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- Alamo Group of the Sierra Club
- Aquifer Guardians in Urban Areas
- Austin Regional Sierra Club
- Bexar Audubon Society
- Bexar Green Party
- Cibola Nature Center
- 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
- 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
- Preserve Our Water-Blanco County
- San Antonio Conservation Society
- San Geronimo Valley Alliance
- San Geronimo Watershed Alliance
- San Marcos Greenbelt Alliance
- San Marcos River Foundation
- Santuario Sisterfarm
- Save Barton Creek Association
- Save Our Springs Alliance
- Scenic Loop/Boerne Stage Alliance
- Sisters of the Divine Providence
- Smart Growth San Antonio
- SEED Coalition
- Texas Water Alliance
- Travis County Green Party
- West Texas Springs Alliance
- Wimberley Valley Watershed Association

February 11, 2008

TxDOT, New Braunfels Outer Loop Study
 c/o RJ Rivera Associates, Inc.
 Email: info@nbolstudy.com
 Fax: (210) 340-5664

VIA FAX AND EMAIL

Re: Comments on Proposed Corridor for New Braunfels Outer Loop

Dear TxDOT and RJ Rivera Associates,

Please accept these comments on behalf of the Greater Edwards Aquifer Alliance (GEAA). GEAA is a non-profit coalition of organizations across the Edwards Aquifer united to preserve the water, wildlife, scenic beauty, and cultural heritage of the Edwards Aquifer and the Texas hill country.

As part of the New Braunfels Outer Loop study process, we submitted comments on July 7 of last year outlining some general environmental considerations. We reiterate these past comments and urge early incorporation of environmental constraints, namely that 1) the western and northern portions run through the highly-sensitive Edwards Aquifer recharge zone and will likely cross endangered karst invertebrate habitat (see 65 Fed. Reg. 81419 for listing), and 2) the northern portion, and possibly other portions, run through prime habitat of the endangered Golden-cheeked warbler (see 55 Fed Reg. 53153 for listing, and Golden-cheeked warbler recovery plan).

Having pointed out these crucial environmental characteristics of the areas west and north of New Braunfels, we are disappointed that there has not been more of an effort to incorporate these constraints early on in the process. From the most recent press release it appears that the options shown at the second public meeting were developed based on the following goals: minimize residential displacement; minimize impacts to schools; avoid cemeteries and prehistoric burial sites; avoid impacts to parks/recreational facilities; avoid impacts to historic resources; avoid impacts to landfill.

We think it is an oversight to not include factors such as “minimize impacts to groundwater and wells;” “minimize impacts to endangered species habitat, including sensitive karst zones and woodlands for the Golden-cheeked warbler and Black-capped vireo;” and “minimize impacts to critical environmental features, such as streams, bluffs, and recharge features.” Again, we urge early incorporation of these factors, and early coordination with state and federal environmental agencies and local

February 11, 2008
GEAA Comments
New Braunfels Outer Loop
Pg. 2

government. Extensive mapping and surveying of environmental constraints such as warbler habitat, wells, sensitive caves and recharge features should be a priority of this planning process, and would make a much better project while also providing invaluable information to the City of New Braunfels for other future planning.

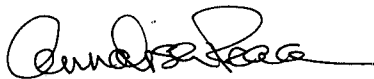
We also note that TxDOT is under an obligation to “proactively address environmental issues,” 43 Tex. Admin. Code § 2.4(4)(A), and to “ensure that a systematic, interdisciplinary, and public approach is used to evaluate social, economic, and environmental impacts.” *Id.* § 2.4(3)(B). Indeed, regulations regarding the development of any road project stress the need for *early* coordination with the public up to and including the inception of a proposal. *See* 23 C.F.R. § 771.111(a), (h)(2) (“procedures must provide for: . . . (ii) Early and continuing opportunities during project development for the public to be involved in the identification of social, economic, and environmental impacts.”); *see also* 43 Tex. Admin. Code § 2.43(b), (c)(3) (“Public meetings will be held: (A) as early as the department determines feasible to assure public input into project planning; (B) to provide a free exchange of project views and concerns; (C) during project planning and development in order to keep the public informed”).

With respect to the public process for the New Braunfels Outer Loop Study, we also have concerns and feel that the process could be improved. We have heard from some landowners affected by the corridor who feel that they were left out during the crucial final stages, not able to give input, and possibly not even properly notified. It is also clear that there was no public meeting between the short list stage and the final corridor recommendation. Certainly those crucial final steps in the process call for greater collaboration with the public and not less.

In light of the above concerns, we ask that the New Braunfels Outer Loop Study slow down to reassess whether environmental constraints and the views of affected landowners have been adequately incorporated into the final corridor recommendation. We think that these are areas that can be improved on, and we look forward to working with TxDOT, the City of New Braunfels, and RJ Rivera Associates on this effort.

Thank you for your consideration, and please feel free to contact us if you have any questions.

Sincerely,



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