Leesa Brieger

North Comal County is in the Edwards Contributing Zone and sits over karst formations of the Edwards-Trinity (Plateau) Aquifer. Pollutants released into surface water there flow into the Edwards Recharge Zone, and pollutants released into the Trinity Aquifer there ultimately wind up in the Edwards Aquifer, which is connected to the Trinity.

Wastewater treatment facilities and discharge points are proposed for Broken Cedar Ranch and Canyon Ranch in north Comal County. Neither has been built; Broken Cedar has not been permitted. Both would release pollutants from partially treated wastewater
* into the surface water flowing into the Edwards Aquifer recharge zone and
* into groundwater connecting to the Edwards Aquifer.

Existing developments such as Vintage Oaks in New Braunfels and Santa Rita Ranch in Leander have implemented 100% reuse of their treated effluent, treating the wastewater to high standards (for protection of the aquifer) and using the output as irrigation water or for sale as gray water.

Because any pollution allowed into our waters in north Comal County ultimately winds up in the Edwards Aquifer, our communities here request the implementation of similar protection for our surface and groundwater by way of protecting the Edwards Aquifer. (Protection of our own health is a beneficial by-product.) We request that TCEQ impose 100% water reuse requirements on all wastewater generated by Broken Cedar Ranch and Canyon Ranch.

Because pollution released as treated wastewater into other rivers in the Edwards recharge zone has similar repercussions on the Edwards Aquifer, we request a 100% water reuse requirement on all wastewater currently discharged into rivers in the Edwards recharge zone and similar consideration for all wastewater treatment in areas of the Edwards-Trinity (Plateau) Aquifer: 100% water reuse requirements.

Allowing partially treated wastewater to flow into streams and groundwater, ultimately ending up in the Edwards Aquifer, does not furnish a protection to the Edwards Aquifer, nor indeed to any of our water resources.

Please require 100% wastewater reuse universally. It is necessary for the protection of public health and natural resources in this state.