

My name is Annalisa Peace and I am speaking on behalf of the Greater Edwards Aquifer Alliance.

While we were delighted to hear that SAWS staff had decided against running water and sewer infrastructure through the properties protected by the city of San Antonio's Edwards Aquifer Protection Program, GEAA is not yet ready to endorse the option proposed by the SAWS staff.

In the interests of providing information to help you determine which option is most protective of the Aquifer among those presented in the Risk Assessments that you requested, GEAA contracted with two experts to review the four options presented in the staff report.

Hydrogeologist, Raymond Slade spent 32 years with the USGS, where he served as the Surface Water Specialist for the Texas office. He subsequently worked for 7 years at the Edwards Aquifer Research and Data Center and currently has his own consulting service. Raymond has authored over 80 reports concerning floods, flood frequency, drought, the Edwards Aquifer, and urban and rural hydrology and surface and groundwater water quality.

Dr. Lauren Ross, PhD, Professional Engineer is owner of Glenrose Engineering. Her areas of expertise include water quality protection and engineering design, groundwater transport, solid waste management and disposal, environmental monitoring and litigation. Among many reports, Lauren authored GEAA's report on [Land Applied Wastewater Effluent Impacts on the Edwards Aquifer](#). Lauren is also reviewing the Water Pollution Abatement Plan submitted to TCEQ by Meritage Homes for the Estancia project – in part to determine whether it fully complies with San Antonio's water quality ordinances.

I gave them until the third week in June to present their comments. Since Lauren and Raymond are midway through with their work and, since the reviews and recommendations from these experts is offered to assist you in

determining the best outcome regarding service to the Specht tract (Estancia), I am requesting that a final decision on this matter be delayed until your July Board meeting.

Looking at the larger picture, the fifteen local GEAA member groups will be meeting with Mayor Nirenberg and their City Council Representatives to request that they take action to examine all aspects of SAWS role in development and provide guidance to SAWS in these matters.

We agree with what Mr. Puente said to the San Antonio Report, “ that without City Council action, SAWS staff will continue to find themselves caught between two conflicting mandates: their legal duty to serve new water and sewer customers and the City’s interest in protecting San Antonio’s main drinking water supply.” “A few years ago, there was a task force put together to work on [the City’s] Unified Development Code,” Puente said. “Maybe something like that needs to be put together again, where all the stakeholders are involved, where everybody has that opportunity to say what their thoughts are on these issues. And then ultimately have City Council tell us – through policymaking, through ordinance, through direction – as to how we want to continue to grow.”

In that San Antonio considers amendments to the Unified Development Code every five years and, that this process is currently on-going, we should not miss this opportunity to enhance and clarify protections for San Antonio’s primary source of water. GEAA technical director, Debbie Reid currently serves on the Technical Committee for the UDC revision process, where she has been advocating amendments to the UDC to better manage storm water.

We agree with you, Mayor Nirenberg, that the city needs a coordinated growth strategy to balance environmental conservation with the increasing population. We hope that you will consider GEAA as a resource to aid in devising policy recommendations and we look forward to working with all of you on these efforts.

Comments from the Greater Edwards Aquifer Alliance to the SAWS Board June 8, 2021

I am also grateful to SAWS staff for meeting with me and answering the many questions I had regarding options for utility service to the Specht Tract.

Likewise, I thank them for giving me the heads up on a utility service agreement that you will be considering today (item #25) to provide service to the Dominion Retail Center. Being familiar with past problems involving sewage at the Center, we agree with the staff recommendation.

Thank you.