

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

December 10, 2025

Gwen Ricco  
MC 205  
Office of Legal Services  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711

**Re: SB 616 and SB 1061: Injection Through the Edwards Aquifer for Aquifer Storage and Recovery and Class III Production Area Authorization Amendment RPN: 2025-033-331-WS**

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

This rulemaking implements SB 1061 (89R), relating to procedural requirements for uranium mining production area authorizations. Under SB 1061, applications for authorizations or amendments to authorizations allowing mining and restoration activities in production zones are to be considered uncontested matters, not subject to contested case hearings or the hearing requirements of Chapter 2001, Government code, provided certain conditions are met.

The TCEQ states that “the public would have fewer opportunities to contest PAA applications for the use of Class III injection wells in mining operations” and that “there would be fewer contested case hearings requiring agency participation for PAA applications, provided certain specific conditions are met.” GEAA strongly opposes efforts to rollback avenues for contested case hearings, due to the dangerous precedence this rollback may set.

Contested case hearings are integral to safeguarding due process and ensuring the public’s ability to challenge permits that could pose a threat to their health, private property, or quality of life. Eliminating the opportunity for contested case hearings eliminates one of the only effective public avenues for analyzing and responding to the impacts of the permitted activities. Contested case hearings on new or amended permits help the public ensure that the permitted activities are sufficiently protective of local air and water quality.

**We encourage the TCEQ to reject the provisions of SB 1061 that would eliminate or reduce public involvement.** Thank you for your consideration.



Annalisa Peace  
Executive Director  
Greater Edwards Aquifer Alliance



Rachel Hanes  
Policy Director  
Greater Edwards Aquifer Alliance