

## Member Organizations

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 Center for Conservation  
Citizens for the Protection of Cibolo 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

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January 12, 2023

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 Douglas T. Harrison for TPDES Permit No. WQ0016211001

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

1. **Background.** Douglas T. Harrison, 1000 Harrison Road, New Braunfels, Texas 78132, has applied to the Texas Commission on Environmental Quality (TCEQ) for a new Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0016211001, to authorize the discharge of treated domestic wastewater at a daily average flow not to exceed 600,000 gallons per day. TCEQ received this application on September 1, 2022.

The facility will be located approximately 0.4 miles south of the intersection of Harrison Road and State Highway 46, in Comal County, Texas 78132. The treated effluent will be discharged to West Fork Dry Comal Creek, thence to Dry Comal Creek, thence to the Comal River in Segment No. 1811 of the Guadalupe River Basin

2. **Greater Edwards Aquifer Alliance (GEAA).** GEAA submits the following comments on behalf of our fifty-four member organizations and requests a public meeting and 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 Douglas T. Harrison

GEAA's members have serious concerns regarding the permit application and regarding the degradation of Dry Comal Creek and Comal River 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 of Application, Intent to Obtain Water Quality Permit, Notice of Application, and Preliminary Decision for TPDES Permit for Municipal Wastewater, the proposed discharge route is from the plant site to West Fork Dry Comal Creek, thence to Dry Comal Creek, thence to the Comal River in Segment No. 1811 of the Guadalupe River Basin

There are several areas of concern with the current application:

A. Implementation of Beneficial Reuse: As it stands today, the Harrison Tract Wastewater Treatment Facility (WWTF) application does not include any capacity to conduct beneficial reuse, promoting environmental harm to Dry Comal Creek, Comal River, and the surrounding watershed areas. Accordingly, GEAA urges the applicant to utilize a “One Water” approach for their wastewater treatment system, incorporating beneficial reuse of effluent, thereby eliminating the need to discharge effluent into Dry Comal Creek and Comal River. In the event the applicant is unable to reuse all the wastewater generated, it is GEAA’s recommendation that the remaining amounts be land applied, with the applicant setting aside or purchasing the necessary land for such and obtaining the requisite Texas Land Application Permit (TLAP) from TCEQ.

B. Water Quality and Quantity Impacts: The proposed effluent path will flow from West Fork Dry Comal Creek, thence to Dry Comal Creek, thence to the Comal River at a volume of 600,000 gallons per day. According to the 2022 Texas Integrated Report, a TCEQ review summarizing the condition of Texas’ surface waters, both Dry Comal Creek and Comal River are flagged as impaired waterbodies; meaning both these waterbodies’ effluent limitations are not stringent enough to implement water quality standards. In 2010, Dry Comal Creek (Segment 1811A\_01) was listed as impaired for bacteria in water (recreation use), and in 2016 Comal River (Segment 1811\_01) was listed as impaired for bacteria in water (recreation use) as well. To address these high bacteria levels, the Dry Comal Creek and Comal River Watershed Protection Plan (WPP) was developed to implement best management strategies (BMPs) to improve the water quality and quantity across this watershed area.

