

Treatment units in the Interim I phase will include a fine screen, an anoxic tank, two pre-aeration tanks, an MBR unit, and a chlorine contact chamber. Treatment units in the Interim phase II will include a second identical MBR plant as in the Interim I phase. Treatment units in the Final phase will include four identical MBR plants as in the Interim I phase. The facility will include one storage pond with a total surface area of 1.43 acres and total capacity of 3.36 acre-feet for storage of treated effluent prior to irrigation. The facilities have not been constructed.

The draft permit authorizes the disposal of treated domestic wastewater effluent at a daily average flow not to exceed 0.100 MGD in the Interim I phase, 0.200 MGD in the Interim II phase, and 0.365 MGD in the Final phase.

The effluent limitations for all phases in the draft permit, based on a daily average, are 5 mg/l biochemical oxygen demand (BOD₅), 5 mg/l total suspended solids (TSS), 2 mg/l ammonia-nitrogen (NH₃-N) and, based on a single grab, 126 colony forming units (CFU) or most probable number (MPN) of *E. coli* per 100 ml.

The wastewater treatment facility and disposal site will be located in the drainage basin of Guadalupe River Above Canyon Lake in Segment No. 1806 of the Guadalupe River Basin.

The wastewater treatment facility and disposal site will be located at 26226 West State Highway 46, in the City of Spring Branch, Comal County, Texas 78070.

B. Procedural Background

The permit application was received on November 8, 2019 and declared administratively complete on November 21, 2019. The Notice of Receipt and Intent to Obtain a Water Quality Permit (NORI) was published on November 27, 2019 in the *Herald-Zeitung*. The Combined Notice of Public Meeting and the Notice of Application and Preliminary Decision (NAPD) was published on February 15, 2020 in the *Herald-Zeitung*. A Public Meeting Notice was published on May 7, 2020 to correct the location for the public meeting to an online public meeting via webcast. A public meeting was held on June 9, 2020 via webcast. The public comment period ended at the close of the Public Meeting.

This application was filed on or after September 1, 2015; therefore, this application is subject to the procedural requirements adopted pursuant to House Bill (HB) 801, 76th Legislature (1999), and Senate Bill (SB) 709, 84th Legislature (2015), both implemented by the Commission in its rules in 30 TAC Chapter 39, 50, and 55. The Texas Legislature enacted Senate Bill 709, effective September 1, 2015, amending the requirements for comments and contested case hearings. This application is subject to those changes in the law.

C. Access to Rules, Laws, and Records

Please consult the following websites to access the rules and regulations applicable to this permit:

to access the Secretary of State website: www.sos.state.tx.us;

for TCEQ rules in 30 TAC: www.sos.state.tx.us/tac/ (select “TAC Viewer” on the right, then “Title 30 Environmental Quality”);

for Texas statutes: <http://www.statutes.legis.state.tx.us/>;

to access the TCEQ website: <https://www.tceq.texas.gov/rules/index.html> (for downloadable rules in Microsoft Word or Adobe PDF formats, select “Rules,” then “Current Rules and Regulations,” then “Download TCEQ Rules”)

for Federal rules in Title 40 of the Code of Federal Regulations: <http://www.epa.gov/lawsregs/search/40cfr.html>; and

for Federal environmental laws: <http://www.epa.gov/lawsregs/>.

In light of directives to protect public health, to obtain documents located in the Office of the Chief Clerk, please leave a voice mail at (512) 239-3300 and someone will return your call the same day. Some documents located in the Office of the Chief Clerk may be located on the Commissioners’ Integrated Database at: <https://www14.tceq.texas.gov/epic/eCID/>.

The permit application, Executive Director’s preliminary decision, and draft permit are available for viewing and copying at Mammen Family Public Library, 131 Bulverde Crossing, Bulverde, Texas.

II. COMMENTS

A. General Comments

Comment 1:

The persons listed on attachment 1 stated that they are opposed to the issuance of the permit or, asked the TCEQ to deny the permit.

Response 1:

The Executive Director acknowledges the comments in opposition and appreciates the involvement of so many residents about this application. However, the Applicant is the entity that proposes the location of the facility, point of discharge, and the discharge route in the application rather than the Executive Director. The Executive Director evaluates applications for wastewater treatment plants based on the information provided in the application. The Executive Director can recommend issuance or denial of an application based on whether the application complies with the Texas Water Code and TCEQ regulations. TCEQ’s permitting authority does not include the

authority to mandate a different location for the facility if the location in the application complies with 30 TAC Chapter 309, Subchapter B (Location Standards), specifically 30 TAC § 309.13 pertaining to “Unsuitable Site Characteristics” for a treatment facility.

The Executive Director evaluated the Silesia Properties application according to all applicable statutory and regulatory requirements and determined that, if properly operated, the facility will not negatively impact human health or the environment.

Comment 2:

The commenters in Attachments 2 and 7 stated that there will be risk posed to endangered birds and other animals which could be impacted by the proposed permit. Several commenters expressed concern about the Texas blind salamander which is an endangered species and which lives in nearby caves

Response 2:

The proposed permit is a state-only wastewater land application permit, and there is no state requirement that the TCEQ consider an application’s potential impact on threatened and endangered species for this type of permit. However, the permit does seek to protect the environment, which would include any species that live in that environment, through requirements such as the following:

1. Appropriate effluent limits, monitoring requirements, disinfection requirements, and soil monitoring requirements
2. Provisions that specify the suitable application rate at which the effluent and its nutrients will be taken up by the vegetation with no runoff or percolation
3. Buffer zones between the application area and water bodies and water wells
4. Buffer zones for odor abatement
5. Proper design, operation, and maintenance of the wastewater treatment facility and effluent dispersal system
6. Proper sewage sludge disposal
7. Consideration of area soil conditions, recharge features, seeps, and springs

More specific environmental-protection-provision examples include Permit Condition 2.d., which requires the permittee to “take all reasonable steps to minimize or prevent any discharge or sludge use or disposal or other permit violation which has a reasonable likelihood of adversely affecting human health or the environment,” and Permit Condition 6, which prohibits the storage, processing, and disposal of hazardous waste.

Comment 3:

A number of commenters in Attachments 3 and 16 expressed concerns about potential flooding and runoff as a result of this proposed permit. Adrah Anzalotta is also concerned about flash floods in the Honey Creek and Guadalupe River watershed as a result of the development reducing open grassland in the area. The runoff and pollution from a high-density development is a danger to wildlife, plant life, and existing neighbors. Several commenters stated that they are concerned with the treated effluent overwhelming the ecosystem of Honey Creek, Honey Creek Cave, and the Guadalupe River.

