

I am speaking on behalf of the Greater Edwards Aquifer Alliance.

The United Nations has designated November 19th World Toilet Day. GEAA is celebrating by meeting with you all to protest this discharge permit for a new sewage treatment plant that will treat 460,000 gallons per day to be discharged just north of the confluence of Dripping Springs and Lewis creeks, which flow into the nearby Cibolo Creek – a major source of recharge for the Edwards Aquifer.

This new treatment plant will serve the 4S Ranch subdivision just outside Bulverde that will put 1880 homes on 780 acres. Given that this subdivision will sit on the Edwards Aquifer Contributing Zone, very near the Recharge Zone, GEAA is available to work with you, the developer, and with local citizens to promote measures to mitigate negative impacts to the Aquifer.

Recharging the Edwards with sewage effluent that is not treated to drinking water standards will introduce emerging contaminants such as unmetabolized drugs and personal care products into our drinking water supply. Local wells will be at risk in the event of a sewage leak. The cumulative impacts of urban growth and new sewage infrastructure in this area will ultimately degrade the quality of our Edwards and Trinity groundwater.

We realize that sanitation is an important issue for the developing world. Likewise, appropriate, and inappropriate uses of sanitation infrastructure as it impacts the Edwards Aquifer has been a major focus of GEAA's resources of late. Local municipalities and folks in the unincorporated area really need the State of Texas to act on their behalf by addressing these issues on a permit by permit basis. Because Edwards water is not pretreated prior to use and distribution, we must be ever mindful of ensuring that water that recharges the Aquifer is clean and high quality.

We anticipate that the TPDES permit is being submitted for your approval for the purpose of implementing sewage infrastructure to allow high density development of this site. Such development is inconsistent with current land use patterns in this unincorporated area. It is also inconsistent with impervious cover limits of 8% to 15% recommended by karst scientists to protect water quality on the Edwards Aquifer Recharge Zone and nearby Contributing Zone. GEAA is particularly concerned about the cumulative impact that multiple high density developments in this area will have on the quality of water recharging the aquifer to supply local wells and the Comal Springs.

Besides our concerns about the impact of high density housing on the Edwards Aquifer Recharge and Contributing Zones, we are concerned about the impacts of unplanned growth on this community. Approval of this and other high density developments in the area will most likely require a suite of expensive drainage, transportation, and other infrastructure projects in the near future.

Citizens rely on you to work with them to protect their property, their water resources, and their investment in this community. We urge you to deny approval of the amendment to the 4S Ranch Water Quality Permit.

Thank you for this opportunity to speak.