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exas Water Code § 26.046; 30 TAC Chapter 213
To Whom It May Concern:
I am a Comal County resident and a private well owner within the Comal Trinity Groundwater Conservation District. I submit these comments regarding the annual public hearing on protection of the Edwards Aquifer and its contributing zone.
The stated purpose of these hearings is to assist the Commission in its shared responsibility with local governments—including cities, counties, and groundwater conservation districts—to protect aquifer water quality. I respectfully ask the Commission to explain why Comal County and the Comal Trinity Groundwater Conservation District appear to have limited authority to protect the Aquifer Contributing Zone, while private well owners in these areas lack meaningful protection from potential groundwater contamination associated with wastewater-treatment plant discharges.
Private well owners, including my household, depend directly on groundwater for our drinking water. Yet wastewater-treatment plant permits may authorize effluent discharge into contributing-zone areas above or near private wells. Our groundwater conservation district may not be able to deny such permits, despite the potential risk to the groundwater resources it is charged with conserving and protecting.
I am particularly concerned about the following proposed or pending wastewater-treatment plant permits:
Lennar's Canyon Ranch WWTP Permit No. WQ0015866001, which has been under renewal review since the June 2, 2026 public-comment period and is proposed to discharge into the Cow Creek Formation within the Aquifer Contributing Zone.
Lennar's proposed Broken Cedar WWTP Permit No. WQ0016660001, which was pending approval following the February 10, 2026 public meeting.
Both proposed facilities are located within a few miles of Canyon Reservoir, in an area vulnerable to flooding. Numerous documented and undocumented private wells are present in the area, along with Texas Water Company wells. Any failure, overflow, flood-related release, or long-term degradation of groundwater quality could threaten private well users, public-water supplies, and Canyon Reservoir.
Canyon Reservoir is a vital regional water resource, supplying approximately 90,000 acre-feet of water and serving millions of Texans in the surrounding region. The risks posed by treated-effluent discharge in the contributing zone deserve a precautionary response, particularly where groundwater is relied upon for household drinking water.
I respectfully request that TCEQ require 100 percent onsite treatment and beneficial reuse of wastewater for WWTPs proposed in this area, rather than permitting effluent discharge into the Aquifer Contributing Zone. Requiring onsite treatment and reuse would reduce the risk of contamination to neighboring private wells, public-water wells, the Edwards Aquifer system, and Canyon Reservoir.
I also ask TCEQ to strengthen protections for private well owners and ensure that Comal County and the Comal Trinity Groundwater Conservation District have a meaningful role in decisions that may affect groundwater quality within their jurisdiction.
Thank you for considering these comments and for protecting the water resources on which Comal County residents depend.