Response 3:

The TCEQ does not have jurisdiction to address flooding as part of the wastewater permitting process. The permitting process is limited to controlling the discharge of pollutants into water in the state and protecting the water quality of the state's rivers, lakes and coastal waters.

For flooding concerns, please contact the local floodplain administrator for this area. If you need help finding the local floodplain administrator, please call the TCEQ Resource Protection Team at (512) 239-4691.

Comment 4:

Commenters are concerned that the discharge will find its way to waters that are used for recreational use and that the public's ability to enjoy the receiving and downstream waters will be negatively affected by the permit. The persons in Attachment 4 stated that this Project will negatively impact recreational use of caves, the Guadalupe river, and the Guadalupe River state park.

Response 4:

The draft permit does not authorize the discharge of pollutants to water in the state and prohibits unauthorized discharge. Silesia Properties, LP proposed to land-apply treated effluent on 84 acres of public access open areas through a subsurface area drip dispersal system (SADDS) that is designed to keep the irrigated effluent within the rootzone in the top 18 inches of soil. Therefore, no impacts to recreational use of downstream waters is expected.

Comment 5:

Jaime Miller requested the required effluent limits for the proposed permit.

Response 5:

The effluent limitations for all phases in the draft permit, based on a daily average, are 5 mg/l biochemical oxygen demand (BOD5), 5 mg/l total suspended solids (TSS), 2 mg/l ammonia-nitrogen (NH3-N) and, based on a single grab, 126 colony forming units (CFU) or most probable number (MPN) of E. coli per 100 ml. The draft permit can be

viewed in the Chief Clerk's office. In light of directives to protect public health, to obtain documents located in the Office of the Chief Clerk, please leave a voice mail at (512) 239-3300 and someone will return your call the same day. Some documents located in the Office of the Chief Clerk may be located on the Commissioners' Integrated Database at: <<https://www14.tceq.texas.gov/epic/eCID/>>.

Comment 6:

The individuals in Attachment 5 expressed concern regarding potential algal blooms and potential fish kills from the treated effluent.

Response 6:

This permit prohibits the discharge of wastewater or pollutants into water in the State. Silesia Properties, LP proposed to land-apply treated effluent on 84 acres of public access open areas through a SADDS that is instrumented to keep the irrigated effluent within the rootzone in the top 18 inches of soil. The draft permit also includes that in accordance to the requirements of 30 TAC § 222.81(a), the permittee shall locate the SADDS a minimum horizontal distance of 100 feet from surface waters in the state. An additional provision requires the placement of soil moisture sensing monitors in each zone placed twelve inches below the drip lines. These monitors will automatically shut off irrigation to that zone when the soil becomes saturated. If Silesia Properties, LP complies with all the conditions of the permit there is no potential for algal blooms or fish kills to occur in the nearby waterbodies.

If the facility is found to be out of compliance with the terms or conditions of the permit, an applicant may be subject to enforcement. If anyone experiences any suspected incidents of noncompliance with the permit or TCEQ rules, they may report these to the TCEQ by calling the toll-free number, 1-888-777-3186, or the TCEQ Region 13 Office in San Antonio at (210) 490-3096. Citizen complaints may also be filed on-line at https://www.tceq.texas.gov/assets/public/compliance/monops/complaints/complaint_s.html. If Silesia Properties, LP fails to comply with all requirements of the permit, it may be subject to enforcement action.

Comment 7:

Individuals in Attachment 6 requested the TCEQ implement higher than usual water quality standards on the proposed permit.

Response 7:

In accordance with 30 TAC Chapter 309 the effluent limitations that are required for irrigation on a site with public access are as follows: Based on a daily average, are 20 mg/l biochemical oxygen demand (BOD₅), 20 mg/l total suspended solids (TSS), 126 colony forming units (CFU) or most probable number (MPN) of *E. coli* per 100 ml. The Applicant proposed a more stringent effluent set based on a daily average of 5 mg/l

biochemical oxygen demand (BOD₅), 5 mg/l total suspended solids (TSS), 2 mg/l ammonia-nitrogen (NH₃-N) and, based on a single grab, 126 colony forming units (CFU) or most probable number (MPN) of *E. coli* per 100 ml.

The Applicant also proposed a 0.5 mg/l total phosphorus effluent limit. Since phosphorus is a necessary plant nutrient, it is not advisable to limit total phosphorus in the effluent. In addition, a proposed dissolved oxygen effluent limit is not necessary because dissolved oxygen is a water quality consideration for effluent discharged into a receiving body of water.

Comment 8:

Joyce M. Moore commented that the issuance of this permit will result in an illegal trespass. Sixto Ray Casas stated that they own property adjacent to the proposed project and they are in the middle of a dispute with the current owner of the subject property regarding an easement. They are concerned that we will have to deal with wastewater and other problems from this project and they do not feel the Applicant will be a responsible neighbor.

Response 8:

The TCEQ was given the authority to issue permits for the discharge of waste or pollutants into or adjacent to water in the state.¹ If the permit is issued, it will not grant the Applicant the right to use private or public property for the conveyance of wastewater.² Additionally, the draft permit does not authorize any invasion of personal rights or any violation of federal, state, or local laws or regulations. It is the responsibility of Silesia to acquire all property rights necessary to use the discharge route.³ Finally, the draft permit does not limit the ability of nearby landowners to use common law remedies for trespass, nuisance, or other causes of action in response to activities that may or actually do result in injury or adverse effects on human health or welfare, animal life, vegetation, or property, or that may or actually do interfere with the normal use and enjoyment of animal life, vegetation, or property.

Comment 9:

Individuals in Attachment 8 are concerned about the impact of the development to the groundwater supply during a drought in the Texas hill country to neighboring landowners and their private wells in the area.

Response 9:

TCEQ does not have jurisdiction to address issues regarding density of developments or general impact to neighborhoods or cities from the wastewater treatment facility as

¹ TWC § 26.027(a)

² Draft Permit, Pg. 1

³ Draft Permit, Pg. 1

part of the wastewater permitting process. While the Texas Legislature has given the TCEQ the responsibility to protect water quality, the water quality permitting process is limited to controlling the discharge of pollutants into or adjacent to water in the state and protecting the water quality of the state's rivers, lakes and coastal waters.

Comment 10:

The persons in Attachment 9 expressed concern that proposed chlorine disinfection will kill soil health bacteria necessary to process land disposed effluent.

Response 10:

Chlorine is a plant-essential element. Chlorine application is required by regulation 30 Texas Administrative Code (TAC) 309.3(g) where there is the potential for public contact with the soil. Tap water has a limit of 4 mg/L of chlorine (30 TAC 290) within the distribution system. The effect on soil health of chlorine addition through the irrigation is minuscule. Lawns are watered with tap water without deleterious effects to soil health.

