

Alamo, Austin, and Lone Star chapters of  
the Sierra Club  
Aquifer Guardians in Urban Areas  
Bexar Audubon Society  
Bexar Green Party  
Boerne Together  
Bulverde Neighborhood Alliance  
Cibolo Nature Center  
Citizens Allied for Smart Expansion  
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 Party of Austin  
Headwaters at Incarnate Word  
Helotes Heritage Association  
Helotes Nature Center  
Hill Country Planning Association  
Green Society of UTSA  
Guadalupe River Road Alliance  
Guardians of Lick Creek  
Kendall County Well Owners Association  
Kinney County Ground Zero  
Leon Springs Business Association  
Medina County Environmental Action  
Association  
Native Plant Society of Texas – SA  
Northwest Interstate Coalition of  
Neighborhoods  
Preserve Castroville  
Preserve Lake Dunlop Association  
San Antonio Audubon Society  
San Antonio Conservation Society  
San Geronimo Nature Center  
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  
Solar San Antonio  
Sisters of the Divine Providence  
Travis County Green Party  
West Texas Springs Alliance  
Water Aid – Texas State University  
Wildlife Rescue & Rehabilitation  
Wimberley Valley Watershed Association

February 28, 2019

Via Public Comment  
The Texas Commission on Environmental Quality  
Bridget C. Bohac, Chief Clerk  
12100 Park 35 Circle, Bldg F  
Austin, TX 78753

RE: Request for Reconsideration WQ0014975001

Dear Ms. Bohac,

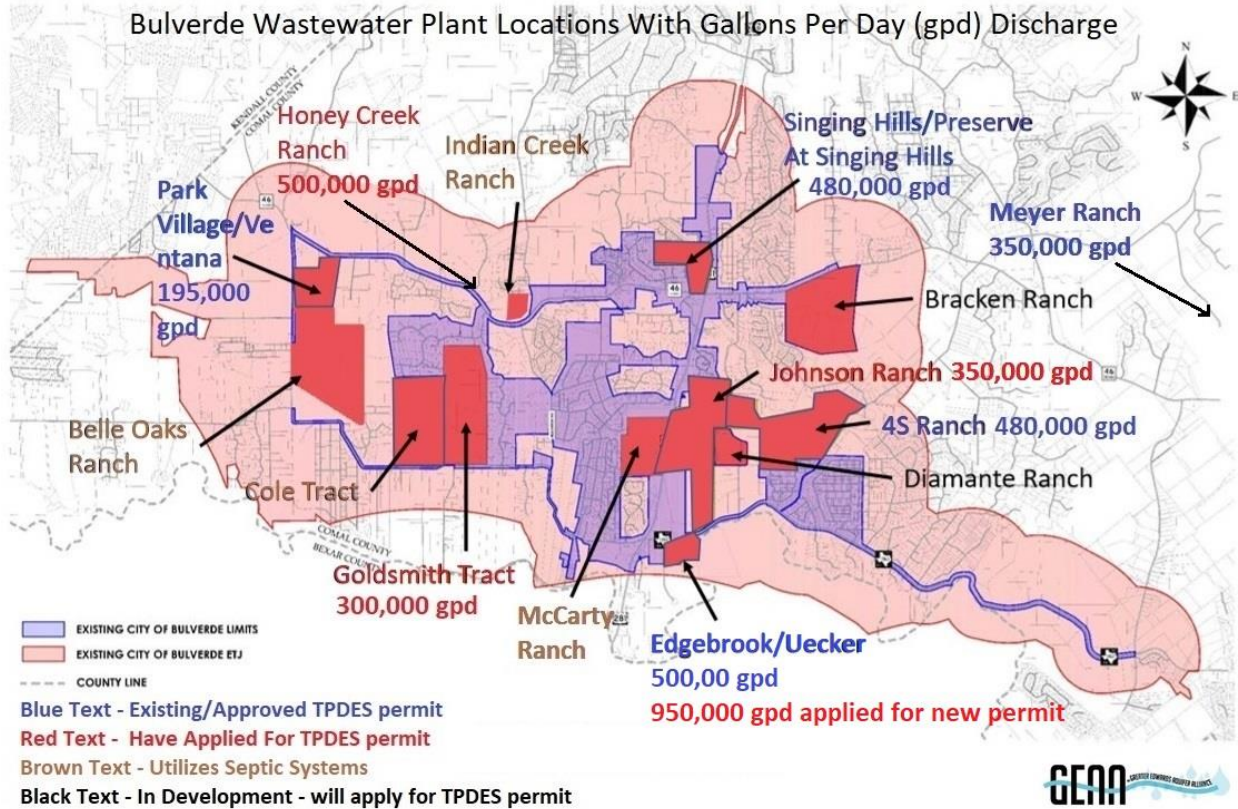
On behalf of the Greater Edwards Aquifer Alliance (GEAA), I request that the TCEQ reconsider their preliminary decision to renew the subject permit. If TCEQ declines to reconsider renewal of TPDES permit WQ0014975001, we request a Contested Case Hearing. GEAA also requests standing as an affected party in the State Office of Administrative Hearing process, citing Patricia and Terrell Graham as member of GEAA.

GEAA joined the Graham family in contesting the original amendment to the DHJB Development, LLC TPDES permit due to concerns about discharging sewage effluent that is not treated to drinking water standards into the Edwards Aquifer watershed, where it will enter the aquifer with no filtration.

TCEQ has named the Edwards Aquifer as the major aquifer in the state most vulnerable to pollution since the surface and subsurface environments are highly interconnected in karst areas and the physical nature of these terrains allows pollution to travel great distances quickly and with little to no filtration. Actions of individuals on the surface are directly correlated to groundwater quality.

Because urban development occurs (and degrades water quality) in increments on a project-by-project basis, and often without context, we are concerned that the TCEQ is issuing permits without examining what the cumulative impacts of these permits will mean for those who rely on Edwards wells within this area, and for the future of our region in terms of reliance on the Edwards Aquifer as a high quality water supply. The effects are not limited to destruction of rural lands, wildlife habitats, and pristine Hill Country streams and springs. They include severe financial and social costs as well, some of which we are only beginning to understand.

The Aquifer Alliance is very concerned about the cumulative impacts of this and additional permits to discharge sewage effluent into this watershed. At this time, we are aware of two additional applications to discharge sewage effluent into this watershed.



The Cibolo Creek is designated as a major recharge feature of the Edwards Aquifer. We are concerned about the impact that this amount of effluent will have if it is allowed to recharge the Edwards Aquifer.

On March 9, 2015 State Administrative Law Judge Kathleen Parsley set forth an opinion for denial of the Amendment to the TPDES Permit, stating "that if the permit is issued, the effluent discharge will negatively impact Protestants' use and enjoyment of their property." On June 2, 2015, the Judge amended her decision further in favor of the Lux and Graham families, ruling that not only is the proposed discharge route not a watercourse in accordance with case law, but that it is not Waters of the State of Texas and the Applicant is not entitled to discharge into it.

By approving renewal of this permit, you are allowing the neighboring subdivision to relegate sewage and drainage infrastructure on to property that they do not own. In essence, you are giving them the right to dump their refuse on to the property of their neighbor, thereby depriving the neighboring property owners of the full use and enjoyment of their land while substantially devaluing their property.

Thank you for the opportunity to submit these comments.

Annalisa Peace  
Executive Director