GEAA Greater Edwards Aquifer Alliance

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 Allia
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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May 28, 2026

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 Utilities Inc. of Texas' Renewal Application for TPDES Permit No. WQ0015866001- Canyon Ranch Wastewater Treatment Facility (WWTF)

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

1. Background: Utilities, Inc. of Texas, P.O. Box 140164, Austin, Texas 78714, has applied to the Texas Commission on Environmental Quality (TCEQ) to renew Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0015866001 (EPA I.D. No. TX0140155) to authorize the discharge of treated wastewater at a volume not to exceed a daily average flow of 300,000 gallons per day.

The domestic wastewater treatment facility is located approximately one mile northeast of the intersection of Farm-to-Market Road 306 and Jolie Drive, near the city of Fischer, in Comal County, Texas 78070. The discharge route is from the plant site to an unnamed tributary of Devil's Hollow, thence to Devil's Hollow, thence to Canyon Lake. The unclassified receiving water uses are minimal aquatic life use for the unnamed tributary of Devil's Hollow and limited aquatic life use for Devil's Hollow. The designated uses for Segment No. 1805 are primary contact recreation, public water supply, aquifer protection, and exceptional aquatic life use.

2. Greater Edwards Aquifer Alliance (GEAA): GEAA submits the following comments on behalf of our fifty-nine member organizations and requests a contested case hearing regarding this permit application. GEAA also requests that our organization be 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, their springs, watersheds, and the Texas Hill Country lands that sustain them.

GEAA has members who live, recreate, and rely on groundwater and surface water resources within the Canyon Lake watershed and downstream of the proposed discharge. GEAA's members have serious concerns regarding the application and draft permit and the potential for degradation of surface water and groundwater resources associated with the proposed discharge. GEAA's specific concerns are summarized below.

3. Comments on the application:

A. Phosphorus Limits and Antidegradation Protection: Examining the draft permit in the renewal paperwork, the Canyon Ranch WWTF has been slated a total phosphorus limit of 1.0 mg/L in all phases. GEAA requests that TCEQ revise the draft permit to include a more stringent total phosphorus limit, and otherwise provide a detailed technical explanation for why a 1.0 mg/L limit is sufficiently protective of the unnamed tributary, Devil's Hollow, and Canyon Lake.

The draft permit would authorize up to 0.30 MGD of treated domestic wastewater in the final phase. At a total phosphorus limit of 1.0 mg/L, the final phase would authorize a phosphorus loading of approximately 2.5 pounds per day. GEAA is concerned that this loading may not be sufficiently protective for a tributary system draining to Canyon Lake, particularly under low-flow or intermittent-flow conditions where treated effluent may represent a substantial portion of the receiving stream flow.

GEAA requests that TCEQ evaluate whether a lower total phosphorus limit is necessary to protect downstream water quality, minimize nutrient enrichment, and maintain the designated uses of Canyon Lake. Given that the facility is designed to include phosphorus-removal capability (alum dosing equipment and storage for chemical phosphorus precipitation), TCEQ should require a more protective total phosphorus limit that reflects the treatment technology available at the facility.

GEAA recommends that a no greater than 0.15 mg/L total phosphorus limit be applied across all phases of the permit. Additionally, due to the water quality concerns regarding 25 domestic water supply wells located within 1.5 miles of the Canyon Ranch WWTF and concerns about cumulative impacts from discharging additional wastewater effluent into Canyon Lake, GEAA requests that TCEQ consider enforcing the strict limit of <0.06 mg/L total phosphorus. This stricter limit aligns with the Ambient Water Reporting Limits (AWRL) and Limit of Quantitation (LOQ) reporting limits for total phosphorus, which TCEQ-certified water quality labs must reliably test and report.

B. Impacts on Surrounding Groundwater Wells and Aquifer Protection: According to the Texas Water Development Board (TWDB), 27 water wells were found to be within a 1.5-mile distance of the Canyon Ranch WWTF's discharge point, with 11 wells found to be within a mile distance (Figure 1). Water well data was pulled from three TWDB groundwater databases: TWDB Groundwater Database (GWDB) reporting 1 well in the 1.5-mile distance area, Submitted Drillers Reports (SDR) Database reporting 25 wells in the 1.5-mile distance area, and Brackish Resources Aquifer Characterization System (BRACS) Database reporting 1 well in the 1.5-mile distance area[1].

Further examining the stated water well data, 25 out of the 27 wells were noted to be used for domestic (household), irrigation, or public supply purposes. The number of wells located in this close proximity to the facility, 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. Many private wells are not subject to routine water quality monitoring, and well owners rely on groundwater as their primary source of drinking water. The intermittent nature of the receiving stream, combined with the density of

[1] Texas Water Development Board. *Groundwater Data Viewer*, 2022, https://www3.twdb.texas.gov/apps/WaterDataInteractive/GroundwaterDataViewer/?map=sdr.

nearby wells, raises concerns regarding potential groundwater vulnerability, particularly in areas where surface water may lose flow to the subsurface.

