

Alamo, Austin, and Lone Star chapters of the Sierra Club  
Aquifer Guardians in Urban Areas  
Bexar Audubon Society  
Bexar Green Party  
Boerne Together  
Cibolo Nature Center  
Citizens Allied for Smart Expansion  
Citizens for the Protection of Cibolo Creek  
Comal County Conservation Alliance  
Environment Texas  
First Universalist Unitarian Church of San Antonio  
Friends of Canyon Lake  
Friends of Dry Comal Creek  
Friends of Government Canyon  
Fuerza Unida  
Green Party of Austin  
Headwaters at Incarnate Word  
Helotes Heritage Association  
Helotes Nature Center  
Hill Country Planning Association  
Green Society of UTSA  
Guadalupe River Road Alliance  
Guardians of Lick Creek  
Kendall County Well Owners Association  
Kinney County Ground Zero  
Leon Springs Business Association  
Medina County Environmental Action Association  
Native Plant Society of Texas – SA  
Northwest Interstate Coalition of Neighborhoods  
Preserve Castroville  
Preserve Lake Dunlop Association  
San Antonio Audubon Society  
San Antonio Conservation Society  
San Geronimo Nature Center  
San Geronimo Valley Alliance  
San Marcos Greenbelt Alliance  
San Marcos River Foundation  
Save Barton Creek Association  
Save Our Springs Alliance  
Scenic Loop/Boerne Stage Alliance  
Securing a Future Environment  
SEED Coalition  
Solar San Antonio  
Sisters of the Divine Providence  
Travis County Green Party  
West Texas Springs Alliance  
Water Aid – Texas State University  
Wildlife Rescue & Rehabilitation  
Wimberley Valley Watershed Association

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March 27, 2019

Bridget Bohac, Chief Clerk  
Texas Commission on Environmental Quality  
Office of the Chief Clerk, MC 105  
P.O. Box 13087  
Austin, Texas 78711-3087

Submitted electronically at <http://www14.tceq.texas.gov/epic/eComment/>

Re: Comments and Hearing Request Regarding Application of South Central Water Company for TPDES Permit No. WQ0014988001

Please accept the attached comments on behalf of the fifty-two member groups of the Greater Edwards Aquifer Alliance.

**1. Background.** South Central Water Company (SCWC), P.O. Box 570177, Houston, Texas 77257, has applied to the Texas Commission on Environmental Quality (TCEQ) to renew Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0014988001 (EPA I.D. No. TX0132837) to authorize an increase in the discharge of treated wastewater to a volume not to exceed a daily average flow of 950,000 gallons per day. The domestic wastewater treatment facility is located approximately 1,600 feet southeast of the intersection of U.S. Highway 281 and Farm-to-Market Road 1863 in the town of Bulverde in Comal County, Texas 78163. The discharge route is from the plant site to a roadside ditch along Wiley Road; thence to an unnamed tributary; thence to Upper Cibolo Creek.

**2. Greater Edwards Aquifer Alliance (GEAA).** GEAA submits the following comments and requests a public meeting regarding this permit application. GEAA is a 501(c)(3) nonprofit organization that promotes effective broad-based advocacy for protection and preservation of the Edwards Aquifer, its springs, watersheds, and the Texas Hill Country that sustains it. GEAA has multiple members who would be adversely affected by the proposed application of Cherryville GP, Inc. and Cherryville #5, Ltd.

GEAA's members have serious concerns regarding the permit application, mostly notably regarding the safety of the water supply from numerous wells located just downstream in the Oak Village subdivision of Bulverde. GEAA's members' ability to safely draw water from Edwards Aquifer wells in the area is of primary concern, as the treated sewage outfall location is less than a half mile upstream from most of these wells. Accordingly, GEAA urges SWSC to utilize a

“One Water” approach for their wastewater treatment system, incorporating beneficial reuse of effluent, thereby eliminating the need to discharge effluent into Cibolo Creek, which recharges the Edwards Aquifer at the outfall location. In the event SWSC is unable to reuse all of the wastewater generated, it is GEAA’s recommendation that the remaining amounts be land applied, with SWSC purchasing the necessary land for such and obtaining the requisite TLAP permit from the TCEQ.

**3. Comments on the Application.** As noted in the Receipt of Application and Intent to Obtain Water Quality Permit, the proposed discharge route is from the wastewater plant site to a roadside ditch along Wiley Road; thence to an unnamed tributary; thence to Upper Cibolo Creek; thence to the San Antonio River.

SCWC currently discharges effluent from the Edgebrook development under their current TPDES permit. Although the discharge of effluent is currently intermittent due to the fact that the Edgebrook development is still being built out, there have already been noticeable impacts on Cibolo Creek (see Fig. 1 below).



Fig. 1 Algae from treated sewage can be seen on Cibolo Creek just below the Edgebrook WWTP outfall on 3/2/19

Prior to the discharging of effluent into Cibolo Creek from the SCWC WWTP, Cibolo Creek featured clear pools of water rather than algae-covered sections (see Fig. 2 below).



