Greater Edwards Aquifer Alliance

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 Nature Center
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 Planning Association
Kendall County Well Owners Association
Kinney County Ground Zero
Leon Springs Business Association
Medina County Environmental Action
Native Plant Society of Texas – SA
Northwest Interstate Coalition of Neighborhoods
Preserve Castroville
Preserve Lake Dunlop Association
Preserve Our Hill Country Environment
Riveraid
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 Alliance
Solar San Antonio
Sisters of the Divine Providence
Texas Cave Management Association
Trinity Edwards Spring Protection Association
Water Aid – Texas State University
Wildlife Rescue & Rehabilitation
Wimberley Valley Watershed Association

PO Box 15618

October 20, 2026

Texas Water Development Board
1700 Congress Ave.
Austin, TX 78701

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RE: Draft Interim Study of Incorporating Wastewater into the State Water Planning Process

To Whom It May Concern,

Please accept the attached comments on behalf of the fifty-nine member groups of the Greater Edwards Aquifer Alliance.

A. Background: The Texas Water Development Board (TWDB) is seeking public comment on the following draft study report: Draft - Interim study of incorporation of wastewater planning into the state water planning process.

The TWDB has conducted an interim study of the incorporation of wastewater planning into the state water planning process pursuant to Senate Bill 7, 89th Texas Legislature. The study evaluated both 1) the feasibility and practicability of incorporating planning for the development of infrastructure to meet the state's current and future wastewater treatment needs, and 2) the statutory changes necessary to facilitate the incorporation of wastewater treatment planning into the process used to produce each state water plan under [Texas Water Code] Section 16.051, beginning with the five-year state water planning period ending January 5, 2032.

After considering public comments, the TWDB Executive Administrator will finalize and submit the report to the Office of the Governor and required legislative members identified in Texas Water Code Sec.16.0123 by December 1, 2026.

B. Greater Edwards Aquifer Alliance (GEAA): GEAA submits the following comments on behalf of our fifty-nine member organizations. GEAA is a 501(c)(3) nonprofit organization that promotes effective, broad-based advocacy for the protection and preservation of the Edwards and Trinity Aquifers, their springs, watersheds, and the Texas Hill Country lands that sustain them.

C. Comments on the Study: Following the layout of the online form, GEAA submits the following comments on the interim study

1. Please submit any comment(s) relevant to **Section 1.0: Introduction, purpose, and background**. Please include page number(s) and submit succinct and relevant information.

The Greater Edwards Aquifer Alliance (GEAA) has no additional comments on this section, pages 9-23.

2. Please submit any comment(s) relevant to **Section 2.0: The feasibility and practicability of incorporating wastewater infrastructure planning into the 2032 State Water Plan**. Please include page number(s) and submit succinct and relevant information.

GEAA recognizes the timing, staffing, funding, and institutional constraints described throughout this section and does not recommend adding comprehensive wastewater planning responsibilities to an active regional planning cycle without adequate authority and resources. However, these constraints should inform a phased approach to further work. The final study should make clear that its infeasibility finding applies to full integration into the 2032 cycle under the conditions evaluated, and identify any preparatory or coordination activities that could be undertaken during that cycle to incorporate wastewater planning within the 2037 cycle.

When evaluating those activities, Sections 2.2 and 2.5 should more fully assess potential benefits beyond additional reuse supply volumes, including source-water protection, reduced pollutant loading, avoided or deferred treatment costs, earlier identification of wastewater capacity needs, and better coordination of infrastructure investments. These benefits are directly relevant to GEAA's interest in protecting the Edwards and Trinity aquifers and their connected surface waters. Conclusions about limited additional benefits or the extent to which readily available reuse opportunities are already included in water plans should be supported by evidence that identifies the underlying assumptions and geographic limitations. The inclusion of reuse strategies in existing plans does not, by itself, establish that all locally practicable opportunities have been identified.

Therefore, GEAA supports further evaluation of the non-potable reuse opportunities acknowledged in the interim study. This evaluation should distinguish the treatment, infrastructure, and operational considerations associated with direct potable reuse from those relevant to industrial, landscape irrigation, and other non-potable uses, so that each application is assessed according to its requirements and local conditions.

GEAA's February 2024 report, *Water Reuse in the Hill Country: Lessons from Existing Reuse Facilities in Texas and Opportunities to Advance Reuse in Comal County* (https://aquiferalliance.org/wp-content/uploads/2024/05/Publication-Version-Water-Reuse-in-the-Hill-Country-GEAA-February-2024.pdf), illustrates the value of further analysis of reuse opportunities. Using TWDB's 2020 water-use estimates, the report identified reuse as approximately 1.5 percent of Comal County's total water use. It examined potential non-potable applications at aggregate production operations and for outdoor irrigation, coordination among service providers, and possible reuse districts with boundaries responsive to local supply and demand. Determining the feasibility of these opportunities and the quantity of reliably available reuse supply requires updated analysis of actual flows, existing commitments, demand after conservation, treatment, storage, conveyance, operating costs, and effects on downstream flows and users.

