

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 Center for Conservation

Citizens for the Protection of Cibolo Creek

Comal County Conservation Alliance

Environment Texas

First Universalist Unitarian Church of SA

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 Alliance

Kendall County Well Owners Association

Kinney County Ground Zero

Leon Springs Business Association

Native Plant Society of Texas – SA

Northwest Interstate Coalition of
Neighborhoods

Pedernales River Alliance – Gillespie Co.

Preserve Castroville

Preserve Lake Dunlop Association

Preserve Our Hill Country Environment

RiverAid San Antonio

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

Sisters of the Divine Providence

Solar San Antonio

Texas Cave Management Association

Trinity Edwards Spring Protection Assoc.

Water Aid – Texas State University

Wildlife Rescue & Rehabilitation

Wimberley Valley Watershed Association

January 5, 2023

City of Martindale- Planning and Zoning Commission
Martindale City Hall
407 Main Street
Martindale, TX 78655

*Submitted via email on Jan. 3, 2023, to all members of Martindale City Council;
Katherine Glaze, Sonja Gonzales Villalobos, Jan Bunker, Nicholas Stiller, Mike
McClabb, and Sam Clinton*

Re: Written Comments for Martindale Planning and Zoning Meeting Item: Zoning
Change for Martindale Truck Stop

Please accept the attached comments on behalf of the fifty-four member groups of
the Greater Edwards Aquifer Alliance

1. **Greater Edwards Aquifer Alliance (GEAA).** GEAA submits the following
comments on behalf of our fifty-four member organizations. GEAA is a 501(c)(3)
nonprofit organization that promotes effective broad-based advocacy for the
protection and preservation of the Edwards Aquifer, its springs, watersheds, and
the Texas Hill Country that sustains it. GEAA and its members' specific areas of
concern are summarized in the following section of this letter.

2. **Comments on the zoning case.** It is our understanding that this zoning case is a
request to change the current zoning of "Mixed-Use" to "Commercial" to support
the development of a large-scale gas station. This requested zoning change is
located along Highway 80 in Martindale and will consist of several gas pumps,
driver rest areas, and possibly, a car wash. GEAA wishes to raise the following
concerns:

- a) Impacts on the Lower San Marcos River: GEAA understands the location of this
zoning request is in close proximity to the Lower San Marcos River, a popular
recreational spot year-round for snorkeling, fishing, swimming, tubing, and
kayaking. The establishment of a large-scale gas station would bring serious
pollutant concerns that could ultimately impact the water quality of the Lower
San Marcos River. Pollutants would stem from the motor vehicles and large
trucks that would utilize the facility, heightening the risk of oil, grease, toxic
chemicals, and heavy metals from these vehicles entering the Lower San
Marcos River via stormwater runoff from the site.
- b) Stormwater Pollution Impacts & Control: Though the state requires a
stormwater management plan for Municipal Separate Storm Sewer Systems
(MS4s), GEAA's experience in inspecting engineered best management
practices (BMPs) installed to mitigate polluted stormwater runoff from
commercial sites resulted in an alarming number of BMPs that were poorly
designed and/or poorly maintained; rendering them non-functional.

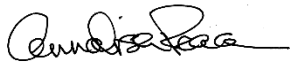
GEAA would encourage the City of Martindale to require a Stormwater Pollution Prevention Plan (SWPPP) to be submitted for your review if this zoning change ultimately gets approved. Further, we ask that the City of Martindale considers requiring the installation of permanent pollution prevention BMPs and that a local agency be tasked with inspecting all construction and permanent BMPs on a regular basis to make sure that they are functional.

Additionally, we have found that few gas station employees are well-educated on the protocol to be followed in the event of a gasoline spill. Given the proximity of the site of this proposed zoning change to the Lower San Marcos River, this could be cause for concern.

GEAA recognizes that land uses might change as areas become urbanized; however, we strongly object to land use changes that would bring preventable environmental impacts. Therefore, we encourage and support the Commission to deny this zoning request.

Thank you for the opportunity to submit these comments.

Sincerely,



Annalisa Peace
Executive Director
Greater Edwards Aquifer Alliance



Nathan Glavy
Technical Director
Greater Edwards Aquifer Alliance