



Member Organizations

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
Headwaters at Incarnate Word
Hays Community Action Network
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
Leon Springs Business Association
Lone Star Chapter of Sierra Club
Medina County Environmental Action Association
Native Plant Society of Texas – SA
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
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
Texas Water Alliance
Travis County Green Party
West Texas Springs Alliance
Water Aid – Texas State University
Wildlife Rescue & Rehabilitation
Wimberley Valley Watershed Association

PO Box 15618
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August 13, 2015

Steven J. Raabe
Administrative Agent for Region L
San Antonio River Authority
P.O. Box 839980 San Antonio, Texas 78283-3692

Dear Mr. Raabe,

Please accept these comments on the Region L Plan on behalf of the 51 member organizations of the Greater Edwards Aquifer Alliance. The Greater Edwards Aquifer Alliance (GEAA) promotes effective broad-based grassroots advocacy for aquifer protection throughout the 21 county Edwards Aquifer region. GEAA works with 51 member organizations to build statewide support for conservation and sustainable management of our water resources. Our overall goal is to protect the Edwards and Trinity aquifers, contributing watersheds, and the flora and fauna, history and culture of the Texas Hill Country.

It is the consensus of our member organizations that the citizens of our region will be best served by a Plan that recognizes the need to conserve and preserve our regional water resources. We echo the comments, to follow, of Dianne Wassenich, our representative on the Region L Planning Group.

Thank you for the opportunity to submit these comments.

Sincerely,

Annalisa Peace
Executive Director

REGION L COMMENTS 6/10/15

Dianne Wassenich, I represent the Public on Region L, and I am staff for SMRF, a 30 year old nonprofit that works to preserve public access and protect the flow, natural beauty and purity of the SM River, its watershed and estuaries for future generations. So I view the Region L plan knowing that we are all served best by caring for our rivers and aquifers so that our water supplies are stable, for our public health, our economic health and for wildlife and our own quality of life as well. I thank the technical consultants, the administrative staff of Region L and our chair Con Mims for doing a herculean job in preparing the many pages of this plan, and managing a very large planning group through the years of work on it. I however have trouble supporting it in its current form for 10 reasons.

1. The extreme redundancy of the long “dream list” of recommended water projects is a problem. They may not have customers, or several projects serve the same customer or the same need. If Region L is just supposed to rubber stamp any scheme that anyone comes up with, then that is not planning. It is a waste of money to fund Region L and spend all these hours going to meetings if the group is not planning. We should be determining which projects are really needed, and when. To just throw in any project that anyone can dream up, just to be sure it is “in the plan” in order to get funding at any time that the dreamer wants it, is not planning.
2. The place for projects that are not suitably fleshed out yet is in the alternative category. And that goes especially for the Recommended projects that have 0 yield listed, because they can't get permits from groundwater districts that are trying to keep from exceeding their Managed Available Groundwater. There is no logic to recommending 0 yield projects.
3. Piping water long distances from rural counties to enable paving over our central Texas cities' aquifer recharge zones is such a serious problem that anyone should recognize it, and Region L should not approve it in the Plan.

Recommendations for development off of recharge zones should be part of any acceptance of plans to pipe water around. This growth explosion in inappropriate areas is a classic California water practice that has mined rural aquifers there, drying up rivers and farms, and we should be smart enough learn from their terrible blunders.

4. The environmental assessment is purposely very broad and uses methods that are designed to show little difference in taking more water from our rivers, which does impact our bays and estuaries.

But everyone knows there are serious problems down there at the coast, and long hours were spent at BBEST and BBASC meetings to narrow down how much flow is needed in our rivers and bays. We have waited so long to acknowledge the problem that some species can barely be found any more to study them.

Those BBEST/BBASC efforts are ignored in the way the environmental assessment is done in Region L. The assessment is an afterthought rather than looking at what the bays need and finding ways to provide that through the water planning process.

5. And that leads me to the two new GBRA lakes planned, Lower and MidBasin. Lakes which evaporate water from the very river system that already does not have enough water for years at a time to spare for the bays and estuaries, in our semi-arid climate. Lakes are a damaging and outdated type of water project, just digging the hole deeper that we are already in. Climate change is already here and we have to stop building the old, and look to the new ways of providing water. So I strongly support the ASR projects and reuse and water conservation projects in this plan.

6. I believe brush removal to create water supplies could cause us water quality and quantity problems in the long run and we need careful and selective brush management instead, creating healthy water catchments.

7. The way that demand or need is determined, by asking how much everyone thinks they will need, is not appropriate as a basis for the plan.
8. I support the Unique Stream Segments portion of the plan and support adding to those in the future, though sadly it is largely symbolic because of the conditions added to the language.
9. We need to consider the conflicts of interest that exist in almost all the regional planning groups, using the firms that want to build the projects to guide the planning process, and discuss those conflicts openly.
10. Rainwater harvesting needs to be emphasized more, it could meet the needs of a lot of aquifer recharge zone residents, and less trenches would then be blasted and sawed into the recharge zone for pipelines.