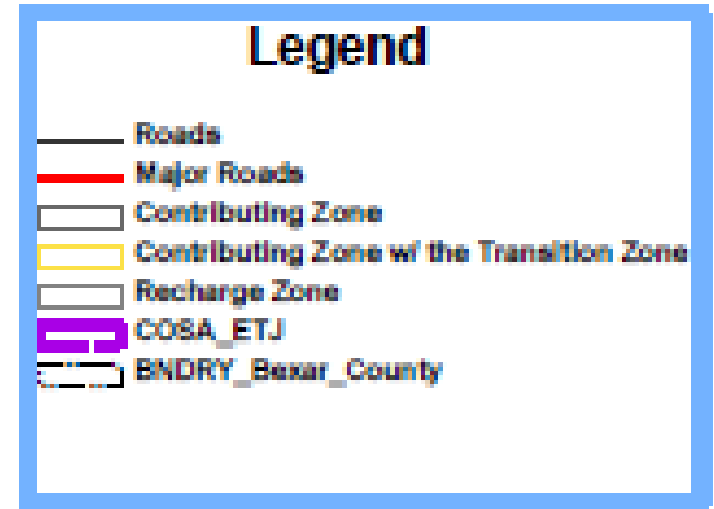
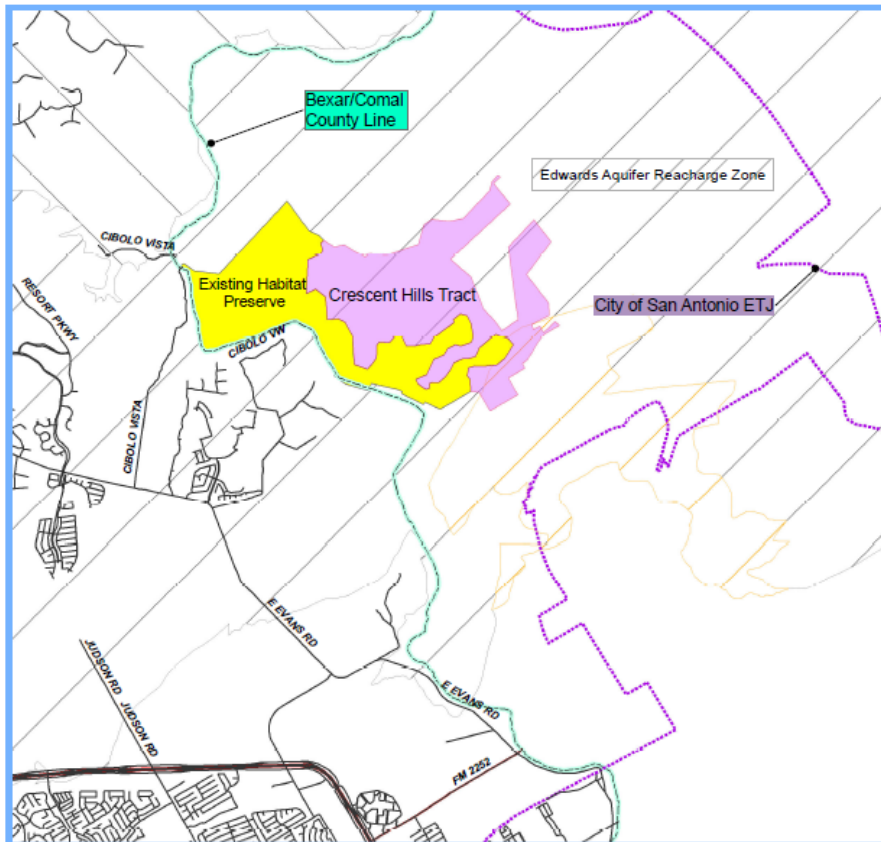


The Greater Edwards Aquifer Alliance is a coalition of 50 member groups formed to protect the Edwards Aquifer and its contributing Hill Country watersheds. For more information visit our website at [www.AquiferAlliance.org](http://www.AquiferAlliance.org)



On March 11, 2013, the SAWS Board approved water and wastewater service to Crescent Hills, a development located entirely in Comal County on the Edwards Aquifer Recharge Zone.

