

May 8, 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 Cody Harris, Chair
The Honorable Armando Martinez, Vice-Chair
The Honorable Members Ashby, Barry, C. Bell, Buckley, Fairly, Gámez, J. Garcia, M.
González, Romero, Villalobos, and Zwiener
House Committee on Natural Resources

**Re: Senate Bill 2660, An Act Relating to the Hays Trinity Groundwater
Conservation District; 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. **GEAA strongly supports this bill as it was originally written and does not support the amendment made to the bill in the Senate. We ask that you strike the amendment and advance the bill as it was originally filed.**

The Hays Trinity Groundwater Conservation District has an excellent staff and board who have been working at a severe disadvantage due to deficiencies in their original enabling legislation. Ensuring SB 2660 passes as originally written without the Senate amendment is a chance to give them the tools they need to equitably address water availability within a district that is experiencing unprecedented growth and development.

SB 2660, as originally filed, would bring the HTGCD's authority in line with the majority of other GCDs in the state, giving it the same tools as neighboring districts. HTGCD is currently only allowed to charge fees for *new water utility service connections*, new well construction, and permit renewal, meaning their main funding mechanism is from drilling new wells.

The original version of SB 2660 would provide the district the authority to impose the greater of a production fee of 38 cents for groundwater pumped from wells in its regulatory area – a fee on par with fees that can be charged by the GCD in the eastern half of Hays County – or of the raw surface water cost charged by river authorities in the district. This provision would allow the charge to account for inflation. Exempt wells and wells used strictly for agriculture would not be charged this fee.

The amended version that passed the Senate drops the production fee to 30 cents per 1,000 gallons from 38 cents and eliminates the provision that would have allowed the fee to keep up with inflation – the raw surface water cost section. The Senate amendment also added Section 8843.152 to the list of sections of Chapter 8843, Special District Local Laws Code to be repealed. The addition of this section to the list of repealed sections would repeal the HTGCD's ability to charge a water utility service connection fee for each new water service connection. The district relies heavily on this section of the code for its revenue and would be severely hamstrung in its ability to carry out its mission and functions.

By dropping the production fee amount, eliminating the measure that would have allowed the fee to match inflation, and repealing a significant source of the district's funding, the amended Senate version of SB 2660 does far more harm to the HTGCD than good. The amended version would kneecap the district, placing the Trinity Aquifer, and the thousands of Texans who rely on it, in a far more precarious position than they are in today.

The bill, as filed, is a good bill and widely supported in Hays County. The Hays County Commissioners Court unanimously voted to support the bill, as did the city councils of Wimberly and Woodcreek. The bill ensured that the rights of Trinity Aquifer users in western Hays County were protected to the same degree as groundwater users in the eastern half.


Background

Water supplies in counties that rely on the Trinity aquifer are facing unprecedented demand. The HTC GD is currently in its highest level of emergency drought stage. Regional stream gauges are recording sustained record low flows, water haulers are at capacity, and the HTC GD and local well drillers are responding to a significant increase in dry-wells and burnt-out well pumps. Trinity aquifer and river conditions are the worst on record in the district's history, including during the 2011 drought.¹

The Trinity Aquifer is "one of the most extensive and highly used groundwater resources in Texas," and its contributing and recharge zones are currently under exceptional and extreme drought classifications, with only a one percent chance of the current drought ending within the next six months.² Regional rainfall forecasts predict below normal conditions, evaporation forecasts predict high rates of evaporative loss, and "thousands of groundwater wells...have seen a drop in their water levels".^{3,4} Texas faces a very real possibility of a severe water shortage in certain parts of the state by 2030 and a large state-wide water deficit by 2070. Meanwhile, Hays County is one of the fastest growing counties in the state and nation.

SB 2660, in its original form, is much needed. We ask that you strike the Senate amendment and advance the bill as it was originally filed.

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



Rachel Hanes, Policy Director

¹ <https://haysgroundwater.com/drought-management/>

² <https://www.expressnews.com/hill-country/article/hays-county-trinity-aquifer-water-drought-20263589.php>

³ <https://www.waterdatafortexas.org/drought>

⁴ <https://www.texastribune.org/2025/03/13/texas-water-explained-supply-demand/>