



ENVIRONMENTALLY  
SENSITIVE AREA  
NO SWIMMING OR WADING

# WATER FOR RESIDENTS

Ensuring housing solutions do not worsen  
the water crisis in Texas' Edwards and  
Trinity aquifer region

Greater Edwards Aquifer Alliance

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## Introduction

In preparation for the 89<sup>th</sup> Texas Legislature, the leaders of the Texas Senate and House of Representatives released their respective interim charges. Due to the housing challenges facing Texans, both chambers received interim charges related to housing affordability.

The Texas House Committee on Land and Resource Management received the following:

*Housing Affordability:* Examine factors affecting housing attainability and affordability in Texas, including state and local laws impacting supply and demand for housing, barriers to construction resulting from zoning practices, and the availability and costs of housing inputs.

The Texas Senate Committee on Local Government received the following:

*Housing Affordability:* Study issues related to housing, including housing supply, homelessness, and methods of providing and financing affordable housing. Make recommendations to reduce regulatory barriers, strengthen property rights, and improve transparency and accountability in public programs for housing.

These are valuable charges. Texas is short on housing and shorter still on affordable housing. Yet Texas is also facing water shortages and threats to water quality, brought about by increasingly frequent droughts and floods, population growth, increases in temperatures, and the loss of agricultural and conservation lands. With no change to its approach to development and to water management, Texas faces “a real and present potential for civilization-altering drought” (Collins 2024).<sup>1</sup>

It is imperative, then, that the solutions to the housing crisis do not exacerbate the water crisis. Similarly, solving the housing crisis must also mean ensuring that newly supplied housing has a consistent and clean water supply and is not at risk of flooding.

The pressures facing the housing market and the water supply statewide are intensified in the Edwards and Trinity aquifer region of Central Texas. Many of the fastest growing towns, cities, and counties in the state – and even the country – are located in this region. The Edwards and Trinity aquifer region is subject to intense floods and droughts, often faces water restrictions, and is uniquely susceptible to water pollution.

In light of a housing-oriented legislative session, the Greater Edwards Aquifer Alliance (GEAA) would like to provide an overview of the housing affordability discussion; an overview of water availability and quality concerns; and specific recommendations for ensuring that solutions to the housing crisis do not further aggravate water supply concerns, especially in the Edwards and Trinity aquifer region, and for ensuring long-term affordability for Texans.

## Definitions

Cost burdened: When housing costs – for renters or homeowners – comprise 30 percent or more of a household’s income.<sup>2</sup>

Domestic migration: The movement of populations within the United States.<sup>3</sup>

Ecosystem Services: The direct and indirect benefits ecosystems provide, including providing food and fresh water; regulating flooding and erosion; regulating local air, water, and soil quality; supporting wildlife habitats and human health; and providing opportunities for tourism and recreation.<sup>4</sup>

Housing affordability: Whether a family earning the median income in an area can qualify for a mortgage on a median-priced home in that same area or whether a household’s housing costs do not exceed 30 percent of the household’s income.<sup>5</sup>

Housing costs: Rent or mortgage payments, property taxes, utilities, homeowners or renters insurance, condominium or mobile-home fees, repair and maintenance costs, and similar costs.<sup>6</sup>

Impervious cover: Any form of “human-made surface that doesn’t absorb rainfall,” including pavement, roads, roofs, building structures, or parking lots (Austintexas.gov n.d.).<sup>7</sup>

Institutional investors: Companies, often backed by private equity groups, that own more than 1,000 housing units, which are most often rental units.<sup>8</sup>

Median household income: The income level of a household in a specific demographic location in which half the households of that region earn more than that income level and half earn less.<sup>9</sup> In Texas, the median household income was \$72,284 in 2022.<sup>10</sup>

Multi-family housing: Any housing where multiple families reside at the same time, including apartments, condominiums, duplexes, triplexes, townhomes, etc.<sup>11</sup>

Short-term rental (STR): A residential dwelling unit offered as temporary accommodations – usually under 30 days – to overnight guests for a fee and often advertised on a rental platform, such as Airbnb or VRBO.<sup>12</sup>