No.	Tract Name	Developer	Acreage	Water EDUs	WW EDUs	Board Reason	Water CCN	WW CCN
1	Crescent Hills	3009 Land Ltd	1,545	3,800	3,500	AC/EARZ	Inside	Pending



## San Antonio has three world class assets:

- The Alamo
- The Edwards Aquifer
- Bracken Bat Preserve

The proposed Crescent Hills Development threatens to compromise two of these. Crescent Hills is sited entirely on the Edwards Aquifer Recharge Zone and entirely in Comal County.



# In the Edwards Aquifer Recharge and Contributing zones

- Increased Impervious Cover Leads to Downstream Flooding



# In the Edwards Aquifer Recharge and Contributing zones Increased Urbanization is Impairing Water Quality

## Results of EAA well tests (2011 – present\*) detecting anthropogenic or “emerging” contaminants (pharmaceuticals and personal care products)

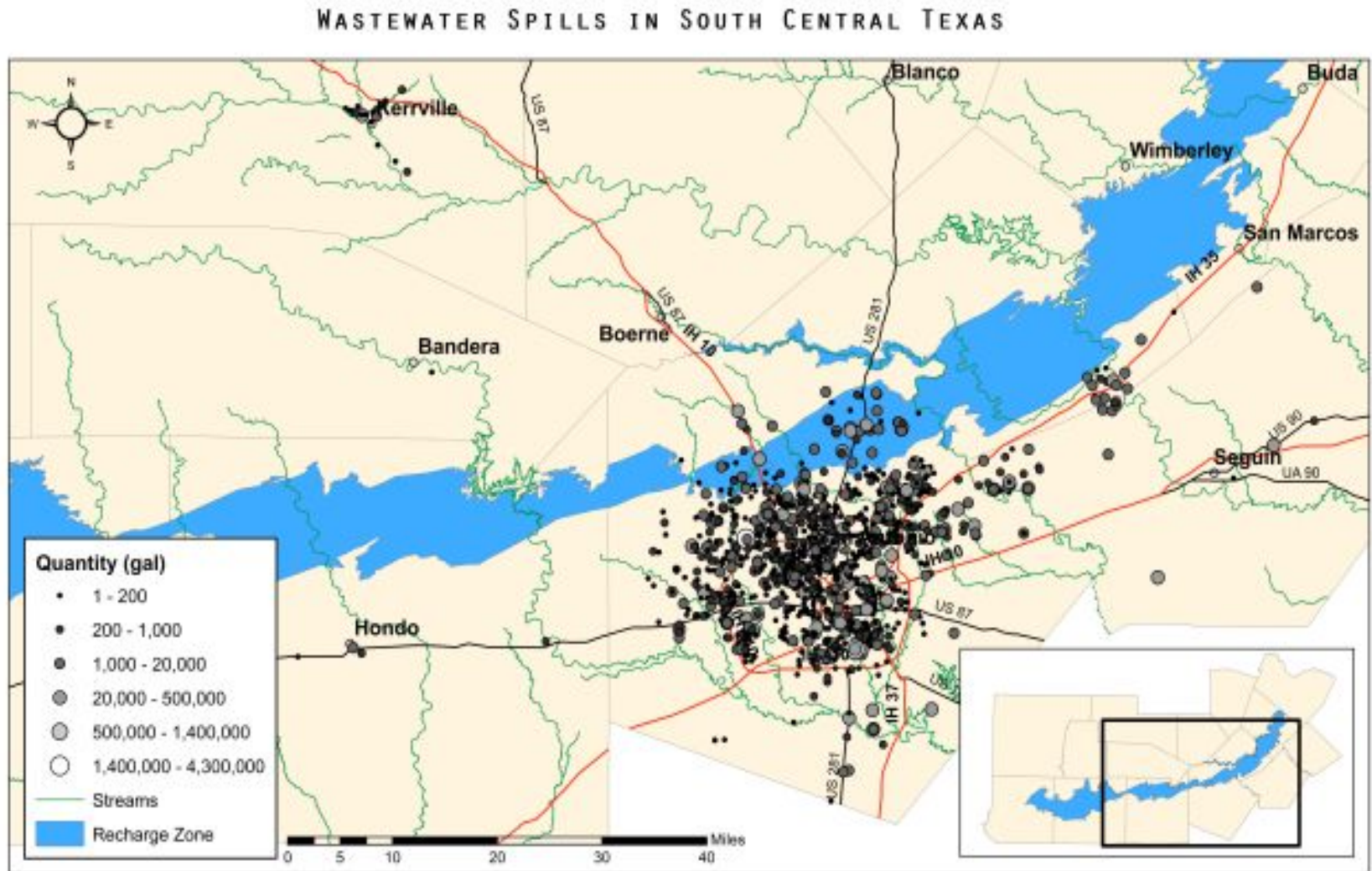
Analytic Method Chemical Name Result Unit AY-68-28-2118/22/11 10:50 AMWS-LC-002217a-Estradiol 1.2ng/l AY-68-28-2118/22/11 10:50 AMWS-LC-0022 Equilenin 3.8ng/l AY-68-28-2118/22/11 10:50 AMWS-LC-0022 Estrone 6.9ng/l AY-68-28-2118/22/11 10:50 AME1694 Triclocarban 2.9ng/l AY-68-28-2118/22/11 10:50 AME1694 Tylosin 2.3ng/l AY-68-28-6088/18/11 10:30 AME1694 Cotinine 1.7ng/l AY-68-28-6088/18/11 10:30 AME1694 Cotinine 1.7ng/l AY-68-28-6088/18/11 10:30 AME1694 Lincomycin 0.51ng/l AY-68-28-6088/18/11 10:30 AME1694 Lincomycin 0.51ng/l AY-68-28-6089/19/12 12:40 PME1694 Diltiazem 7.9ng/l AY-68-29-1128/18/11 1:35 PME1694 Lincomycin 0.42ng/l AY-68-29-1121/11/12 11:05 AME1694 