

January 9, 2013

Board of Directors, San Antonio Water System

Regarding Agenda Item #33 of March 11, 2013 Board Meeting

Dear Chairman Guerra and members of the Board,

Regarding Item #33, a resolution to provide water and/or waste water service to the Crescent Hills Development:

The Greater Edwards Aquifer Alliance strongly opposes extending waste water service to this site on the Edwards Aquifer Recharge Zone. We note that SAWS has the latitude to decline waste water service, as the site is not yet within your CCN. We believe that extension of waste water service involving, as in this case, gravity feed lines within creek beds on the Edwards Aquifer Recharge Zone, are not appropriate for this environmentally sensitive area. Given that 75% to 80% of recharge occurs within streams and rivers that traverse the Edwards Aquifer Recharge Zone, the event of a spill of could have serious consequences to nearby wells. The Edwards Aquifer staff recently reported extremely elevated levels of fecal coliform bacteria in water wells as far as four miles away from the site of a spill that occurred on the Recharge Zone on October 15, 2012.

The cost of compliance with TCEQ requirements for camera testing wastewater lines on the Edwards Aquifer Recharge Zone is estimated at \$37,000/mile. Currently, this cost is borne by all SAWS rate payers. Until such time as a more equitable method of financing inspections and other measures needed to protect the Recharge Zone are implemented, we oppose approval of additional wastewater infrastructure within the Edwards Aquifer Recharge Zone in areas that are not included within SAWS Waste Water CCN's.

Additionally, the extension of waste water service to this site would serve to encourage additional high density development in this extremely sensitive area. We call your attention to the fact that this site is contiguous to the Cibolo Canyon Preserve, purchased by Bexar County and the U.S. Army to preserve habitat for the golden cheek warbler and to protect water quality. We ask that you deny waste water service to this, and any future developments in this area.

I am extremely grateful to you for providing us the opportunity to try to minimize impacts on our ground and surface water resources. If you have any questions, or would like to discuss this matter further, please do not hesitate to contact me at your convenience.

Respectfully,



Annalisa Peace
Executive Director