Single-family housing: Any housing intended for one family to live in at one time, usually referring to “freestanding structures on their own pieces of property and not attached to homes owned by other individuals” (Zinn 2022).<sup>13</sup>

Zoning: Local laws and regulations that allow “local governments to regulate which areas under their jurisdiction may have real estate or land used for particular purposes” (Kenton 2024).<sup>14</sup>

# Housing Availability and Affordability in Texas

## Background

For decades, Texas has had a national reputation for its low cost of housing. This reputation is starting to falter. The state has recently begun to struggle to build enough homes to meet housing demands and to provide housing at prices its low- and median-income residents can afford without becoming cost burdened or facing risk of foreclosure.<sup>15</sup> This widening housing gap is occurring even as Texas continues to build more homes than any other state in the United States. As the demand has increased, so too have home prices and rents.<sup>16</sup>

Texas' population is growing faster than its housing supply and the housing supply that is present is not necessarily affordable. As of 2022, Texas was at least 320,000 homes short of what its population needed, with the greatest shortage occurring in the segment of the market affordable to middle-income homebuyers. As of 2022, the median household income necessary to afford the median home in each of the major metropolitan areas in Texas had risen each of the preceding 5 years.<sup>17</sup> Meanwhile, also as of 2022, around 39 percent of Texas households were cost burdened.<sup>18</sup> Still, Texas added more residents between 2018 and 2023 than any other state and grew at a faster rate than all but four states.<sup>19</sup>

There are myriad reasons for the housing availability and affordability issues in Texas. Among these are a lack of housing investment following the financial crisis of 2007-08; the global COVID-19 pandemic; an increase in telework opportunities; an increase in institutional investors or hedge fund buyers; low interest rates between 2020-2022; supply chain shortages; high interest rates since late 2022; an increase in the cost of rural land following the pandemic; and accelerating domestic migration into Texas between 2020 and 2023. There are existing resources that outline these causes in greater detail, some of which are provided in the appendix.

It appears likely that a primary issue during the 2025 legislative session will “be whether the state or cities should make the rules on where homes can be built” (Fechter 2024).<sup>20</sup> It is also possible that solutions at the state level will focus on removing or weakening land use and housing regulations, including zoning and permitting authority and building code ordinances. Environmental regulations may also be weakened as a strategy.

Beyond these general predictions, it is not yet clear what exactly lawmakers intend and how these policy issues will play out in the session. There are several additional measures that contribute to the housing affordability crisis in Texas that have not been as routinely discussed, which will be briefly outlined in the following section.

## Notable issues

### Sprawl

Much of the prolific housing growth in Texas has historically occurred in the form of building more low-density, “detached single-family homes in outlying suburban areas,”

i.e., sprawl (Fechter 2024).<sup>21</sup> This strategy is becoming increasingly ineffective in lowering home prices efficiently, especially when taking into account the indirect costs of sprawl on renters, homeowners, and local governments, such as increased transportation, utility, emergency response, and infrastructure costs.<sup>22</sup> Sprawling development can impose three to ten times the annual cost per household on local governments compared to more compact urban center development.<sup>23</sup> These costs may be passed on to residents.

Indirect costs are not often considered in discussions of housing affordability, but greatly impact homeowners' and renters' financial situations. For example, in Bexar County, the average housing cost as a percent of income is 26 percent, while housing plus transportation costs rises to an average of 46 percent of household income. In Comal County, these percentages rise to 34 and 57 percent, respectively.<sup>24</sup>

Meanwhile, additional negative consequences and risks of this type of land use pattern are becoming increasingly better understood. Sprawl often pushes housing developments onto land previously used for agricultural or conservation purposes or that was completely undeveloped. These types of land were providing ecosystem services that are now reduced or eliminated with the land's development. The new developments may also be placed on land that has traditionally been more at risk of natural threats, such as flooding or wildfires – risks that are amplified with additional development and amplified further still when development occurs on land not subject to stormwater or watershed protection ordinances.<sup>25</sup> \*