Caffeine 53ng/l AY-68-29-1121/11/12 11:05 AMWS-LC-0022 Estrone 1.6ng/l AY-68-29-1121/11/12 11:05 AME1694 Lincomycin 0.27ng/l AY-68-29-1138/18/11 12:05 PME1694 Lincomycin 0.31ng/l AY-68-29-1138/18/11 12:05 PME1694 Lincomycin 0.31ng/l AY-68-29-1131/10/12 11:25 AMWS-LC-002217a-Estradiol 1.4ng/l AY-68-29-1131/10/12 11:25 AMWS-LC-002217b-Estradiol 1.5ng/l AY-68-29-1131/10/12 11:25 AME1694 Caffeine 320ng/l AY-68-29-1131/10/12 11:25 AME1694 Diltiazem 0.48ng/l AY-68-29-1131/10/12 11:25 AMWS-LC-0022 Estrone 1.3ng/l AY-68-29-1131/10/12 11:25 AME1694 Lincomycin 0.69ng/l AY-68-29-1131/10/12 11:25 AME1694 Triclosan 17ng/l AY-68-29-4181/17/12 9:45 8/16/12 9:50 AME1694 Thiabendazole 24ng/l IDX-68-15-901 Hueco Springs 12/3/12 1:15 PME169817a-Estradiol 1.60ng/l IDX-68-15-901 Hueco Springs 12/3/12 1:15 PME1694 Cotinine 4.85ng/l IDX-68-15-901 Hueco Springs 12/3/12 1:15 PME1694 Diltiazem 0.705ng/l IDX-68-23-301 Comal Springs 8/23/11 8:50 AMWS-LC-002217a-Estradiol 4.3ng/l IDX-68-23-301 Comal Springs 8/23/11 8:50 AMWS-LC-002217b-Estradiol 7.0ng/l IDX-68-23-301 Comal Springs 8/23/11 8:50 AMWS-LC-0022 Equilenin 0.72ng/l IDX-68-23-301 Comal Springs 8/23/11 8:50 AMWS-LC-0022 Estrone 5.8ng/l ILR-67-01-801 Hotel Springs at San Marcos 12/3/12 11:50 AME1694 Cotinine 4.73ng/l ILR-67-01-801 Hotel Springs at San Marcos 12/3/12 11:50 AME1694 Diltiazem 0.451ng/l ILR-67-09-101 12/14/12 12:00 AME1694 Caffeine 250ng/l ILR-67-09-101 12/14/12 12:00 AME1694 Carbamazepine 19ng/l ILR-67-09-101 12/14/12 12:00 AME1694 Sulfamethoxazole 12ng/l

