



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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June 11, 2024

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 Hearing Request Regarding the Application of Village at Grape Creek, LLC. for TPDES Permit No. WQ0016363001

Please accept the attached comments on behalf of the sixty member groups of the Greater Edwards Aquifer Alliance.

1. **Background:** The Village at Grape Creek, LLC, 15119 Memorial Drive, Suite 113, Houston, Texas 77079, has applied to the Texas Commission on Environmental Quality (TCEQ) for a new Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0016363001, to authorize the discharge of treated domestic wastewater at a daily average flow not to exceed 20,000 gallons per day.

The facility will be located approximately 0.65 miles southwest of the intersection of Jenschke Lane and U.S. Highway 290, in Gillespie County, Texas 78624. The treated effluent will be discharged to an unnamed tributary, thence to Pedernales River in Segment No. 1414 of the Colorado River Basin. The unclassified receiving water use is minimal aquatic life use for the unnamed tributary. The designated uses for Segment No. 1414 are primary contact recreation, public water supply, and high aquatic life use.

2. **Greater Edwards Aquifer Alliance (GEAA).** GEAA submits the following comments on behalf of our sixty member organizations and requests a contested case hearing regarding this permit application. GEAA also requests that our organization is recognized as an affected party with standing to represent our members who are adjacent landowners. GEAA is a 501(c)(3) nonprofit organization that promotes effective broad-based advocacy for the protection and preservation of the Edwards and Trinity Aquifers, its springs, watersheds, and the Texas Hill Country lands that sustains them. GEAA has multiple members who would be adversely affected by the proposed TPDES permit of the Village at Grape Creek, LLC.

GEAA’s members have serious concerns regarding the application and draft permit, and regarding the degradation to the Pedernales River that will likely occur with the increased 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 Application and Intent to Obtain Water Quality Permit, the discharge route will be from the plant to an

unnamed tributary, thence to Pedernales River in Segment No. 1414 of the Colorado River Basin. There are several areas of concern with the current application:

A. Effluent Discharge Levels: The effluent discharge levels in the draft permit grant the Village at Grape Creek Wastewater Treatment Facility (WWTF) an 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), 5 mg/l dissolved oxygen (DO), and 1 mg/l 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 phosphorus limit of 0.5 mg/l; **bringing the effluent discharge level to a 5mg/l CBOD5, 5mg/l TSS, 2 mg/l NH3-N .50 mg/l TP, and a 5 mg/l DO maximum effluent discharge limit.**

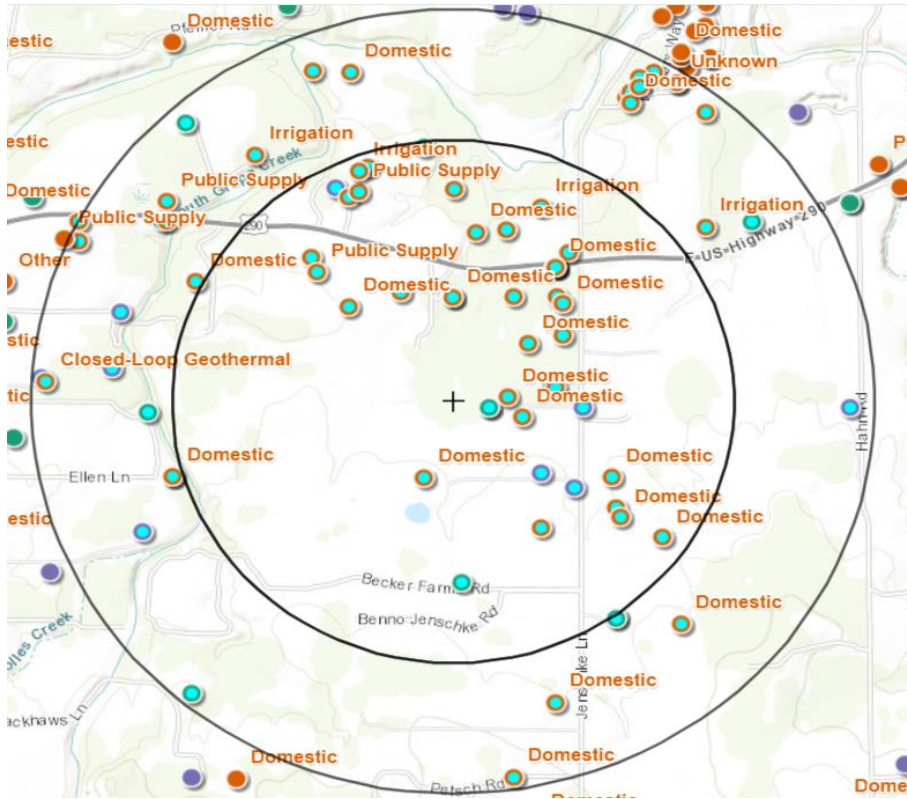
B. Implementation of Beneficial Reuse: As it stands today, the Villages at Grape Creek WWTF’s application and draft permit does not include any capacity to conduct beneficial reuse to mitigate environmental harm to the Pedernales River, and the surrounding watershed areas. Accordingly, GEAA urges Village at Grape Creek, LLC to utilize a “One Water” approach for their wastewater treatment system, incorporating beneficial reuse of effluent; thereby, eliminating the need to discharge effluent into the Pedernales River. In the event Village at Grape Creek, LLC is unable to reuse all the wastewater generated, it is GEAA’s recommendation that any amounts that would not be beneficially reused on or off site should be land applied, with the applicant purchasing or setting aside land within their site for land application as needed and obtaining the requisite Texas Land Application Permit (TLAP) permit from TCEQ.

C. Impacts on Surrounding Wells: According to the Texas Water Development Board (TWDB), 78 water wells were found to be within a 1.5-mile distance of the Villages at Grape Creek WWTF’s discharge point, with 42 wells found to be within a mile distance of the Village at Grape Creek WWTF’s discharge point (Figure 1). Water well data was pulled from three TWDB groundwater databases; TWDB Groundwater Database (GWDB) reporting 10 wells in the 1.5-mile distance area, Submitted Drillers Reports (SDR) Database reporting 57 wells in the 1.5-mile distance area, and Brackish Resources Aquifer Characterization System (BRACS) Database reporting 11 well in the 1.5-mile distance area<sup>1</sup>.

Further examining the stated water well data, 60 out of the 78 wells were noted to be used for domestic (household), irrigation, or public supply 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 Village at Grape Creek WWTF’s effluent and local groundwater supply.

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<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.



**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 stated factors when implementing the Village at Grape Creek’s TPDES application and will adopt standards that are in line with preserving the pre-permit characteristics of the receiving waterbody and its historic uses.

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