



Member Organizations

- Alamo Group of the Sierra Club
- Aquifer Guardians in Urban Areas
- Austin Regional Sierra Club
- Bexar Green Party
- Cibolo Nature Center
- Environmental Stewardship Committee of the Episcopal Church of Reconciliation
- Environmental Stewardship Committee of the 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
- Kendall County Well Owners Association
- Kinney County Ground Zero
- Medina County Environmental Action Association
- Northwest Interstate Coalition of Neighborhoods
- Preserve Our Water-Blanco County
- San Antonio Conservation Society
- San Geronimo Watershed Alliance
- San Marcos Greenbelt Alliance
- San Marcos River Foundation
- Santuario Sisterfarm
- Save Barton Creek Association
- Save Our Springs Alliance
- Save Scenic Loop
- Smart Growth San Antonio
- SEED Coalition
- Texas Water Alliance
- Travis County Green Party
- West Texas Springs Alliance
- Wimberley Valley Watershed Association

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October 6, 2006

Mr. Bill Roberts
 Texas Water Development Board
 P. O. Box 13231
 Austin, TX 78711-3231

VIA E-MAIL

Dear Mr. Roberts,

I am writing on behalf of the Greater Edwards Aquifer Alliance to express some concerns with the draft 2007 State Water Plan prepared by the Texas Water Development Board. We appreciate the opportunity to submit these comments.

The Greater Edwards Aquifer Alliance unites thirty-four organizations behind a comprehensive plan to protect the Edwards Aquifer, its springs and contributing watersheds, and the Texas Hill Country. Though I have not polled our member groups nor submitted these comments for their approval, I feel confident that they are within the scope of the Greater Edwards Aquifer Alliance Aquifer Protection Plan that has been endorsed by all of our member groups. I hope that individual member groups of the Alliance have submitted their comments, as well.

As you well know, a large part of the 21 county Edwards Region, including communities served by aquifers of the Trinity formation, are among the fastest growing areas in the nation. The latest report of the United States Census Bureau counts five counties within the Edwards Aquifer region, including Kendall and Comal counties, as among the fastest growing areas in the nation. According to the US Census Bureau, between 2000 and 2004 Comal County grew by 17.7%.¹ During 2005 it is estimated that Kendall County grew by 5%, and Comal by 4.5%.² San Antonio is the third fastest growing large city in the nation.³

If we are to plan for sustainable water supplies for those who live here, and for those who will come in the future, we must begin to build water conservation into our infrastructure. One way to do this is to encourage all groundwater conservation districts to liberally designate water intensive uses as non-essential in their critical period drought management plans. It has been demonstrated that defining certain uses as non-essential in times of drought has the very positive effect of permanently reducing water usage. For example, when San Antonio Water Systems defined all carwashes except those that had water re-circulation systems as non-essential, it insured that most new carwashes being built in San Antonio reuse water. Water intensive businesses, such as carwashes and golf courses will look to other sources to supply their water needs, including use of greywater, re-circulation systems, perhaps even rainwater harvesting, if they know that their use of our underground water resources will be curtailed during times of drought.

Other water intensive practices, such as automatic sprinkler systems, vanity lakes, turf grass irrigation, and such will be discouraged from the inception if these uses are defined

¹ US Census Bureau, Population Division, "100 Fastest Growing Counties in the US"
² San Antonio Express News, March 13, 2006 "Texas Counties Among Fastest Growing in US"
³ Bloomberg network, June 19, 2006 "San Antonio Boom May Dry Up as Water Ebbs and People Pour In".

as non-essential, thereby negating some of the need to secure additional water resources to serve our needs in times of drought. Rather than predicating the need for future water supplies on current patterns of growth and use, we should be doing everything that we can to require less use of this precious resource.

We urge you and the Texas Water Development Board to more prominently recommend water conservation, and all the tools that will achieve water conservation, in your plans for achieving resource sustainability for the next fifty years. These tools include requiring the adoption serious drought management plans, widely inclusive definitions of non-essential uses, and keeping certain aspects of drought management plans in effect on a permanent basis.

Also of concern to the members of the Greater Edwards Aquifer Alliance is the issue of the sustainability of our groundwater resources when vast portions of the recharge and contributing zones of the Edwards and Trinity aquifers are being urbanized. It has been estimated that 2,000 housing starts per month are currently being platted in Bexar County alone. The primary problem with all this growth is that the bulk of it is occurring in areas that threaten to compromise the quantity and quality of our underground water supplies in the Edwards and Trinity formations. This has the effect of increasing demands upon our water supplies while reducing and degrading the water available from these karst formations.

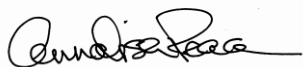
According to the American Farmland Trust "to ensure a future...with ample and clean water supplies...and an enviable quality of life, citizens and officials need to act today by ...conserving working lands through public and private options...Support future public funding initiatives to fund the purchase of land and development rights...Provide incentives for urban redevelopment and for conservation subdivisions for new housing needs to minimize sprawl...and loss of open space, and maintaining floodplain buffers along creeks and rives...to minimize expenditures on flood related cleanup."⁴

We request that the Texas Water Development Board begin researching the effect that increased development on our recharge zone has in reducing water availability in our aquifers. Besides serious concerns about the effects of unregulated growth in this environmentally sensitive area on the quality of our groundwater, we would also like to know with some certainty what effect, if any, that paving, plugging and the on-going destruction of recharge features has on the amount of water entering and being stored in the aquifer.

There are many other concerns with the Draft 2007 Water Plan. These are very well covered in the letter submitted to you by Ken Kramer on behalf of the Lone Star Sierra Club.

Thank you for your consideration of these comments.

Sincerely,



Annalisa Peace
Executive Director

4 American Farmland Trust, 2004 "Cost of Community Services: The Value of Farmland and Open Space in Bexar County, Texas"