\*excludes results from test well near Cibolo Nature Center

Lincomycin and sulfamethoxazole are antibiotics • Diltiazem is a blood pressure medication • Carbamazepine is an epilepsy medication . Cotinine is a nicotine metabolite



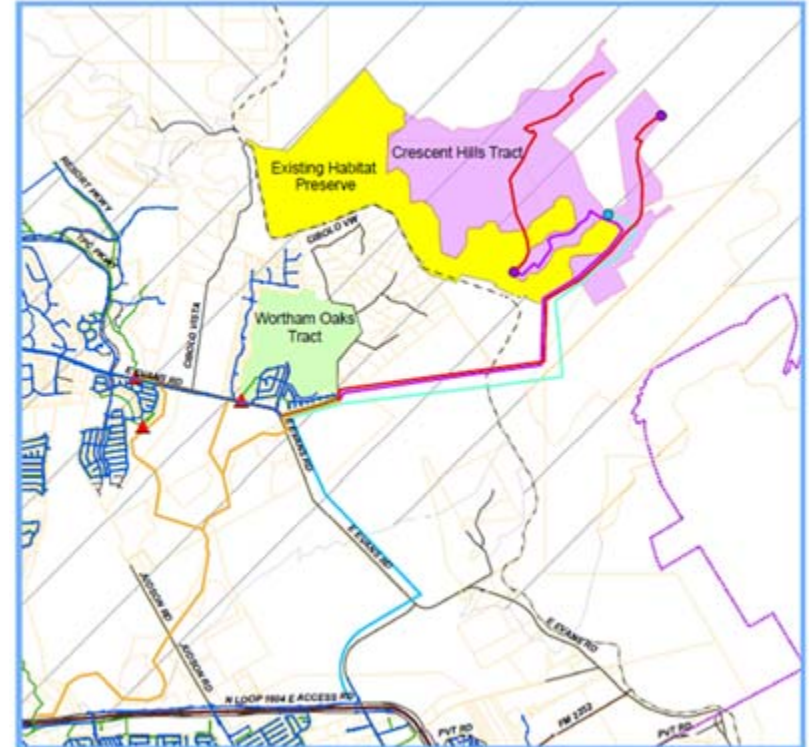
Between January 2008 and May 2012 eighty three spills totaling 809,000 gallons (2.5 acre/feet) of raw sewage occurred on Edwards Aquifer Recharge Zone.



