

April 21, 2025

The Honorable Gary Gates, Chair
The Honorable Suleman Lalani, Vice-Chair
The Honorable Members Alders, Davis, Hinojosa, Hunter, Lopez, Morgan, Virdell
House Committee on Land & Resource Management

Re: House Bill 3798, An Act Relating to Municipal Regulation of the Removal of an Ashe Juniper Tree

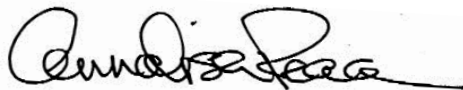
The [Greater Edwards Aquifer Alliance](#) (GEAA) appreciates the opportunity to submit these comments on behalf of our sixty-two member groups that are allied in advocacy for the preservation of our ground and surface water resources in twenty-one counties within Central and South Texas. While we value and respect private property rights, GEAA is deeply concerned about the impact HB 3798 will have on local control, environmental protections, and sensitive endangered-species habitat. We align with Joint Base San Antonio and Audubon Texas and oppose this bill.

HB 3798 would prohibit cities from regulating the removal of ashe juniper trees, which are native species integral to the protection of the endangered Golden-cheeked Warblers and to aquifer protection. Ashe juniper trees are part of a broader ecosystem; they support many other types of wildlife, help prevent soil erosion, and support healthy watersheds. The unregulated clearing of ashe junipers could lead to long-term ecological damage.

Cities often have tree preservation ordinances in place to protect ecologically sensitive areas. HB 3798 would override a significant portion of these local protections, making it easier for developers – many of whom are from out of state – to clear-cut critical habitats. If this bill passes, it could pave the way for future rollbacks of environmental protections critical to the Edwards and Trinity aquifer region; future bills could expand exemptions, allowing further destruction of sensitive habitats.

In San Antonio, the city's tree ordinance only applies to subdivision developers, not to homeowners or agricultural lands. If the city's authority is preempted, which this bill would do, the city's ability to protect ashe juniper habitats from encroachment would be exceedingly limited. An exemption for ashe junipers from tree preservation ordinances increases the potential for misuse of San Antonio's development code. The city's ability to regulate the removal of ashe juniper trees is critical. It protects JBSA-Camp Bullis from excessive Golden-cheeked Warbler populations, protects the campus from excessive light from developments, protects surrounding development from noise from the campus, helps keep San Antonio within its ozone standards attainment levels, helps prevent soil erosion, and supports the watershed.

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

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