Greater Edwards Aquifer Alliance

Member Organizations

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

PO Box 15618
San Antonio, Texas 78212

May 1, 2025

The Honorable Members of the Delegation Representing GEAA Members

Re: House Bill 2347, An Act Relating to the Adoption of a Water Conservation Program by Certain Counties

Honorable 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. We strongly support House Bill 2347.

Water conservation is the lowest-cost water supply measure and is critical to ensuring Texas' water future, yet counties are generally unable to adequately manage water usage and conservation. Counties are not authorized by statute to be able to require water conservation plans or programs. This means that unincorporated areas of counties, and often the extraterritorial jurisdictions of municipalities, do not have any water conservation programs.

Much of the Edwards and Trinity aquifer 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] The state 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, the majority of population growth along the I-35 Corridor and within the Hill Country is occurring within unincorporated areas. For example, in the Hill Country, the population in the unincorporated areas of counties has grown by 103% overall since 1990: unincorporated areas in Bandera, Bexar, Blanco, Comal, Hays, Kendall, Kerr, Gillespie, and Travis counties have grown 137, 81, 104, 176, 195, 176, 55, 50, and 98 percent, respectively. In some of these counties, the vast majority of the population lives in unincorporated portions of the county.[3] What this means is that large portions of the Hill Country's population are not required to mitigate their impact on the region's water supplies.

This increasing population growth, while it no doubt has many economic benefits, places great strain on the region's aquifers, which are already at record or near record lows. The Hill Country's critical aquifers cannot be sustained without further water conservation efforts undertaken by all who reside in the region.

Furthermore, much of the charm and attraction of the Hill Country lies in its unique landscapes and ecology. The "natural" Hill Country lands do not need much, if any, landscape irrigation. Yet, studies consistently show that between 30 and 60 percent of residential water use is for outdoor water purposes, much of which is not effectively utilized,

[1] https://www.waterdatafortexas.org/drought
[2] https://www.texastribune.org/2025/03/13/texas-water-explained-supply-demand/
[3] https://hillcountryalliance.org/wp-content/uploads/State_of_the_Hill_Country-Network_REPORT_2022.pdf

and the Hill Country is no outlier.[4] Some unincorporated areas of the Hill Country have also been shown to use far more water than their counterparts within municipal boundaries.[5] Counties need more tools to ensure responsible water use within their jurisdiction in order to protect vital water supplies.[6] More than 2 million people, including those within the Hill Country Priority Groundwater Management Area, rely on the Edwards and Trinity aquifers.

Water conservation plans are a low-cost, high-reward, and simple way to reduce water use.[7] As you work this session to address the state's many water challenges, we urge you to support HB 2347. Thank you for your consideration, and please consider GEAA as a resource that is at your disposal.

Annalisa Peace
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Greater Edwards Aquifer Alliance

Rachel Hanes
Policy Director
Greater Edwards Aquifer Alliance

[4] https://www.twdb.texas.gov/publications/reports/technical_notes/doc/SeasonalWaterUseReport-final.pdf; https://19january2017snapshot.epa.gov/www3/watersense/pubs/outdoor.html
[5] https://hillcountryalliance.org/wp-content/uploads/State_of_the_Hill_Country-Network_REPORT_2022.pdf
[6] https://aquiferalliance.org/wp-content/uploads/2023/07/Full-Report_County-Tools-Report.pdf
[7] https://texaslivingwaters.org/water-conservation/