



Dear GEAA members and friends,

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

This [1,545 acre tract](#), bordered by the newly acquired Cibolo Canyon Preserve and the Bracken Bat Preserve, is too high density for the Recharge Zone. Planned to build out at four houses per acre, Crescent Hills does not comply with San Antonio's impervious cover restrictions. It is estimated that SAWS will need to secure an additional 81 acre feet per year to provide water service to this new development.

Given that SAWS is [exploring options](#) to pipe water in from other areas to meet projected demands, it is time that we - as a community - engage in this issue. How big do we want SAWS to grow? Do we want to provide service outside of Bexar County? Do we, as rate payers, want to fund big dollar supply projects in order to fund sprawl over the Edwards Recharge Zone? We are very grateful to SAWS Trustee, Samuel E. Luna, for bring these issues up at the March 11th SAWS Board meeting, and for following up with a [letter to the SAWS Board](#). We agree that the vote to approve service to Crescent Hills should be rescinded.

Also very troubling is the fact that SAWS plans to subsidize 50% of the cost of installing oversized sewer lines to Crescent Hills. Not only will this promote additional growth over the Edwards Recharge Zone, but these lines will be installed within the creek bed of Elm Hole Watering Creek and its tributaries.



Sewer line proposed to serve Crescent Hills – SAWS

SAWS routinely installs sewage lines right up the middle of intermittent streams that recharge the Edwards Aquifer, as they plan to do to provide service to Crescent Hills. Given that 75% to 80% of recharge occurs within streams and rivers that traverse the Edwards Aquifer Recharge Zone, the event of a spill of could have serious consequences to nearby wells. The Edwards Aquifer staff recently reported extremely elevated levels of fecal coli form bacteria in water wells as far as four miles away from the site of a spill that occurred on the Recharge Zone on October 15, 2012.

During the period between January 2008 and May 2012 eighty-three spills totaling 809,000 gallons (or 2.5 acre feet) of raw sewage occurred on the Edwards Aquifer Recharge Zone. Because the Edwards Aquifer does not filter surface runoff on the Recharge Zone, this is cause for concern.

Recognizing that sewage infrastructure poses a threat to the continued quality of the Edwards Aquifer, TCEQ requires camera testing of wastewater lines that traverse the Recharge Zone at five year intervals. The cost of compliance with these requirements

is estimated at \$37,000/mile. Currently, this cost is borne by all SAWS rate payers. Additionally, **the extension of waste water service into the Edwards Recharge and Contributing zones serves to encourage additional high density development in this extremely sensitive area.** Until such time as a more equitable method of financing inspections and other measures needed to protect the Recharge Zone are implemented, we oppose approval of additional wastewater infrastructure within the Edwards Aquifer Recharge Zone.

It is time that our community had a serious discussion about expanding SAWS services. Do we really want to export water from elsewhere to provide service for new development on the Edwards Aquifer Recharge Zone? **Please contact the [Mayor and your City Council Representative](#) to voice your concerns.**

Many thanks!

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