



**Member Organizations**

Alamo, Austin, and Lone Star chapters of the Sierra Club

- Bexar Audubon Society
- Austin, Bexar and Travis Green Parties
- Bexar Grotto
- Boerne Together
- Bulverde Neighborhood Alliance
- Bulverde Neighbors for Clean Water
- Cibolo Nature Center
- 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 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
- Preserve Our Hill Country Environment
- 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
- Signal Hill Area Alliance
- Solar San Antonio
- Sisters of the Divine Providence
- Texas Cave Management Association
- Trinity Edwards Spring Protection Association
- Water Aid – Texas State University
- Wildlife Rescue & Rehabilitation
- Wimberley Valley Watershed Association

March 18, 2021

House Natural Resources Committee:

- The Honorable Rep. Tracy O. King, Chair
- The Honorable Rep. Cody Harris, Vice Chair
- The Honorable Rep. Rhetta Andrews Bowers
- The Honorable Rep. Kyle J. Kacal
- The Honorable Rep. Lyle Larson
- The Honorable Rep. Eddie Lucio III
- The Honorable Rep. Dennis Paul
- The Honorable Rep. Four Price
- The Honorable Rep. Ana-Maria Ramos
- The Honorable Rep. Armando Walle
- The Honorable Rep. Terry M. Wilson
- Sam Bacarisse

In support of HB 2716

Dear Chairman King and members of the House Natural Resources Committee,

I submit this letter of support on behalf of the 54 member organizations of the Greater Edwards Aquifer Alliance (GEAA).

The State has made significant investment in properties managed by the Texas Parks and Wildlife Department (TPWD). In order to protect our public investments, TPWD must be allowed to contest water and waste water permits that would compromise the condition and/or purpose of these public properties and their wildlife assets.

Because the ability to contest permits was stripped from the TPWD in 2011, the agency is currently prohibited from contesting a waste water permit application by Silesia Properties, LP (Permit No. WQ0015835001) for Honey Creek Ranch MUD in Comal County. TPWD’s Honey Creek State Natural Area (HCNA) is the only property contiguous to and immediately down gradient and downstream of Silesia’s proposed residential and commercial development. As such, TPWD would be the party most impacted by this permit should it be approved as submitted. Yet, they are unable to join GEAA, the Texas Cave Management Association, the Archdiocese of San Antonio, Bulverde Neighborhoods for Clean Water, and other contiguous landowners who have been recognized with standing to contest this permit.

Acquired by the State to protect 2,293.7 acres of this pristine Hill Country site, TPWD only allows public access by guided tour and prohibits pets in order to protect the high quality flows of the Honey Creek. Immediately downstream at the confluence of Honey Creek and the Guadalupe River is Guadalupe State Park, one of the most enjoyed water recreational spots in Texas. It seems absurd that TPWD is forbidden by the State to contest a permit that, if approved, could indelibly compromise the HCNA and the Guadalupe State Park – both managed by TPWD for the use and enjoyment of the citizens of Texas.

Although HB 2716 will not allow TPWD to employ their expertise in protecting HCNA in this instance, it would prevent from reoccurring any similar situation whereby TWDB is prohibited from meaningfully acting to protect the properties they manage. Our State parks represent substantial investments by the citizens of Texas and are worthy of all the protection we can afford. We urge you to send this excellent bill on its way to becoming law.

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Thank you for the opportunity to submit these comments. Should you have any questions or wish to discuss this further, please contact me at your convenience.

Respectfully,

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

Annalisa Peace  
Executive Director  
Greater Edwards Aquifer Alliance

CC: Scott Gilfillan  
Buffy Crownover  
Ben Utley  
Lynlie Wallace  
Caroline Cone  
McKenna Martinez  
Kathy Haigler  
Hal Talton  
Hanna Lisenbe  
Lawrence Zamarron  
Rachel Piotrkowski  
Jordan Dickens  
Rahul Sreenivasan  
Wasiq Javed  
Jeff Frazier