

May 2, 2025

Honored Members of the Texas Senate Representing GEAA Members

Re: Senate Bill 1882, An Act Relating to the Imposition by a Municipality of a Moratorium on Property Development in Certain Circumstances.

Honored Members,

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. While we understand the pressing challenges facing affordable housing in this state, GEAA is deeply concerned about the impact SB 1882 will have on the ability of cities to protect the Edwards and Trinity aquifers, their related surface waters, and the Texans who depend on these water sources. **We strongly oppose this bill.**

We believe that this bill is too far-reaching and broad and could have many outsized impacts, both on local control issues and on surface and groundwater protection, especially in the Edwards and Trinity aquifer region. **We hope that you will vote no on SB 1882. If this bill does advance, however, we hope to see substituted language or amendments that ensure the ability of cities to continue to be able to protect the Edwards and Trinity aquifers on which more than 2 million Texans depend.**

SB 1882 would greatly limit a city's ability to protect water resources and ensure adequate infrastructure capacity. Moratoria are a valuable tool which allow local governments time to appropriately analyze and plan for infrastructure needs and for the impacts of new development. Moratoria protect residents from water shortages or issues in capacity at essential water and wastewater facilities. Why would we want to place residents in harm's way in this manner?

More than 2 million people rely on the water supplies of the Edwards and Trinity aquifers – karst limestone aquifers that are highly susceptible to pollutants and contamination from stormwater runoff. The springs and spring-fed rivers of these two aquifers are also major economic drivers for the regional economy. These aquifers are recharged by surface waters and stormwater that flow through the Texas Hill Country into the Edwards Aquifer Recharge Zone. The quality and availability of water in the aquifers is directly correlated to the quality and availability of surface water and stormwater that flows through the Hill Country.

Some of the fastest growing counties and cities in the state, and the nation, are located along the I-35 corridor and over portions of the Edwards and Trinity aquifers. These two aquifers are both in emergency drought stages, and the Edwards has recently reached its lowest level since 1990. Much of the region – i.e., the Hill Country – is under Exceptional Drought, 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”.^{1,2} 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.

¹ <https://www.waterdatafortexas.org/drought>

² <https://www.texastribune.org/2025/03/13/texas-water-explained-supply-demand/>

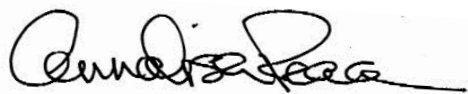
Act Now Comal
Alamo, Austin, and Lone Star chapters of
the Sierra Club
Bexar Audubon Society
Bexar and Travis-Austin Green Parties
Bexar Grotto
Boerne Together
Bulverde Neighborhood Alliance
Bulverde Neighborhoods for Clean Water
Cibolo Center for Conservation
Citizens for the Protection of Cibolo
Creek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

Water supplies in counties that rely on the aquifers are facing unprecedented demand; in Comal County, Texas Water Company recently had to deny service to nine developments due to a lack of water supply. Cities need enhanced tools to handle water quality and availability concerns in the region, not a rollback of existing tools and authorities.

It is admirable that this legislature is working to increase housing affordability in Texas, and many good bills have been discussed and advanced this session (find out more about GEAA's recommendations for housing and aquifer protection at the footnote below.³) This bill, however, is too broad and would likely not lower housing costs in the region. Many of the homes being built in the Hill Country and on the western side of the I-35 corridor are not affordable and likely would remain unaffordable even if such statutes are rolled back. The land itself is simply too expensive.⁴ The median home price in Hays, Comal, and Kendall counties range from \$396,160 to \$579,900, with many homes listed for far more than \$750,000.⁵

City residents and officials want to ensure their government's authority is not rolled back and their water supplies remain protected. We should be working to enhance the authority of cities in the Hill Country or over the Edwards Aquifer to protect critical water supplies, not rolling it back. The conditions of our ground and surface water supplies in the region, and the Texans who rely on them, need ongoing, rigorous protection. **Please vote no on SB 1882.**

