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SOAH Docket No. 473-21-024  
PUC Docket No. 51023

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In Re: Application of the City of San Antonio \*  
Acting by and through the City Public Service \*  
Board (CPS Energy) to amend its Certificate \* Before the State Office of  
Of Convenience and Necessity for the \* Administrative Hearings  
Proposed Scenic Loop 138-kV Transmission \*  
Line Project in Bexar County, Texas \*

Declaration Testimony of Roy R. Barrera III

My name is Roy Barrera III, my date of birth is 02/22/1977, and my address is 26912 Toutant Beauregard Rd, Boerne, TX 78006. I declare under penalty of perjury that the following it is true and correct:

"I am over the age of eighteen and am competent to make this declaration. The facts in this declaration are within my personal knowledge and are true and correct.

1. My name is Roy R. Barrera III. I have been a licensed practicing attorney in the State of Texas since 2002.
2. My home address is 26912 Toutant Beauregard Rd., Boerne, TX 78006. I have lived on this particular 5.2 acre parcel of property since 2012, when I designed and constructed a permanent residence with my wife to raise our three children. This 5.2 acre parcel is contiguous to and essentially part of a larger 327 acre tract of land owned by my grandfather Roy Barrera, Sr. (the "Barrera Ranch"). I was born and raised on the Barrera Ranch and have lived there almost my entire life. My three children also have known no other home than the Barrera Ranch. My homestead, along with the contiguous 327 acres consists of the following:
  - A. 68.4 acres of recorded wildlife management acreage (including another 32 – 100 total).
  - B. 193.27 acres of range/brush and improved pastureland which features:
    - i. Heidemann Family Cemetery (established pre 1840) A Texas Historic Commission (THC) Registered Historic Cemetery
    - ii. Heidemann Ranch Complex (established early 1800) which is listed on the National Registry of Historic Farms and Ranches –
    - iii. A natural spring fed pond – stocked for fishing
    - iv. A stock tank fed by windmill – stocked for fishing  
(both the pond and tank have become the landing and breeding ground for two species of duck– Black Bellied Whistlers (aka Mexican Tree ducks) and Egyptian geese.
    - v. Improved grassland for stock
    - vi. Natural brush cedar for wildlife

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- vii. 6 other residential (Family) homes
  - a. Roy R. Barrera, Sr. (owner since 1971 in residence since 2015)
  - b. Roy R. Barrera, Jr. & wife Sally (in residence since 1973)
  - c. Carmen Alice B. Ramirez & husband Rick (in residence since 1980)
  - d. Bobby Barrera & wife Karen (in residence since 1985)
  - e. Mark J. Barrera & wife Abril (in residence since 2005)
  - f. Gilbert E. Barrera (in residence since 2015)
  - g. Monica Ramirez Khirallah & husband David (-proposed residence 2021)
  - h. Marissa Barrera Morales & husband Lawrence (future residence)

C. 65.0 acres of rangeland

- 3. I object to Segments 28, 29, 30, 31, 35, and the meeting point of Segments 31, 35 and 36 for the following reasons:
  - 3.1 Segment 29 would constitute a taking of my northern boundary line, come within 150 feet of my home structure and water well and destroy the large oak trees in my back yard. This segment would not just come within my view, as many others have complained, but would bisect my property and literally tower over my home. Segment 29 will totally and completely destroy my homestead property and its value. Furthermore, it follows no property line or public roadway and fragments intact land which goes against TPWD's statement in its Recommendation Letter to the PUC that "the State's long-term interests are best served when new utility lines and pipelines are sited where possible in or adjacent to existing utility corridors, roads or rail lines instead of fragmenting intact lands."
  - 3.2 Segments 28, 29, 30, 31, and 35 cut directly across the Barrera Ranch and/or individually owned family parcels contiguous to or within the Barrera Ranch disrupting the wildlife and protected habitat of the Golden-Cheeked Warbler. It also follows no property line or public roadway and fragments intact land which goes against TPWD's statement in its Recommendation Letter to the PUC that "the State's long-term interests are best served when new utility lines and pipelines are sited where possible in or adjacent to existing utility corridors, roads or rail lines instead of fragmenting intact lands."

Respectfully submitted,

/S/ ROY R. BARRERA III

Roy R. Barrera III

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Boerne, Texas 78006  
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Certificate of Service

I certify that a true and correct copy of the foregoing has been filed with the Commission and served on all other parties via the PUC interchange on this 23rd day of February, 2021 pursuant to SOAH Order Number 3 issued in this docket.

/S/ ROY R. BARRERA, III

Roy R. Barrera III