

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

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June 15, 2009

Con Mims
Chairman, Region L Planning Group
c/o San Antonio River Authority
PO Box 839980
San Antonio, Texas 78283-9980

Dear Chairman Mims,

Thank you for your consideration of the following comments from the Greater Edwards Aquifer Alliance (GEAA) regarding the Amendment of the 2006 South Central Texas Regional Water Plan to be submitted for approval by the Texas Water Development Board.

On page 33-3 the statement is made that the Guadalupe Blanco River Authority (GBRA) will work with Region L participants and other public and private water rights holders in the basin toward the development of a voluntary strategy to promote environmental stewardship. This goal is somewhat vague and should be more detailed as how this concept would actually work and what, in fact, constitutes environmental stewardship. Specific conservation agencies should be identified along with their roles and, in particular, how this body would actually function, along with specific goals and desired outcomes.

Comment #2

Page 33-7 through page 33-16 presents a boilerplate version of environmental descriptions for the flora and fauna of the general project area. Only one and a half pages (page 33-10 and part of page 33-16) speak to the topic of environmental mitigation. Furthermore, statements on these pages are heavily qualified with such phrases as "would be" and "some care may be necessary" and "key considerations." We believe that detailed environmental assessment studies along with prudent site-specific mitigation measures are needed for a project of this magnitude.

Comment #3

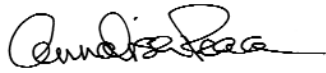
On page 33-19 there is a cost summary that details estimated costs, including the cost for environmental studies. GEAA would like to ascertain the actual role that HDR will play in this project. If in fact HDR will perform the engineering and cost analyses, then GEAA believes that the environmental studies should be carried out by an independent environmental consultant to maintain transparency and avoid any potential conflicts of interest.

Comment #4

Page 33-20 lists implementation issues. Once again the word "may" is used several times on the page. GEAA believes that if funding is sought from the Texas Water Development Board (TWDB), then a full-fledged environmental assessment, consistent with TWDB requirements, should be prepared listing all existing environmental resources, the impacts that various project alternatives will have upon these resources along with a no-action alternative.

Thank you for providing the opportunity to comment upon this document.

Sincerely,

A handwritten signature in black ink, appearing to read "Annalisa Peace". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Annalisa Peace
Executive Director