

Dear GEAA Members and Friends,

Tomorrow, July 2nd, GEAA and others will be going to the San Antonio Water System (SAWS) Board to [request that SAWS apply to the Texas Commission on Environmental Quality \(TCEQ\) to amend permits that designate SAWS as the sole service provider for water and sewer service.](#) Specifically, we will request that SAWS apply to TCEQ to decertify the portion of the Edwards Aquifer Recharge and Contributing Zones in northern Bexar County, and the entire portion of Comal County that is currently included in CCN #20285 and CCN # 10640.

SAWS has been very disingenuous in their statements to the press regarding their inability to deny service to Crescent Hills and other developments.

Spokespeople for SAWS have repeatedly said that “pursuant to the Texas Water Code, SAWS must serve every customer within its CCN so long as the customer follows SAWS rules. If SAWS were to refuse service, then the Texas Commission on Environmental Quality (TCEQ) could issue emergency orders compelling service and penalize SAWS up to \$5,000 per day for failing to provide such service.”

What they neglect to mention is that TCEQ only requires this because SAWS asked to be the sole service provider. GEAA’s lawyers and TCEQ staff have assured us that this could easily be remedied with a simple action from SAWS. This action merely involves SAWS submitting this request to TCEQ by filling out a form created for that purpose. Once this is accomplished, SAWS will be free to deny service, as they have done in the past, to projects that are incompatible with aquifer protection.

GEAA is particularly concerned with the extension of sewer mains to be installed within creek beds that recharge up to 80% of the water that we drink. Approximately 10 miles of additional sewage infrastructure traversing the Edwards Aquifer Recharge Zone will be required to extend service to the Crescent Hills development in Comal County. Given that these lines will require special inspection and maintenance and threaten to pollute our groundwater, springs, and rivers as this infrastructure ages, we oppose SAWS contracts for sewer service to undeveloped portions of the Edwards Aquifer Recharge Zone.

We also question the wisdom of extending SAWS service into Comal County. Given SAWS projections that San Antonio will need to secure an additional 50,000 acre feet of new water supplies by 2020, we wonder why they continue to expand their service area into contiguous counties.

In a nutshell, GEAA members do not want SAWS installing additional sewage infrastructure within the Edwards Aquifer Recharge Zone, and we do not want to pay for securing additional water supplies that will be used to serve new development on the Recharge Zone. Amending SAWS permits to exclude the Edwards Aquifer Recharge Zone will enable the SAWS Board to consider the consequences of land uses incompatible with preserving the Edwards Aquifer, when contemplating contracts for SAWS services to new developments.

We will continue to press SAWS and the City of San Antonio to [protect the Bracken Bat Cave](#), the Edwards Aquifer Recharge Zone, and Comal and Hueco springs from encroaching high density development. Your support on this issue has been overwhelming and very much appreciated.

Thank you!

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Executive Director
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