

Greater Edwards Aquifer Alliance comments to SAWS Board May 4, 2021
Item #25 - Briefing and deliberation regarding Utility Service Agreement Development Process

Since 2010 GEAA has been asking for clear policy recommendations from the City regarding SAWS service area and Utility Service Agreements. We are specifically concerned about SAWS role in facilitating high density development over the Edwards Aquifer Recharge and Contributing zones and, about expanding SAWS service to counties outside of Bexar and San Antonio's ETJ.

Regarding the Utility Service Agreement for the Specht tract, specifically the amended waste water route unanimously approved by you all on January 12th of this year, upon my review of that Board Meeting video, I was surprised that SAWS staff did not mention that the amended route would cross three conservation easements held by the City for the EAPP.

Since this is a precedent setting case, you all deserved a briefing on this aspect of the Specht USA. This puts a spotlight just how problematic is the lack of coherent policy when SAWS service seemingly conflicts with our City's goals for Aquifer protection.

When Sam Mills was in charge of the USA's, we were kept well informed and usually were given the opportunity to comment on individual USA's, as well as on staff recommendations of changes to SAWS terms on issuing service contracts. More recently, as SAWS expands service outside of Bexar County, the number of instances where the issuance of USA's have impacts beyond SAWS purview are increasing. One example is service to the Lily Ranch.

We recommend that a City task force be convened sooner rather than later to examine all aspects of SAWS role in development and provide guidance to SAWS in these matters. This task force should include stakeholders such as GEAA and the citizens Rate Advisory Committee.

As we recommended in 2014, we call for the City and/or the SAWS Board to adopt a moratorium on issuing new Utility Service Contracts for water and waste water service on the Edwards Aquifer Recharge, Transition, and Contributing zones until such time as policies protective of these areas are adopted.

The Aquifer Alliance is not saying we have all the answers needed to solve these problems. Waste water issues are especially problematic. But, we do have over 16 years' experience working on these issues, including negotiating numerous settlements for TPDES permits outside the San Antonio area.

We would like the opportunity to visit with each of you or, better yet, for Dr. Ron Green and I to present our take on "SAWS Role in Development" to the Board as we did in 2014.

Thank you for this opportunity to comment. We look forward to working with you and the City on this important matter.