

November 17, 2011

Comments Re: Regional Transportation Plan

As the product of an inclusive process that engaged expert planners from the cities of New Braunfels and Seguin, Texas Department of Transportation, and citizen stakeholders, the Regional Transportation Plan reflects a rational consensus that should be approved without amendment. This Plan, as submitted, addresses planning for transportation infrastructure needed to accommodate economic development and projected growth while recognizing the necessity to preserve the rivers and springs that make this region so special.

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. Efforts to preserve the species, however, could be severely and permanently compromised by any plans, such as the proposed New Braunfels Outer Loop, that promote development within the Edwards Aquifer Recharge Zone.

The EARIP Expert Science Subcommittee, on page 22 of their December 28, 2009, report, 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, "As illustrated by the water quality data previously presented to the EARIP, 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."

"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" produced by the Ecosystem Restoration Subcommittee."

The resources that the City of New Braunfels has devoted to storm water management, transportation planning, and the protection of Comal Springs are truly impressive. We therefore urge the City of New Braunfels to keep in mind potential impacts on water quality when considering plans for transportation infrastructure. We hope that you will continue planning for growth with the goal of sustaining the springs and riparian habitat

that make the City of New Braunfels one of the most desirable locations in the State of Texas.

Annalisa Peace is the Executive Director of the Greater Edwards Aquifer Alliance, which unites 50 organizations within 21 counties in Central Texas behind a comprehensive plan to protect the Edwards and Trinity aquifer ecosystems.