

Alamo Group of the Sierra Club  
Aquifer Guardians in Urban Areas  
Austin Regional Sierra Club  
Bexar Audubon Society  
Boerne Together  
Cibola Nature Center  
Citizens Allied for Smart Expansion  
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  
Helotes Nature Center  
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  
OST 100  
Preserve Castroville  
Preserve Lake Dunlop Association  
Preserve Our Water-Blanco County  
San Antonio Audubon Society  
San Antonio Conservation Society  
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

January 7, 2010

Office of the Chief Clerk  
MC 105  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

Re: Renewal of Permit No. WQ0012074001

Dear Chief Clerk,

Thank you for the opportunity to submit these comments on behalf of the 47 member organizations of the Greater Edwards Aquifer Alliance (GEAA), and in particular the members of Friends of Canyon Lake, whose drinking water comes from the Triple Peak Inlet. We have a vested interest in water quality for Canyon Reservoir and the Guadalupe River. Like many here, I have seen a steady decline in overall quality, exacerbated by the current decline in lake level and river flow due to drought and increased diversion.

We have investigated the permitted treatment parameters of the old Fort Sam Houston Recreation Area wastewater treatment plant (Permit No. WQ0012074001) and believe that treatment level to be minimal (15-10). Although the permitted discharge quantity is small, it represents an issue we must challenge if we are to be consistent in attempts to assist the state in improving overall Guadalupe River quality.

You are aware that we have recently succeeded in efforts to improve Canyon Lake WWT as exemplified by the current Canyon Park Estates facility upgrade (5-2-2-1). You may also recall that we demanded a public hearing on a proposed large size WWTP on the south side of the lake, resulting in that permit application being withdrawn by the submitter, SJTX, Inc., dba Canyon Lake Water Service Company.

We therefore respectfully request that you NOT approve the FSH renewal until that agency agrees to upgrade the Recreation Area WWTP to at least a 5-2-2-1 level. ***In addition, we request a Public Hearing at the earliest date to formally present our demands to the requester.***

Last, I call your attention to the current restrictions on ANY level of wastewater discharge into the Highland Lakes and the ongoing rationale for non approval of permits by Leander and Granite Shoals. We see no reason why the Lower Colorado should receive more favorable treatment to that afforded the Guadalupe.

We sincerely hope you share our desire to improve water quality in the surface waters of our state, and that you stand with us to take reasonable actions to do so.

Respectfully,



Annalisa Peace  
Executive Director

Cc: Hon. Doug Miller, State Rep  
Comal County Commissioners  
Robert W. Wickman