

Shaun Speck

From: PUBCOMMENT-OCC
Sent: Thursday, October 30, 2025 1:53 PM
To: PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Cc: Laurie Gharis; Deornette Monteleone
Subject: FW: TCEQ Letter In Opposition of TPDES Permit WQ0016171001
Attachments: Senator Donna Campbell - Guajolote Ranch Development Opposition.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

From: Jim Morales <Jim.Morales@senate.texas.gov>
Sent: Thursday, October 30, 2025 1:40 PM
To: Katherine Thigpen <Katherine.Thigpen@tceq.texas.gov>; Steven Schar <Steven.Schar@Tceq.Texas.Gov>; Dennise Braeutigam <Dennise.Braeutigam@tceq.texas.gov>; Chikaodi Agumadu <Chikaodi.Agumadu@tceq.texas.gov>; Clay Kelley <Clay.Kelley@tceq.texas.gov>
Cc: Shane Birdwell <Shane.Birdwell@senate.texas.gov>
Subject: TCEQ Letter In Opposition of TPDES Permit WQ0016171001

Dear TCEQ Chair and Staff,

Please see attached letter from Senator Campbell opposing TPDES Permit WQ0016171001 for the Guajolote Ranch Development, citing significant environmental, scientific, and procedural concerns regarding proposed wastewater discharge into the Helotes Creek watershed.

Senator Campbell respectfully requests that the Commission deny the permit, formally incorporate the Southwest Research Institute findings, publicly clarify statements regarding effluent safety, and reconcile conflicting positions between TPDES and Edwards Aquifer protection programs.

The Senator has requested a **written response within thirty days** addressing these concerns and detailing any corrective measures the Commission intends to pursue.

Should you have any questions please feel free to contact this office.

Regards,

Jim Morales

Legislative Director
Office of State Senator Donna Campbell. M.D.
Texas Senate District 25
jim.morales@senate.texas.gov

Texas Capitol, Room 3E.18
PO Box 12068
Austin, TX 78711
O: 512-463-0125

District Address:
229 Hunter Village

Suite 105
New Braunfels, Texas 78132
O: 830-626-0065



Shaun Speck

From: Dennise Braeutigam
Sent: Thursday, October 30, 2025 1:44 PM
To: Laurie Gharis; Clay Kelley
Cc: Deornette Monteleone; Angela Motloch
Subject: letter
Attachments: TCEQ Letter In Opposition of TPDES Permit WQ0016171001

Please see the attached to Chairwoman. Please assign in malta and we will send to program.

Thank you,
Dennise

Dennise Braeutigam
Office Manager for Executive Office
Texas Commission on Environmental Quality
512-239-0598





Donna Campbell, M.D.

Texas State Senator
District 25

October 30, 2025

Ms. Brooke Paup, Chairwoman
Texas Commission on Environmental Quality
MC 100
P.O. Box 13087
Austin, TX 78711-3087

RE: Opposition to TPDES Permit WQ0016171001 – Guajolote Ranch Development

Dear Chairwoman Paup:

I strongly oppose the issuance of TPDES Permit WQ0016171001, which would allow wastewater discharge into the Helotes Creek watershed within Senate District 25. This proposal threatens groundwater integrity, endangered species habitat, and public health, while disregarding TCEQ's statutory duties under state and federal law.

Scientific and Environmental Integrity

The proposed discharge site lies within habitat supporting federally protected species, including *Eurycea rathbuni* and *Etheostoma fonticola*. Excluding these species from review contradicts Section 7 of the Endangered Species Act and the recommendations of the Office of Public Interest Counsel. Furthermore, the 2020 Southwest Research Institute study—commissioned under San Antonio's Edwards Aquifer Protection Program—concluded unequivocally that any wastewater discharge within the Helotes Creek watershed would degrade Edwards Aquifer recharge quality. To date, this finding has not been scientifically refuted.

Reports of Regulatory and Procedural Concerns

Changes to the administrative record following public hearings, without notice or comment, appear inconsistent with Texas Government Code §2001.058(e). Additionally, the applicant's removal of the originally proposed retention pond—previously essential to effluent compliance—renders prior modeling invalid under Texas Water Code §26.121. Proceeding under these circumstances compromises the transparency and integrity of the permitting process.

Policy and Public Confidence

TCEQ staff reportedly have made statements that groundwater impacts are “not considered” in TPDES decisions contradict the Commission's own Edwards Aquifer Protection Program, which recognizes direct surface-to-groundwater connectivity in karst regions. Similarly, public assurances that effluent would be “safe to drink” conflict with the permit's failure to meet Type I reclaimed water standards. Such inconsistencies erode public trust and obscure the legitimate environmental risks associated with discharge in sensitive recharge zones.



Donna Campbell, M.D.

Texas State Senator
District 25

In light of these deficiencies, I respectfully request that the Commission:

1. **Deny TPDES Permit WQ0016171001;**
2. Formally incorporate and address the findings of the Southwest Research Institute study;
3. Publicly clarify statements made regarding effluent safety; and
4. Reconcile TCEQ's conflicting positions on groundwater protection between TPDES and Edwards Aquifer programs.

Texas has long led in balancing responsible development with strong environmental stewardship. Protecting the Edwards and Trinity Aquifers is not only an environmental imperative but also a public trust obligation.

I respectfully request a **written response within thirty days** of this letter addressing these concerns and detailing the corrective measures the Commission intends to pursue.

Sincerely,

A handwritten signature in black ink that reads "Donna Campbell".

Senator Donna Campbell, M.D.
Texas Senate District 25
Chair, Senate Committee on Nominations
Vice Chair, Senate Committee on Education K-16