Comment 11:

Ryan Bass asked why the treated water is not being repurposed for use within the development. Mr. Bass also asked why the developer doesn't use Low Impact Development (LID) strategies to improve stormwater quality leaving the site.

Response 11:

The TCEQ's rules applicable to the beneficial reuse of reclaimed water are found in 30 TAC Chapter 210. In order for an applicant to obtain this authorization, Silesia Properties, LP must first have a Texas Pollutant Discharge Elimination System (TPDES) permit or a no-discharge Texas Land Application (TLAP) state permit.⁴ TCEQ's rules provide that use of reclaimed water may only be authorized for "on a demand" use, which prevents treated water from being provided during times it cannot be beneficially used and allows the reclaimed water user to refuse delivery of reclaimed water at any time.⁵ Subsequently, the reclaimed water producer must have a guaranteed method of effluent disposal via either a TPDES or TLAP permit. The TCEQ does not have the authority to require a permittee to obtain a Chapter 210 reuse authorization. If the permit is issued, Silesia Properties, LP will have to notify the Executive Director that it intends on using the reclaimed water and obtain approval to provide reclaimed water.⁶ Treated effluent that is used for irrigation under a reuse authorization must meet the appropriate effluent limits as required by 30 TAC Chapter 210.

⁴ 30 TEX. ADMIN. CODE § 210.5(a)

⁵ 30 TEX. ADMIN. CODE § 210.7

⁶ 30 TEX. ADMIN. CODE § 210.4

Because the facility is located in the Edwards Aquifer Contributing Zone, Silesia Properties, LP is required to design and implement stormwater controls before, during, and after construction per 30 TAC § 213 Subchapter B.

Comment 12:

Persons in Attachment 10 expressed concern about a reduction in property values as a result of the proposed land application.

Response 12:

The water quality permitting process is limited to controlling the discharge of pollutants into water in the state and protecting the water quality of the state's rivers, lakes, and coastal waters. The TCEQ does not have jurisdiction under the Texas Water Code or its regulations to address or consider property values or the marketability of adjacent property when determining whether to approve or deny a permit application. As mentioned above, the scope of TCEQ's regulatory jurisdiction does not affect or limit the ability of a landowner to seek relief from a court in response to activities that interfere with the landowner's use and enjoyment of their property.

Comment 13:

Dennis Edward Dawson stated he is a landowner abutting the subject property on the east from HWY 46 North for 4200 feet and that Parcel 24 on Attachment 2--the parcel as designated is severely misrepresented on the map. Also that the application shows no watersheds nor contour lines nor where the grey water lines will go. Mr. Dawson requested a map of where the wells in the 1/2-mile circumference are located along with water migration maps and tables. Cal Creek and Glen Rose aquifers need to be sited on a map, with depths and migration movements. He requested performance bonds and fines and annual testing to make sure the ground water quality (which scientists have bench marked) does not deteriorate. Mr. Dawson also stated that the impermeable liner is not thick enough and will be subject to dry rot.

Response 13:

The Applicant submitted a well map as part of Domestic Worksheet 3.0, Section 6 (Well and Map Information). This map identifies wells within one mile and one-half mile of the proposed site. A map showing the locations of water wells is also provided in the Recharge Feature Plan submitted for Domestic Worksheet 3.3, Section 3 (Required Plans). Additionally, the Recharge Feature Plan contains a discussion on the direction of groundwater flow and the depth to groundwater at the proposed site.

The Applicant proposed an Ethylene Propylene Diene Terpolymer (EPDM) liner that will be either 45-mil or 60-mil thick as indicated in Attachment 14 of the application. Special Provision 44 of the draft permit requires the wastewater pond be adequately lined and managed to control seepage in accordance with 30 TAC § 217.203 and 30 TAC § 309.13. The Applicant has proposed a liner thickness that exceeds the

requirements of those rules. Additionally, a wastewater pond with a synthetic membrane liner is required to have an underdrain with a leachate detection and collection system. The Texas-licensed professional engineers of the Water Quality Division's (WQD) Plans and Specifications Team will evaluate the proposed liner and leak detection system prior to pond construction to ensure the pond construction meets standard engineering practices for the area and to ensure the requirements in 30 TAC § 217.203 and 30 TAC § 309.13 are met. In order to ensure the integrity of the pond liner remains intact to minimize leakage during operation, Special Provisions 45 and 46 of the draft permit requires the wastewater pond be periodically inspected for signs of damage and leakage, and repaired or taken out of service, if necessary.

Comment 14:

The persons in Attachment 11 commented that the Class C operator requirement does not provide the necessary operation and oversight for such a facility.

Response 14:

In accordance with 30 TAC § 30.350, the draft permit requires the wastewater treatment facility be operated by a chief operator or an operator holding a Category C license or higher (Figure: 30 TAC § 30.350(e)). The wastewater treatment facility must be operated a minimum of five days a week by the licensed chief operator or an operator holding the required level of license or higher. A Class C operator must have a high school diploma (or equivalent), two years of work experience and 60 hours of training. It is Silesia Properties LP's responsibility to hire the appropriate operator; if a Class C operator is not available, they may hire a Class B or A operator.

A requirement for a higher-level operator can be placed into the draft permit if the facility has any signs of compliance issues. Since there are currently no compliance issues, the draft permit designated that a Category C operator is required. If Silesia Properties, LP were to agree to hiring a Class B or Class A operator, the draft permit would be revised accordingly.

Comment 15:

Individuals in Attachment 12 commented that Bermuda grass is invasive and inappropriate to use for irrigation in the proposed draft permit.

Response 15:

Per recommendation from Texas Parks and Wildlife Department and per the request from the applicant, Bermuda grass was removed from the permit and replaced with Zoysia grass and Eastern gamagrass.

Comment 16:

Adrah Anzalotta expressed concern about increased noise pollution and increased human interaction as a result of the proposed development.

Response 16:

The permitting process is intended to control the land application of treated effluent for beneficial use on a designated site(s) that is proposed in the application. The TCEQ does not have the authority to address these types of issues as part of the wastewater permitting process. TWC Chapter 26 and applicable wastewater regulations do not authorize the TCEQ to consider issues such as noise or increased human interaction.

However, the permit does not limit the ability of an individual to seek legal remedies against Silesia Properties, LP regarding any potential trespass, nuisance, or other causes of action in response to activities that may result in injury to human health or property or that may interfere with the normal use and enjoyment of property.

B. Impacts to Surface Water and Groundwater**Comment 17:**

Commenters in Attachment 13 expressed concern about impacts to water quality from the proposed discharge and that the draft permit fails to adequately protect downstream surface water including Honey Creek and the Guadalupe River, the Honey Creek State Natural Area, the Trinity aquifer, and the southern segment of the Edwards aquifer.

