

# Drought and Demand - April 22, 2025

## Questions Answered

\*These questions were collected from the audience on April 22, 2025 and distributed to each of the participants. The responses below come directly from the panel participants as well as Comal County Commissioners.

### Guadalupe Blanco River Authority (GBRA)

**\*How many cities/towns does Canyon Lake provide water for?**

•GBRA is a regional, wholesale water supplier that utilizes Canyon Reservoir to store water for approximately 100 customers throughout the basin; however, about 30 municipalities, districts, utilities, and industrial customers account for ~98 percent of the total acre-feet under contract. Individual customers make up the remaining demand. See the customers on Page 64 (page 68 of the PDF) of this [document](#).

**\*How does GBRA ensure cities comply with all the contractual obligations and ensure cities are taking efforts to conserve water? If a city does not conserve water thru water conservation efforts or severe restrictions on its residents, can the city be fined, can the city's water contract with GBRA be voided?**

•GBRA's Canyon Reservoir wholesale customers are subject to the GBRA drought contingency plan (DCP). Currently, wholesale customers are under a Stage 4 drought restriction which requires a mandatory 15% reduction in contracted water outlined in a curtailment plan. GBRA does not control how cities/utilities manage their water supply portfolios, only the curtailments related to contracted water from Canyon Reservoir.

•GBRA's DCP requires wholesale customers to develop and implement a Curtailment Plan which outlines the measures a customer will employ to achieve a reduction in actual water use that is less than or equal to their Annual Allotment. GBRA monitors usage monthly.

**\*Are you doing anything to ensure no one is privately damming upstream of Canyon Lake?**

•Dams are regulated by the Texas Commission on Environmental Quality.

**\*Are households allowed to use greywater for watering yards ok? So long it is phosphorus and free of detergents, it should be safe."**

•The Texas Commission on Environmental Quality sets standards for grey water usage and systems.

**\*Per the GBRA contracts for the sale of water to the various cities/ towns around Canyon Lake - Do all the cities/towns as part of their contractual obligations required to implement drought water restrictions on their residence similar to what is in place with Canyon Lake residences? For example - San Antonio, New Braunfels, Boerne? Is the selling price for the water the same for all cities? Can you tell us what the prices are tonight?**

- *GBRA's drought restrictions apply to the contracted amounts each wholesale entity/customer has for water stored in Canyon Reservoir. An individual retail customers' restrictions are managed by specific retail utilities (NBU, SAWS, Texas Water Co, etc), not GBRA*

- *The "Firm Water" rate for raw water stored in Canyon Reservoir is approved annually by the GBRA Board of Directors as part of the Fiscal Year Work Plan and Budget. For FY 2025, the Firm Water rate charged to customers is \$184 per acre-foot.*

- o *"Firm water" defined: refers to a stored water supply that is modeled to be available during a repeat of the worst drought on record.*

**\*During severe drought conditions can the GBRA more aggressively reduce the sale of water by doubling the percent reductions and having higher lake levels as a trigger point for reduced sales?**

- *The ~90,000 acre-feet of water GBRA is permitted to divert annually from Canyon Reservoir is already fully allocated to long-term contract holders. No new contracts have been issued for Canyon Reservoir in more than a decade. Releases during drought conditions are based on contracted amounts, GBRA's Drought Contingency Plan (DCP) and other regulatory requirements.*

- *GBRA will initiate Stage 5 conditions if water in storage in Canyon Reservoir falls to or less than elevation 865 feet msl (118,817 acre-feet or approximately 31% full) and will initiate 30 percent curtailment of contracted amounts.*

**\*What is the money (from water sales) used for from the sale of water? How does it benefit the lake?**

- *GBRA was granted Water Rights Permit #1886 in 1959 by the State Board of Water Engineers "to appropriate, divert and use public waters of the State, to consist of storm, flood and unappropriated public waters of the Guadalupe River in Comal County...as may be necessary when beneficially used for the purpose of municipal use." The permit required GBRA to enter a contract with the U.S. Army Corps of Engineers to construct and impound the permitted water in the conservation storage pool of Canyon Reservoir.*

- *Operating expenses include payment to U.S. Army Corps of Engineers (USACE) for operation and maintenance of Canyon Dam, and remaining debt service payments. Additionally, USACE*

*has communicated that over the next few years it is embarking on several large rehabilitation projects. GBRA is responsible for a portion of these improvements and will manage the impact to the raw water rate through a rate stabilization approach and designate excess budgeted funds, as necessary.*

