

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

March 31, 2025

The Honorable Gary Gates, Chairman
House Committee on Land & Resource Management

Re: House Bill 3919, An Act Relating to Size and Density Requirements for Residential Lots in Certain Municipalities; authorizing a fee

Dear Chairman Gates,

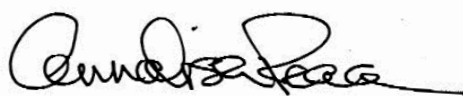
The [Greater Edwards Aquifer Alliance](#) (GEAA) appreciates the opportunity to submit this letter on behalf of our sixty-two member groups that are allied in advocacy for the preservation of our ground and surface water resources in twenty-one counties within Central and South Texas.

The Greater Edwards Aquifer Alliance is grateful for your consistent efforts to tackle housing affordability issues. We are generally supportive of efforts that work to increase density in the urban core and protect agricultural, conservation, and heritage lands. For HB 3919, we would ask, however, that you consider implementing two changes before the bill is presented to the committee on Thursday, April 3.

GEAA would like to ask you to consider inserting the two amendments (enclosed) that were added to the Senate companion of HB 3919 -- SB 15. These amendments would raise the population threshold of the specified cities to 150,000 from 90,000 and would allow cities to still adopt ordinances, rules, or other measures related to lot sizes and lot regulations that apply to land located in an aquifer recharge zone and that relate to the protection of an aquifer.

Lot size regulations are crucial to cities' ability to protect critical groundwater supplies. Dense, small lot developments over aquifer recharge zones increases impervious cover, which can both limit recharge and put water quality at risk of degradation. The Edwards and Trinity aquifers supply over 2 million Central Texans with water and are incredibly vulnerable to contamination from stormwater runoff and to development that limits their ability to recharge.

These two changes will not affect most of the areas highlighted by this bill, ensuring that the bill is still able to spur increased urban density. The two changes would, however, be instrumental in protecting the water quality and availability of water supply for over 2 million Texans. 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.



Annalisa Peace
Executive Director, GEAA



Rachel Hanes
Policy Director, GEAA