The “drive to qualify” style housing development – where prospective homeowners must drive further and further out of the city center to afford housing where land prices are cheaper – imposes hidden costs not only on those homeowners, but also on the entire region or state.<sup>26</sup> Sprawl-like growth has consistently been shown to contribute to increased greenhouse gas emissions, energy consumption, deforestation, and air quality concerns and to the loss of natural habitats and open spaces.<sup>27</sup>

This pattern of development also contributes to increased water consumption, flash flooding, increased impervious cover, and the disruption of natural hydrologic cycles, which can strain existing water supplies and threaten water quality.<sup>28</sup> These outlined “hidden” costs of sprawl development can greatly reduce the long-term affordability of housing state-wide through increased utility bills, higher levels of state and local government disaster spending, a greater likelihood of future bond projects, and increased insurance rates.

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\* For more information on the ability of developments to be withdrawn from municipalities' extraterritorial jurisdictions and their more protective environmental regulations and the risks this ability poses to natural resources and state residents, see GEAA's “A Review of the Impacts of Senate Bill 2038 on Land Use and Water Supplies in Central Texas” at <https://aquiferalliance.org/wp-content/uploads/2024/05/Report-on-the-Impacts-of-SB-2038-in-Central-Texas-5.21.24.pdf>

## Institutional Investors

Institutional investors are often cited as a significant barrier to housing affordability and accessibility; they began entering the housing market in greater numbers following the Great Recession of 2007-2009 and “had ‘a notable presence in more than 50 U.S. cities’” by 2021 (Merrefield 2023).<sup>29</sup> The numbers regarding the share of the housing and rental markets occupied by institutional investors nationally and across Texas vary widely and are hard to decisively pin down. Most sources agree, however, that institutional investors occupy a larger share of the single-family rental market in Texas than in other states.<sup>30</sup>

It is also difficult to determine exactly what effect institutional investors have on the housing market, as “it’s unclear how much they distort the overall housing market” (Fechter 2024).<sup>31</sup> Some research shows that institutional investors buying single-family homes can help increase access to renters while at the same time decreasing access for first-time or low-income homebuyers. As of 2024, Texas continues to lead the nation in terms of its share of the market occupied by institutional investors.<sup>32</sup>

Even if institutional investors have a slight positive impact on the single-family rental market, they may have, in turn, a negative impact on the multi-family rental market. Many multi-family management companies appear to be using rent-setting software that uses anticompetitive pricing algorithms to raise rents.<sup>33</sup> While this issue is currently being studied – and at least one rent-setting software company is facing lawsuits – it is emblematic of the larger trend of housing ownership by “opaque management companies” (Flowers, et al. 2024).<sup>34</sup>

## Short-Term Rentals

Short-term rentals have faced similar scrutiny as institutional investors in discussions surrounding housing affordability and availability. There are two general types of short-term rentals: owner-occupied and investor-owned. Owner-occupied STRs are properties where the homeowner rents out a room of the house, segment of the house (such as basement or attachment), or the whole property when unoccupied. Investor-owned STRs are properties rented out by institutional investors who own multiple properties.<sup>35</sup>

Owner-occupied SRTs do not appear to have much impact on local housing markets, while investor-owned SRTs appear to have some impact, though many analyses are still ongoing. Reforms that limit SRTs to those that are owner-occupied; the number of SRTs per block; the number of days a property can be rented; or the places in which a property can be rented have been shown to slightly decrease long-term rental prices and could make housing stock more available.<sup>36</sup>

## Parking Minimums

One important, but often overlooked, cause of a constricted and unaffordable housing market is the minimum parking mandate. Parking minimums are “local zoning requirements that mandate a minimum number of parking spaces required for various types of developments” (Housing Affordability Institute n.d.).<sup>37</sup> Parking minimums add to the cost of building housing, which is passed on to the renters or homebuyers through

increased rent or mortgage payments. A study in Austin, Texas estimated that “requiring one additional parking space per unit raised monthly rent by up to \$200,” while a San Francisco study found single-family homes with off-street parking sold for 12 percent more than those without added parking (Fechter 2024).<sup>38</sup>

