Donna Campbell, M.D.
Texas Senate District 25