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



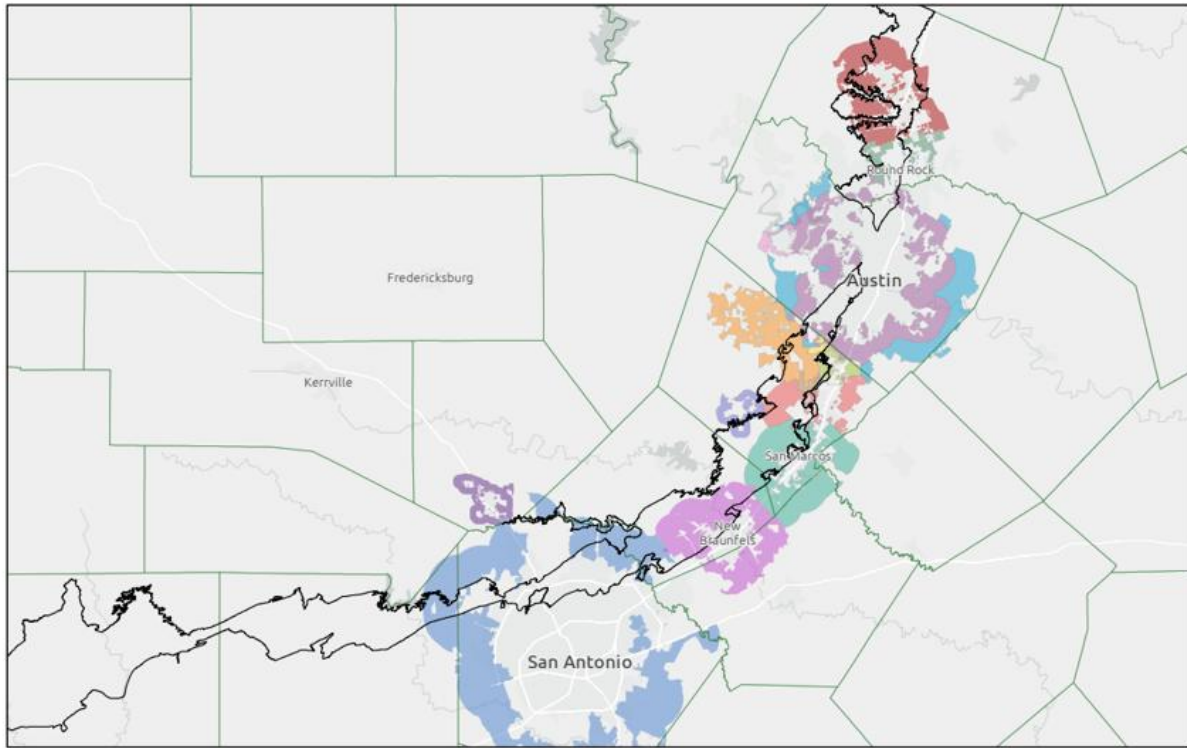
Rachel Hanes, Policy Director

³ <https://aquiferalliance.org/wp-content/uploads/2025/01/GEAA-Housing-and-Water-Concerns-in-the-Hill-Country-2.3.24.pdf>

⁴ <https://trerc.tamu.edu/wp-content/uploads/2024/12/2268-3Q2024.pdf>

⁵ <https://www.redfin.com/county/2685/TX/Comal-County/housing-market>; <https://www.redfin.com/county/2744/TX/Hays-County/housing-market>; <https://www.redfin.com/county/2769/TX/Kendall-County/housing-market>

ETJs and the Edwards Aquifer Recharge Zone



5/3/2024

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|-------------------------------|----------------------|-------------------|-------------------|-----------------|
| Edwards Aquifer Recharge Zone | AUSTIN 5 MILE ETJ | HAYS ETJ | WIMBERLEY ETJ | SAN ANTONIO ETJ |
| Texas County Boundaries | BUDA ETJ | LAKEWAY ETJ | BOERNE ETJ | ROUND ROCK ETJ |
| | AUSTIN 2 MILE ETJ | MOUNTAIN CITY ETJ | GEORGETOWN ETJ | |
| KYLE ETJ | DRIPPING SPRINGS ETJ | SAN MARCOS ETJ | NEW BRAUNFELS ETJ | |



1:1,321,217

0 10 20 40 mi
0 15 30 60 km

Texas Parks & Wildlife, CONANP, Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, NPS, USFWS

Rachel N Hanes