

1.

Acquisition of SAWS water service has the effect of driving up the purchase price of land — which drives higher density developments rather than large lot subdivisions that would be less of a threat to ground and surface water quality.

The prospect of oversized water mains opens up undeveloped areas to new development by making it more affordable for developers to tie on to existing mains. This would be great if this was an area where we would want growth but, conversely, it is a bad policy if our aim is to restrict growth in an environmentally sensitive area.

Land within this area that is not under the jurisdiction of local municipal governments does not have zoning or other protections available for employment by Comal County to regulate development.

GEAA is calling on SAWS to amend state permits to exclude the entire Edwards Aquifer Recharge Zone from the area where it is required by law to provide service.

2.

By approving wastewater utility service agreements in this area, SAWS will open new areas of highly sensitive aquifer lands to high-density development.

Gene Dawson, president of Pape-Dawson Engineers Inc., sums up the issue quite succinctly in an April 9, 2014 article in the San Antonio Express-News, "Business in, waste out," stating, "Organized wastewater collection is what drives development."

When SAWS provides water and sewer service, it enables much higher density, usually as high as four to six lots per acre. Housing developments of this density bring increased traffic, thoroughfare construction, sewage infrastructure installed within streams that recharge the aquifer and other related impacts, all leading to pollution of the aquifer.

The prospect of conveying sewage to a centralized treatment site, such as SAWS would employ, would either require conveyance of raw sewage in gravity feed mains that are located at the lowest elevations, including being placed in stream beds that are themselves Edwards Aquifer recharge features, or require lift stations, which are vulnerable to failure from a variety of factors. Neither prospect is optimal when it comes to protecting the Edwards and Trinity karst systems.

The City of San Antonio has the right of first refusal for non-SAWS sewage systems within the ETJ. This could be a tool used to insure that sewage infrastructure within San Antonio's ETJ meets City standards, is adequately protective, and is well managed.

Additionally, there are a host of expensive regulatory requirements involved with expanding development over the recharge zone, including regular smoke and camera testing of sewage lines and inspection of stormwater filtration basins.

None of these measures is required for development that is not over the recharge zone, and these expenses are currently borne by all SAWS ratepayers. All SAWS ratepayers would be subsidizing development in our most environmentally sensitive area.

For these reasons, the Greater Edwards Aquifer Alliance has consistently opposed SAWS wastewater service contracts over the Edwards Aquifer recharge and transitions zones, and the contiguous contributing zone.

3.

If SAWS is not required as the sole service provider to supply water and waste water services in this area, SAWS would have more leverage to negotiate Utility Service Agreements that are more protective of the Edwards Aquifer. For example, SAWS could require any new developments that contract for SAWS water service to incorporate best management practices and comply, where appropriate, with impervious cover restrictions and other measures that are adequately protective of the Edwards Aquifer Recharge and Contributing zones.

As a party in the Edwards Aquifer Habitat Conservation Plan, SAWS has an interest in protecting springflows of high quality Edwards water at the Comal Springs.

We need SAWS to become part of the solution in protecting the Edwards Aquifer, not part of the problem.

4.

Additional Comments:

Since the majority of SAWS customers live in Bexar County, they would not benefit from any new revenues derived from sales and property taxes collected on new development in Comal County. Yet, they would be sharing the cost of identifying and providing additional water supplies and of paying for regulatory requirements needed to comply with TCEQ's Edwards Aquifer Protection Program.

As a matter of equity, this is not fair to low income San Antonio residents, nor to the majority of customers that SAWS was created to serve.