

Alamo, Austin, and Lone Star chapters of the Sierra Club
Bexar Audubon Society
Bexar Green Party
Boerne Together
Bulverde Neighborhood Alliance
Cibolo Nature Center
Citizens Allied for Smart Expansion
Citizens for the Protection of Cibolo Creek
Comal County Conservation Alliance
Environment Texas
First Universalist Unitarian Church of San Antonio
Friends of Canyon Lake
Friends of Dry Comal Creek
Friends of Government Canyon
Fuerza Unida
Green Party of Austin
Green Society of UTSA
Guadalupe River Road Alliance
Guardians of Lick Creek
Headwaters at Incarnate Word
Helotes Heritage Association
Hill Country Planning Association
Kendall County Well Owners Association
Kinney County Ground Zero
Leon Springs Business Association
Medina County Environmental Action
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 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
Travis County Green Party
Water Aid – Texas State University
West Texas Springs Alliance
Wildlife Rescue & Rehabilitation
Wimberley Valley Watershed Association

March 4, 2019

House Natural Resources Committee
Chair: Rep. Lyle Larson
Vice Chair: Rep. Will Metcalf
Members: Rep. Alex Dominguez
Rep. Jessica Farrar
Rep. Cody Harris
Rep. Tracy O. King
Rep. Mike Lang
Rep. Poncho Nevárez
Rep. Tom Oliverson
Rep. Four Price
Rep. Ana-Maria Ramos

RE: HB 478

Honorable Members of the House Natural Resources Committee,

The Greater Edwards Aquifer Alliance (GEAA) supports HB 478 relating to the funding of flood planning, mitigation, and infrastructure projects. Given that most of our service area is widely recognized nationally as “flash flood alley”, we are delighted that Rep. Phelan has put forth this measure to adequately fund planning for and building flood control projects.

We especially support subsections to Sec. 15.535 requiring that

- (1) the eligible political subdivision has acted cooperatively with other political subdivisions to address flood control needs in the area in which the eligible political subdivisions are located;
- (2) all eligible political subdivisions substantially affected by the proposed flood project have participated in the process of developing the proposed flood project;
- (3) the eligible political subdivisions, separately or in cooperation, have held public meetings to accept comment on proposed flood projects from interested parties; and
- (4) the technical requirements for the proposed flood project have been completed and compared against any other potential flood projects in the same area.

Comprehensive planning for flood control projects within the entire watershed and contiguous impacted watersheds is long overdue. As observed in the Interim Report of the House Natural Resources Committee¹, “Most flood planning is not occurring on a regional or watershed scale. At the watershed scale, the San Antonio River Authority is an example of watershed-scale planning. They’ve developed a sophisticated program to develop modeling, mapping, and mitigation efforts for flooding in that basin. ... Stakeholders showed a strong preference for watershed-scale planning for the future of flood planning in Texas, and provided

<https://www.house.texas.gov/media/pdf/committees/reports/85interim/Natural-Resources-Committee-Interim-Report-2018.pdf> pp 17, 18

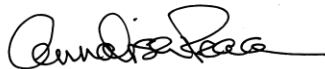
input as to what this process might look like. They indicated it would be important to identify and prioritize projects, much like is done in the State Water Plan, assess upstream and downstream impacts, and develop consistent policies and guidelines to require communities following some and evaluate future changes that could occur in the watershed, such as development.”

The provision for public input [Sec. 15.535 (3)] can contribute substantially to the success and usefulness of flood control projects as local residents are usually most familiar with the impacts of stormwater on their communities and are thus often able to provide valuable expertise.

As proponents of green infrastructure techniques, GEAA also supports Section 15.535 (4)(b) “The application must include an analysis of whether the proposed flood project could use floodwater capture techniques for water supply purposes, including floodwater harvesting, detention or retention basins, or other methods of capturing storm flow or unappropriated flood flow.” We believe this approach will make the most of our water resources, with the caveat that that in-stream flows to the bays and estuaries needed to maintain the health of estuarian ecosystems should be seriously reflected in these calculations.

We urge you to send this excellent bill for a vote of the House. Thank you for the opportunity to submit these comments.

Respectfully,

A handwritten signature in black ink, appearing to read "Annalisa Peace", with a long horizontal line extending to the right.

Annalisa Peace
Executive Director
Greater Edwards Aquifer Alliance