These mandates can also reduce the number of housing units that can be built in a particular area, as space that could otherwise be used for additional housing is taken up by required parking spots.<sup>39</sup> For example, in San Antonio, 29 percent of the central city is dedicated to off-street parking.<sup>40</sup> When development is constrained in this manner, “the most affordable units tend to be eliminated first, since they are the least profitable” to the developer (Litman 2024).<sup>41</sup>

### Homeowners Insurance

Texans’ home insurance rates have recently been increasing dramatically, faster than any other state in the country. In 2023, “the Texas Department of Insurance recorded a 21% jump in statewide rates...the biggest annual spike in at least a decade” (Kimble and Ghisolfi 2024).<sup>42</sup> A primary reason for this rise in rates is the cost of extreme weather events, which have been increasing in frequency and intensity. The state “has seen more billion-dollar weather disasters than any other state in recent decades” (Friedman, et al. 2024).<sup>43</sup> During the 2010s, there were “on average six \$1 billion climate-related storms or climate-related disasters per year” (Worthy 2024).<sup>44</sup> In the 2020s, Texas has, on average, experienced twelve \$1 billion natural disasters annually, double the prior decade.<sup>45</sup>

Texas has also seen more homes being built in risk-prone areas – see *sprawl* above – and inflation has driven up the costs of replacing and repairing homes. Rates have increased as insurance companies in Texas have had, over the last five years, to pay more in claims than they have collected in premiums.<sup>46</sup> Rising homeowners insurance premiums place burdens on more than just existing homeowners. Increasing rates keep potential homeowners from entering the housing market by driving up the cost of monthly mortgage payments to an unaffordable level. In certain disaster-prone areas, insurance companies have pulled out of the market altogether, which results in lenders not backing mortgages, shutting out more potential homebuyers.<sup>47</sup>

### Building Codes

Weak or unenforced building codes can encourage substandard housing production. When homes are poorly constructed, homeowners face higher repair and maintenance incidences and costs, adding to the long-term unaffordability of housing and providing a “barrier to building inter-generational wealth” through the value of the home (Carrasco 2024).<sup>48</sup> Texas has some of the worst building codes of any of the states along the Atlantic and Gulf coasts.<sup>49</sup> There is no state-enforced residential building code.

Weak building codes can also lead to greater damage to homes and properties during natural disasters, which can cause insurance claims and rebuilding costs to rise to unaffordable levels.<sup>50</sup> As illustrated in the insurance section above, the increasing quantity and cost of claims has led to state-wide increases in insurance rates. Other states



with stronger or better-enforced building codes record fewer losses than Texas. Those states' insurers do not have to pay out as many claims as Texan insurers, "reducing the need to hike rates for homeowners" or exit the market altogether (Kimble 2024).<sup>51</sup>

Other states that regularly experience similar flooding and natural disasters as Texas offer incentives and mandatory insurance discounts to homeowners who take advantage of resilient home construction standards, like the Fortified standard. Texas does not do so, "despite leading the country in losses from catastrophic weather" (Kimble 2024).<sup>52</sup> Even where Texas cities do independently take advantage of higher standard programs, they rarely have taken full advantage.

The Federal Emergency Management Agency offers a Community Rating System program through which participating communities can receive credits for implementing voluntary higher regulatory standards to achieve better floodplain management and fewer flood losses. In exchange, FEMA flood insurance policyholders in that community can receive discounted premiums, lowering their housing costs.<sup>53</sup> The number of credits a community receives determines the extent of the discount: Class 1 communities receive up to 45 percent off flood insurance premiums, while Class 10 communities receive zero percent.<sup>54</sup> At least 75 Texas cities participate in this program, but only 11 have achieved a Class 5 or higher ranking, and none have achieved better than a Class 3.<sup>55</sup> Significant insurance premium reductions remain on the table.

