

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

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April 29, 2016

Liza C. Meyer
Office of Sustainability
City of San Antonio
Sent via e-mail to: 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