**Texas Commission on Environmental Quality** **September 22, 2026**
Edwards Aquifer Protection Program
Attn: Monica Reyes
San Antonio Regional Office
14250 Judson Road
San Antonio, Texas 78233-4480

**RE: Public Comments, Edwards Aquifer Protection Program Annual Hearing;**

**Request to Extend Edwards Aquifer Protection to the Northern Segment of the Edwards Balcones Fault Zone Aquifer in Bell County**

Dear Commissioners:

My name is Dirk Aaron, and I reside in Salado, Bell County, Texas. I respectfully submit these comments in my individual capacity as a private citizen, as Director of the Clearwater Underground Water Conservation District, and as someone who has devoted much of his professional career to groundwater management and the protection of groundwater resources in Central Texas.

I identify my current and former positions with the Clearwater Underground Water Conservation District solely to provide the Commission with the professional background and experience that inform these comments. These comments are my own and should not be interpreted as an official position of the Clearwater Board of Directors unless separately acted upon by that Board.

My request to the Commission is straightforward:

***"I respectfully request that the Texas Commission on Environmental Quality initiate the process necessary to evaluate extending the Edwards Aquifer Protection Program to the full scientifically supported northern extent of the Edwards Balcones Fault Zone Aquifer in Bell County."***

**<u>A Lifetime Working With Texas Groundwater</u>**

My professional career in Texas agriculture and natural-resource management began in 1982. I subsequently had the privilege of serving for more than fifteen years as General Manager of the Clearwater Underground Water Conservation District before retiring from that position. Today, I continue serving the citizens of Bell County as the recently appointed Precinct 2 Director on Clearwater's Board of Directors.

Throughout those years, I have worked with groundwater conservation districts, landowners, cities, water suppliers, engineers, hydrogeologists, state agencies, elected officials, and many others who share responsibility for managing and protecting the groundwater resources upon which our communities depend.

My relationship with TCEQ also goes back many years. In one particularly meaningful assignment, I was appointed by TCEQ to serve on the review panel considering the petition of inquiry involving the groundwater conservation district in Starr County. I was subsequently designated by the Chairman of TCEQ to chair that review panel.

That experience gave me a particular appreciation for the Commission's responsibilities. I saw firsthand the importance of careful fact-finding, sound science, local participation, due process, and fair regulatory oversight.

I mention these experiences not to elevate my comments above those of any other citizen. I mention them simply to explain the perspective from which I make this request.

I know groundwater. I know Bell County. I know the northern segment of the Edwards Aquifer. And after decades of watching, studying, managing, and advocating for this resource, I believe we have reached an important moment.

**The Time Has Come for Bell County**

For many years, those of us involved in groundwater management in Bell County have asked that the northern extent of the Edwards Balcones Fault Zone Aquifer receive the thoughtful consideration and preventive protection that this vulnerable groundwater resource deserves.

We have studied it. We have mapped it. We have monitored it. We have watched development steadily move toward it.

Today, that concern is no longer theoretical.

The Northern Segment of the Edwards Aquifer extends northward through Williamson County and into Bell County. Its karst geology includes the types of faults, fractures, solution features, caves, sinkholes, and other pathways that can allow surface water to move rapidly into the groundwater system.

Those same characteristics that make the Edwards such an extraordinary aquifer also make it particularly vulnerable to contamination.

At the same time, Bell County is growing. Residential subdivisions, commercial projects, roads, wastewater infrastructure, and other development are increasingly being projected and proposed in areas overlying or affecting the northern Edwards BFZ Aquifer.

This creates an increasingly important question for Bell County and for the State of Texas:

***"Do we put appropriate preventive protections in place before development reaches these sensitive areas, or do we wait until development has occurred and attempt to address water-quality problems after the fact?"***

I strongly believe prevention is the wiser course.

**An Established Texas Program Already Exists**

I am not asking TCEQ to invent an entirely new regulatory concept.

