

Alamo, Austin, and Lone Star chapters of  
the Sierra Club  
Aquifer Guardians in Urban Areas  
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 Dry Comal Creek  
Friends of Government Canyon  
Fuerza Unida  
Green Party of Austin  
Headwaters at Incarnate Word  
Hays Community Action Network  
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  
Leon Springs Business Association  
Medina County Environmental Action  
Association  
Native Plant Society of Texas – SA  
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  
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  
Travis County Green Party  
West Texas Springs Alliance  
Water Aid – Texas State University  
Wildlife Rescue & Rehabilitation  
Wimberley Valley Watershed Association

April 29, 2016

Liza C. Meyer  
Office of Sustainability  
City of San Antonio  
Sent via e-mail to: [Liza.Meyer@sanantonio.gov](mailto:Liza.Meyer@sanantonio.gov)

**RE: POLICY DEVELOPMENT PROPOSAL**  
**Coal Tar Sealant Ordinance**

Dear Ms. Meyers, Mayor Taylor, and City Council Representatives,

The comments to follow are submitted on behalf of the fifty-two member organizations of the Greater Edwards Aquifer Alliance, including sixteen San Antonio area member groups: AGUA, Alamo Group of the Sierra Club, Bexar Audubon Society, Bexar Green Party, First Universalist Unitarian Church of San Antonio, Friends of Government Canyon, Fuerza Unida, Headwaters at Incarnate Word, Leon Springs Business Association, Native Plant Society of Texas - San Antonio Chapter, Northwest Interstate Coalition of Neighborhoods, San Antonio Audubon Society, San Antonio Conservation Society, Scenic Loop Boerne Stage Alliance, Solar San Antonio, Sisters of the Divine Providence; and State-wide groups: Environment Texas and SEED Coalition. The comments address the prohibition of PAH sealants, and related proposed new rules.

We are grateful to District 8 City Councilman Ron Nirenberg for issuing a Council Consideration Request (CCR) requesting staff to consider a prohibition on coal tar-based sealants during the development of the comprehensive water study. We feel that this is an excellent step forward for the City of San Antonio to begin implementing the recommendations included in that study. Further, we compliment City Staff for writing a clear, comprehensive, and enforceable ordinance.

All members of the Greater Edwards Aquifer Alliance (GEAA) are delighted with and fully support the proposed ban on using PAH (coal tar) sealants to pave streets and parking lots within the jurisdiction of the City of San Antonio. If the City of San Antonio approves this new rule, it will join other cities and states in efforts nationwide to keep this pollutant out of our water supplies. This prohibition will greatly complement and enhance the work being performed through the Edwards Aquifer Recovery Implementation Program to protect threatened and endangered aquatic species at Comal and San Marcos Springs. Attached is additional information in the form of a fact sheet that GEAA distributes regarding the use of these sealants. We strongly urge that this rule be approved.

Thank you for the opportunity to submit these comments. Please feel free to contact me at your convenience if you have any questions or concerns.

Sincerely,



Annalisa Peace, Executive Director