



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
- Headwaters at Incarnate Word
- Hays Community Action Network
- 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
- Leon Springs Business Association
- Lone Star Chapter of Sierra Club
- Medina County Environmental Action Association
- Native Plant Society of Texas – SA
- 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
- 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
- Texas Water Alliance
- Travis County Green Party
- West Texas Springs Alliance
- Water Aid – Texas State University
- Wildlife Rescue & Rehabilitation
- Wimberley Valley Watershed Association

May 28, 2015

Bridget C. Bohac, Chief Clerk
 MC105
 Texas Commission on Environmental Quality
 P.O. Box 13087
 Austin, TX 78711-3087

Re: Greater Edwards Aquifer Alliance Comment on Proposed Permit NO. WQ0015219001; CN604516112 RN107104929

Dear Ms. Bohac:

We request reconsideration of the TCEQ Executive Director’s decision dated May 1, 2015 to approve permit No. WQ0015219001. We request reconsideration because we contend that the serious concerns outlined in comments we submitted at the hearing on October 30, 2014 have not been adequately addressed by the TCEQ in making the decision to approve this permit. We specifically refer to Comment #4 in the May 1st Executive Director’s decision.

The Greater Edwards Aquifer Alliance, comprised of fifty-one member organizations, is primarily concerned about the approval of this permit and related development because we believe it will have a negative impact on water quality. The wastewater project for which the applicant has been granted this permit is located too close to the Edwards Aquifer Contributing Zone. Boundaries of the Contributing Zone are arbitrary, and often do not reflect geology. Given that the boundary in this instance is based upon the County line, it is probably not terribly accurate.

Studies currently being conducted by Southwest Research Institute for the Edwards Aquifer Authority indicate that the Contributing Zone of the Edwards Aquifer, especially areas within the Glenrose formations of the Trinity Aquifer, may be far more significant in terms of recharge to the Edwards than was previously believed.

The site for the package plant and wastewater irrigated greenbelt is in southeastern Kendall County. The site is also approximately 600 feet northwest of the Edwards Aquifer Contributing Zone. The 40.5 acres proposed for land irrigation is more accurately described as karst surface and intermittent creek bed with potential for aquifer recharge. This package plant would be sited in a location that is potentially the boundary of the Upper and Lower Glen Rose formations.

Our understanding is that recharge features are frequently found along this boundary. The presence of karst features on the tract immediately to the south of the Reserve at Ammann Road is a strong indicator that there could be karst features on the Reserve at Ammann Road site. We understand the owner of the K-7 Ranch had submitted a detailed comment letter with maps and photos and that indicate that several karst features have been found. The applicant should be required to hire a consultant to conduct a professional survey for cave or recharge features on the proposed site and the results reported to TCEQ. Then the wastewater permit writers at TCEQ should evaluate the results of such a study and evaluate the propriety of siting a wastewater plant and 40.5 acre irrigation system at this location.

Also, the site is approximately 1.5 miles north (upstream) of Cibolo Creek and runoff may end up in Cibolo Creek via tributaries during heavy rain events. Also, a package plant may be insufficient to handle the large nutrient load from 635 houses (51 million gallons per year maximum capacity, 140,000 gallons per day per the NORI and draft permit) and could result in groundwater or surface water contamination. This is a large volume for a package plant and it will be difficult to treat this much effluent to appropriate standards for ammonia, phosphorus, and total suspended solids and to contain this on site during heavy rain events. Even if permit limits are met, if the 40.5 acres are indeed located over karst features, this may contaminate the Trinity Aquifer, possibly the Edwards Aquifer, or local groundwater wells.

GEAA's 2011 study on "Land-Applied Wastewater Effluent Impacts on the Edwards Aquifer" (<http://www.aquiferalliance.net/Library/GEAAPublications/GlenroseEdwardsWastewaterReport20111103.pdf>) outlines many causes for concern with this type of project. The report examines existing evidence that wastewater effluent discharged in the San Antonio Edwards Aquifer contributing zones under Texas Land Application Permits (TLAPs), issued by the Texas Commission on Environmental Quality, have failed to protect springs, creeks, rivers, and groundwater. Significant findings of the study include:

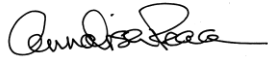
- TLAPs are wildly inconsistent in terms of requirements for wastewater treatment, offline effluent storage volume, irrigation area size, or downgradient monitoring. The result of these inconsistencies is widely different levels of protection for downgradient springs, streams, rivers, and wells.
- Sparsely available monitoring data from streams and/or springs downstream from TLAPs indicate significant degradation of the high quality water that would naturally occur at those locations.
- Regulations governing TLAPs should be overhauled to provide a consistent and high level of water quality protection across the Edwards Aquifer.

In the context of the thin soils, numerous springs, and sensitive Texas Hill Country streams, rivers, and aquifers, any wastewater effluent system represents a threat of permanent and significant

degradation. Only by soundly based and strictly enforced regulations can we balance the provision of wastewater infrastructure to suburban residences with protection of the natural streams and springs that draw people to these areas.

Thank you for the opportunity submit this request.

Respectfully,

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