

Alamo, Austin, and Lone Star chapters of  
the Sierra Club

Bexar Audubon Society

Austin, Bexar and Travis Green Parties

Bexar Grotto

Boerne Together

Bulverde Neighborhood Alliance

Bulverde Neighbors for Clean Water

Cibolo Nature Center

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 Society of UTSA

Guadalupe River Road Alliance

Guardians of Lick Creek

Headwaters at Incarnate Word

Helotes Heritage Association

Kendall County Well Owners Association

Kinney County Ground Zero

Leon Springs Business Association

Medina County Environmental Action

Native Plant Society of Texas – SA

Northwest Interstate Coalition of  
Neighborhoods

Preserve Castroville

Preserve Lake Dunlop Association

Preserve Our Hill Country Environment

San Antonio Audubon Society

San Antonio Conservation Society

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

Signal Hill Alliance

Sisters of the Divine Providence

Solar San Antonio

Texas Cave Management Association

Trinity Edwards Spring Protection  
Association

Water Aid – Texas State University

Wildlife Rescue & Rehabilitation

Wimberley Valley Watershed Association

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Statement to SAWS Board – December 7, 2021

Re: Agenda Items 43C

These comments are on behalf of the Greater Edwards Aquifer Alliance regarding the prospect of providing SAWS waste water service to the Guajolote Tract. I notice that folks from the City of Grey Forest are here because they are concerned about this, as well.

Tracey Lehman and SAWS staff reached out to us and we had the opportunity to discuss this issue. As we have stated previously, options for wastewater service in this area often involve settling on the least bad path forward.

A 2020 study by South West Research Institute funded by the City of San Antonio's Edwards Aquifer Protection Program developed an integrated hydrologic computer model to evaluate the impact of different types of wastewater disposal facilities on the Edwards Aquifer. They examined all the options that SAWS staff will present to you today for the Guajolote tract, including TPDES, TLAP, and OSSF.

According to Dr. Ronald Green, SwRI technical advisor and project manager for the study, SWRI considered a range of hypothetical scenarios of the size and capacity of the hypothesized wastewater facilities consistent with possible residential development in the Helotes Creek Watershed area. Their results predicted that installing additional wastewater systems in the region, regardless of type, would increase the amount of wastewater discharged to the environment and significantly degrade the watershed and the quality of water recharging the Edwards Aquifer.

With this in mind, after discussion with SAWS staff, GEAA has come to the conclusion that the optimal wastewater disposal for this tract would be to for the developer to contract for installing and maintaining OSSF for ½ acre lots. This is not an option that can be approved by you all but, given that a significant amount of recharge to SAWS Edwards supplies occurs in this area, it would not be out of line for SAWS to advocate this plan of action.

For the record, GEAA would be very opposed to SAWS extending service to this tract, either by employing lift stations or gravity feed mains.

As for the other option open to the developer – applying for a permit to discharge effluent from a plant on site, GEAA would formally oppose a direct discharge permit, as we have so many others of this type that have the potential to negatively impact the Edward Aquifer. Our recommendation would be for SAWS to oppose such a permit, as well.

I also noticed that approval of SAWS waste water service for 300 EDU's to Source Texas LLC is on your agenda for today. This project is also outside of SAWS CCN for waste water and on the Edwards Aquifer Contributing Zone.

Although I do not know the details of this particular agreement, I bring it to your attention in light of the conclusions determined by the SWRI study. As we have requested previously, we would like to establish some type of forum to examine and provide guidance to SAWS regarding waste water service on the Edwards Aquifer Recharge and Contributing Zones.

GEAA staff has met with most of the San Antonio City Council members and has requested their guidance on this issue. We will continue to work toward establishing City policy regarding these matters.

Respectfully,

Annalisa Peace  
Executive Director  
Greater Edwards Aquifer Alliance