

Alamo Group of the Sierra Club
Aquifer Guardians in Urban Areas
Austin Regional Sierra Club
Bexar Audubon Society
Bexar Green Party
Boerne Together
Cibolo Nature Center
Citizens Allied for Smart Expansion
Citizens for the Protection of Cibolo Creek
Environment Texas
First Universalist Unitarian Church of
San Antonio
Friends of Canyon Lake
Friends of Government Canyon
Fuerza Unida
Green Party of Austin
Hays Community Action Network
Headwaters Coalition
Helotes Heritage Association
Helotes Nature Center
Hill Country Planning Association
Guadalupe River Road Alliance
Guardians of Lick Creek
Kendall County Well Owners Association
Kinney County Ground Zero
Medina County Environmental Action
Association
Northwest Interstate Coalition of
Neighborhoods
Preserve Castroville
Preserve Lake Dunlop Association
San Antonio Audubon Society
San Antonio Conservation Society
San Geronimo Nature Center
San Geronimo Valley Alliance
San Marcos Greenbelt Alliance
San Marcos River Foundation
Santuario Sisterfarm
Save Barton Creek Association
Save Our Springs Alliance
Scenic Loop/Boerne Stage Alliance
Securing a Future Environment
SEED Coalition
Solar San Antonio
Sisters of the Divine Providence
Smart Growth San Antonio
Texas Water Alliance
West Texas Springs Alliance
Wildlife Rescue & Rehabilitation
Wimberley Valley Watershed Association

PO Box 15618
San Antonio, Texas 78212
(210) 320-6294
www.AquiferAlliance.org

November 15, 2011

Comments to the City Council
City of New Braunfels

Re: Regional Transportation Plan

Dear Mayor Pospisil and City Council of the City of New Braunfels,

On behalf of the fifty member organizations of the Greater Edwards Aquifer Alliance, our Board of Directors, and our many individual members, we urge you to approve the Regional Transportation Plan submitted to you today.

As the product of an inclusive process that engaged expert planners from the City of New Braunfels, the City of Seguin, the Texas Department of Transportation, as well as input from citizen stakeholders, we believe that the plan reflects a rational consensus, and should be approved without amendment. The Regional Transportation plan, as submitted, adequately addresses the planning for transportation infrastructure needed to accommodate economic development and projected growth while being mindful of the necessity to preserve the watersheds and riparian areas that make your region so special. We were delighted that the City's Planning and Zoning Commission voted to approve this plan without amendments, and urge you to do the same.

The City of New Braunfels, as a managing partner of the Edwards Aquifer Recovery Implementation Program (EARIP), has committed significant financial resources to the protection of the endangered species at Comal Springs. Measures to preserve the species, however, could be severely and permanently compromised by any plans, such as the creation of the proposed New Braunfels Outer Loop, that promote residential and commercial development within the fragile Edwards Aquifer Recharge Zone.

The Expert Science Subcommittee of the EARIP, on page 22 of their December 28, 2009, report entitled *Analysis of Species Requirements in Relation to Spring Discharge Rates and Associated Withdrawal Reductions and Stages for Critical Period Management of the Edwards Aquifer*, states "[w]ater quality encompasses a range of variables that can potentially impact fountain darters and other aquatic life if altered too far from the historic range to which the stream inhabitants have become accustomed. Most potential water quality problems are linked to nonpoint source pollution such as fertilizer runoff and chemicals washed in from adjacent streets; ... The potential for accidents and nonpoint source pollution to affect the organisms in the Comal River may be exacerbated

during below average flows since chemicals and nutrients would be less diluted when a lower volume of water is present."

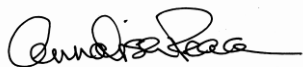
According to the report of the Water Quality Subcommittee of the EARIP, "Water quality impacts can be expressed in a variety of ways. For example, impacts, such as sedimentation, resulting from stormwater runoff directly into the spring or stream habitats used by covered species could actually reduce the extent of suitable habitat areas. Some of those direct impacts, particularly to the extent that they originate within the riparian areas adjacent to the habitat areas, are addressed in the report entitled "Restoration and Mitigation Actions for the Comal Springs Ecosystem" ¹ produced by the Ecosystem Restoration Subcommittee."

"As illustrated by the water quality data previously presented to the EARIP by George Rice, runoff and spills originating even at long distances from the spring openings also can affect water quality at the springs. Fortunately, water quality in the Edwards Aquifer and at the spring openings remains very good. However, as levels of development continue to increase over the recharge zone, transition zone, and even the contributing zone, the threats to water quality will increase."

We therefore urge you to keep in mind the potential impacts on water quality when considering plans for development over the Edwards Aquifer Recharge and Contributing zones within your jurisdiction. This includes plans for transportation infrastructure.

We have been impressed with the resources that the City of New Braunfels has devoted to stormwater management, transportation planning, and the protection of the Comal Springs. We sincerely urge you to build upon these initiatives by approving the Regional Transportation Plan as approved by the City of New Braunfels Planning and Zoning Commission on November 15th and submitted to you today. And, we hope that you will consider the Greater Edwards Aquifer Alliance as a resource that is at your disposal as you continue to plan for growth while sustaining the water and natural resources that make the City of New Braunfels one of the most desirable locations in the State of Texas.

Sincerely,



Annalisa Peace
Executive Director