Texas already has an Edwards Aquifer Protection Program.

Under 30 Texas Administrative Code Chapter 213, TCEQ regulates certain development activities over delineated contributing, recharge, and transition zones of the Edwards Aquifer for the purpose of protecting the aquifer from pollution.

That framework recognizes a fundamental principle that I believe applies equally to the northern portion of this groundwater resource: where hydrogeology creates an unusually direct connection between activities on the land surface and the quality of groundwater below, reasonable preventive measures are preferable to attempting remediation after contamination has occurred.

The Edwards Aquifer Protection Program also demonstrates that groundwater protection and responsible development do not have to be mutually exclusive.

Bell County will continue to grow. It should.

Our communities need homes, businesses, roads, schools, infrastructure, and economic opportunity. Private property rights must also be respected throughout this process.

The question is not whether Bell County should grow.

The question is whether that growth can occur with an established, scientifically based process designed to protect an irreplaceable groundwater resource before problems occur.

I believe it can.

**Requested Commission Action**

***"I respectfully request that the Texas Commission on Environmental Quality initiate the scientific, hydrogeologic, mapping, stakeholder, and rulemaking process necessary to evaluate extending the Edwards Aquifer Protection Program to the full scientifically supported extent of the Edwards Balcones Fault Zone Aquifer in Bell County, including the appropriate recharge, transition, contributing, and hydrologically connected areas identified through that process."***

I further ask that TCEQ undertake this effort cooperatively and transparently, engaging the Clearwater Underground Water Conservation District, Bell County, affected municipalities, landowners, developers, water suppliers, engineers, hydrogeologists, environmental interests, and other affected stakeholders.

I am deliberately asking that the ultimate regulatory boundaries be **scientifically supported**.

Those boundaries should not be predetermined by me or by any single interested party. They should result from the best available hydrogeologic information, appropriate field investigation and mapping, meaningful stakeholder participation, and TCEQ's technical expertise.

But the process must begin.

**I Believe TCEQ Can Do This**

I recognize what I am asking of the Commission.

Extending the program into additional portions of Bell County would require technical evaluation, updated mapping, stakeholder participation, consideration of affected property owners and local governments, rulemaking, and ultimately additional responsibilities for TCEQ staff.

I do not minimize those challenges.

My experience working with TCEQ is one of the reasons I am bringing this request directly to the Commission.

Over many years, I have developed strong and professional relationships with this agency and its people. I have watched TCEQ address difficult questions involving science, private property, development, local government, water quality, and the public interest. I believe TCEQ possesses both the professional capacity and the institutional experience necessary to undertake this effort thoughtfully and fairly.

There may never be a perfect time to extend these protections.

But there comes a time when the consequences of waiting become greater than the difficulty of acting.

For the northern segment of the Edwards Aquifer in Bell County, I believe that time has arrived.

**A Personal Request**

I make this request not only as someone who has worked professionally in groundwater management, but as someone who calls Bell County home.

For years, we have asked.

For years, we have studied.

For years, we have monitored.

And for years, we have watched development move closer.

**Now is the time for preventive protection.**

Please give the northern segment of the Edwards BFZ Aquifer in Bell County the opportunity for the same thoughtful, science-based consideration for protection that Texas has provided elsewhere over this extraordinary groundwater resource.

We are not asking TCEQ to stop growth.

We are asking TCEQ to help us prepare for it responsibly.

We are not asking the Commission to prejudge where every regulatory boundary should ultimately lie.

We are asking the Commission to begin the scientific and public process necessary to determine those boundaries.

Most importantly, we are asking that this work begin while we still have the opportunity to protect this resource proactively, rather than someday looking backward and asking why we waited.

I respectfully ask the Commission to begin that process.

Thank you for your consideration of these comments, for your service to the people of Texas, and for the opportunity to participate in the Edwards Aquifer Protection Program annual hearing.

Respectfully submitted,

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