

Alamo Group of the Sierra Club  
Aquifer Guardians in Urban Areas  
Austin Regional Sierra Club  
Bexar Audubon Society  
Boerne Together  
Cibolo Nature Center  
Citizens Allied for Smart Expansion  
Environmental Stewardship  
Committees of the Episcopal Church of  
Reconciliation & Episcopal Diocese of  
West Texas  
Environment Texas  
First Universalist Unitarian Church of  
San Antonio  
Friends of Canyon Lake  
Fuerza Unida  
Government Canyon Natural History  
Association  
Hays Community Action Network  
Helotes Heritage Association  
Helotes Nature Center  
Hill Country Planning Association  
Guardians of Lick Creek  
Kendall County Well Owners Association  
Kinney County Ground Zero  
Medina County Environmental Action  
Association  
Northwest Interstate Coalition of  
Neighborhoods  
OST 100  
Preserve Castroville  
Preserve Lake Dunlop Association  
Preserve Our Water-Blanco County  
San Antonio Conservation Society  
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  
Sisters of the Divine Providence  
Smart Growth San Antonio  
SEED Coalition  
Texas Water Alliance  
West Texas Springs Alliance  
Wildlife Rescue & Rehabilitation  
Wimberley Valley Watershed Association

Statement for City of New Braunfels Planning and Zoning Commission Meeting  
January 6, 2009 - Agenda Item 5C

Dear New Braunfels Planning and Zoning Commissioners:

These comments are made on behalf of the 45 member organizations of the Greater Edwards Aquifer Alliance (GEAA). The Alliance represents citizen organizations and individuals who have a deep and abiding interest in protecting and preserving the quality and quantity of water flowing from Edwards Aquifer wells and springs.

The Estates at Stone Crossing is located fully within the Edwards Aquifer Recharge Zone, designated one of the most environmentally vulnerable regions in the state. In the interest of preserving and protecting the Aquifer, we urge you to deny or postpone this request for approval of the plat for the Estates at Stone Crossing as it is currently presented.

The Estates at Stone Crossing development's impervious coverage is estimated to be about 32 percent. Research<sup>1</sup> shows that impervious cover that exceeds 12% - 20% results in significant impairment to surface water quality by generating pollutants that are carried in stormwater runoff into our water source, the Edwards Aquifer. Even modest levels of impervious cover could increase pollutant loads by 5 to 12 times that of an undeveloped site. GEAA recommends that impervious cover on developments within the Edwards Aquifer Recharge Zone be restricted to 15% or less, or that specific Low Impact Development techniques, which are more comprehensive in their value in protecting water quality than the engineered water quality abatement remedies currently required under state law, be employed to mitigate negative impact to water quality.

The proposed plat for The Estates at Stone Crossing includes land designated for C-1A use, which allows for a variety of non-residential uses that could significantly damage our water source. Some of these uses include: auto inspection and repair; battery station; cleaning, pressing, and dyeing; dry cleaning; and printing shop. Regardless of how stringent the development's plans for pollution abatement are, research and past experience show that allowing high impact commercial use of property located on the Recharge Zone will contribute to water pollution.

Due to the environmental sensitivity of this site, I urge you to either deny this request for approval of the plat for the Estates at Stone Crossing, or to postpone approval until such time as it can be revised to lessen potential negative impacts on the Edwards Aquifer. Options for mitigating adverse impacts on the Aquifer include Low Impact Development techniques, offsets of developed land with park land or other open space to reduce cumulative impervious cover, and revision of permitted uses prohibiting the abovementioned commercial uses that pose a hazard to water quality. We would be happy to work with you and the developer to address these issues. Thank you for this opportunity to present these comments.

Respectfully,

Annalisa Peace  
Executive Director

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1. Stormwater Runoff for Selected Watersheds in the Edwards Aquifer Recharge Zone, Bexar County, Texas, 1996-98. U.S. Geological Survey, March, 1998.