

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
Cibola Center for Conservation
Citizens for the Protection of Cibola 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 22, 2025

The Honorable Charles Perry, Chair, *Senate Committee on Water, Agriculture, & Rural Affairs*

Re: Senate Bill 1911, An act relating to a restriction on permits authorizing direct discharges of waste or pollutants into water in certain stream segments, stream assessments units, and drainage areas.

Dear Chairman Perry,

I want to thank you on behalf of the [Greater Edwards Aquifer Alliance](#) and our 62 member groups for all your work this session to advance much-needed solutions to Texas' water concerns. As part of this work, I wanted to gauge your interest in hearing [Senate Bill 1911](#) in the Senate Committee on Water, Agriculture, & Rural Affairs. This bill would be instrumental in protecting the treasures that are Texas' pristine streams and rivers. Pristine streams are the backbone of many Texas communities' economies and have been valued for generations. SB 1911 would help ensure these streams will run clear for many more generations.

SB 1911 is similar to HB 4146 that was filed in the 87th Session, which was authored by Representative Tracy O. King and passed by the House. Pristine streams would be defined under the bill as stream segments for which 75% of phosphorus measurements from 2015-2024 were below 0.06 mg/liter. Most of these streams are in the Texas Hill Country.

Phosphorous present above naturally occurring levels can lead to excessive algae growth or even toxic algae blooms. Toxic algae blooms can cause fish die-offs, impair aquatic ecosystems, raise treatment costs, and endanger the health of wildlife and pets. Streams are often impaired after wastewater is discharged into these streams. Even after treatment to or beyond state and federal standards, wastewater still contains phosphorus.

This bill would discontinue the use of TPDES permits that allow treated wastewater to be discharged directly into the identified streams and their watersheds. TCEQ would be able to continue to issue Texas Land Application Permits (TLAP) within these watersheds. TLAP irrigation as a means of wastewater disposal has been proven effective at dispersing wastewater while protecting water quality in sensitive watersheds, such as around the Highland Lakes and within the Edwards Aquifer Recharge Zone.


This bill would not impede developers. In fact, many developers face years long delays when attempting to receive a TPDES permit due to public concern about discharge impacts. Developers near sensitive watersheds will likely face shorter permitting times and greater public acceptance for using TLAPs. This bill will also protect economic development and tourism-related businesses in communities where these stream segments are present.

As such, I would like to ask you to consider hearing this bill in your committee this session.

Thank you for your consideration, and please consider GEAA as a resource at your disposal. We look forward to working with you on this issue.



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