Fig. 2 Aerial photo from 2017 of the same section of Cibolo Creek as shown in Fig. 1, prior to effluent discharge

The fact that only an intermittent discharge of effluent is causing so much algae in Cibolo Creek is a major concern for those landowners located just downstream, as Cibolo Creek recharges the aquifer that feeds local wells. Some of these landowners are GEAA members and have expressed their concerns to our organization. They have asked what will happen to their water supply once the SCWC WWTP increases the effluent discharge to their currently permitted 500,000 gallons/day level, and even beyond that to the requested 950,000 gallons/day level requested in the current permit application.

Compounding the issue is the Johnson Ranch development, which also currently discharges their effluent into Cibolo Creek. The Johnson Ranch outfall location sits between the Edgebrook outfall location and the aforementioned Oak Village wells (see Fig 3 on the following page). Johnson Ranch has a permit to discharge up to 350,000 gallons/day of treated sewage into the same section of Cibolo Creek as SCWC, via an unnamed tributary that flows into Cibolo Creek (see Fig. 4 on the following page). **This means that if the current SCWC permit is approved, virtually all of the Cibolo Creek flow will be treated sewage, up to 1.3 million gallons/day of effluent, which will then leak into the Edwards Aquifer and local wells via the many faults and fractures in the Cibolo Creek limestone bed/recharge zone. The public supply wells in the area receive only minimal water treatment prior to human consumption.**

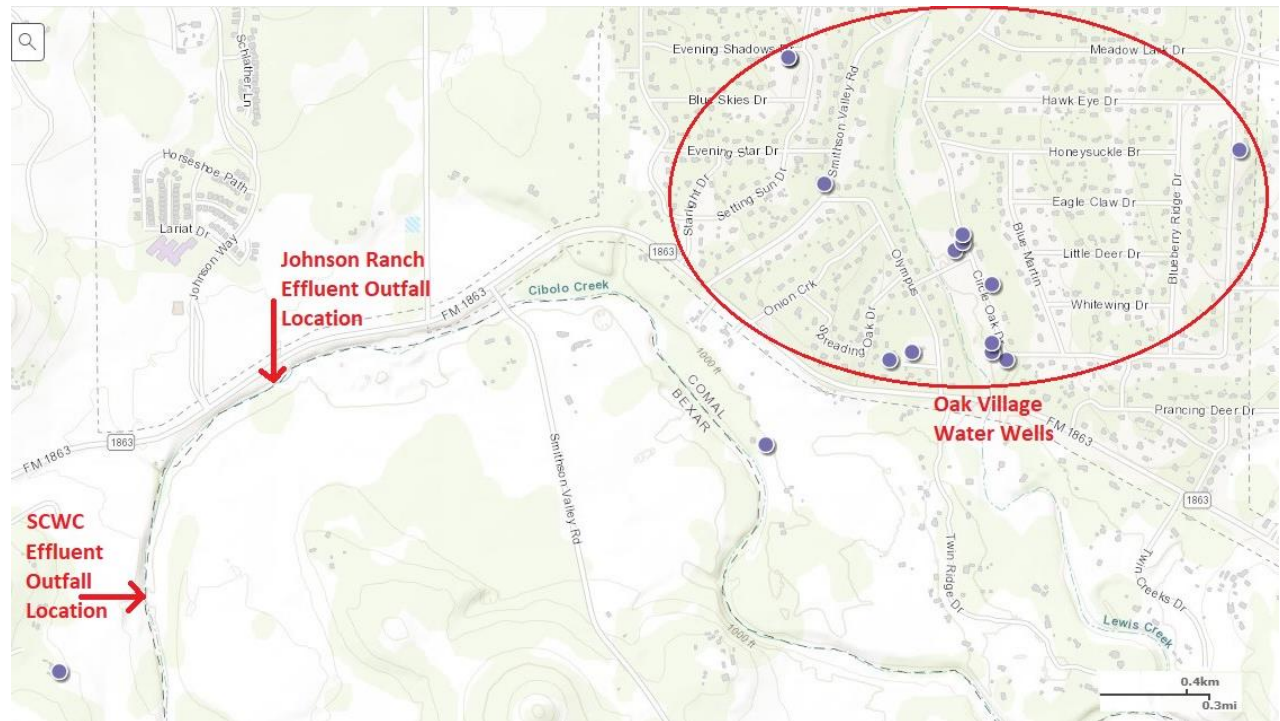


Fig. 3 South Central Water Company (SCWC) and Johnson Ranch both discharge treated sewage into Cibolo Creek

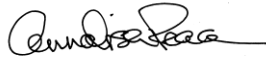


Fig. 4 Johnson Ranch's treated sewage discharge flows from this unnamed tributary into Cibolo Creek

An accidental spill or discharge of raw sewage or partially-treated sewage from the SCWC WWTP would prove catastrophic, given the local conditions described above. But even under normal operation, following standard procedures and safeguards for wastewater treatment plants, the local impacts would still be severe. The TCEQ has previously stated that in evaluating wastewater permits, they consider the baseline conditions in the receiving stream, the physical and hydrological characteristics of the stream, water body uses, and the associated water quality standards that protect those uses. None of these criteria would indicate that the proposed wastewater plan is suitable for the Cibolo Creek area, given that it lies in the Edwards Aquifer recharge zone, with numerous public water supply wells located just downstream. Accordingly, GEAA encourages the TCEQ to reject the proposed permit.

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Annalisa Peace". The signature is fluid and cursive, with a long horizontal stroke at the end.

Annalisa Peace  
Executive Director