As the members of the Edwards Aquifer Recovery Implementation Program struggle to come to consensus on the management of San Antonio's primary source of water, San Antonio Water System (SAWS) is understandably concerned over how proposed reductions in the amount San Antonio can withdraw from the Edwards will affect plans for growth.

Last week the Greater Edwards Aquifer Alliance (GEAA) was notified that SAWS is moving forward to secure permits to designate the agency as the sole provider of water and sewer service within a large area of the Edwards Aquifer Recharge and Contributing zones. Why is SAWS looking to expand their service area when they may be hard pressed to meet projected needs? GEAA, the City of Grey Forest, Helotes Heritage Association, San Geronimo Valley Alliance and others are contesting these applications for Certificates of Convenience and Necessity (CCN).

The area designated in the contested SAWS applications provides 10% of the entire recharge to the Edwards Aquifer. Providing water and sewer service will open the Hill Country in NW Bexar and Medina counties to much higher density housing development, easily as high as 4-6 lots per acre. Development of this density would result in high levels of impervious cover, increased traffic, thoroughfare construction, and other related infrastructure development, all leading to continued and irreversible impact on the aquifer. The effects on the amount and quality of recharge to the aquifer are as yet undetermined, but respected karst scientists warn that promoting high density development within this area could compromise both.

Besides the obvious disconnect of supply versus demand demonstrated by applying for CCN's in this area, there are a number of other factors that indicate that this action is premature:

- SAWS Board and staff are currently engaged in a Planning and Policy process to determine how and where SAWS' resources will be allocated. We believe the CCN applications should be withdrawn until this process is completed and direction from the Board is secured.
- Various stakeholders are currently working on a Habitat Conservation Plan for the endangered species of the Southern Edwards Plateau region, including the areas covered in these contested permits. This process was formed to address the issue of preserving habitat so as not to interfere with the Army's mission at Camp Bullis. Promoting high density development in this region before a plan is in place to mitigate the impact on endangered and threatened species would be counterproductive.
- Guaranteeing water and sewer service will also have the effect of increasing the price of land within the CCN, thereby making it too expensive to protect our watershed through San Antonio's Aquifer Protection initiative.

If SAWS secures the contested CCN permits they will have to provide service to anyone who asks. Without the CCN, SAWS will still be able to provide water and sewer service at the discretion of the Board. More importantly, SAWS Board and staff will retain the leverage to negotiate with developers to ensure that any development that does take place within our watershed will not compromise the aquifer and the best interests of the City of San Antonio.

Promoting growth in this manner will force SAWS to secure additional expensive sources of new water. Since our heavy reliance on the Edwards is increasingly contentious, it makes no sense to encourage growth where it might diminish the amount of water recharging the Edwards, and thus the amount available to all who rely on this resource. We urge SAWS to withdraw the contested applications until planning processes have been completed.

Annalisa Peace is the Executive Director of the Greater Edwards Aquifer Alliance, which unites fifty member organizations behind a comprehensive plan to protect regional karst aquifers, their springs and watersheds, and the Texas Hill Country.

SAWS is the largest single user of the Edwards Aquifer as the primary source of water for the nation's seventh-largest city.