## Water Availability and Quality in Central Texas

### Background

The Edwards Aquifer "is one of the most productive aquifers in the United States" and provides water for upwards of 2 million people in Central and South Texas (Edwards Aquifer Authority n.d.).<sup>56</sup> It is a karst limestone aquifer, meaning it is formed out of porous (characterized by sinkholes, caves, and fractures) limestone bedrock. This porous nature "allows water to move quickly and freely from the surface into the network below ground, recharging the aquifer," but it does not allow for much, if any, filtration of that water (GEAA n.d.).<sup>57</sup>

The San Antonio segment of the Edwards Aquifer underlies parts of Atascosa, Bexar, Comal, Frio, Guadalupe, Hays, Kinney, Medina, Uvalde, and Zavala counties, while the Barton Springs segment overlays parts of Bell, Travis, and Williamson counties (see Figure 1).<sup>58</sup> Many of these counties are among the fastest-growing in the country or border a county with high population growth. This rapid development places great strain on water availability in the region and threatens water quality.<sup>59</sup>

The Trinity Aquifer, located slightly to the north and west of the Edwards Aquifer, has many of the same characteristics and faces many of the same challenges as the Edwards Aquifer. The Trinity Aquifer is less porous, however, which limits its ability to recharge and to recover from drought compared to the Edwards Aquifer. The Central Texas region overlying the Trinity Aquifer – Bandera, Bexar, Blanco, Burnet, Comal, Hays, Gillespie,

Kendall, Kerr, and Travis counties – is then even more at risk from pressures arising from drought, overconsumption of scarce water resources, and overdevelopment.

Much of the Edwards and Trinity aquifer region is situated in Flash Flood Alley, which is “one of the most flood-prone regions in North America” (San Antonio River Authority n.d.).<sup>60</sup> At the same time, the region more frequently than not faces moderate to extreme drought conditions. During these periods of drought, groundwater levels decline, which leads to declines in spring flows, well elevations, and surface water flows. The unique hydrogeological environment of the region means “water sources are highly vulnerable to shortages caused by drought” and overuse and to contamination from wastewater disposal and stormwater management practices (Hanes 2024).<sup>61</sup> These risks are amplified as development and population growth continue to increase over ecologically sensitive areas in the region.

