Greater Edwards Aquifer Alliance

Member Organizations

Act Now Comal
Alamo, Austin, and Lone Star chapters of the Sierra Club
ARK Ecological Consulting
Beltorre and Surrounding Neighbors
Bexar Audubon Society
Bexar and Travis-Austin Green Parties
Bexar Grotto
Bulverde Neighborhood Alliance
Bulverde Neighborhoods for Clean Water
Cibolo Center for Conservation
Citizens for the Protection of Cibolo Creek
Coalition for Responsible Aggregate Mining (CREAM)
Comal Conservation
Comfort Neighbors
Congregation for Divine Providence
Conservation Society of San Antonio
Dry Comal Creek Neighbors
Environment Texas
First Universalist Unitarian Church of SA
Fischer Neighbors
Fitzhugh Neighbors
Friends of Canyon Lake
Friends of Castroville Regional Park
Friends of Government Canyon
Fuerza Unida
Green Society of UTSA
Hays Residents for Land & Water Protection
Headwaters at Incarnate Word
Helotes Heritage Association
Hill Country Alliance
Kendall County Well Owners Association
Kerr County Water Alliance
Las Moras Springs Association
Llano River Watershed Alliance
Mystic Shores Neighbors
Native Plant Society of Texas – SA & NB
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 Marcos Greenbelt Alliance
San Marcos River Foundation
Save Our Springs Alliance
Save Salado Creek
Save Texas Streams
Scenic Loop/Helotes Creek Alliance
SEED Coalition
Signal Hill Area Alliance
Texans for Environmental Awareness
Texas Cave Management Association
Trinity Edwards Spring Protection Assoc.
Water Aid – Texas State University Watershed Association
Wildlife Rescue & Rehabilitation

August 18, 2026

The Honorable Cody Harris, Chair
The Honorable Armando Martinez, Vice-Chair
The Honorable Members Ashby, Barry, Bell, Buckley, Fairly, Gámez, Garcia, González, Romero Jr., Villalobos, and Zwiener
House Committee on Natural Resources

Re: **August 24th House Committee on Natural Resources Interim Hearing**

The Greater Edwards Aquifer Alliance (GEAA) is a nonprofit organization dedicated to the protection and preservation of the Edwards and Trinity aquifers, their springs, watersheds, and the Hill Country that sustains them. Our alliance has 59 member groups across 21 counties in the Texas Hill Country. We work to ensure the protection of the health, safety, and welfare of all those who rely on these sources of water.

We ask that you consider and act on the recommendations outlined herein as you work to ensure the long-term availability, quality, and affordability of Texas' water supplies. These recommendations are intended to lessen the pressures on the state's water supplies and ensure our water resources are managed sustainably and in the best interest of the public.

Increase or, at Minimum, Maintain the Texas Water Development Board Budget

Texas faces at least $157 billion in water infrastructure and supply costs and another $59 billion in flood infrastructure and mitigation costs. Reservoirs and aquifers across the state have hit record lows over the last couple of years, leading to emergency drought declarations and pumping restrictions. At the same time, nearly 150 people have died in the tragic, major flood events in the Texas Hill Country and San Antonio in 2025 and 2026. Without appropriate investment in water supply, flood prevention, and infrastructure needs over the coming decades, Texas water supplies and the people and industries that depend on them will be at increasingly greater risk.

Yet, due to the Governor's call for state agencies to pare back their budgets by 3%, the Texas Water Development Board has proposed decreasing funding to the Agricultural Water Conservation Fund, Economically Distressed Areas Program, Innovative Water Technologies strategy, Water Conservation Education and Assistance strategy, and Statewide Flood Planning.

Texas cannot afford these cuts. These programs, and the TWDB in general, need continued and adequate funding and staffing to support the needs of Texans. Unprecedented population growth, rising costs, enduring drought, repeated and devastating riverine and coastal floods, and accelerated water use by new industries are placing even greater demand on increasingly strained water supplies.

