

January 19, 2017

**Re: Item # 29.** An Ordinance authorizing an Interlocal Agreement between the City of San Antonio and Bexar County for the implementation of the Southern Edwards Plateau-Habitat Conservation Plan (SEP-HCP); appointing members to its Coordinating Committee; and appropriating \$175,000 from the Development Services Fund.

The members of the Greater Edwards Aquifer Alliance strongly urges you not to approve this Interlocal Agreement or, to postpone the item and go back to the drawing board to come up with an agreement that includes some citizen participating in making decisions, and which protects Prop 1 Funds from being used to subsidize development.

The Interlocal Agreement should specify an administrative framework to receive public input to inform the adaptive management and planning for this HCP. Due to the significant public funding, a Citizens Advisory Committee with public meetings should be required in addition to a Science Advisory Committee. Regularly scheduled meetings of the scientific and citizen advisory committees should be a required part as part of the agreement or, at the least, significant citizen representation should be added to the membership of the Coordinating Committee.

It is proposed that the SEPHCP will be administered by the City of San Antonio and Bexar County. We recommend that the SEP HCP would greatly benefit from a third party administrator, such as an independent non-profit or an environmental regulatory agency which is unaffiliated with the City or County. We recommend that the SEPHCP administrator should be an independent agency or non-profit entity, affiliated with but not directly managed by the Permittees. Any plans by the Plan Administrator to outsource program management to a nonprofit or other entity should be detailed in the Interlocal Agreement. Given the lack of transparency evident throughout this process, it is asking a lot of the public to accord approval of details as yet unspecified as to the administration of the SEPHCP to a Management Committee that lacks any meaningful opportunity for public participation.

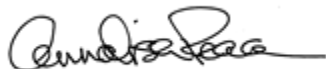
GEAA would strongly object to the use of properties previously secured through purchase with Proposition 3 and Proposition 1

funds, or of lands contiguous to Government Canyon that are controlled by the State, to mitigate take for covered species unless 100% of the purchase price is remitted to the Prop 1 fund. The Citizen's Advisory Committee for the Southern Edwards Plateau Habitat Conservation Plan clearly provided direction that this alternative was not acceptable. The prospect of using land secured through sales taxes collected from the citizens of the City of San Antonio for the explicit purpose of protecting the Edwards Aquifer to mitigate additional high density development within the sensitive zones of the Edwards Aquifer is a betrayal of the public trust and an abuse of the intent of Propositions 3 and 1.

If, however, future properties were identified that were suitable for protection under the City of San Antonio's Edwards Aquifer Protection Plan and as mitigation land for the SEPHCP, consideration for utilizing both funds for the preservation of such property might make sense. Given that preservation was consistent with the goals of both initiatives, we would have no objection to consideration, on a case by case basis, of the use of complementary funding from both sources for mitigation of land eligible for funding under both programs.

Should you chose to approve this Interlocal Agreement as presented today, you are risking public confidence in one of San Antonio's most progressive and effective environmental programs, as well as missing a great opportunity to insure that this Habitat Conservation Plan is well managed for the benefit of the citizens of San Antonio and Bexar County.

Thank you,

A handwritten signature in black ink, appearing to read "Annalisa Peace". The signature is fluid and cursive, with a long horizontal stroke at the end.

Annalisa Peace  
Executive Director