



Member Organizations

- Alamo Group of the Sierra Club
- Aquifer Guardians in Urban Areas
- Austin Regional Sierra Club
- Bexar Audubon Society
- Bexar Green Party
- Boerne Together
- Cibolo Nature Center
- Citizens Allied for Smart Expansion
- Citizens for the Protection of Cibolo Creek
- Environment Texas
- First Universalist Unitarian Church of San Antonio
- Friends of Canyon Lake
- Friends of Government Canyon
- Fuerza Unida
- Green Party of Austin
- Hays Community Action Network
- Headwaters Coalition
- Helotes Heritage Association
- Helotes Nature Center
- Hill Country Planning Association
- Guadalupe River Road Alliance
- Guardians of Lick Creek
- Kendall County Well Owners Association
- Kinney County Ground Zero
- Medina County Environmental Action Association
- Northwest Interstate Coalition of Neighborhoods
- Preserve Castroville
- Preserve Lake Dunlop Association
- San Antonio Audubon Society
- San Antonio Conservation Society
- San Geronimo Nature Center
- San Geronimo Valley Alliance
- San Marcos Greenbelt Alliance
- San Marcos River Foundation
- Santuario Sisterfarm
- 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
- Texas Water Alliance
- Water Aid, Texas State University
- West Texas Springs Alliance
- Wildlife Rescue & Rehabilitation
- Wimberley Valley Watershed Association

August 2, 2016

Mayor Daniel Guerrero and City Council
City of San Marcos
Sent via e-mail to [Mayor Council Info@sanmarcostx.gov](mailto:Mayor_Council_Info@sanmarcostx.gov)

Dear Mayor Guerrero and Council Members of the City of San Marcos,

Thank you for the opportunity to submit these comments regarding Agenda items #14 and #15 on this evening's City Council meeting regarding an application to change the land use designation for a site at Wonder World Drive and Hunter Road to accommodate a new HEB store.

The Greater Edwards Aquifer Alliance requests that you direct HEB Grocery Company to build their new store on a parcel of land that they already own at the intersection of McCarty Lane and Interstate 35. By doing so, you would have far more certainty that the project will not negatively impact water quality of the Edwards and Purgatory Creek.

The site under consideration at Wonder World Drive presents some serious challenges should you approve the change in land use designation and allow this project to move forward. Proximity to Purgatory Creek and the Edwards Aquifer Recharge Zone would have to be taken into account in the event of a fire. Given the large amount of inventory at a typical HEB that could be classified as toxic or hazardous, it is possible that fire suppression using water could negatively impact Purgatory Creek. We suggest you consult with your Fire Marshall on this matter prior to making any decisions.

Since Pape Dawson Engineering, the firm associated with this project, was contracted by the City of San Antonio to work on the City's Low Impact Development Technical Guidance Manual¹, we know that they are familiar with techniques that promote sustainable development. We urge you to prevail upon the firm to incorporate all appropriate techniques into the final plans for the new HEB, regardless of the site chosen.

Should you chose to consider the Wonder World site, which is next to Purgatory Creek and is currently designated open space, we believe that protections for this site already negotiated should remain in place to address best practices for maintaining water quality. We have, however, many concerns that are not addressed in the current plan.

<http://texaslid.org/pdfs/San%20Antonio%20LID%20Guidance%20Manual.pdf>

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We ask that you make approval contingent upon, at a minimum, the following measures:

- Consider pervious paving wherever practical for reducing runoff.
- Construct adequate stormwater detention prior to construction to protect property downstream.
- Build well outside of the area impacted by the 1998 flood.
- Base stormwater plans and siting on new FEMA floodplain maps anticipated by the City, not the current FEMA maps.
- Monitor water quality basins (BMP's) at established intervals and submit results to the City of San Marcos.
- Prior to construction, submit plans for maintenance of water quality BMP's to the City of San Marcos for approval.
- Make sure that any caves discovered during construction are promptly reported to the Edwards Aquifer Authority. Even a tiny surface crack can end up being a long cave that is important for recharge and may be habitat for endangered species. Ezell's Cave and blind salamanders are nearby the Wonder World Drive site. Archeologic items are also hard to see when the bulldozer or excavator operator is up in his high seat. It will be critical to have experts on hand while excavating this site.

We are told that HEB has gone above and beyond complying with the current requirements of the City of San Marcos, for which we are grateful. We are also grateful to HEB for contributing to the publication of GEAA's "Watershed Stewardship for the Edwards Aquifer Region", a publication that we hope they will consult prior to finalizing plans for any new stores. Further, we call on the City of San Marcos and HEB to select the IH 35 site rather than the Wonder World Drive site, and to take every opportunity to incorporate the Low Impact Development techniques to protect the Aquifer and make their new store a model development.

In conclusion, the Greater Edwards Aquifer Alliance urges you not to take action to approve changes in designation of the City's Land use Plan until the recommended measures have been fully considered.

Sincerely,

Annalisa Peace
Executive Director
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