# Not on Our Water! Not with Our Money!

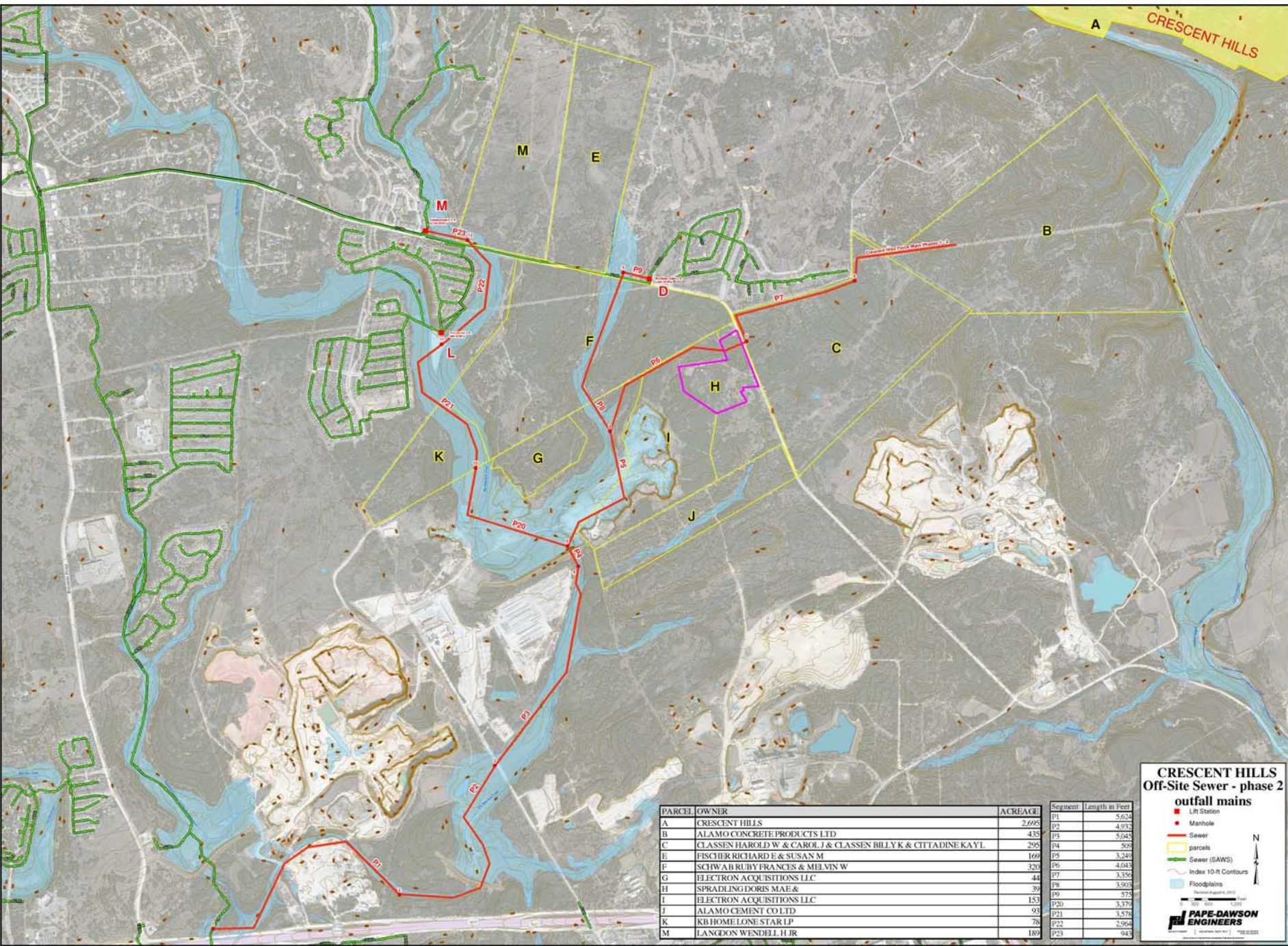
To serve the Crescent Hills development, SAWS Rate payers will be called on to subsidize:

- Fifty percent of the cost of running an oversized sewer main to the development. SAWS has determined that the oversized main is needed to serve other developments anticipated to be built in this area. *The sewage infrastructure will be installed in creeks that recharge the Edwards Aquifer.*





**CRESCENT HILLS**



**CRESCENT HILLS  
Off-Site Sewer - phase 2  
outfall mains**

■ Lift Station  
■ Manhole  
— Sewer  
 parcels  
— Sewer (SAWS)  
— Index 10-ft Contours  
 Floodplains