Response 17:

The draft permit does not authorize the discharge of pollutants to water in the state and prohibits unauthorized discharge. Silesia Properties, LP proposed to land-apply treated effluent on 84 acres of public access open areas through a SADDs that is instrumented to keep the irrigated effluent within the rootzone in the top 18 inches of soil.

Comment 18:

The Individuals in Attachment 14 expressed concerns regarding the Karst geography in the area around the proposed development.

One person stated that Special Provision 36 on page 40 calls for evaluations of newly discovered karst features to determine if they are sensitive, when the international scientific karst literature makes it abundantly clear that they are highly sensitive. The permit should require fully characterizing karst features to determine what protective measures are possible, if any. In addition, special provision 43 notes that three karst features are known on the site and recommends 50-ft setbacks with no supporting justification. One-size-fits-all solutions often do not work in karst where conditions and management needs may vary significantly between karst features. Special Provision 9, on page 34, prohibits a SADDs within 150-500 ft of wells according to TAC standards. Such requirements make it clear that the standards were not developed for karst aquifers and this recommendation did not consider that many of Texas' longest

caves are formed in the Lower Glen Rose Aquifer. Caves are the natural pipelines for karst aquifers. The above-mentioned Edwards Aquifer report demonstrates flowrates reaching more than 16,000 feet/day. Such flow rates can be observed by the general public in Cave Without A Name, a Lower Glen Rose Aquifer cave that is not fully explored and currently has a surveyed length of over 3.5 miles. More significantly, Honey Creek Cave is Texas' longest cave with about 21 miles of aquifer steamways known so far. It is adjacent to the proposed SADDs site and clearly demonstrates rapid, unfiltered flow for miles through the aquifer in that area.

Response 18:

The draft permit includes provisions that are designed to protect both surface and groundwater quality. These provisions include the requirement to maintain a minimum depth of six inches of soil above the drip irrigation lines and the minimum depth of twelve inches of soil below the drip irrigation lines. In areas where this minimal requirement is not met, the permittee will import soils. The permittee is required to submit a plan for review and possible revision and approval at least 90 days prior to construction. Irrigation effluent is not designed or expected to move beyond the soil depth. An additional provision requires the placement of soil moisture sensing monitors in each zone placed twelve inches below the drip lines. These monitors will automatically shut off irrigation to that zone when the soil becomes saturated.

The WQD understands the significance of the karst topography at and surrounding the proposed site. A Recharge Feature Plan (RFP) for the proposed irrigation fields is required in the application for a SADDs wastewater facility and by the SADDs rules found in 30 TAC § 222.79. This RFP was conducted by a Texas-licensed professional geoscientist in order to identify the presence or absence of karst-related recharge features at the proposed site. The field survey for the RFP was conducted using approved methods found in the TCEQ Edwards Aquifer Protection Program "Instructions to Geologists for Geologic Assessments on the Edwards Aquifer Recharge/Transition Zones (Form TCEQ-0585)." The field survey also extended an additional 150 feet beyond the proposed wastewater irrigation fields for additional protection. The survey area was determined by the Texas-licensed professional geoscientist to be appropriate based on the natural drainage ways and topography of the site (refer to page 5, section 2.0, of the RFP). The RFP was reviewed by a WQD professional geoscientist. Additionally, staff from the TCEQ Region 13 Office inspected the proposed irrigation fields and adjacent areas for recharge features. The WQD professional geoscientist also reviewed the information collected by the TCEQ Region 13 staff. No recharge features were identified in the proposed wastewater irrigation fields. Three potential recharge features were identified outside the proposed wastewater irrigation fields but within the property boundary. Because TCEQ recognizes the significance of karst topography, and out of an abundance of caution, these features are to be protected with buffers, fencing with lockable gates, and upslope diversion berms per Special Provision 43 of the draft permit. Other Special

Provisions (including 14, 33, 34, 35, and 36) require the permittee to prevent seepage of wastewater from leaving the root zone of the proposed crop to be grown at the site and to address any recharge features that may be discovered during the construction and operation of the proposed irrigation fields and wastewater pond.

Comment 19:

The individuals listed in Attachment 8 have expressed concerns relating to potential contamination of groundwater and underground water wells.

Response 19:

The draft permit includes provisions that are designed to protect both surface and groundwater quality, including Honey Creek and the Guadalupe River, and groundwater, including the Trinity and Edwards aquifers. Several Special Provisions in the draft permit (including 8, 9, 41, and 42) require minimum buffer distances between the irrigation fields and private wells and public water wells, springs, or other sources of public drinking water, as per 30 TAC § 309.13 and 30 TAC § 222.81. Special Provision 31 of the draft permit requires the permittee to submit a Springs and Seep Monitoring Plan which includes corrective measures in the event laboratory results indicate wastewater emerges as a seep or spring near the site. Other Special Provisions (including 33, 34, 35, and 36) require the permittee to address any recharge features that may be discovered during the construction and operation of the proposed irrigation fields and wastewater pond. Special Provision 37 requires the plugging of abandoned and unused water wells that can be conduits to groundwater. Special Provision 39 requires the permittee to maintain a minimum horizontal buffer distance of 100 feet between the irrigation fields and surface water, including roadside ditches along Highway 46. Special Provision 40 requires the permittee to backfill surface water ponds located within 100 feet of the irrigation fields and wastewater pond. Special Provisions 44, 45, and 46 require the wastewater pond to be constructed and inspected periodically in accordance with 30 TAC § 309.13 and 30 TAC § 217.203 in order to prevent seepage of wastewater to groundwater.

Additionally, Special Provisions 14 and 15 of the draft permit require the permittee to prevent wastewater from leaving the root zone by ensuring effluent and nutrient uptake by the proposed crop. This provision is met through precise effluent application rates.

Comment 20:

The individuals in Attachment 5 commented that the draft permit should include effluent limits on phosphorus and total nitrogen to ensure aquatic and terrestrial life are not impaired by the draft permit. They also commented that the receiving waters are especially sensitive to nutrient enrichment. The commenters also expressed concern regarding depressed dissolved oxygen limits as a result of the treated effluent. The persons in Attachment 5 expressed concern that this 529-acre development will

cause eutrophication. Eva Ott stated that due to steep slopes in the basin, it is entirely possible that effluent could be transported to the main channel or tributary of honey creek where it could cause eutrophication and threaten downstream surface water and groundwater supplies.