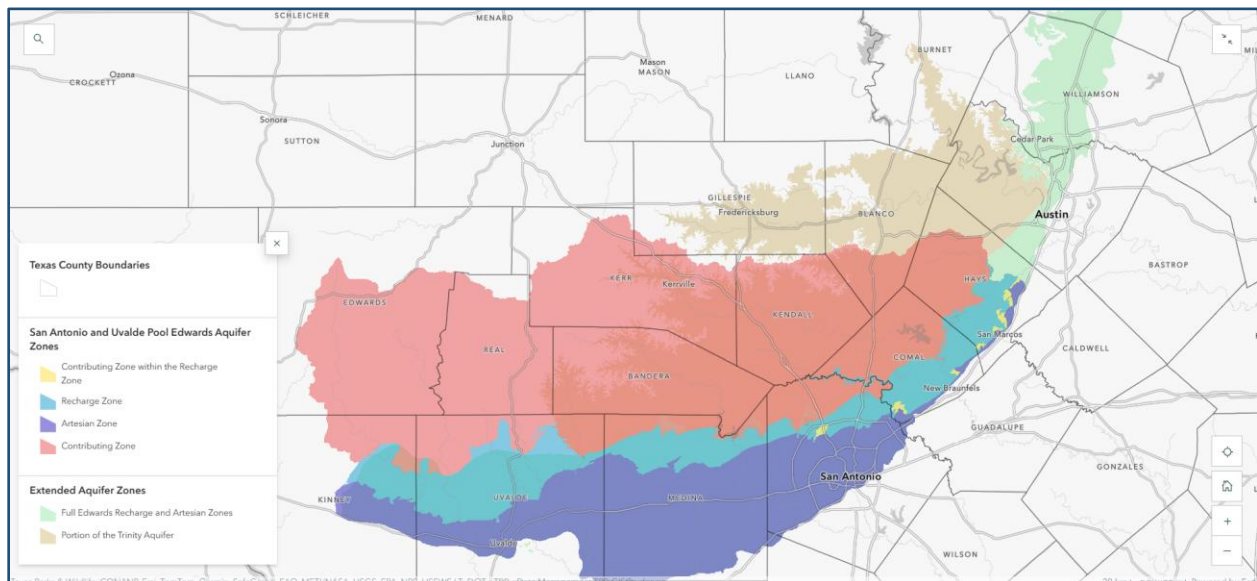


Figure 1. Map showing the Contributing, Recharge, and Artesian Zone of the Edwards Aquifer and the Hill Country extent of the Trinity Aquifer.<sup>62</sup>

## Notable Issues

### Water Quality Concerns

The Edwards Aquifer is split into three zones, the contributing, recharge, and artesian zone. Much of the Edwards Aquifer Contributing Zone overlies the Trinity Aquifer. In the contributing zone, rain runoff flows over the land and into waterways before flowing downstream. The water then drains and percolates into the aquifer in the recharge zone through caves, sinkholes, and cracks formed in the karst limestone. Once underground, the water flows through the porous network of the aquifer before pressure forces the water back to the surface through springs or wells in the artesian zone.<sup>63</sup> This process does not filter the stormwater that recharges these aquifers.

These characteristics of the Edwards and Trinity aquifers that allow recharge to occur are the same characteristics that make for a difficult conversation around housing

development in the contributing and recharge zones. Increasing impervious cover over the contributing zone can cause runoff to pick up contaminants and pollutants as it flows towards the recharge zone. Generally speaking, “as impervious cover rises above 10%, there is almost always a measurable loss in water quality” (Flinker 2010).<sup>64</sup> The general lack of filtration in karst aquifers, combined with increasing impervious cover, places the water supplies for upwards of 2 million people at risk of contamination from pollutants, waste, bacteria, and contaminants of emerging concern like pharmaceuticals and PFAS.

### Water Availability Concerns

Water infrastructure – which includes Texas’ water supply portfolio – is one of the state’s “three pillars of economic growth and development” and underpins the other two pillars: workforce and electric reliability (Mazur 2024).<sup>65</sup> A weakening water infrastructure pillar threatens to destabilize the remaining pillars. Insufficient water supplies place the reliability of the state’s electrical grid and many of its water-dependent industries, such as mining and agriculture, at risk.<sup>66</sup>

Texas’ water supplies are facing critical challenges due to drought and population growth. Population growth will increase Texans’ water demands, even as supplies are projected to diminish during future dry years.<sup>67</sup> And while Texas is no stranger to drought conditions – the state survived the droughts of the 1950s and 2010s – history suggests future droughts could be far worse.

Tree ring studies show that Texas has endured more intense droughts than those that have occurred over the past 200 years. Furthermore, recent analyses of the 1950s and 1960s suggest that the economic and technology conditions that helped Texans recover from the 1950s drought of record are no longer feasible.<sup>68</sup> Recharge conditions of sensitive aquifers, too, have changed since the 1950s. Development has increased impervious cover over the aquifers, decreasing their ability to replenish (see Figure 2).