Revised August 9, 2013  
1" = 100' Horizontal  
1" = 100' Vertical  
  
  
**PAPE-DAWSON ENGINEERS**  
1100 West 10th Street, Suite 100, Fort Collins, CO 80521

PARCEL	OWNER	ACREAGE	Segment	Length in Feet
A	CRESCENT HILLS	2,695	P1	5,624
B	ALAMO CONCRETE PRODUCTS LTD	435	P2	4,932
C	CLASSEN HAROLD W & CAROL J & CLASSEN BILLY K & CITTADINE KAY L	295	P3	5,043
E	FISCHER RICHARD E & SUSAN M	169	P4	509
F	SCHWAB RUBY FRANCES & MELVIN W	320	P5	3,240
G	ELECTRON ACQUISITIONS LLC	44	P6	4,043
H	SPRADLING DORIS MAE &	39	P7	3,354
I	ELECTRON ACQUISITIONS LLC	153	P8	3,903
J	ALAMO CEMENT CO LTD	93	P9	579
K	KB HOME LONE STAR LP	78	P20	3,379
M	LANGDON WENDELL H JR	189	P21	3,578
			P22	2,964
			P23	943



## **Not on Our Water! Not with Our Money!**

**To serve the Crescent Hills development, SAWS Rate payers will be called on to subsidize:**

- the cost of inspections required by TCEQ for sewage infrastructure installed on the Edwards Aquifer Recharge Zone.

TCEQ requires camera testing every five years for sewer lines on the Recharge Zone, at an estimated cost to SAWS customers of \$37,000/mile.

*This cost does not apply to sewage infrastructure that is not on the Recharge Zone.*

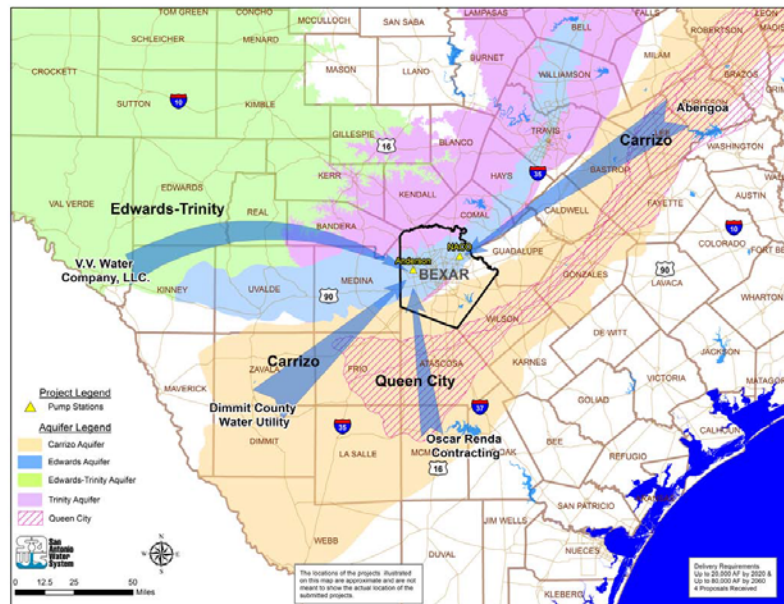
# Not on Our Water! Not with Our Money!

## To serve the Crescent Hills development, SAWS Rate payers will be called on to subsidize:

- the cost of providing water to 3,800 residential units.

SAWS will have to provide a total of 1,089 acre feet of water per year at a cost of \$992,079.00 per year.

SAWS customers will face increased rates in the near future to cover the costs of securing additional water supplies.



## The Greater Edwards Aquifer Alliance Requests:

- That City Council rescind the service contracts approved by the SAWS Board for water and waste water service to Crescent Hills
- That SAWS amend their CCN permit so that they are not the sole service provider for part of Comal County
- a large buffer zone to protect the Bracken Bat Cave, similar to the buffer zone that protects the Toyota Plant, and for enforcement of San Antonio's 15% Impervious Cover Limit as required on this site.
- Or - that CoSA use Prop 1 Funds to Purchase the Property.





# You can do this...

- On April 17, 2008 the City Council issued a resolution denying a petition from BP Limited to provide water service to the proposed Hills of Castle Rock subdivision after the SAWS Board voted to deny service.
- We ask that you issue a similar resolution to deny water and waste water service to Crescent Hills.

