Statement for City of New Braunfels Planning and Zoning Commission Meeting
January 6, 2009 - Agenda Item 5C

Dear New Braunfels Planning and Zoning Commissioners:

These comments are made on behalf of the 45 member organizations of the Greater Edwards Aquifer Alliance (GEAA). The Alliance represents citizen organizations and individuals who have a deep and abiding interest in protecting and preserving the quality and quantity of water flowing from Edwards Aquifer wells and springs.

The Estates at Stone Crossing is located fully within the Edwards Aquifer Recharge Zone, designated one of the most environmentally vulnerable regions in the state. In the interest of preserving and protecting the Aquifer, we urge you to deny or postpone this request for approval of the plat for the Estates at Stone Crossing as it is currently presented.

The Estates at Stone Crossing development's impervious coverage is estimated to be about 32 percent. Research\(^1\) shows that impervious cover that exceeds 12% - 20% results in significant impairment to surface water quality by generating pollutants that are carried in stormwater runoff into our water source, the Edwards Aquifer. Even modest levels of impervious cover could increase pollutant loads by 5 to 12 times that of an undeveloped site. GEAA recommends that impervious cover on developments within the Edwards Aquifer Recharge Zone be restricted to 15% or less, or that specific Low Impact Development techniques, which are more comprehensive in their value in protecting water quality than the engineered water quality abatement remedies currently required under state law, be employed to mitigate negative impact to water quality.

The proposed plat for The Estates at Stone Crossing includes land designated for C-1A use, which allows for a variety of non-residential uses that could significantly damage our water source. Some of these uses include: auto inspection and repair; battery station; cleaning, pressing, and dyeing; dry cleaning; and printing shop. Regardless of how stringent the development's plans for pollution abatement are, research and past experience show that allowing high impact commercial use of property located on the Recharge Zone will contribute to water pollution.

Due to the environmental sensitivity of this site, I urge you to either deny this request for approval of the plat for the Estates at Stone Crossing, or to postpone approval until such time as it can be revised to lessen potential negative impacts on the Edwards Aquifer. Options for mitigating adverse impacts on the Aquifer include Low Impact Development techniques, offsets of developed land with park land or other open space to reduce cumulative impervious cover, and revision of permitted uses prohibiting the abovementioned commercial uses that pose a hazard to water quality. We would be happy to work with you and the developer to address these issues. Thank you for this opportunity to present these comments.

Respectfully,

Annalisa Peace
Executive Director

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