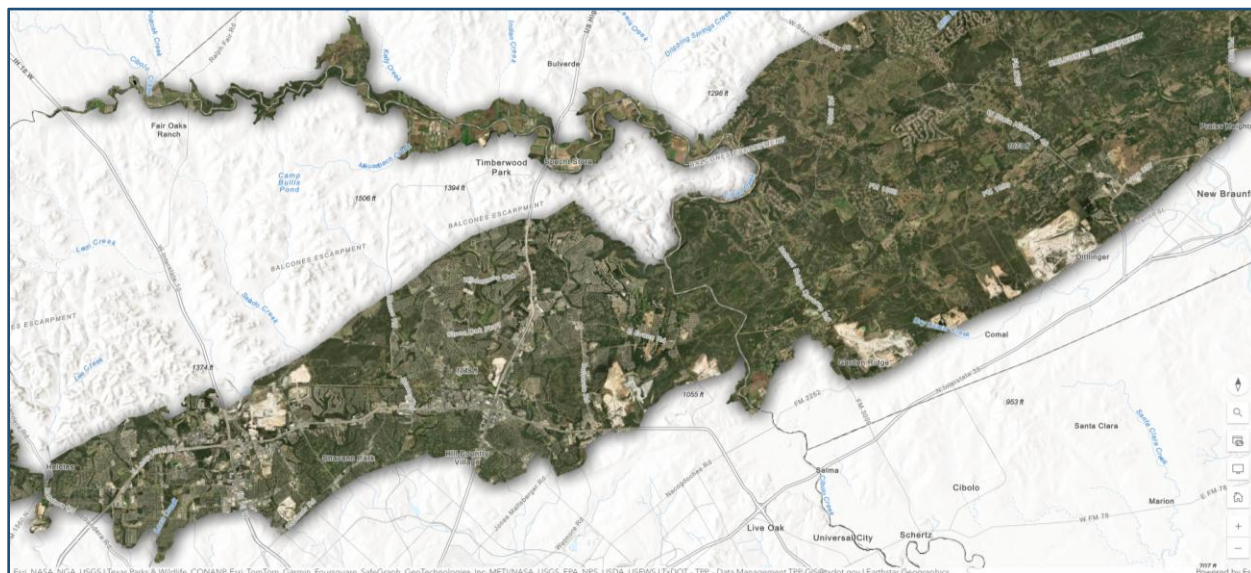


Figure 2. Map illustrating impervious cover over the Edwards Aquifer Recharge Zone (satellite imagery portion of the map).<sup>69</sup>

Conditions facing the rest of Texas are amplified in the Edwards and Trinity aquifer region. The Hill Country is currently undergoing a drought that began in earnest in 2022. At the time of writing, the Edwards Aquifer was at its second-lowest January 1 reading on record, only one foot higher than the January 1, 1957 reading during the drought of record. Over the past several years, Canyon Lake, Medina Lake, and Lake Travis, among other regional reservoirs, have hit record lows, with Canyon and Medina lakes continuing to drop.<sup>70</sup>

The Cow Creek Groundwater Conservation District (GCD) and Hays Trinity GCD, both of which govern portions of the Trinity Aquifer, are in emergency drought stages.<sup>71</sup> The Edwards Aquifer Authority and Barton Springs Edwards Aquifer Conservation District are both one level above their respective worst-case scenario drought stages and will enter those stages without above average rainfall.<sup>72</sup> Forecasts for 2025 do not predict above average rainfall.<sup>73</sup>

At least 184 Texas public water systems have reported some form of mandatory water restrictions in place to avoid shortages. Eight of these water systems notified the state they had less than a 45-day supply at the time of their implementation of the restriction.<sup>74</sup> In September 2023, after using more than 100 percent of its Edwards Aquifer water right, Kyle, Texas had to strike a deal with San Marcos to buy a portion of San Marco's water rights.<sup>75</sup> Earlier that same summer, the town of Blanco experienced a water emergency due to pipe breaks, leaks, and low reservoir and river levels.<sup>76</sup> The mayor of Blanco warned its residents that "it would be wise...to expect we will be in situations like this from time to time" (Jacobco 2023).<sup>77</sup>

Kyle, along with other cities in the region, has begun to look for water from another location – the Carrizo-Wilcox Aquifer to the east. But the Carrizo-Wilcox Aquifer is itself facing pressures from drought, its low ability to recharge, a lack of regulation, and multiple large Central Texas cities exporting its water. It is likely that the Carrizo-Wilcox will be overallocated "within the next 10 to 20 years" (Fisher 2023).<sup>78</sup> Meanwhile, Central Texas' population continues to grow.

Housing development over the Edwards and Trinity aquifer contributing and recharge zones will exacerbate these water availability pressures facing the region. Impervious cover over the recharge zones will prevent much needed recharge of the aquifers, while continuing population growth will lead to overconsumption of already constrained water sources.

