

July 31, 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

To: The Honorable Members of the Texas Legislature

**Re: Senate Bill 12, Relating to the Use by a Political Subdivision of Public Funds
for Lobbying Activities**

The Greater Edwards Aquifer Alliance (GEAA) is a nonprofit organization dedicated to the protection and preservation of the Edwards and Trinity aquifers, their springs, watersheds, and the Texas Hill Country that sustains them. Our alliance has 62 member groups across 21 counties in the Texas Hill Country region. We work in this field to ensure the protection of the health, safety, and welfare of all those who rely on these sources of water.

SB 12 would prohibit cities and counties from using their public funds to pay a lobbyist to represent the concerns and interests of these local governments and of their residents at the Legislature and would prevent them from being able to join a nonprofit state association that could help them represent their interests.

Cities and counties in Texas, especially smaller or more rural communities, are already extremely limited in time, resources, technical expertise, and staff. Facing short, biannual legislative sessions that result in over 10,000 bills -- many of which would significantly impact cities, counties, and their residents if passed -- local governments need to be as best equipped as possible to represent their communities. Being able to hire lobbyists to represent the best interests of their residents and being able to join associations that can provide resources, guidance, and assistance during the legislative session ensures that all Texans have a greater opportunity to have their voices heard at the Legislature.

GEAA regularly works with city governments, county governments, and citizens across the Texas Hill Country. We see every day the constraints facing these communities. Texans expect that their local governments will advocate on their behalf for their best interests. We need to continue to ensure cities and counties are able to do just that.

For further information, we have enclosed the Sierra Club Lone Star Chapter's comments, which we wholeheartedly endorse, against this bill.

We respectfully ask that you do not pass Senate Bill 12 or any of its companion bills. Texans deserve to have their voices heard and to have their local governments be represented in the decision-making process. Senate Bill 12 will not protect Texan taxpayers, rather it will limit a significant avenue in which taxpayers may have their interests represented at the Capitol.

Thank you for your consideration, we look forward to working with you on this issue.



Annalisa Peace
Executive Director



Rachel Hanes
Policy Director



SIERRA CLUB

LONE STAR CHAPTER

To: The Honorable Bryan Hughes, Chair

Members, Senate Committee on State Affairs

From: Cyrus Reed, Sierra Club, Lone Star Chapter, cyrus.reed@sierraclub.org, 512-888-9411

July 22nd, 2025

SB 12 by Middleton (Relating to the Use by a Political Subdivision of Public Funds for Lobbying Activities) Is Mean-Spirited and Bad Public Policy

SB 12 is mean-spirited and bad public policy. In Texas, as you know the Legislature only meets in general for 140 days on odd numbered years, and then on occasion, like today in special session for 30 days. During that time, thousands of individuals, organizations and lobbyists which represent them do their best in a short amount of time to follow the legislative process, propose legislative solutions and represent their position as best they can. As an example, Sierra Club uses our staff and volunteers to represent our positions, but at times has hired outside lobbyists on particular issues where we may lack knowledge or expertise.

Last legislative session there were well over 10,000 bills, resolutions and constitutional amendments. Many of these directly impacted city and county government, and many pieces of legislation are designed specifically to remove or impact the power of local government. In 2023, for example, there was the so-called “death star” bills to take away cities' rights to regulate issues in various codes unless expressly granted by the legislature, and others which seek to limit cities ability to regulate sources of energy. It would be ludicrous to think that every county in Texas or every city in Texas could cover these issues individually, without the use of associations or outside lobbyists.

This past legislative session there were also many bills to allow gas and electric utilities to charge “interim” rates that many cities were concerned about. Because cities have to protect their citizens from high rates, having those cities at the table as those legislative proposals are discussed is key and important.

Yet SB 12 would say that a city or county can not use public funds either to pay individual lobbyists to represent them or even public funds for the associations that represent cities and counties.

Think about it. The Legislature only meets every other year for 140 days, and cities and counties would have to rely on their elected officials or particular departments to come to the capitol to represent them? How can small cities and counties adequately make their issues known when they do not have extra staff to travel to Austin and follow the complex, and fast-moving pace of the legislative session?

Lobbyists are hired because they have expertise about the legislative process and can effectively represent the interests of individual cities. Associations have staff that have experience with the legislative process and have relationships with elected officials at the legislature. These relationships are invaluable so the interests and positions of cities can be known.

Business and private interests have the ability to hire literally dozens of people and are also represented by associations. Last session, AECT had nine lobbyists, while member companies Oncor had 27, CenterPoint Energy 22, AEP 4, and Vistra 37. TXOGA and TIPRO routinely hire lobbyists, as do the individual oil and gas companies that are members of these associations.

Entity	Oncor	Center Point Energy	AEP	AECT	NRG	VISTRA	TXU
2025 Lobby Team	27	22	4	9	18	37	38

Source: Texas Ethics Commission

Our laws are better and our legislative process is better when everyone is at the table and when cities and counties can be well represented. Even laws passed that have limited the power of cities - like HB 40 (Darby) regarding oil and gas regulation - was improved because cities and their associations could count on professional staff and outside lobbyists to help create good compromise.

Should cities and counties have a public process to adopt their legislative priorities, with input from local citizens? Absolutely. Should contracts with associations and lobby firms be public so citizens can know who is representing their city or county? Absolutely. Should decisions about spending public money on lobbyists or associations be adopted publicly with the chance for the public to weigh in if they disagree? Yes. Should the legislature consider eliminating some expenses like cities paying for trips for legislators or buying lunches? Sure

But passing a law to prevent cities and counties from the right to defend their own interests with professional, knowledgeable lobbyists, or associations is an infringement of their right to free speech and to be well represented. It will also lead to worse public policy outcomes if the city and counties don't have a real seat at the table.

