

April 30, 2025

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

The Honorable Gary Gates, Chair
The Honorable Suleman Lalani, Vice-Chair
The Honorable Members Alders, Davis, Hinojosa, Hunter, Lopez, Morgan, Virdell
House Committee on Land & Resource Management

Re: House Bill 882, An Act Relating to Building Codes Applicable in the Unincorporated Areas of a County; Authorizing a Fee

The [Greater Edwards Aquifer Alliance](#) (GEAA) appreciates the opportunity to submit these comments on behalf of our sixty-two member groups that are allied in advocacy for the preservation of our ground and surface water resources in twenty-one counties within Central and South Texas. We support House Bill 882.

Texas is one of the fastest-growing states in the nation, and many of its counties are the fastest-growing in the nation. Growth in the [unincorporated areas of these counties is often occurring at an even faster rate](#) than growth within the corporate boundaries of cities. Many of the buildings built within unincorporated areas are not being built to the same standards as inside the city due to outdated building code standards (Sierra Club).

CSHB 882 would help solve this issue by adopting the 2018 International Residential and Building (Commercial) codes for unincorporated areas of the state. Currently, Texas is stuck at the 2006 standards. Modern building codes are designed to better protect residential and commercial buildings from extreme weather events. Adopting more modern building codes in order to help mitigate floods was a key recommendation of the Texas Water Development Board's 2024 Texas State Flood Plan (Sierra Club).

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](#)). Texas has some of the [weakest building codes](#) of any of the states along the Atlantic and Gulf coasts.

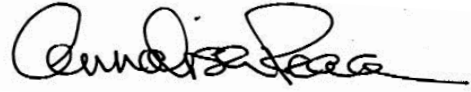
Weaker building codes also lead to greater damage to homes and properties during natural disasters, which can cause [insurance claims and rebuilding costs to rise](#) to unaffordable levels. The increasing quantity and cost of claims has led to state-wide increases in insurance rates. Other states with 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](#)).¹

This bill provides counties time to adopt these codes, authority to impose permit fees and hire inspectors, and enhanced enforcement powers. These additional powers are *optional*, and would be based on public notice and input. Counties should be granted these additional powers and ability to meet updated minimum standards in order to protect Texans in all parts

¹ <https://aquiferalliance.org/wp-content/uploads/2025/01/GEAA-Housing-and-Water-Concerns-in-the-Hill-Country-2.3.24.pdf>

of the state. Updated building codes in unincorporated areas can help reduce water use, mitigate flooding, ensure safe and reliable housing construction, reduce costs to residents, and reduce insurance rate hikes. We encourage your support for House Bill 882.

Thank you for your consideration. Please consider GEAA as a resource that is at your disposal. We look forward to working with you on this issue.

A handwritten signature in black ink, appearing to read "Annalisa Peace". The signature is fluid and cursive, with a long horizontal stroke at the end.

Annalisa Peace, Executive Director

A handwritten signature in black ink, appearing to read "Rachel Hanes". The signature is cursive, with the first name "Rachel" written in a larger, more prominent script than the last name "Hanes".

Rachel Hanes, Policy Director