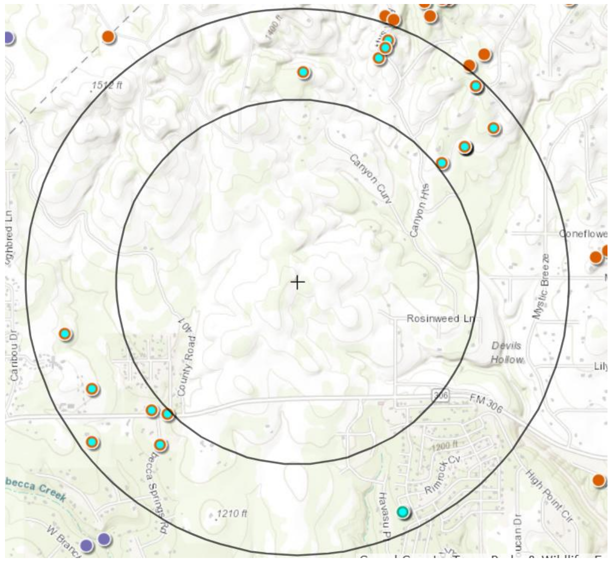

Figure 1: Location of Groundwater Wells from the Canyon Ranch WWTF's Discharge Point

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

Additionally, GEAA notes that the application does not include a site-specific evaluation of groundwater connectivity, losing-stream conditions, or well vulnerability along the discharge route. GEAA requests that TCEQ carefully consider the proximity of groundwater resources and ensure that permit conditions adequately protect aquifer resources and private well users.

C. Impacts on Receiving Waterbody and Flow Conditions: The discharge route identified in the renewal application is from Outfall 001 to an unnamed tributary of Devil's Hollow, then to Devil's Hollow, and then to Canyon Lake. The immediate receiving waters are identified as an unnamed tributary of Devil's Hollow and Devil's Hollow, with Canyon Lake as the downstream classified segment. GEAA is concerned that the draft permit does not sufficiently explain how the authorized discharge will affect receiving-water flow conditions, particularly if the unnamed tributary or Devil's Hollow has intermittent or low-flow characteristics.

Additionally, even with the initial permit being issued to the Canyon Ranch WWTF in 2021, the facility is marked as "inactive" in the application paperwork; therefore, no effluent data or operating record has been collected to fully understand the wastewater impacts of this facility on the surrounding environment. Without actual discharge data, the public must rely on TCEQ's modeling assumptions, the applicant's design information, and the draft permit limits. GEAA requests a clearer explanation of how TCEQ evaluated receiving-water conditions and whether treated effluent could dominate streamflow during dry periods.

A continuous or recurring discharge of treated domestic wastewater into a small or intermittent tributary may alter hydrology, channel form, erosion patterns, sediment transport, aquatic habitat, and downstream pollutant delivery. These concerns are especially relevant in steep Hill Country drainages where high-energy stormflow, thin soils, exposed limestone, and low baseflow can create unstable channel conditions.

D. Incorporation of Class A Operator and Chapter 210 Authorization: The application identifies the facility operator as an operator with Texas Water Utilities, Inc. to be contracted prior to startup, with a Wastewater Class C license and license number to be determined. GEAA is concerned that a future Class C operator may not provide sufficient assurance for a membrane bioreactor system with UV disinfection and chemical phosphorus precipitation in a sensitive receiving watershed. MBR systems can produce high-quality effluent, but they require careful operational oversight, membrane maintenance, solids management, process control, UV system maintenance, and chemical dosing management. Startup and phased expansion periods are especially important because operator decisions can directly affect effluent quality. GEAA requests that TCEQ require a Class A wastewater operator for this facility.

Further, GEAA acknowledges that a pending wastewater authorization, R15866001, is tied to this pending wastewater permit when examining the TCEQ Central Registry. GEAA would like to confirm if this pending authorization is tied to a Chapter 210 Reuse authorization, and if so, GEAA would like to learn more about the specific plans associated with this authorization, such as the total percentage of beneficial reuse and the means by which the reused water will be utilized.

4. Conclusion: The TCEQ has previously stated that in evaluating wastewater permits, it considers 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. GEAA respectfully requests that TCEQ carefully consider the intermittent nature of the receiving stream, downstream designated uses in Canyon Lake, groundwater proximity, and nutrient sensitivity when finalizing this permit.

GEAA appreciates the opportunity to submit these comments and requests that TCEQ adopt permit conditions that are protective of surface water and groundwater resources and consistent with antidegradation requirements.

Thank you for your consideration.

Sincerely,

Nathan Glavy

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