GEAA recommends the legislature increase funding for the TWDB, allowing the agency to increase and better support its investment in water conservation, innovation, and assistance, especially for rural and economically distressed areas of the state. The state should continue to provide funding and technical assistance for communities most in need of support for water and flood infrastructure projects planning and implementation.

Greater Edwards Aquifer Alliance
PO Box 15618, San Antonio, Texas 78212

Prioritize Conservation, Reuse, And Aquifer Storage and Recovery (ASR) Strategies Over Surface Water Reservoirs and Consider Stormwater Capture and Reuse as a Water Supply Strategy.

Surface reservoirs in Texas lose around 7.4 million acre-feet of water combined each year to evaporation. Annual reservoir evaporative losses can, in fact, often exceed the state's total annual municipal use.[1] ASR projects offer a way to store and access water without major evaporative losses. Recycled water is also a relatively drought-proof supply and can easily help offset many non-potable uses, relieving pressure on potable water supplies.[2] Conservation, ASR, and reuse are strategies that can provide and protect relatively large amounts of supply in the short-term and can often cost far less – especially conservation strategies – than new surface water supplies.

Stormwater mitigation projects with a water supply component, such as off channel detention combined with aquifer recharge dams or ASR, could also be a low-cost strategy, especially as rainfall becomes more sporadic but more intense. This strategy is not, however, currently included in the water plan's recommended strategies. Flood mitigation and drainage infrastructure projects can capture excess flood waters which can then be treated and used as an additional water supply source.

We are glad to see that conservation, reuse, and ASR makes up a significant portion of the recommended water management strategy supply volumes in the State Water Plan, reinforcing their value as cost-effective and largely drought-resilient approaches. We are concerned, however, that 34 percent of the recommended water supply strategy volumes are expected to come from new major reservoirs and other surface water supplies. As the price tag of the recommended projects continues to increase, it is imperative that projects are prioritized that are sustainable in the face of increasing temperatures and aridification and that do not sink taxpayer dollars into projects with diminishing returns.

GEAA recommends directing the TWDB to prioritize conservation, demand reduction, reuse, and ASR before relying on more expensive, unsustainable, or environmentally disruptive projects. These strategies can reduce pressure on existing supplies, delay or avoid costly infrastructure and new supply investments, and help communities stretch existing water supplies during drought. We also ask that the legislature direct TWDB to evaluate stormwater capture and reuse as an additional water supply strategy to be included in the planning process.

Improve Water Quality Planning Integration and Water Quality Standards

Water supply planning should more fully integrate water quality considerations. Long-term water reliability depends not only on the volume of water available, but also on whether that water remains usable, treatable, and protective of public health, aquatic systems, and source water resources. The State Water Plan includes a section on water quality and protection of state resources, including discussion of nutrients, dissolved oxygen, bacteria, toxicity, salinity, nitrates, and other indicators. However, these considerations appear to function largely as high-level assessments rather than central planning criteria.

GEAA recommends that TWDB more directly incorporate water quality protection into water supply strategy evaluation, project prioritization, and future regional planning guidance. The legislature should direct TCEQ to adopt water quality standards for salinity, stricter water quality standards for recycled produced water and recycled municipal wastewater, stricter water quality standards for aquifer recharge and contributing zones, and water quality standards for emerging contaminants and forever chemicals, including PFAS contaminants.

Treat Aquifer Recharge Protection as a Water Supply Strategy.

Aquifer recharge protections should be treated as a core water supply strategy. In the Edwards Aquifer region, recharge zones, contributing zones, caves, sinkholes, losing streams, riparian corridors, and undeveloped open space are essential to the long-term function of the aquifer system. As Central Texas continues to experience rapid growth, impervious cover and poorly planned development can reduce infiltration, increase polluted stormwater runoff, and impair the natural systems that support groundwater recharge and springflow. The Draft State Water Plan currently identifies aquifer recharge as just 0.1% of the recommended water management strategy supplies in 2080.