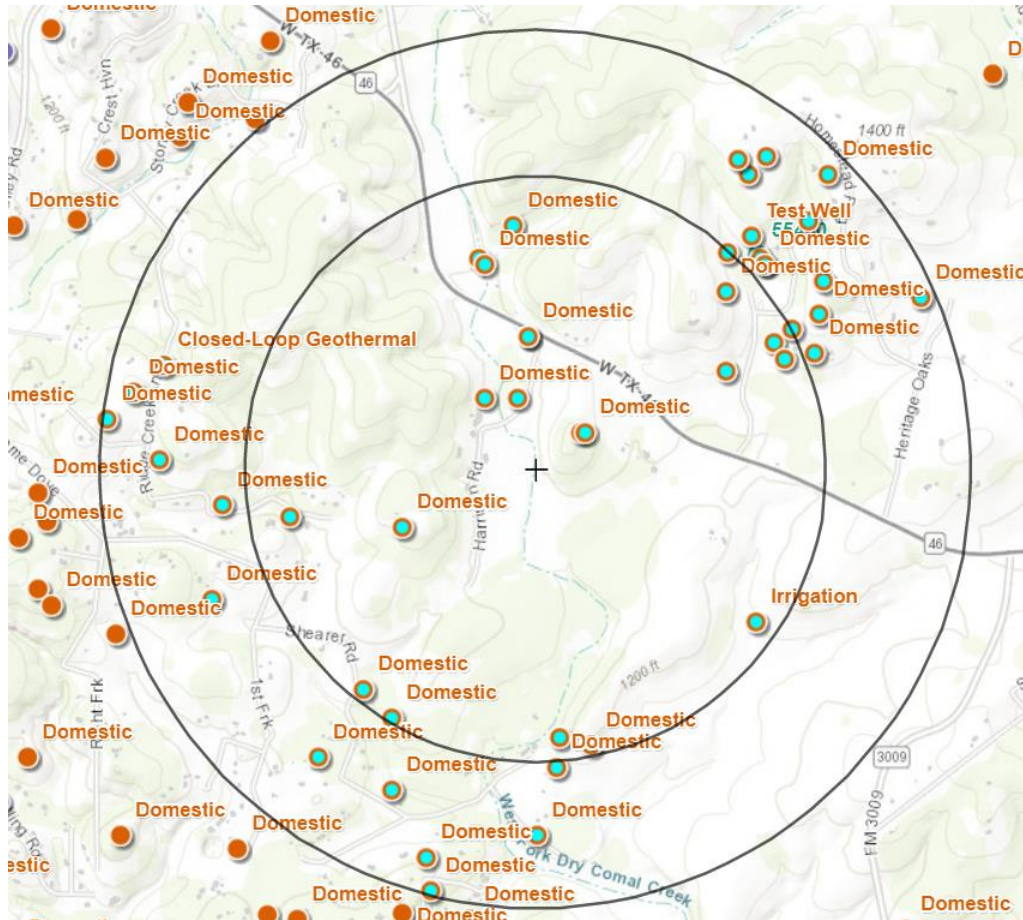
Both the Dry Comal Creek and Comal River are essential natural resources in this geographic area, supporting economic development and recreation in New Braunfels, as well as agriculture operations throughout the area. GEAA encourages the protection and preservation of these two waterbodies and does not support activities that would further degrade the water quality and increase the quantity of low-quality water in this watershed region.

B. Application Discrepancies- Facility Location: Examining the permit application, Section 10 of the Administrative Report 1.0 states the facility will be located approximately 0.3 miles South of the intersection of State Highway 46 and Harrison Rd. in Bulverde, Comal County, TX. However, under Section 1 of the Supplemental Permit Information Form (SPIF), the facility location is described to be located approximately 0.34 miles due south of the intersection of FM 3351 and Ammann Rd. in Bulverde, in Comal County. GEAA encourages TCEQ to thoroughly examine this application for additional discrepancies in order to prevent further misinformation from being conveyed to the public regarding this TPDES application.

D. Impacts on Surrounding Wells: According to the Texas Water Development Board (TWDB), 48 water wells were found to be within a 1.5-mile distance of the Harrison Tract WWTF’s discharge point, with 21 wells found to be within a mile distance of the Harrison Tract WWTF’s discharge point (Figure 1). Water well data was pulled from three TWDB groundwater databases; TWDB Groundwater Database (GWDB) reporting zero wells in the 1.5-mile distance area, Submitted Drillers Reports (SDR) Database reporting

43 wells in the 1.5-mile distance area, and Brackish Resources Aquifer Characterization System (BRACS) Database reporting one well in the 1.5-mile distance area<sup>1</sup>.

Further examining the stated water well data, 43 out of the 48 wells were noted to be used for domestic (household) purposes. The volume of wells located in this close proximity to the discharge point and route poses a serious concern of cross-contamination with the local groundwater supply that these well owners rely on to meet their needs. Further, many of these wells are not required to regularly test the water quality of their wells, subjecting them to potential public health concerns that result from the cross-contamination of the Harrison Tract WWTF's effluent and local groundwater supply.



**Figure 1: Location of Groundwater Wells from Proposed Harrison Tract WWTF Discharge Point.**

**Note: Inner Circle: One-mile distance, Outer Circle: 1.5-mile distance.**

**All impacted wells are highlighted in Light Blue**

**Orange Circle: SDR Wells, Purple Circle: TWDB GWDB Well, Green Circle: BRACS Well**

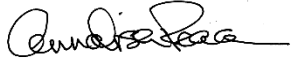
The TCEQ has previously stated that in evaluating wastewater permits, they consider baseline conditions in the receiving stream, the physical and hydrological characteristics of the stream, waterbody uses, and the associated water quality standards that protect those uses. We trust that the TCEQ will consider the

<sup>1</sup> Texas Water Development Board. *Groundwater Data Viewer*, 2022, <https://www3.twdb.texas.gov/apps/WaterDataInteractive/GroundwaterDataViewer/?map=sdr>. Accessed 1 Nov. 2022.

stated factors when examining the Douglas T. Harrison 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



Nathan Glavy  
Technical Director  
Greater Edwards Aquifer Alliance