Evaluating these opportunities also requires practical ways for providers and planning entities to coordinate. In response to the governance concerns identified in this section, the study should evaluate basin or subregional working groups, agreements among existing entities, dedicated technical support, and parallel wastewater assessments that could improve coordination while retaining current regional water planning boundaries. Comparing these approaches with full structural integration, and identifying the evidence needed to assess their costs and benefits, would provide a clearer basis for selecting workable next steps.

Please note: GEAA's comments address the 2032 feasibility findings (pages 36–38), potential benefits and reuse considerations (pages 26–29, 33, and 36), and governance and data coordination (pages 30–32).

3. Please submit any comment(s) relevant to **Section 3.0: Statutory changes necessary to facilitate the incorporation of wastewater infrastructure planning into the process used to produce each state water plan**. Please include page number(s) and submit succinct and relevant information.

Sections 3.1–3.2 outline the statutory and programmatic changes associated with integrating wastewater infrastructure planning into the state and regional water planning process. Because these requirements depend on the scope and structure selected, GEAA recommends that the final study explain, in more detail, what legislative changes would be needed to fully incorporate wastewater planning into the state water planning process.

For both full integration and the alternatives discussed in Section 4, the final study should explain which activities could proceed under existing law, which would require additional legislation, and what rulemaking, interagency agreements, staffing, or appropriations would be needed to support implementation. GEAA acknowledges that TWDB does not currently have the funding or staffing appropriate to incorporate wastewater planning into the 2032 State Water Plan. However, the final study should analyze at what levels of staffing and funding the incorporation might be possible in advance of the 2037 State Water Plan. The final study should also distinguish legal requirements from policy and program design choices, particularly whether changes to regional boundaries or planning-group membership would be necessary for each approach under consideration. These distinctions would help decision-makers understand the requirements and resources associated with the available options.

GEAA recognizes that wastewater planning occurs on a finer geographic scale and that its governance is diffuse. The final study should examine whether the legislative creation of wastewater reuse districts – similar to the Alamo Conservation and Reuse District that provided the basis for San Antonio Water Systems' nationally recognized reuse system – would assist in the regionalization of wastewater planning.

To guide the next phase of work, the final study should clarify the respective responsibilities of TWDB, TCEQ, and participating regional entities and identify actions for legislative consideration. These recommendations should also address how water and wastewater providers, local governments, river authorities, groundwater districts, environmental interests, and affected communities would participate in any expanded planning process, including the support needed for small and rural systems to participate effectively. Clarifying both institutional responsibilities and opportunities for participation would give the Legislature a stronger basis for selecting and funding a practicable approach.

Please note: GEAA's comments address the statutory changes discussed on pages 38–40 and the agency responsibilities, staffing, stakeholder participation, and planning-structure changes discussed on pages 40–41.

4. Please submit any comment(s) relevant to **Section 4.0: Potential alternative approaches for projecting statewide wastewater infrastructure needs**. Please include page number(s) and submit succinct and relevant information.

GEAA supports further development of the alternatives outlined in Sections 4.1–4.4 and recommends a defined next phase combining a statewide wastewater baseline assessment with funded regional coordination pilots. The assessment would establish the scale and distribution of infrastructure needs, while the pilots would test whether closer coordination improves planning decisions and produces lessons applicable elsewhere in Texas.

The statewide assessment should build on existing information, including local capital improvement plans, TCEQ permitting and Water Quality Management Plan information, Clean Watersheds Needs Survey data, and regional studies. It should document infrastructure condition, projected service area growth, anticipated capacity needs,

existing reuse commitments, and relevant watershed and source-water conditions, while distinguishing permitted capacity from actual treatment flows and reliably available reuse supply. Projections should disclose their assumptions and uncertainty and account for differences among drought, typical, and wet-weather conditions. Findings and supporting methods should be publicly accessible, with follow-up assistance to address gaps in small-system data so that incomplete reporting does not obscure their needs.

Regional pilots would complement this statewide assessment by examining how coordination works under different local conditions. Selection should consider rapid growth, sensitive drinking water sources, fragmented service arrangements, reuse potential, and the needs of small or rural communities. For example, Comal County and comparable Hill Country areas warrant consideration, alongside communities in other settings across Texas. GEAA's February 2024 Comal County reuse report, discussed in our Section 2 comments, provides a starting point for examining local opportunities and coordination barriers. Its recommendation for further study of reuse districts with flexible boundaries could help inform pilot scoping.

