



Member Organizations

Alamo Group of the Sierra Club
Aquifer Guardians in Urban Areas
Austin Regional Sierra Club
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 Government Canyon
Fuerza Unida
Green Party of Austin
Hays Community Action Network
Headwaters Coalition
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
Medina County Environmental Action Association
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
Santuario Sisterfarm
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
Smart Growth San Antonio
Texas Water Alliance
West Texas Springs Alliance
Wildlife Rescue & Rehabilitation
Wimberley Valley Watershed Association

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December 15, 2011

RE: Ordinance 2011-76

Dear Mayor Guerrero and Members of City Council,

On behalf of the fifty member organizations of the Greater Edwards Aquifer Alliance, our Board of Directors, and our many individual members, we urge you to postpone your vote on the Sessoms Creek project until such time as you have received and studied detailed plans for the project that address the many concerns submitted by the San Marcos River Foundation and their engineer, Lauren Ross.

The City of San Marcos, as a managing partner of the Edwards Aquifer Recovery Implementation Program (EARIP), has committed significant financial resources to the protection of the endangered species at San Marcos Springs. Measures to preserve the species, however, could be severely and permanently compromised by any plans, such as those proposed for the Sessoms Creek Project, that promote high density development within this fragile watershed.

The Expert Science Subcommittee of the EARIP, on page 22 of their December 28, 2009, report entitled *Analysis of Species Requirements in Relation to Spring Discharge Rates and Associated Withdrawal Reductions and Stages for Critical Period Management of the Edwards Aquifer*, states "[w]ater quality encompasses a range of variables that can potentially impact fountain darters and other aquatic life if altered too far from the historic range to which the stream inhabitants have become accustomed. Most potential water quality problems are linked to nonpoint source pollution such as fertilizer runoff and chemicals washed in from adjacent streets; ... The potential for accidents and nonpoint source pollution to affect the organisms in the Comal River may be exacerbated during below average flows since chemicals and nutrients would be less diluted when a lower volume of water is present."

According to the report of the Water Quality Subcommittee of the EARIP, "Water quality impacts can be expressed in a variety of ways. For example, impacts, such as sedimentation, resulting from stormwater runoff directly into the spring or stream habitats used by covered species could actually reduce the extent of suitable habitat areas. Some of those direct impacts, particularly to the extent that they originate within the riparian areas adjacent to the habitat areas, are addressed in the report entitled "Restoration and Mitigation Actions for the Comal Springs Ecosystem"¹ produced by the Ecosystem Restoration Subcommittee."

"As illustrated by the water quality data previously presented to the EARIP by George Rice, runoff and spills originating even at long distances from the spring openings also can affect water quality at the springs. Fortunately, water quality in the Edwards Aquifer and at the spring openings remains very good. However, as levels of development continue to increase over the recharge zone, transition zone, and even the contributing zone, the threats to water quality will increase."

New studies conducted by Baylor University scientists to determine how drought affects water and its pH levels, therefore affecting water quality and aquatic life among other things, indicate that "In wadeable streams under lower flow conditions there was much more variability in pH and then greater potential influences on water quality as far as toxicity of various types of contaminants are concerned".

We therefore urge you to keep in mind the potential impacts on water quality and drainage issues when considering plans for development within your jurisdiction. As a former City of San Antonio City Council staffer, and in my current job as director of the Greater Edwards Aquifer Alliance, I have seen the adverse impacts posed by allowing high density development within the Edwards Aquifer watershed. The City of San Antonio has had to spend upwards of a billion dollars to address flooding that resulted from compromising the integrity of the Recharge Zone by allowing high density development within that region. Other cities now have to find funding for high dollar drainage projects to address issues from improperly sited suburban development. I urge you to respect the natural integrity of the karst system that has provided high quality water to the Central Texas region through San Marcos Springs.

We have been impressed with the resources that the City of San Marcos has devoted to aquifer protection and stormwater management in the past. We sincerely urge you to build upon these initiatives by requiring that all development within this area comply with the "Low Density Residential" recommendation as currently zoned.

We hope that you will consider the Greater Edwards Aquifer Alliance as a resource that is at your disposal as you continue to plan for growth while sustaining the water and natural resources that make the City of San Marcos one of the most desirable locations in the State of Texas.

Sincerely,

Annalisa Peace
Executive Director
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