

Alamo Group of the Sierra Club
Aquifer Guardians in Urban Areas
Austin Regional Sierra Club
Bexar Audubon Society
Bexar Green Party
Boerne Together
Cibolo Nature Center
Citizens Allied for Smart Expansion
Citizens for the Protection of Cibolo Creek
Environment Texas
First Universalist Unitarian Church of
San Antonio
Friends of Canyon Lake
Friends of Government Canyon
Fuerza Unida
Green Party of Austin
Headwaters at Incarnate Word
Hays Community Action Network
Helotes Heritage Association
Helotes Nature Center
Hill Country Planning Association
Guadalupe River Road Alliance
Guardians of Lick Creek
Kendall County Well Owners Association
Kinney County Ground Zero
Leon Springs Business Association
Lone Star Chapter of Sierra Club
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
Texas Water Alliance
Travis County Green Party
West Texas Springs Alliance
Water Aid – Texas State University
Wildlife Rescue & Rehabilitation
Wimberley Valley Watershed Association

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September 10, 2015

To: Chairman Berto Guerra and San Antonio Water System Board Members

Comments from Greater Edwards Aquifer Alliance on Proposed Revisions to
SAWS Utility Service Regulations

These comments are made on behalf of the fifty one member organizations of the
Greater Edwards Aquifer Alliance. Having reviewed proposed changes to SAWS
Utility Service Regulations¹, we submit the following:

GEAA fully supports Section 11.4 Lift Stations and Force Mains. Revised
requirements for lift stations and force mains by strengthening the economic
feasibility. Specifically, the developer must show that the cost of the gravity main is
at least three times more than the lift station and force main and 10 years of
maintenance. Also specified that lift stations and force mains are not eligible for
pro-rata refunds. Added requirement for the developer to provide on-site
easements for future gravity mains to eliminate the proposed lift station, and
added option for SAWS to assist with obtaining off-site easement if developer is
unable to obtain it, and if the easement is unobtainable, a lift station and force
main may be allowed.

Our *Analysis of Wastewater Spills on the Edwards Aquifer Recharge Zone*² found
within the recharge zone there were 83 spills ranging from 5 to 150,000 gallons
per spill from 2004 to 2012. 81 of these spills occurred between 2008 and 2012.
Approximately 5% of the spills recorded were within the boundary of the recharge
zone, comprising 3% of the total volume of spills recorded across South Central
Texas. We further found many of the spills were associated with lift stations. Of
great concern was the fact that several lift stations were the sites of multiple
reported spills³.

Adequate regulation of sewage infrastructure is a critical component in protecting
the public health and the integrity of our Edwards Aquifer water supplies, because
raw sewage spilled on the Edwards Aquifer Recharge Zone is communicated
directly into the Aquifer. Infiltration also occurs, in many instances, on the
Contributing Zone contiguous to the Recharge Zone.

I, personally, have seen a lift station on the Edwards Aquifer Recharge Zone
overflow during a storm. It was not a pretty sight to see raw sewage and
everything else that people flush down a toilet flowing into a large Edwards Aquifer
Recharge cave on an adjoining property. Such failures are alarming no matter
where they occur. It is especially troubling that sewage infrastructure is often built

¹http://www.saws.org/business_center/developer/utilityservicereqs/docs/SAWS%20USR%20draft%20changes%2005.08.15.pdf

²<http://www.aquiferalliance.net/Library/GEAAPublications/FinalReport-GEO4427.pdf>

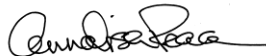
³Data on individual spills can be found at
http://geosites.evans.txstate.edu/g4427/S12/GEAA/ims/all_with_roads/default.asp

on the Contributing Zone (CZ) contiguous to the Edwards Aquifer Recharge Zone (ERZ) in order to avoid regulations applying to the Recharge Zone. Since the ERZ / CZ boundaries are so imprecise, we often see major recharge features off the ERZ that are not protected by State regulation under State Edwards Rules. The Edwards Aquifer Authority (EAA) recommends inclusion of 3 - 5 miles into the contiguous Contributing Zone in their rules to assure adequate protection of the ERZ. But, the EAA has not taken any action pertinent to regulating sewage discharges so, only State regulations apply.

The passage during the 84th Legislature of SB 912 / HB 2051 diminished requirements for reporting sewage spills of less than 1,000 gallons. Under the new law, only monthly reporting to the TCEQ will be required. This will make it more difficult to address persistent failures in a timely manner. So, infrastructure such as lift stations, which are subject to failure should be discouraged when possible.

Utility Service Agreement regulations such as this are consistent with SAWS authority to enforce San Antonio's water quality ordinances and manage the City's MS4 Permit. We contend that the health and safety of San Antonio's citizens should take precedence over concerns with the cost of building and maintaining sewage infrastructure. We urge you to adopt the proposed revisions to SAWS Utility Service Regulations in their entirety.

Sincerely,

A handwritten signature in black ink, appearing to read "Annalisa Peace", with a long horizontal flourish extending to the right.

Annalisa Peace
Executive Director