To produce findings that support practical decisions, each pilot should:

1. Compare practicable alternatives, including coordinated regional service, improvements to existing systems, appropriate decentralized treatment, and beneficial reuse, using common growth and demand assumptions. As part of this evaluation, assess the feasibility of requiring new wastewater systems to be designed to accommodate future retrofits for reuse technologies.
2. Evaluate lifecycle costs, affordability, staffing and operational requirements, drought reliability, water-quality protection, and the effects of changing return flows.
3. Measure whether coordination identifies additional viable opportunities, changes project timing or selection, avoids unnecessary investment, or improves information available to decision-makers.
4. Publish methods, assumptions, findings, and limitations, with opportunities for public input during scoping and before final recommendations.

To move these efforts toward implementation, the final study should identify lead and supporting agencies, scope and deliverables, estimated staffing and funding needs, public participation milestones, and completion and reporting dates. The proposed schedule should make findings available early enough to inform decisions about the next regional planning cycle and include a public review point for determining whether to expand coordination, maintain a separate wastewater assessment, or pursue broader integration. That decision should be guided by the results of the assessment and pilots, recognizing that different locations may require different governance arrangements and reuse approaches.

Please note: GEAA's comments address statewide assessments (pages 42–43), existing data and plans (page 44), coordination pilots (pages 44–45), and streamlined assessments (page 45)

5. Please submit any comment(s) relevant to **Section 5.0: Funding options to expand funding availability for wastewater infrastructure**. Please include page number(s) and submit succinct and relevant information.

GEAA supports further evaluation of the preferred approach in Section 5.1, which would expand wastewater infrastructure assistance through existing Rural Water Assistance Fund and Water Loan Assistance Fund programs supported by Texas Water Fund transfers. The draft states that no statutory eligibility changes would be required,

while also identifying minor statutory or constitutional changes as an implementation consideration. The final study should clarify which changes, if any, are contemplated, along with the funding and administrative actions needed to implement this approach.

Because the draft identifies a limited prioritization structure as a constraint, further development of this approach should include transparent criteria for evaluating projects based on public-health, source-water protection, affordability, and infrastructure benefits. Technical assistance should help small and rural systems identify their priority needs and access suitable funding, ensuring that limited local capacity does not prevent them from participating.

The funding discussion should also address the resources needed to identify and evaluate infrastructure needs. Across the alternatives in Section 5, the final study should distinguish funding for planning, data development, and technical assistance from financing for infrastructure construction. In particular, the statewide assessment and regional pilots recommended in our Section 4 comments should have identified funding sources and staffing support. Any additional responsibilities assigned to regional planning groups or local systems should be accompanied by adequate resources to carry them out.

These planning improvements should be evaluated independently of any decision to expand eligibility under the State Water Implementation Fund for Texas (SWIFT). The final study should identify funding approaches that strengthen coordination and address wastewater infrastructure needs while maintaining support for drought-resilient water supply. GEAA requests resource estimates and specific actions for legislative consideration to provide a practical basis for advancing this work.

Please note: GEAA's comments address the preferred funding approach, project prioritization, and implementation requirements on pages 46–47, and the implications of expanding SWIFT eligibility on page 49.

6. Please submit any comment(s) relevant to **Section 6.0: Key findings**. Please include page number(s) and submit succinct and relevant information.

GEAA recommends that the key findings more clearly distinguish the constraints on full integration into the 2032 State Water Plan from the potential value of near-term coordination and longer-term integration. Building on the reuse opportunities and improved statewide visibility of infrastructure needs already recognized in the draft, the findings should also address source-water protection, earlier identification of capacity needs, and better coordination of infrastructure investments.

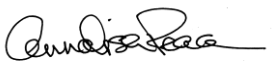
To advance the alternatives identified in the study, GEAA recommends adding a finding that calls for a defined next phase combining a statewide wastewater baseline assessment with funded regional coordination pilots. This recommendation should identify responsible agencies, estimated resources, necessary authority, opportunities for public participation, measurable milestones, and a reporting schedule. The schedule should aim to produce findings early enough to inform the regional planning cycle leading to the 2037 State Water Plan, with any decision to expand coordination or pursue integration guided by the results, legislative direction, and adequate resources.

GEAA appreciates TWDB's work to identify the challenges and opportunities associated with wastewater planning. The final study should pair its feasibility findings with a practical course of action for addressing the identified barriers and informing future policy decisions.

Please note: GEAA's comments address the findings on 2032 feasibility, coordination benefits, and alternative approaches summarized on page 50.

Thank you for your consideration,

Sincerely,



Annalisa Peace, Executive Director