Response 20:

As stated previously, this application is for a Texas land application permit and no discharge of pollutants into water in the State is authorized by the draft permit. In accordance with 30 TAC Chapter 309 and 222, total nitrogen and phosphorus limits are not required for land application authorizations. Also, the applicant had proposed a 0.5 mg/l total phosphorus effluent limit. Since phosphorus is a necessary plant nutrient, it is not advisable to limit total phosphorus in the effluent. In addition, a proposed dissolved oxygen effluent limit is not necessary because dissolved oxygen is a water quality consideration for effluent discharged into a receiving body of water. Furthermore, the proposed aerobic process will produce a well-oxygenated effluent.

In addition, the draft permit does contain an annual soil testing requirement. (Special Provision #26 on page 36 of the draft permit) Some of the parameters that are being monitored include Total Nitrogen and Plant Available Phosphorus.

The soil testing plan in Special Provision 26 of the draft permit requires that the applicant test for Total Nitrogen and Plant Available Phosphorus in the soil. In addition, because of the low effluent application rates and the low total nitrogen in the effluent, the transport of nitrogen beyond the rooting zone is not expected. Phosphorus, the other nutrient that contributes to eutrophication, would be adsorbed by the soil and taken up by the crops so that it would not be a factor in eutrophication.

Comment 21:

The persons in Attachment 15 commented on Nitrates as a key nutrient with human health effects from exposure. The Draft Permit has no nitrate limit. A Nitrate or Total Nitrogen limit is needed to protect Honey Creek and the Guadalupe River from excessive algae growth and to protect the drinking water supply.

Response 21:

In accordance with 30 TAC Chapter 309 and 222, total nitrogen, nitrate and phosphorus limits are not required for land application authorizations. The soil testing plan in Special Provision 26 of the draft permit requires that the Applicant test for Total Nitrogen and Plant Available Phosphorus in the soil. In addition, because of the low effluent application rates and the low total nitrogen in the effluent, the transport of nitrogen beyond the rooting zone is not expected. Phosphorus, the other nutrient that contributes to eutrophication, would be adsorbed by the soil and taken up by the crops so that it would not be a factor in eutrophication.

Comment 22:

Commenters in Attachment 12 stated that the addition of 365,000 gallons of wastewater per day to the surrounding environment will promote the growth of countless invasive plant species, in addition to streambank erosion and the destruction of streams.

Response 22:

The TCEQ permitting process is limited to controlling the discharge of pollutants into water in the state and protecting the water quality of the state's rivers, lakes, and coastal waters. A proposed facility's potential impact on erosion or soil conservation is outside the scope of the evaluation of a wastewater discharge permit application. In addition, this permit is a no-discharge authorization and should not contribute to the erosion of streambanks and any degradation of the nearby streams.

The proposed permit prohibits unauthorized discharge of wastewater or any other waste and includes appropriate requirements and no discharge of pollutants into water in the State is authorized by the draft permit. For example, a permittee must maintain adequate safeguards to prevent the discharge of untreated or inadequately treated wastes during electrical power failures by means of alternate power sources, standby generators, or retention of inadequately treated wastewater.⁷ In addition, the plans and specifications for domestic sewage collection and treatment works associated with any domestic permit must be approved by TCEQ.⁸ All of these permit provisions are designed to help prevent unauthorized discharges. Finally, Silesia Properties, LP will be subject to potential enforcement action for failure to comply with TCEQ rules or the permit. The permit also requires a 100-foot buffer zone between the irrigation fields and all surface water bodies.

If the facility is found to be out of compliance with the terms or conditions of the permit, Applicant may be subject to enforcement. If anyone experiences any suspected incidents of noncompliance with the permit or TCEQ rules, they may report these to the TCEQ by calling the toll-free number, 1-888-777-3186, or the TCEQ Region 13 Office in San Antonio at (210) 490-3096. Citizen complaints may also be filed on-line at <https://www.tceq.texas.gov/assets/public/compliance/monops/complaints/complaints.html>

Comment 23:

Individuals in Attachments 8 and 13 asked how irrigation and infiltration amounts are evaluated to ensure no treated effluent reach groundwater or surface water.

⁷ 30 TEX. ADMIN. CODE § 217.36.

⁸ Silesia Properties, LP Draft Permit, Special Provision, Items 4 and 5, page 33; *see also* 30 TEX. ADMIN. CODE § 217.6(d).

Response 23:

The application rate of 0.1 gallons per square foot per day in a SADDs under 30 TAC 222 has been deemed to be protective of groundwater by the TCEQ in Comal County because when saturated conditions occur in a zone, the sensing device will tell the system to stop flow to the affected zone. Seepage is not indicated by the Natural Resources Conservation Service (NRCS) to be a limitation of the soils that characterize the application area so surfacing of irrigated effluent is not expected to occur.

C. Comments regarding proposed development**Comment 24:**

Veronica Hawk asked what the backup plan is in place should the treatment plant fail. James David Doyle asked if the Applicant is required to have a backup plan for times when the soil is already saturated and cannot absorb 365,000 gallons per day, and where that effluent will go. Mr. Doyle asks if there is a plan in place should the effluent exceed the estimate of 365,000 gallons per day.

Response 24:

The draft permit requires the Applicant to take certain steps to minimize the possibility of an accidental discharge of untreated wastewater or wastewater treatment facility failure. For example, Silesia Properties, LP must maintain adequate safeguards to prevent the discharge of untreated or inadequately treated wastes during electrical power failures by means of alternate power sources, standby generators, or retention of inadequately treated wastewater. In addition, the plans and specifications for domestic sewage collection and treatment works associated with any domestic permit must be approved by TCEQ.

Special Provision No. 20 of the draft permit requires that the permittee design and install temporary storage that equals at least three days of the design flow of the facility for times when the subsurface area drip dispersal system is out of service due to an emergency or scheduled maintenance. In addition, the permittee shall pump and haul wastewater from the facility to prevent the discharge of treated or untreated wastewater if complete shutdown of the wastewater treatment facility becomes necessary or if the storage capacity is exceeded.

Additionally, Operational Requirement 8 of the draft permit states that when the flow reaches 75 percent of the permitted daily average flow for three consecutive months, Silesia Properties, LP must initiate engineering and financial planning for expansion or upgrade of the domestic wastewater treatment or collection facilities. When the flow reaches 90 percent of the permitted daily average flow for three consecutive months, Silesia Properties, LP must obtain authorization from TCEQ to begin constructing the necessary additional treatment or collection facilities. All of these permit provisions are designed to help prevent unauthorized discharges. If an unauthorized discharge

occurs, Silesia Properties, LP will be required to report it to TCEQ within 24 hours. Finally, the permittee is subject to potential enforcement action for failure to comply with TCEQ rules or the permit.

