



Member Organizations

Alamo, Austin, and Lone Star chapters of the Sierra Club
Act Now Comal
ARK Ecological Consulting
Belton & Surrounding Neighbors
Bexar Audubon Society
Bexar and Travis-Austin Green Parties
Bexar Grotto
Bulverde Neighborhood Alliance
Bulverde Neighborhoods for Clean Water
Cibola Center for Conservation
Citizens for Protection of Cibola Creek
Coalition for Responsible Aggregate Mining (CREAM)
Comal Conservation
Comfort Neighbors
Congregation of the Divine Providence
Conservation Society of San Antonio
Dry Comal Creek Neighbors
Environment Texas
First Universalist Unitarian Church of SA
Fischer Neighbors
Fitzhugh Neighbors
Friends of Canyon Lake
Friends of Castroville Regional Park
Friends of Government Canyon
Fuerza Unida
Green Society of UTSA
Hays Residents for Land & Water Protection
Headwaters at Incarnate Word
Helotes Heritage Association
Hill Country Alliance
Kendall County Well Owners Association
Kerr County Water Alliance
Las Moras Springs Conservation Assoc.
Llano River Watershed Alliance
Native Plant Society of Texas – SA & NB
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 Marcos Greenbelt Alliance
San Marcos River Foundation
Save Our Springs Alliance
Save Salado Creek
Save Texas Streams
Scenic Loop/Helotes Creek Alliance
SEED Coalition
Signal Hill Area Alliance
Texas Cave Management Association
Trinity Edwards Spring Protection Assn.
Water Aid – Texas State University
Watershed Association
Wildlife Rescue & Rehabilitation
Greater Edwards Aquifer Alliance
PO Box 15618 San Antonio, TX. 78212

June 9, 2026

Comal County Commissioners Court
100 Main Plaza
New Braunfels, Texas 78130

Re: Agenda Item #5: Order No. 565, Updated Comal County Subdivision Rules and Regulations

Dear Judge Hoyt and Commissioners:

On behalf of the Greater Edwards Aquifer Alliance (GEAA), we respectfully submit these comments in support of Agenda Item #5, Order No. 565, adopting updated Comal County Subdivision Rules and Regulations.

GEAA supports Comal County's efforts to strengthen subdivision standards in response to continued growth and development pressure. In particular, we support the proposed updates increasing minimum lot-size requirements for subdivisions using individual on-site sewage facilities. Larger minimum lot sizes can help reduce development intensity in sensitive areas, provide greater space for appropriate wastewater treatment, and better align subdivision approvals with water-resource protection and public health considerations.

GEAA also supports the proposed increase in minimum lot frontage requirements. Increasing the minimum frontage requirement from 40 continuous feet to 60 continuous feet can help promote safer and more adequate ingress and egress, reduce problematic access configurations, and support more orderly subdivision development.

GEAA also appreciates the proposed updates related to water availability documentation. Requiring clearer demonstration of water supply adequacy is important for responsible growth, especially in fast-growing unincorporated areas where groundwater resources, public water systems, wastewater infrastructure, and long-term water availability are increasingly strained.

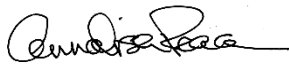
We recognize that county authority is limited in several important areas, including water use, density, landscaping, and habitat conservation. For that reason, it is important that Comal County use the subdivision

authority available to it to promote orderly development, protect public health and safety, and reduce avoidable impacts to water resources.

GEAA respectfully encourages the Court to approve Order No. 565 and to ensure that any exemptions or variance requests are applied narrowly and consistently so that the intent of the updated regulations is not undermined.

Thank you for your consideration.

Sincerely,

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Annalisa Peace
Executive Director
Greater Edwards Aquifer Alliance

A handwritten signature in black ink, appearing to read "Nathan Glavy". The signature is cursive and elegant, with a horizontal line extending to the right.

Nathan Glavy
Technical Director
Greater Edwards Aquifer Alliance

A handwritten signature in black ink, appearing to read "Nathan Glavy". The signature is cursive and elegant, with a horizontal line extending to the right.