GEAA recommends the legislature direct TWDB and regional water planning groups to give greater weight to recharge protection, land conservation, low-impact development, riparian restoration, green infrastructure, and watershed protection as water supply investments.

Decrease Reliance on Historical Drought Conditions and Increase Inclusion of Updated Impacts in Projections.

Texas water plans are based on the benchmark drought of record conditions using historical hydrological data and do not incorporate updated climate models in the planning process. Texas' climate is changing and, "despite the increase in heavy storms, changing climate is likely to make water less available overall."[3] While Texas is no stranger to drought conditions, experts predict future droughts could be more common and potentially far worse than the identified drought of record.[4] Tree ring studies show that Texas has endured more intense droughts than those of the past 200 years, [5] and recent analyses have suggested that the economic and technology conditions that helped Texans recover from the drought of the 1950s are no longer feasible.[6] [7]

GEAA recommends directing the TWDB to update the state water planning process to account for the recognized projected increase in drought intensities and duration, increase in rainfall intensities and volatility, and increase in temperatures. The planning process should also include an analysis of the sustainability of the recommended water supply strategy categories, accounting for these climate impacts.

Decrease Reliance on Historical Water Use Surveys and Incorporate Large-Volume Water Users such as Data Centers.

The Texas Water Development Board "relies on Water Use Survey Historical Summary Estimates to develop forecasts for water demands and determine water needs."[8] By doing so, the planning process fails to account for rapid accelerations in water demand by certain water users. For example, "because much of the unprecedented growth of data centers has occurred in the years since the [last] water plan was published, their water demands are not fully factored into these numbers."[9]

The state's planning process missed the rapid explosion in data centers built for generative AI purposes, which require far greater water and power than traditional data centers, and is likely also failing to account for the growth in industries that rely on ultrapure water. Data centers that began operation in 2025 will not be added to the state water plan until 2032, far after their water use will have begun to impact supplies. Other high demand industrial users, such as semiconductor chip fabricators and cryptocurrency mines, may not be accounted for until well after the 2032 plan, if the state continues to rely on historical use surveys. By not accounting for the current and predicted demands of data centers and other large-volume water users, the state is limiting its ability to estimate the need for future water supply sources, infrastructure, and funding.

GEAA recommends directing the TWDB to immediately begin to define and account for the water demands in the state water plan of data centers, chip manufacturing, and industries that rely on high volumes of ultrapure water. TWDB should also require data-backed future water use estimates from water users in the state to more appropriately ensure the state water planning process appropriately accounts for future demand and rapid accelerations in demand between plans.[10] Contracted facilitators for each regional planning groups could be directed to provide information on high-intensity water users on a timelier basis.

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

Annalisa Peace
Executive Director
Greater Edwards Aquifer Alliance

Rachel Hanes
Policy Director (rachel@aquiferalliance.org)
Greater Edwards Aquifer Alliance

[1] https://aquiferalliance.org/wp-content/uploads/2025/11/GEAA-SB-7-Written-Testimony-HNR-4.24.25.pdf
[2] Water Reuse in the Hill Country: Lessons from Existing Reuse Facilities in Texas and Opportunities to Advance Reuse in Comal County | Texas Water Journal
[3] What Climate Change Means for Texas
[4] Temperature : The Meadows Center for Water and the Environment : Texas State University
[5] https://doi.org/10.21423/twj.v2i1.2049
[6] Prospective-Costs-and-Consequences-of-Insufficient-Water-Infrastructure-Investment-in-Texas_11182024_FinalCover.pdf
[7] GEAA-Housing-and-Water-Concerns-in-the-Hill-Country-2.3.24.pdf
[8] Thirsty-Data-Water-Use-and-The-Projected-Data-Center-Boom-in-Texas.pdf
[9] Ibid.
[10] Data-Centers-in-Texas-A-Review-and-Call-for-Innovation-and-Regulation-GEAA-April-2026.pdf