Comment 25:

James David Doyle asked why the project appears to be undersized based on the average water use per day and how the 365,000 gallons per day was reached? Mr. Doyle also asked what modeling has been done to evaluate fluid movement with regard to the daily application of 365,000 gallons of water per day. He asks if the effluent will reach Honey Creek via seeps or reach the Trinity aquifer or Honey Creek via fractures? Mr. Doyle asks how much water will be removed via evapotranspiration from the dispersal onto Bermuda grass. He asks if there are any nearby examples of success in raising grass crops on the same soil types.

Response 25:

The application that was submitted provided that the need was based on 200 gallons per day per living unit equivalent (LUE) for 365 homes built per year for the next five years. The Applicant stated that the ultimate need is 475,000 gpd with a total of 2,347 homes for the project but is only applying for 365,000 gpd for this application. (Domestic Technical Report 1.1, Section 1, Part A, pg. 19 of 76) As part of the application review, there is no modeling done regarding the fluid movement from daily application of the treated effluent or is required by the TCEQ rules.

The Applicant requests for the final phase 84 acres in drip irrigation. At the allowed rate of 0.1 gallons/square foot/day, this is equivalent to 365,000 gallons per day. The volume of water applied (maximum of 0.1 gallon/foot square/day) will be retained temporarily by the top 18 inches of soil and taken up by plant roots for plant growth. All irrigation will be contained within the application area and none will be available to reach groundwater or surface water.

Per recommendation from Texas Parks and Wildlife Department and per the request from the applicant, Bermuda grass was removed from the permit and replaced with Zoysia grass and Eastern gamagrass (warm season) over seeded with Winter Ryegrass (cool season).

There are several nearby permittees using subsurface systems that are successful in raising grass crops within similar soil types and conditions. Within Comal County, Comal Independent School District has an active SADDs under permit numbers WQ0013812004 and WQ0014295001. Within a neighboring county, Reunion Ranch WCID WWTP (WQ0014480001) in Hays County is successfully operating SADDs systems within similar soil conditions.

Comment 26:

Yvonne Chapman stated that “the subdivision design appears to eliminate the needed land area within its boundaries to support the requested TLAP. The permit type is inconsistent with the subdivision plan. Will the developer amend the proposed subdivision density to fit the now requested TLAP, or will the TLAP, once approved, be amended to fit the disclosed subdivision density?” Jay Jorden, Robert Pegues and Michelle Molina expressed concerns about the number of homes that the Applicant is planning to build and stated that the project is too dense.

Response 26:

As previously stated in the RTC, the application that was submitted provided that the need was based on 200 gallons per day per living unit equivalent (LUE) for 365 homes built per year for the next five years. The Applicant stated that the ultimate need is 475,000 gpd with a total of 2,347 homes for the development but is only applying for 365,000 gpd with a total of 1,825 homes for this application. (Domestic Technical Report 1.1, Section 1, Part A, pg. 19 of 76). The density of a subdivision does not impact the water use. The amount of water used depends on the type and size of the dwellings, as well as whether the dwellings have water-saving devices or irrigation systems. TCEQ’s rules provide the minimum design requirements of a wastewater treatment facility necessary to serve various sizes of subdivisions.

D. Enforcement of the proposed permit**Comment 27:**

Individuals in Attachment 17 asked how the requirements of the permit will be enforced. Specifically, in what ways will TCEQ monitor the water quality of the effluent, the rate of uptake by the grasses, and events during which the soil is saturated, or the total volume of effluent exceeds storage capacity.

Response 27:

The draft permit includes provisions that are designed to protect both surface and groundwater quality. These provisions include the requirement to maintain a minimum depth of six inches of soil above the drip irrigation lines and the minimum depth of twelve inches of soil below the drip irrigation lines. In areas where this minimal requirement is not met, the permittee will import soils. The permittee is required to submit a plan for review and possible revision and approval at least 90 days prior to construction. Irrigation effluent is not designed or expected to move beyond the soil depth. An additional provision requires the placement of soil moisture sensing monitors in each zone placed twelve inches below the drip lines. These monitors will automatically shut off irrigation to that zone when the soil becomes saturated.

For the effluent monitoring, the permit requires that the effluent monitoring shall be done after the final treatment unit and prior to storage of the treated effluent. If the

effluent is land applied directly from the treatment system, monitoring shall be done after the final treatment unit and prior to land application. These records shall be maintained on a monthly basis and be available at the plant site for inspection by authorized representatives of the Commission for at least three years. In addition, the permittee shall pump and haul wastewater from the facility to prevent the discharge of treated or untreated wastewater if complete shutdown of the wastewater treatment facility becomes necessary or if the storage capacity is exceeded.

As previously stated, if a facility is found to be out of compliance with the terms or conditions of the permit, the Applicant may be subject to enforcement. If anyone experiences any suspected incidents of noncompliance with the permit or TCEQ rules, they may report these to the TCEQ by calling the toll-free number, 1-888-777-3186, or the TCEQ Region 13 Office in San Antonio at (210) 490-3096. Citizen complaints may also be filed on-line at

<https://www.tceq.texas.gov/assets/public/compliance/monops/complaints/complaints.html>.

Comment 28:

Individuals in Attachment 17 stated that inspections every five years is inadequate and that more frequent inspections are necessary. Another commenter stated that the public needs performance bonds and fines and inspections by a neutral 3rd party of the water treatment plants effluent to ensure that the standards (5mg/L for BOD, 5mg/L for TSS, 2mg/L for NH₃-N and 0.5mg/L for total Phosphorus) committed to by the developer are met. Annalisa Peace stated that additional public oversight and expanded availability of information is necessary to assure permit compliance.

Response 28:

The TCEQ issues permits that describe the conditions under which the wastewater facility must operate. All facilities must be designed, operated, and maintained consistent with applicable TCEQ rules. These provisions require that a facility is properly operated and maintained at all times.

The TCEQ's Office of Compliance and Enforcement ensures compliance with applicable state and federal regulations. The Region 13 office is required to conduct a mandatory comprehensive compliance investigation (CCI) at minor facilities (facilities with permitted flow less than 1 million gpd) once every five fiscal years. Additional mandatory investigations can be required if the facility is categorized as significant noncompliance (SNC). SNC is determined by the Compliance Monitoring Section of the TCEQ and is based on self-reported effluent violations.

If the facility is found to be out of compliance with the terms or conditions of the permit, the Applicant may be subject to enforcement. If anyone experiences any suspected incidents of noncompliance with the permit or TCEQ rules, they may report these to the TCEQ by calling the toll-free number, 1-888-777-3186, or the TCEQ Region

13 Office in San Antonio at (210) 490-3096. Citizen complaints may also be filed on-line at

<https://www.tceq.texas.gov/assets/public/compliance/monops/complaints/complaints.html>

Comment 29:

Sriram Madabhushi asked who will be responsible if a fish kill occurs or if chemicals, bacteria, or viruses enter the surface or groundwater.

