

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

Cibola Center for Conservation

Citizens for the Protection of Cibola Creek

Comal County Conservation Alliance

Environment Texas

First Universalist Unitarian Church of SA

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

Hill Country Alliance

Kendall County Well Owners Association

Kinney County Ground Zero

Leon Springs Business Association

Native Plant Society of Texas – SA

Northwest Interstate Coalition of
Neighborhoods

Pedernales River Alliance – Gillespie Co.

Preserve Castroville

Preserve Lake Dunlop Association

Preserve Our Hill Country Environment

RiverAid San Antonio

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 Area Alliance

Sisters of the Divine Providence

Solar San Antonio

Texas Cave Management Association

Trinity Edwards Spring Protection Assoc.

Water Aid – Texas State University

Wildlife Rescue & Rehabilitation

Wimberley Valley Watershed Association

March 16, 2022

Laurie Gharis, Chief Clerk

Office of the Chief Clerk, MC 105

Texas Commission on Environmental Quality

PO Box 13087

Austin, TX 78711-3087

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

Re: Comments and Meeting Request Regarding Application of SJWTX Inc. and Mary
Jane Cielencki for TPDES Permit No. WQ0016052001

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

1. **Background.** SJWTX, Inc. and Mary Jane Cielencki, P.O. Box 1742, Canyon Lake,
Texas 78133, has applied to the Texas Commission on Environmental Quality
(TCEQ) for a new Texas Pollutant Discharge Elimination System (TPDES) Permit No.
WQ0016052001, to authorize the discharge of treated domestic wastewater at a
daily average flow not to exceed 260,000 gallons per day. The facility will be
located approximately 0.25 miles northwest of the intersection of Rebecca Creek
Road and U.S. Highway 281 North, in Comal County, Texas 78070. The discharge
route will be from the plant site via pipe to Cypress Creek, thence to the Guadalupe
River Above Canyon Lake in Segment No. 1806 of the Guadalupe River Basin.

2. **Greater Edwards Aquifer Alliance (GEAA).** GEAA submits the following
comments on behalf of our fifty-six member organizations and requests a
contested case hearing regarding this permit application. GEAA is a 501(c)(3)
nonprofit organization that promotes effective broad-based advocacy for the
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 SJWTX, Inc. and Mary Jane
Cielencki.

GEAA's members have serious concerns regarding the permit application and
regarding the degradation to Cypress Creek and the Guadalupe River Above
Canyon Lake that will likely occur with the discharge of treated sewage into these
waterways. GEAA and its members' specific areas of concern are summarized in
the following section of this letter.

3. **Comments on the application.** As noted in the Notice of Receipt/Intent and the
Intent to Obtain Permit, the proposed discharge route is from the plant site via
pipe to Cypress Creek, thence to the Guadalupe River Above Canyon Lake. There
are several areas of concern with the current application:

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a. Effluent Discharge Levels: The effluent discharge levels in the draft application currently depict a phased approach for effluent discharge levels as construction of the Simmons Valley WWTP occurs, with the applicant requesting effluent discharge level limits of 5 mg/l carbonaceous biochemical oxygen demand (CBOD₅), 5 mg/l total suspended solids (TSS), 2 mg/l ammonia-nitrogen (NH₃-N), and an unknown mg/l amount for total phosphorus (TP). Phosphorus is a “limiting nutrient” in ecosystems, meaning the quantity of this nutrient controls the pace of algal and aquatic plant production. However, excess quantities of phosphorus, even in small amounts, can lead to eutrophication and harmful algal growth in a waterbody. **GEAA strongly encourages the adoption of a Total Phosphorus limit of .50mg/l, bringing the effluent discharge level to a 5mg/l CBOD₅, 5mg/l TSS, 2 mg/l NH₃-N, and .50 mg/l TP maximum effluent discharge limit.**

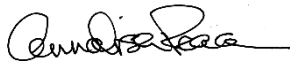
b. Implementation of Beneficial Reuse: As it stands today, the Simmons Valley WWTP application does not include any capacity to conduct beneficial reuse, promoting environmental harm to Cypress Creek, Guadalupe River above Canyon Lake, and the surrounding watershed areas. Accordingly, GEAA urges SJWTX Inc. and Mary Jane Cielencki to utilize a “One Water” approach for their wastewater treatment system, incorporating beneficial reuse of effluent, thereby eliminating the need to discharge effluent into Cypress Creek. In the event SJWTX Inc. and Mary Jane Cielencki are unable to reuse all the wastewater generated, it is GEAA’s recommendation that the remaining amounts be land applied, with SJWTX Inc. and Mary Jane Cielencki purchasing the necessary land for such and obtaining the requisite TLAP permit from TCEQ.

During a March 8, 2022, Spring Branch City Commissioner’s meeting, the applicant expressed intent to investigate Title 30 Texas Administrative Code, Chapter 210 Reclaimed Water use at Jumbo Evans Sports Park located at 101 Jumbo Evans Blvd, Spring Branch, TX 78070. Jumbo Evans Sports Park is located less than 2 miles away from the proposed Simmons Valley WWTP and would benefit from municipal reclaimed water use for irrigation of its athletic fields and other parklands. **GEAA urges the applicant to incorporate Title 30 Texas Administrative Code, Chapter 210 Reclaimed Water use into its current application.**

The TCEQ has previously stated that in evaluating wastewater permits, they consider baseline conditions in the receiving stream, the physical and the hydrological characteristics of the stream, waterbody uses, and the associated water quality standards that protect those uses. We trust that the TCEQ will consider the stated factors when examining the SJWTX, Inc. and Mary Jane Cielencki application and will adopt standards that are in line with others in Central Texas.

Thank you for the opportunity to submit these comments.

Sincerely,



Annalisa Peace
Executive Director
Greater Edwards Aquifer Alliance