## ITEMS FOR INDIVIDUAL CONSIDERATION

The City Clerk read the following Ordinance:

**2008-04-17-0017R**

**Item 4.** A RESOLUTION DENYING THE PETITION OF BP 1766 SAN ANTONIO, LTD., OWNERS OF 1,766 ACRES OF LAND KNOWN AS "THE HILLS OF CASTLE ROCK", FOR THE CITY OF SAN ANTONIO TO MAKE AVAILABLE WATER AND SANITARY SEWER SERVICES AND REFUSING CONSENT FOR THE CREATION BY THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY OF UP TO THREE MUNICIPAL UTILITY DISTRICTS OVER THE PROPERTY, LOCATED IN MEDINA AND BANDERA COUNTIES, LARGELY IN THE CITY'S EXTRATERRITORIAL JURISDICTION (ETJ).

Mr. Jesus Garza presented said item noting that the owners of the Hills of Castle Rock had petitioned the City to provide water and sanitary sewer services to the land within the ETJ and authorization by the Texas Commission on Environmental Quality (TCEQ) to create three Municipal Utility Districts (MUDs). He stated that the area encompassed a total of 1,766 acres and that approximately 1,168 acres were within the City's ETJ.

Mr. Garza added that the San Antonio Water Systems (SAWS) Board had declined to enter into a Utility Service Agreement due to the density and location of the project, sensitive geographical conditions of the land, and the negative impact on the environment and wildlife in the area. He stated that city staff recommended denial of the petition request.

Mr. Douglas McNeel spoke in opposition to the petition. He urged the Council to take a firm stance and deny the petition in an effort to discourage disruptive development. He noted that if the sewage treatment plant was approved, there was a possibility that treated sewage would be discharged into the Edwards Aquifer via the San Geronimo Creek. Mr. McNeel referenced a 2004 Study by Hydrologist Dr. George Veni that contained an assessment of the role that San Geronimo Creek plays in recharging the Edwards Aquifer and provided a copy of the study to the City Council.

Ms. Charlotte Kahl with the Old Spanish Trail Project also spoke in opposition to the petition. She noted the cumulative effects of subdivisions within the Boerne Stage Road Corridor and the efforts required to preserve and protect the area. She commended City Staff for offering smart growth incentives and asked that more creative incentives be established for those developers committed to sensitive growth.

Mr. Robert Lee, Mayor of Castroville, stated that his concerns with the proposed petition were water quantity, water quality, and flooding. He noted that the citizens of Castroville were solely dependent on the Edwards Aquifer and were concerned with growth in Medina County. He asked the Council to consider the possible repercussions if approved.

Ms. Camille White, Member of the San Geronimo Valley Alliance, stated that they were in support of city staff's recommendation to deny the petition.

Mr. Randy Johnson, President of the San Geronimo Valley Alliance, thanked City Staff for their recommendation to deny said request and stated that the water supply needed to be protected. He noted

## **You can do this...**

In September of 2007, SAWS proposed expanding their CCN (Certificate of Convenience and Necessity) to include the entire ETJ of the City of San Antonio. GEAA opposed permit applications to expand into the Edwards Aquifer Recharge and Contributing Zones in Medina and Banderita Counties.

SAWS subsequently withdrew CCN applications for water and waste water service in the contested areas.

Consequently, SAWS can deny service to inappropriate projects in the western segment of the ERZ.

The City of San Antonio can direct SAWS to amend the eastern CCN application to exclude Comal County and the ERZ.

## You can do this...

Senate Bill 2008 (passed by the 80<sup>th</sup> Legislature) creating the Comal County Special Improvements District.

This legislation provided:

- that a water and wastewater facility to be known as the Comal County Water Improvement District No. 1 be built. Nature of District – the district is a water control improvement district created under Section 59, Article XVI, Texas Constitution. Based on this disclosure, there is no need to provide SAWS water into Comal County for Crescent Hills.
- a non-annexation agreement with the City of San Antonio. Neither San Antonio or Bexar County will collect ad valorem, sales, or any other taxes from the Crescent Hills Development.





- **Thank you!**

You may contact us at **210-320-6294**

And visit our web site at

**[www.AquiferAlliance.org](http://www.AquiferAlliance.org)**