**\*GBRA, Do you have reserves for customers without Canyon Lake Water?**

- *GBRA is actively engaged with communities and industries along the I-35, I-10, and TX-130 growth corridors and the gulf coast in developing regional water supply solutions to meet the needs of the population, economy, and environment.*

- *GBRA continues to implement projects to satisfy near-term needs; however, water supply needs beyond the 2040 decade and new demands will have to be sourced from larger, multi-regional projects located and developed beyond the Guadalupe River basin.*

**\*What is required for GBRA to declare a state of emergency concerning lake levels?**

- *GBRA's Drought Contingency Plan defines a Stage 6 Emergency condition exists when any of the following conditions exist, which may occur at any time and are not dependent on being preceded by any other drought stage:*

- o *Mechanical or system failures occur, which cause unprecedented loss of capability to provide water service.*

- o *Natural or man-made contamination of the water supply source(s) occurs.*

- o *GBRA determines water levels are reduced to a condition that could lead to a loss of service within 180 days or less.*

- *To manage limited water supplies and/or reduce water demand during a Stage 6 Emergency condition, the GBRA Board of Directors will establish the curtailment percentage in effect necessary to address the situation.*

**\*How do we plan to preserve recreational activities such as canoeing and fishing on the Guadalupe River if flow and water levels do not increase?**

- *Inflow to Canyon Reservoir and upstream river conditions are dependent on rainfall. GBRA will continue to manage releases from Canyon Dam in accordance with water supply contracts and regulatory requirements.*

**\*What is the construction timeline for the WaterSECURE initiative?**

- *GBRA is still in the early stages of this project. The anticipated initial delivery is targeted for 2033.*

## **Texas Water Company**

### **\*What does stage 5 look like? How far are we from that?**

*Texas Water Company's state-approved Stage 5 Drought Contingency Plan is triggered when the Canyon Reservoir water level drops to 865 feet mean sea level (msl) or lower. As of May 19th, the reservoir is 877.22 feet msl.*

### **\*Who is the decision maker regarding water supply to new developments and who renews existing water agreements? What criteria are used to make these decisions?**

*Decisions regarding water service to new developments are carefully analyzed and determinations are supported by a comprehensive, system-wide water supply study that evaluates all available water sources such as surface water, groundwater, and purchased water. The study also incorporates engineering analysis, projected demand, conservation goals, infrastructure capacity, and regulatory requirements to ensure responsible, sustainable service planning.*

*Existing Water Utility Service Agreements (WUSAs) include specific terms related to infrastructure requirements, developer contribution payment schedules, and key milestone dates. WUSAs are not typically "renewed." If the terms are not met, the agreement is canceled or becomes void. Any request to revise the terms, or reinstate a canceled WUSA, is treated as a new agreement and reviewed under current conditions.*

### **\*Texas Water Company - No New Connections until the pause is lifted. What criteria will you use to determine if new connections will be added?**

*Texas Water Company has paused new developer connections to prioritize water service to existing customers. New Developer connections will only resume when we can confirm a reliable and sustainable water supply that can adequately support both current and future demand.*

*It's important to note that this pause does not stop all construction. Some developers may have previously negotiated and fully executed Water Utility Service Agreements (WUSAs) that remain valid. If the terms of those agreements are met, developers may proceed with construction only for those pre-existing WUSAs. Due to confidentiality provisions, TWC is not permitted to disclose WUSA details. Separately, Customers may also see infrastructure improvement projects underway across our service territory, and these are an integral part of our broader efforts to enhance system reliability and long-term capacity.*

**\*How are you incorporating reuse and conservation methods in your water supply systems now and in the future?**

*Texas Water Company is actively investing in capital infrastructure to reduce water loss and improve system efficiency. Current and future efforts include:*

- **Leak reduction and efficiency** through main replacement projects and advanced metering infrastructure (AMI) to better track and manage usage.
- **Reuse initiatives** such as using recycled water for equipment washing, line flushing to maintain water quality, and capturing HVAC condensate for toilet flushing.

**Long-term planning** includes exploring opportunities for reclaimed water infrastructure (purple pipe) from our wastewater treatment facilities to further expand potential reuse.

