

Texas Wildlife Association

“Working for tomorrow’s wildlife ... TODAY!”

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Texas Commission on Environmental Quality
c/o Ron Ellis
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To whom it may concern,

The Texas Wildlife Association (TWA) is dedicated to conservation and management of wildlife habitat across the state and this includes maintaining the health of the bays and estuaries of the Texas Coast, and the watersheds that support them. We would like to applaud the efforts of TCEQ in keeping the Environmental Flows process moving and express our support of the Commission proceeding with rulemaking for the Sabine/Neches and Trinity/San Jacinto as called for by SB 3.

Science is never perfect and that is why SB3 called for the best available science to be used in this rulemaking process and allowed for adaptive management to be used as more information became available.

TWA’s 5,300 members own or manage nearly 40 million acres across the state of Texas. These land stewards are out on the land making the management decisions that put water in the rivers and aquifers that Texans depend on and should be carefully considered in the balancing analysis. The stream flows they help to create are imperative to their way of life as well other citizens and wildlife down the river from them. From the general health and value of their land to the wildlife habitat that these healthy riparian systems provide, their management decisions are making a difference.

We understand that the balancing process is a difficult one but would suggest not making it a human use vs. environmental use battle as humans often benefit greatly from the natural functions of these environmental systems. We would also urge the Commission to be as transparent as possible in the balancing analysis and document every factor that is considered, including modeling assumptions.

Watersheds are dynamic systems and there are many factors that contribute to the health of that watershed and the bay/estuary system that they support. For this reason, SB 3 called for a “flow regime” to be established for each river system, and not a set of “minimum flows” at a couple of points along the river. We would encourage the Commission to keep the complexity of the different watershed systems in mind when tackling this subject.

Again, TWA is in full support of TCEQ moving along with the process and looks forward to continued involvement with this important project.

Thank you,



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Texas Wildlife Association



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David K. Langford
Governor's Environmental Flows Advisory Committee
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