

April 10, 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  
Cibola Center for Conservation  
Citizens for the Protection of Cibola 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  
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The Honorable Charles Perry, Chair, *Senate Committee on Water, Agriculture, & Rural Affairs*

**Re: Senate Bill 1669, An Act Relating to the Regulation of Stormwater Management by Certain Counties**

Dear Chairman Perry,

I want to thank you on behalf of the Greater Edwards Aquifer Alliance and our 62 member groups for all your work this session to advance much-needed solutions to Texas' water concerns. As part of this work, I wanted to gauge your interest in hearing [Senate Bill 1669](#) in the Senate Committee on Water, Agriculture, & Rural Affairs. This bill, though simple and narrow in scope, would be greatly beneficial to the millions of people who rely on the Edwards and Trinity aquifers.

Over the past few years, many residents in the fastest-growing areas of the Hill Country have raised concerns about groundwater quality and flooding. Elected officials and county residents alike want to see more being done to protect the quality of their water supplies and to protect their counties from floods. Hays County has passed a resolution in support of SB 1669, and Comal County commissioners have written their support of the companion bill, HB 4135, which was heard in House Natural Resources yesterday and was favorably received. These counties should not have to wait a minimum of two more years, if not longer, before they have the appropriate tools to protect their residents from flooding and water quality risks. SB 1669 would provide counties in the Hill Country PGMA and over the Edwards Aquifer with those tools.

SB 1669 is not a broad expansion of county authority; it is limited in scope and restricted only to those counties in which stormwater runoff can significantly impair the quality of critical Central Texas groundwater supplies. Furthermore, the section of code the bill would amend provides an optional authority; counties who are granted this enhanced tool are not obligated to exercise it. If a county chose to adopt this enhanced authority, they would be required to develop a Stormwater Management Program (SWMP), which could be a collaborative process allowing for input and coordination. We have heard from county officials that any cost to the county in developing and implementing this SWMP would be more than offset by the savings that arise from preventing and mitigating flooding impacts and water quality impacts. This change does not create an additional permit for subdivision developers, highway projects, or similar projects, and does not impose a cost to the state or require state funding.

The ability to implement appropriate levels of stormwater management is crucial to protecting the quality of groundwater supplies and the safety of residents in this region. Residents of counties over the Edwards Aquifer or within the Hill Country PGMA expect their local governments -- regardless of whether it is the city or county -- to protect the quality of critical groundwater supplies. We have heard from multiple county officials and from residents who would like to see this bill pass in order to protect their groundwater supplies from contamination and to protect residents from flooding. As such, I would like to ask you to consider hearing this bill in your committee this session.

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



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[Greater Edwards Aquifer Alliance](#)



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[Greater Edwards Aquifer Alliance](#)

## **Background**

The counties between Bexar and Travis along the I-35 corridor and their neighboring Hill Country counties are some of the fastest growing in the state and nation. As population growth and development increases in the region, so too do the risks to water quality from contaminated stormwater runoff. The Edwards and Trinity aquifers are at just as much risk, if not currently more, from contamination from polluted stormwater in Comal, Hays, Kendall, and Williamson counties as they are from polluted stormwater in Bexar and Travis counties. These fast-growing counties also happen to lie in Flash Flood Alley. As development increases, county residents are also at ever greater risk from the impacts of flooding.

Counties are not authorized to implement all the regulatory requirements necessary to protect water quality from stormwater runoff impacts or to mitigate flooding. The exceptions to this general restriction on counties are those counties – Bexar, Harris, and Travis – granted explicit legal authority to implement stormwater management and pollution prevention programs under Title 13 Chapter 573 of the Texas Local Government Code. Counties with this enhanced authority may implement their SWMPs to account for stormwater impacts county-wide, which can ease planning and management efforts, reduce confusion, and better protect groundwater quality and mitigate flooding.

Bexar and Travis counties are granted this enhanced ability to manage stormwater due to their size and their location over the sensitive Edwards Aquifer in order to protect critical groundwater supplies. Nonpoint source pollution, such as contaminated stormwater runoff, is currently the leading cause of water quality degradation in the United States. Hill Country residents have emphasized that it will not matter much if the region has the appropriate levels of supply if that supply is contaminated.

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 and the Edwards Aquifer Contributing Zone into the Edwards Aquifer Recharge Zone. Much of the Edwards Aquifer Contributing Zone overlies the recharge zone of the Trinity Aquifer; the two aquifers are closely interconnected. The quality of water in the aquifers is directly correlated to the quality of surface water and stormwater that flows through the Hill Country. If polluted stormwater enters the aquifers, it can flow rapidly through the aquifer system, making it exceedingly difficult to respond to the pollution and mitigate its impacts.

The Edwards Aquifer does not begin and end in Bexar or Travis County, nor does Flash Flood Alley. To protect the karst aquifer groundwater supplies in Central Texas upon which millions rely and to protect many of those millions from the impacts of flooding, counties overlying the Edwards Aquifer or within the Hill Country Priority Groundwater Management Area should be granted enhanced authority to implement stormwater management efforts.