**\*Texas Water Company, do you have a lake level at which you will put building permits on hold? If we get some rain and the lake goes up a few feet but because we are still in La Nina the lake may go back down. Have you considered that?**

*Texas Water Company does not issue building permits. Building permits are managed by local jurisdictions such as the city or county. However, we currently have a **pause in place on new water connections for new developments**, and that decision is not tied solely to lake levels. We continuously evaluate multiple factors when assessing system capacity, including lake levels, groundwater availability, customer demand, and long-term weather patterns.*

**\*You've stated in your press release that you purchased 6,000 acre/feet of water in 2023. Do you have any active construction projects that will connect those wells to your existing infrastructure?**

*Yes, we do have active construction projects underway to connect the new water supply to our existing infrastructure. In addition to that KT water project, we are also working on infrastructure improvements that will interconnect other systems that currently operate independently.*

**\*What are conservation expectations downstream of the dam? Are they different then those for communities around the lake, if so why?**

*Texas Water Company does not manage Canyon Dam or oversee downstream water systems. Conservation expectations in those areas are set by separate managing entities. Different systems rely on varying water sources such as surface water, groundwater, or purchased water—resulting in different conservation requirements. While approaches may vary, Texas Water Company strongly supports conservation as a vital tool for long-term water sustainability.*

**\*What are current plans to recharge/hold water in Highlands? Are you aware of Symbiosis Texas and Drought Proof Texas Efforts to build conservation terraces?**

*Regarding water recharge or storage in the Highlands area, Texas Water Company is aware of ongoing community-led conservation efforts such as those by Symbiosis Texas and the Drought*

*Proof Texas initiative. While TWC is not directly involved in these projects, we support collaborative approaches to conservation and aquifer sustainability and welcome opportunities to learn more and coordinate where appropriate.*

**\*Will the Texas Water Company be able to service current residents who are currently on exempt wells (but are running dry) even as new construction goes in?**

*Texas Water Company does not manage private wells or their usage. Our responsibility is to manage and plan for the water needs of our current customers who are connected to our system.*

## **Army Corp of Engineers**

**\*Army Corps - What is the purpose of the 3 large pipes, 4-6 smaller pipes going into the lake at the end for Triple Peak Road? Who would that service? Who owns that or who grants water rights?**

- 1. At the end of Triple Peak Road is Texas Water Company surface water treatment plant.*
- 2. TWC would need to respond to "who that water serves."*
- 3. TWC owns that treatment plant*
- 4. GBRA would need to answer who grants water rights.*
- 5. USACE leases land to GBRA and TWC, The State of Texas owns the water rights, and TCEQ manages the water rights, while GBRA sells the rights to TWC.*

**\*Why would the Corps of Engineers allow Texas Water Company to sell water from Canyon Lake to other water companies, especially, when we're in drought?**

- 1. Conservation pool level is determined by the reservoir's authorized purpose and design specifications. The specifications are defined in the project's operational plan. The reservoir's primary and secondary authorized purposes, such as flood control, navigation, water supply to the public, and recreation, influence the conservation pool's size and operation. The dam is operated by USACE who can not change the pool levels.*

## Comal County Commissioners

### **\*How do we influence the TCEQ?**

*TCEQ is a state organization reporting to the legislature. Therefore, individuals should contact their state representatives. <https://www.tceq.texas.gov/>*

### **\*When will building restrictions start on developments due to the water drought? For example making lots bigger and not allowing these high-density neighborhoods that are being built. Since Commissioners cannot make that decision, who is in charge of it, and what can we do as a community to implement it?**

*The County, via Commissioners Court, per statute #232, are specifically prohibited from regulating density of development. The Legislature writes the rules that Commissioners are legally bound to follow—therefore, individuals should contact their state representatives to have those rules changed.*

### **\*Do you believe the approvals for all the subdivision units should be based on your water availability report that is 3 years old and not reflective of current conditions?**

*The Court does not have authority to deny specific units of a subdivision that have already gained approval from utilities for the entire scope of the project—which is required before they even come to the County with their proposed project. The full scope of these projects has to have utility approval from the beginning, regardless of if they propose the entire project at once, or by units—which is customarily how these developments are pursued.*

### **\*Is there an independent auditor that reviews the calculations of water needs for new construction/developments before final approvals for permit that takes into account all the demand on the lakes, groundwater, and aquifers both now, 3 years out 5 years out, 10 years out based on worst case scenarios? If so, where can citizens go to see the results of these audits?**

*Up until now, we have reviewed the WAR's internally before accepting them. This year, Commissioners Court will consider a proposal to contract with an independent firm to review and provide feedback on the WAR's before accepting them.*



**\*Why is all the new development allowed when we are short of water? Existing customers should be first.**

*Any 'new' development you see happening at this point has been in the works for years, and were granted the utility commitments some time ago. What folks are seeing is the building out of lots or projects that have been in the utility companies' planning and projections for a long time, and are finally 'going vertical.' Nobody is being denied water—but the drought contingencies are there for exactly that reason—to protect the water supply for existing customers that are in their inventories. That is exactly why we saw TWC turn down 9 newly proposed subdivisions a couple of months ago.*

Responses Published June 9, 2025