

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  
Wimberly Valley Watershed Association

## **New Braunfels Outer Loop Task Force Meeting, April 2, 2009**

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.

GEAA submitted comments on the New Braunfels Outer Loop Study, (July 2007 and February 2008), in support of the position of Citizens Alliance for Smart Expansion (CASE). We are gratified that CASE has been represented among the members of this task force, and hope that their participation in this process is meaningful and respected.

GEAA's concerns regarding this project are chiefly predicated by the fact that the Western and Northern portions of the proposed New Braunfels Outer Loop, approximately 1/2 of the project area, are located fully within the Edwards Aquifer Recharge Zone (EARZ), which is designated one of the most environmentally vulnerable regions in the state. The unique karst limestone structure of the Aquifer does not filter water entering through conduits in the form of sinkholes, caves, fault lines, and fractures on the land's surface in the Recharge Zone. Due to the highly permeable nature of the Recharge Zone, the Aquifer is particularly vulnerable to non-point source pollution in rainwater runoff.

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.

Roads strongly affect their surrounding ecosystem. There are construction impacts, operational and maintenance impacts, and long-term impacts. Most traffic planners concur that more roads will not solve traffic problems. Loop 1604 in San Antonio is an example. It was widened a decade ago in an effort to eliminate traffic. It did not eliminate traffic, but instead encouraged more development that added to the traffic. Loop 1604 remains one of the most heavily trafficked areas in San Antonio, and during peak travel times, it is a nightmare.

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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.

Since the agencies governing the study area, including the Edwards Aquifer Authority, the Texas Commission on Environmental Quality, and the City of New Braunfels, have neither implemented, nor enforced, regulatory measures that we believe are adequate to prohibit negative impacts on water quality, GEAA would oppose any project that encourages growth within this environmentally fragile area. 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. 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 specific commercial uses that pose a hazard to water quality. We would be happy to work with the City of New Braunfels to address these issues

Any developments within the Recharge Zone are also of particular concern because of possible impacts to the Comal Springs and the endangered species that rely on this unique habitat. Recent studies reviewed by the Edwards Aquifer Recovery Implementation Program indicate that pollution from urban runoff is having a negative effect on populations of the endangered Comal Fountain Darter. We will be happy to furnish pertinent studies and scientific data upon request for your consideration and inclusion in the scope of work of this process.

The Western and Northern portions of the Loop also run through endangered Golden Cheeked Warbler (GCW) habitat, which would be fragmented by the proposed road. You don't have to be bird lover to care about the Warbler's well being. The GCW is a good indicator of habitat health in an area where pristine land is essential to ensuring clean recharge into the Aquifer. When the warbler does not survive, it indicates that the level of urbanization is too intense.

We ask that you seriously reconsider the necessity of the Outer Loop and examine possible alternatives that would not endanger the Edwards Aquifer or endangered species habitat. This is an opportunity for innovative transportation planning that takes into consideration all the factors that make this portion of Texas unique and precious.

In the interest of preserving and protecting the Aquifer, its surface waterways, the species that rely on the Comal Springs, and the scenic, rural and cultural heritage of the Hill Country in Comal County, we urge you to take into account impacts of any future development on the Edwards Aquifer Recharge, Contributing and Transition zones. GEAA has repeatedly recommended that TxDOT commence conducting a full Environmental Impact Statement (EIS) for this project immediately. Arguments that conducting an EIS is premature and inappropriate for the venue under consideration, as the addition of this project to the Major Thoroughfare Plan for the City of New Braunfels, are, we feel, disingenuous given TxDOT's continued high profile engagement in this process.

GEAA employs and works with a number of professional scientists and educators. We are here as a resource not only to citizen groups but to agency officials, as well. You can rely on GEAA's continued participation in this process through our member group, CASE.

Thank you for this opportunity to present these comments.