Response 29:

The proposed permit prohibits unauthorized discharge of wastewater or any other waste and includes appropriate requirements and no discharge of pollutants into water in the State is authorized by the draft permit.

If the facility is found to be out of compliance with the terms or conditions of the permit, Silesia Properties, LP may be subject to enforcement. If anyone experiences any suspected incidents of noncompliance with the permit or TCEQ rules, they may report these to the TCEQ by calling the toll-free number, 1-888-777-3186, or the TCEQ Region 13 Office in San Antonio at (210) 490-3096. Citizen complaints may also be filed on-line at

<https://www.tceq.texas.gov/assets/public/compliance/monops/complaints/complaints.html>

III. CHANGES MADE TO THE DRAFT PERMIT IN RESPONSE TO COMMENTS:

The Executive Director did not make any changes to the draft permit in response to Public Comments.

IV. OTHER CHANGES MADE TO THE DRAFT PERMIT:

1. The cover page of the draft permit revised the crops from Bermudagrass to Zoysia grass and Eastern gamagrass as previously stated.
2. On page 2 of the draft permit was revised to remove the requirement for a trace chlorine residual to be measured at the irrigation sites because it does not apply for a SADDs.
3. The sludge e-reporting language from the draft permit has been removed as it does not apply to the Texas Land Application Permit. The deletion occurred on pages 17, 27, 30, and 32 of the boiler plate language.
4. Special Provision Nos. 15 and 17 revised the crops from Bermudagrass to Zoysia grass and Eastern gamagrass as previously stated.

5. Special Provision No. 26 was revised to place the correct acreage of 84 acres for the soil testing plan.
6. Special Provision 47 was added to the draft permit since the applicant is required to measure for bacteria and this allows to request for a reduced monitoring frequency with 12 months of compliance.
7. Attachment A of the draft permit was revised to reflect the updated storage pond location.

Respectfully submitted,

Texas Commission on Environmental Quality

Toby Baker
Executive Director

Robert Martinez, Director
Environmental Law Division



Anthony Tatu , Staff Attorney
Environmental Law Division
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REPRESENTING THE EXECUTIVE
DIRECTOR OF THE TEXAS COMMISSION
ON ENVIRONMENTAL QUALITY

Attachments 1-17

Attachment 1

Sriram Madabhushi	Jonathan Franks
Juliana Crouch	Jon Cradit
Irene Jennifer Elmendorf-Lehman	Hunter Warren
Ruth Bowman Russell	Jay R Jordan
Logan McNatt	Edwin Goff
James David Doyle	Philip Walker
Adrah Anzalotta (Bulverde Neighborhoods for Clean Water)	Joshua Tatum Moore
Allan B Cobb	Gillian Orr
Matthew Andrew Turner	Tommy Joe
Cheryl Rose Hamilton	Renee Dominguez
Joyce M Moore	Ted D Hawkins
Kurt Menking	Nora Ureste
Scott Harwood Gehman	Dawn Johnson Medieros
Rafael Acuna	Robert Scott Pegues
Carol W Russell	Fernando Palos
Greg Elmendorf	T Man
Jamie Goodwin	Yvonne L Chapman
Brittany Rauscher Williams	Marcus Swepton Presson
Ryan Bass	Bill Holt
Arron Wertheim	William Hunter Warren
Lizette Rincon	David Todd
David Michael Hixon	James Coleman

Attachment 2
Comment 2

Juliana Crouch

Ethan Perrine

Adrah Anzalotta

Joshua Tatum Moore

Jean Krejca

Attachment 3
RTC Comment 3

Adrah Anzalotta (Bulverde Neighborhoods for Clean Water)

Dennis Edward Dawson

Kurt Menking

Ken L Demarest

Jay R Jordan

Charles William Steele

Araceli Betzabe Moreno

Laura Christine Pegues

Yvonne L Chapman

Meredith Maguire

Marcus Swepton Presson

Annalisa Peace (Greater Edwards Aquifer Alliance)

Michelle Molina

James David Doyle

Dennis Edward Dawson

Irene Elmendorf-Lehman

Joe Ranzau

Linda Palit

Attachment 4
RTC Comment 4

Irene Jennifer
Elmendorf-Lehman
Ethan Perrine
Adrah Anzalotta (Bulverde neighborhoods for clean water)
Cheryl Rose Hamilton
Joyce M Moore
Richard F Walker
Greg Elmendorf
Arron Wertheim
Jeff Riss
Hunter Warren
Gillian Orr
Jean Krejca
Tobin Hays
Ted D Hawkins
Robert Scott Pegues
William Hunter Warren
Philip Walker
Don and Sid Formanek
Kurt Menking
Nora Ureste

Attachment 5
RTC Comment 6, 7, and 20

Kelly Deanne Davis (Save Our Springs)
Sarah Baker Faust (Greater Edwards Aquifer Alliance)
Cheryl Rose Hamilton
Joyce M Moore
Kurt Menking
Raymond Slade
Annalisa Peace (Greater Edwards Aquifer Alliance)
Jon Cradit
Jay R Jordan
Charles William Steele
Joshua Tatum Moore
Jean Krejca
Renee Dominguez
Heather Tucek
Eva Silverfine Ott
Laura Christine Pegues
Yvonne L Chapman

Attachment 6
RTC Comment 7

Cheryl Rose Hamilton

Annalisa Peace

Hunter Warren

George Veni

Philip Walker

William Hunter Warren

Kelly Davis (Save Our Springs)

Jensie Madden

Attachment 7
RTC Comment 2

Juliana Crouch

Kelly Deanne Davis (Save our Springs)

Ethan Perrine

James David Doyle

Adrah Anzalotta (Bulverde Neighborhoods for Clean Water)

Sarah Baker Faust (Greater Edwards Aquifer Alliance)

Joyce M Moore

Kurt Menking

Paul G Moore

Allan B Cobb

Sara Ramey

Jay R Jordan

Joshua Tatum Moore

Jean Krejca

Tobin Hays

Renee Dominguez

Heather Tucek

Ted D Hawkins

Attachment 8
RTC Comment 9 & 19

Adrah Anzalotta

Allan Cobb

Sriram Madabhushi

Kelly Deanne Davis (Save our Springs)

Ethan Perrine

Jensie Madden (League of Women
Voters- Comal Area)

Sarah Baker Faust (Greater Edwards
Aquifer Alliance)

