



Member Organizations

Alamo, Austin, and Lone Star chapters of the Sierra Club

Bexar Audubon Society

Austin, Bexar and Travis Green Parties

Bexar Grotto

Boerne Together

Bulverde Neighborhood Alliance

Bulverde Neighbors for Clean Water

Cibolo Center for Conservation

Citizens for the Protection of Cibolo Creek

Comal County Conservation Alliance

Environment Texas

First Universalist Unitarian Church of SA

Friends of Canyon Lake

Friends of Dry Comal Creek

Friends of Government Canyon

Fuerza Unida

Green Society of UTSA

Guadalupe River Road Alliance

Guardians of Lick Creek

Headwaters at Incarnate Word

Helotes Heritage Association

Hill Country Alliance

Kendall County Well Owners Association

Kinney County Ground Zero

Leon Springs Business Association

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

RiverAid San Antonio

San Antonio Audubon Society

San Antonio Conservation Society

San Geronimo Valley Alliance

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

SEED Coalition

Signal Hill Area Alliance

Sisters of the Divine Providence

Solar San Antonio

Texas Cave Management Association

Trinity Edwards Spring Protection Assoc.

Water Aid – Texas State University

Wildlife Rescue & Rehabilitation

Wimberley Valley Watershed Association

September 24, 2026

L'Oreal Stepney, Chairwoman

Brady Franks and Ashley Morgan, Board Members

Texas Water Development Board

1700 North Congress Avenue

Austin, Texas 78701

Submitted via online form (in part) and email to SWPPublicComment@twdb.texas.gov

Re: 2027 State Water Plan Proposed Amendments

The [Greater Edwards Aquifer Alliance](#) (GEAA) appreciates the opportunity to submit these comments on the proposed amendments to the 2027 State Water Plan on behalf of the 59 member groups and thousands of individual members of GEAA that are allied to advocate for the preservation of our ground and surface water resources in 21 counties within the Texas Hill Country and South-Central Texas.

Unprecedented growth in the Texas Hill Country, enduring drought, and accelerated water demands of new industries are placing even greater demand on increasingly strained water supplies. We ask that you consider and act on the recommendations outlined herein as you finalize the 2027 State Water Plan.

These recommendations were provided to you for the public comment period on the draft plan in May and are reiterated here as they remain critical to ensuring a State Water Plan that is sufficiently protective of the state's water supplies and the people and wildlife who depend on them. 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.

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

Texas water plans are based on the benchmark drought of record conditions using historical hydrological data and do not incorporate 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."¹

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.² Tree ring studies show that Texas has endured more intense droughts than those of the past 200 years,³ and recent analyses have suggested that the economic

¹ [What Climate Change Means for Texas](#)

² [Temperature : The Meadows Center for Water and the Environment : Texas State University](#)

³ <https://doi.org/10.21423/twj.v2i1.2049>

and technology conditions that helped Texans recover from the drought of the 1950s are no longer feasible.^{4 5}

To ensure the State Water Plan adequately analyzes water demand, GEAA recommends the TWDB update the 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.”⁶ 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.”⁷

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 TWDB immediately begin to define and account for the future direct and indirect 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.⁸ Contracted facilitators for each regional planning groups could be directed to provide information on high-intensity water users on a more timely basis.

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.⁹ ASR projects offer a way to store and access water without major evaporative losses. Recycled water is also a

⁴ [Prospective-Costs-and-Consequences-of-Insufficient-Water-Infrastructure-Investment-in-Texas_11182024_FinalCover.pdf](#)

⁵ [GEAA-Housing-and-Water-Concerns-in-the-Hill-Country-2.3.24.pdf](#)

⁶ [Thirsty-Data-Water-Use-and-The-Projected-Data-Center-Boom-in-Texas.pdf](#)

⁷ [Ibid.](#)

⁸ [Data-Centers-in-Texas-A-Review-and-Call-for-Innovation-and-Regulation-GEAA-April-2026.pdf](#)

⁹ <https://aquiferalliance.org/wp-content/uploads/2025/11/GEAA-SB-7-Written-Testimony-HNR-4.24.25.pdf>

relatively drought-proof supply and can easily help offset many non-potable uses, relieving pressure on potable water supplies.¹⁰ 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 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 2027 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.

As such, GEAA recommends the TWDB 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 TWDB evaluate stormwater capture and reuse as an additional water supply strategy to be included in the planning process.

GEAA also strongly opposes the inclusion of the Marvin Nichols reservoir as a recommended strategy for Region C. There are opportunities for the City of Dallas and other users of the NTMWD, TRWD, and UTRWD to significantly reduce their gallons per person per day rather than seeking to import water that will render useless hundreds of acres of Texas' most productive farmland.

Increase Integration of Water Quality into Water Availability Planning.

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 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.

¹⁰ [Water Reuse in the Hill Country: Lessons from Existing Reuse Facilities in Texas and Opportunities to Advance Reuse in Comal County | Texas Water Journal](#)

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 2027 State Water Plan currently identifies aquifer recharge as just 0.1% of the recommended water management strategy supplies in 2080. GEAA recommends that TWDB and regional water planning groups give greater weight to recharge protection, land conservation, low-impact development, riparian restoration, green infrastructure, and watershed protection as water supply investments.

We appreciate the proposed amendments to the 2027 State Water Plan, and we ask that you consider our recommendations outlined above to further protect Texas' water supplies. Please consider GEAA as a resource that is at your disposal. We look forward to working with you.



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