### Stormwater and Flooding

When housing and all its related surface cover, such as roads, parking lots, and commercial lots, replace environmentally sensitive watershed areas, it impacts more than just water quality and availability.<sup>79</sup> Increases in impervious cover can also lead to greater stormwater runoff and flooding, both locally and downstream.

Pre-development, stormwater absorbs into the ground, infiltrates into underlying aquifers, and flows off into surface waterways relatively slowly. Flooding in these conditions is

generally less frequent and occurs at a lower intensity. Post-development, the area available to infiltrate water decreases, causing water to flow into waterways “much more quickly, resulting in an increased likelihood of more frequent and more severe flooding” (U.S. Geological Society 2018).<sup>80</sup> For every one percentage point increase in “impervious surfaces that prevent water from flowing into the ground, annual floods increase on average by 3.3%” (Stormwater Solutions 2020).<sup>81</sup>

Though the above patterns hold true in the Texas Hill Country, flooding here has always, even pre-development, been more severe in nature than in many other geographic regions. The Edwards Aquifer region is consistently among the most flood-prone regions in the world, and “urbanization reinforces these natural conditions and increases the probability of casualties and property losses” (Caran and Baker 1986).<sup>82</sup>

Keeping impervious cover over the Edwards and Trinity recharge zones below 10 percent, as recommended by experts, will allow the land to “absorb and filter runoff from developed areas and prevent excessive flooding, ecosystem impairment, and contamination of water supplies” (Flinker 2010).<sup>83</sup>

## Conclusion

The Greater Edwards Aquifer Alliance does not oppose housing development in Texas, generally speaking, but does oppose it where it places the water security of a region at risk. For example, increasing housing density in urban centers should be encouraged, just as sprawling development in the Edwards and Trinity aquifer recharge and contributing zones should be discouraged. Denser, more urban areas and historically rural areas tend to use less water in Central Texas, while agricultural and conserved lands provide valuable ecosystem services.<sup>84</sup>

GEAA anticipates that Texas lawmakers will propose restricting local government regulatory authority and rolling back regulations as a means of increasing housing affordability and availability.<sup>85</sup> While it is possible that rolling back regulations could bring down housing prices and spur growth in the next few years, it is also likely that these price reductions will be offset in the coming decades by increasing repair and maintenance costs, insurance rates, rebuilding costs, and impacts such as flooding and water shortages due to the loss of lands that provide ecosystems services. Such solutions will also likely have limited success in reducing housing prices in the Hill Country region due to the high cost of purchasing land in this region.

GEAA supports responsible, long-term solutions. Rather than focus on slashing regulations and local government authority, which in the long-term could exacerbate housing affordability, the Texas Legislature should focus on measures that provide both affordability and water security in the short and long-term. Lawmakers should consider implementing the following measures to responsibly bring down housing costs while still protecting the Edwards and Trinity aquifer water supplies.

## Key Recommendations

- Encourage responsible increased housing density by encouraging in the existing urban core:
  - accessory dwelling units;
  - lowering or eliminating parking minimums;
  - smaller lot sizes; and
  - restricting investor-owned SRTs.
- Support stronger, more resilient building codes and standards by:
  - implementing and enforcing stronger state-wide residential building codes and standards;
  - allowing municipalities to require more stringent, green, or Fortified building standards;
  - granting counties authority to regulate building codes and standards;
  - encouraging cities to participate to the maximum extent possible in the FEMA Community Rating System program; and
  - not prohibiting cities from enacting voluntary higher building codes and standards.
- Restrict growth over sensitive recharge and contributing zones by:
  - requiring realistic water availability and sustainability reporting for all new developments;
  - enhancing state wastewater permitting requirements for developments in these areas; and
  - maintaining and enhancing city and county regulatory authority over developments in these areas, especially to encourage conservation developments and the use of green infrastructure.

## Appendix

Sources to provide greater context to housing affordability and availability trends.

### Nation-wide

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