Kurt Menking

Marlo Montemayor

Gabe Montemayor

Ryan Bass

Annalisa Peace (Greater Edwards
Aquifer Alliance)

Paul G Moore

Jeff Riss

Jon Cradit

Jeffery N Nichols

George Veni

John Kerr

Jean Krejca

Joyce M Moore

Raymond Slade

Dennis Edward Dawson

Irene Jennifer Elmendorf-Lehman

Kelly Deanne Davis (Save Our Springs)

Matthew Andrew Turner

Cheryl Rose Hamilton

Marlo Montemayor

Paul G Moore

Dr. George Ernie

Meredith Maguire

Heather Tucek

Attachment 9
RTC Comment 10

Kelly Deanne Davis (Save Our Springs)

Dennis Edward Dawson

Michelle Molina

Annalisa Peace (Greater Edwards Aquifer Alliance)

Attachment 10
RTC Comment 12

Joyce M Moore

Joshua Tatum Moore

Arron Wertheim

Attachment 11
RTC Comment 14

Kelly Deanne Davis (Save Our Springs)

Dennis Edward Dawson

Annalisa Peace (Greater Edwards Aquifer Alliance)

Attachment 12
RTC Comment 22

Sarah Baker Faust (Greater Edwards Aquifer Alliance)

Dennis Edward Dawson

Annalisa Peace

Kelly Davis

Attachment 13
RTC Comment 17 & 24

Kelly Deanne Davis (Save our Springs)

James David Doyle

Jensie Madden (League of Women
Voters- Comal Area)

Sarah Baker Faust (Greater Edwards
Aquifer Alliance)

Allan B Cobb

Cheryl Rose Hamilton

Dennis Edward Dawson

Marlo Montemayor

Richard F Walker

Greg Elmendorf

Ryan Bass

Britt White

Raymond Slade

Annalisa Peace (Greater Edwards
Aquifer Alliance)

David Michael Hixon

Robert Corbin

Jeff Riss

Michelle Molina

Sara Ramey

John Mosier

Jon Cradit

John Kerr

Jean Krejca

Tommy Joe

Renee Dominguez

T Man

Heather Tucek

Joyce M Moore

Meredith Maguire

Ted D Hawkins

Robert Scott Pegues

Nora Ureste

Kirsten Vyoral

Attachment 14
RTC Comment 18

Juliana Crouch
Kelly Deanne Davis (Save Our Springs)
Ruth Bowman Russell
Logan McNatt
Ethan Perrine
Carolyn Fusinato
James David Doyle
Adrah Anzalotta (Bulverde Neighborhoods
for Clean Water)
Sarah Baker Faust (Greater Edwards Aquifer
Alliance)
Matthew Andrew Turner
Joyce M Moore
Dennis Edward Dawson
Kurt Menking
Charles William Steele
Marlo Montemayor
Rafael Acuna
Richard F Walker
Carol W Russell
Tyler Horton
Jamie Goodwin
Ryan Bass
Lizette Rincon

Britt White
Raymond Slade
Annalisa Peace
Paul G Moore
Ken L Demarest
Jonathan Franks
Jeff Riss
Michelle Molina
Jon Cradit
Jay R Jordan
Jeffery N Nichols
George Veni
John Kerr
Joe Ranzau
Dr. George Ernie
Linda Palit
Don and Sid Dormanek
Charles William Steele
Edwin Goff
Joshua Tatum Moore
Gillian Orr
Tobin Hays
Heather Tucek
James David Doyle

Attachment 15
RTC Comment 21

Sarah Faust Baker

Annalisa Peace

Kurt Menking

Kelly Deanne Davis (Save Our Springs)

Raymond Slade

Laura Christine Pegues

Attachment 16
RTC Comment 7

Kelly Deanne Davis (Save Our Springs)

Allan B Cobb

Tyler Horton

Jamie Goodwin

Ryan Bass

Arrpm Wertheim

Lizette Rincon

Raymond Slade

Paul G Moore

Ken L Demarest

Sixto Ray Casas

Michelle Molina

Jon Cradit

Jay R Jordan

Charles William Steele

Philip Walker

Araceli Betzabe Moreno

Jean Krejca

Tobin Hays

Renee Dominguez

Heather Tucek

Eva Silverfine Ott

Robert Scott Pegues

Laura Christine Pegues

Kirsten Vyoral

Yvonne L Chapman

Marcus Swepton Presson

Annalisa Peace (Greater Edwards
Aquifer Alliance)

Michelle Molina

Arron Wertheim

James David Doyle

Attachment 17
RTC Comment 27 & 28

Annalisa Peace (GEAA)
Dennis Edward Dawson
Sriram Madabhushi
Jensie S Madden
Veronica Hawk
Dennis Edward Dawson

Attachment 18
RTC Commenters

Kurt Menking	Charles William Steele	Sid Formanek
Sriram Madabhushi	Marlo A Montemayor	Edwin Goff
Juliana Crouch	Scott Harwood Gehman	Philip Walker
Irene Elmendorf- Lehman	Gabe Montemayor	Araceli Betzabe Moreno
Jamie Miller	Rafael Acuna	Joshua Tatum Moore
Veronica Hawk	Richard F Walker	Gillian Orr
Kelly Deanna Davis	Carol W Russell	Jean Krejca
Ruth Bowman Russell	Tyler Horton	Tommy Joe
Logan McNatt	Greg Elmendorf	Tobin Hays
Ethan Perrine	Jamie Goodwin	Renee Dominguez
Raymond Slade	Brittany Rauscher Williams	T Man
Allan B Cobb	Arron Wertheim	Heather Tucek
Jensie Madden	Lizette Rincon	Eva Silverfine Ott
Sarah Baker Faust	Britt White	Ted D Hawkins
Joe Ranzau	Michelle Molina	Nora Ureste
Ryan Bass	Paul G Moore	Dawn Johnson Medeiros
John Mosier	David Michael Hixon	The Honorable Kyle Biedermann
James Coleman	Ken L Demarest	Robert Scott Pegues
Linda Palit	Jonathan Franks	Laura Christine Pegues
Meredith McGuire	Robert Corbin	Kirsten Vyoral
Annalisa Peace	Jeff Riss	Katsy Joiner
George Veni	Sixto Ray Casas	Fernano Palos
Adrah Lea Anzalotta	Sara Ramey	Yvonne L Chapman
Carolyn Fusinato	Jon Cradit	Marcus Swepton Presson
James David Doyle	William Hunter Warren	Bill Holt
Matthew Andrew Turner	Jay R Jorden	David Todd
Cheryl Rose Hamilton	Jefferey N Nichols	The Honorable Donna Campbell
Joyce M Moore	John Kerr	Scott Haag
Dennis Edward Dawson	Don Formanek	