

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

April 14, 2025

The Honorable Charles Perry, Chair
The Honorable Kelly Hancock, Vice-Chair
The Honorable Members Birdwell, Blanco, Gutierrez, Hinojosa, Johnson, Kolkhorst,
and Sparks
Senate Committee on Water, Agriculture, and Rural Affairs

**Re: Senate Bill 1976, An Act Relating to Certain Testing Requirements at
Certain Wastewater Treatment Facilities**

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

The Greater Edwards Aquifer Alliance is grateful to the members for their continued
work to address the many challenges Texas is facing as it confronts major water and
wastewater supply concerns. However, we have many concerns regarding SB 1927
and are therefore submitting these comments against the bill.

Wastewater operators are already facing many financial constraints that are only
expected to increase with population growth and aging infrastructure. The cost of
testing for the constituents required by this bill would be substantial and, in the case of
mifepristone, if not others, would most likely not yield any detectable results.

If the author and supporters of this bill were truly concerned about the health of all
Texans, they would amend this bill to require testing for contaminants of emerging
concern (CECs) or anthropogenic contaminants that are already beginning to be
detected in groundwater or would amend the bill to direct TCEQ to revisit rules
governing wastewater treatment. Emerging contaminants are pollutants that affect the
quality of drinking water but are not yet regulated by the EPA. The main categories of
CECs include per- and polyfluoroalkyl substances (PFAS), biological contaminants and
microorganisms, compounds of pharmaceuticals and personal care products,
nanomaterials, and micro/nanoplastics.

It is highly concerning that many CECs show up when testing is conducted to monitor
for these constituents in water supplies, as their presence can be almost entirely, if not
entirely, attributed to the introduction of wastewater to our surface and groundwater
supplies.

For example, testing conducted by the Edwards Aquifer Authority at the Comal, San
Marcos, and Hueco springs has detected the following contaminants that are likely
present as a result of wastewater contamination: estradiol, equilenin, estrone,
triclocarban, tylosin, cotinine, lincomycin, diltiazem, caffeine, triclosan, thiabendazole,
carbamazepine, and sulfamethoxazole.

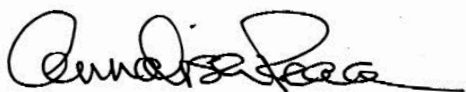
Lincomycin and sulfamethoxazole are antibiotics. Diltiazem is a blood pressure medication. Carbamazepine is an epilepsy medication. Cotinine is a nicotine metabolite. Thiabendazole is used primarily to control mold and as a food additive. Triclocarban is an antimicrobial compound that was widely used in personal care products like soaps, lotions, and deodorants. However, the use of triclocarban has been restricted due to concerns about potential health and environmental impacts. Testing of emerging contaminants in other locations outside of Texas have detected cocaine, nicotine, and other surprising constituents.

Only two of the constituents required for testing by SB 1976, estrone and estradiol, show up in the monitoring conducted at the aforementioned springs. Estrone is a steroid, a weak estrogen, and a minor female sex hormone. Estradiol is an estrogenic steroid used to treat vasomotor symptoms of vulvar and vaginal atrophy in menopause, hypoestrogenism, prevention of post-menopausal osteoporosis, treatment of breast cancer, and advanced androgen-dependent carcinoma of the prostate.

The bill also fails to address the growing list of PFAS detected in Texas water supplies that are likely a result of wastewater contamination. PFAS are a class of CECs made up of several thousand compounds. Due to their use in consumer and commercial applications such as firefighting foams, stain repellants for clothing and carpets, and other sources, PFAS are increasingly being detected in drinking water, groundwater, surface water, landfills, and in the air. The Texas Water Development Board is accepting funding applications for wastewater and drinking water projects that reduce exposure to PFAS and other emerging contaminants.

If we are truly concerned about the health of all Texans, born and unborn, we would look to compile a list of all constituents that might pose harm. However, rather than enlarging the list of contaminants required to be monitored in wastewater streams to include all potentially harmful constituents – which is inefficient, costly, and subject to political and economic winds – we believe these concerns might better be addressed by directing the Texas Commission on Environmental Quality to revisit rules governing wastewater treatment. There are new technologies that are successful in removing many emerging contaminants from wastewater during the treatment process. Perhaps it is time to consider how the removal of *all* CECs might be addressed by state rules. We believe this is a better way to safeguard Texans' health.

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.



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Policy Director, GEAA