

May 2, 2025

The Honorable Todd Hunter, Chair
The Honorable Toni Rose, Vice-Chair
The Honorable Members Canales, Gerdes, Harris, Hernandez, Johnson, Leach, Lopez,
Romero, Jr., and Tepper
House Committee on Calendars

Re: House Bill 4313, An Act Relating to the Authority of a Political Subdivision to Use Public Money for an Environmental Project

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 strongly oppose HB 4313 in any form.**

HB 4313 is an exceedingly broad and overreaching bill. Multiple cities and counties in Texas, such as San Antonio, have Climate Action Plans that are popular and supported by their residents. These Climate Action Plans, meant to improve the lives of Texans, would be severely hampered by this bill. Public events, such as San Antonio Parks & Rec's incredibly popular Earth Day during Fiesta, which thousands of residents take part in every year, would likely not be able to occur under this bill, along with similar events in many other Texan cities. Events like these are popular in cities big and small, regardless of political leaning.

While we understand there is not a political consensus on the causes or harms of greenhouse gases or climate change, we would hope that "reducing the amounts of pollutants reaching the environment" would be something all Texans can get behind. Why would we not want to reduce the amount of water pollution, soil or land contamination, or air pollution? Pollutants can be PFAS in fertilizer that contaminates agricultural fields and livestock, toxic algae-causing phosphorus or untreated sewage in rivers, or hazardous materials released from improperly stored chemicals into the air, etc.

City or county grants for projects that help improve soil conditions or mitigate heat island effects would likely be prohibited under this bill, which would negatively impact the quality of Texans' lives. County and city efforts to expand or implement new public transit projects based on the demands of their citizens could also be derailed if they are deemed an "environmental project," even if their main purpose is traffic or congestion mitigation.

Efforts by political subdivisions to carry out environmental or energy efficiency efforts above and beyond statutory requirements in schools, colleges, hospitals, or healthcare facilities – requirements which are currently outdated – would appear to be prohibited. Energy efficiency is a long-term cost saver; not allowing political subdivisions to implement the energy efficiency standards they deem best suited to their residents' needs could end up costing taxpayers or ratepayers more in the long run than simply making the efficiency updates now rather than deferring these improvements. Environmental efforts could include projects such as improving shade conditions at schools or on hospital grounds. Furthermore, schools, hospitals, and healthcare facilities provide for the most vulnerable of Texans. We should encourage any measure that can improve environmental conditions and energy efficiency and lower costs at these facilities.

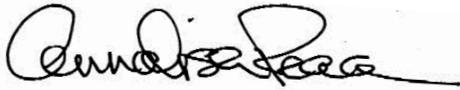
Act Now Comal
Alamo, Austin, and Lone Star chapters of
the Sierra Club
Bexar Audubon Society
Bexar and Travis-Austin Green Parties
Bexar Grotto
Boerne Together
Bulverde Neighborhood Alliance
Bulverde Neighborhoods for Clean Water
Cibolo Center for Conservation
Citizens for the Protection of Cibolo
Creek
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

We do appreciate that the first committee substitute does allow for water conservation or drought contingency measures; flood control, drainage, or water supplies; and engaging in water quality, conservation, or resource management activities. Without these sections, it is highly unlikely San Antonio would be able to implement its Edwards Aquifer Protection Plan under this bill without challenge. The EAPP preserves land critical to groundwater availability and quality; citizens have overwhelmingly approved of the program in four successive ballot measures. Though we hope not to see this bill advance, if it does, it is crucial that these sections remain.

Finally, HB 4313 prohibits a political subdivision from using public money obtained from *any source*, including from a tax, fee, *grant, or donation*. Grants and donations received by political subdivision from outside parties, often for the express purpose of the environmental project, are not funds the local government would likely be free to spend on another project and are funds that have no financial impact on taxpayers or ratepayers. There is no apparent reason to restrict political subdivisions from using grants and donations to implement environmental projects.

This bill is too broad and could handicap and create a chilling effect on local governments who attempt to protect their residents based on the wishes and requests of their residents. **We respectfully ask that you not advance this bill.**

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



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Rachel Hanes, Policy Director
Greater Edwards Aquifer Alliance