Charles Allyn Cutts

October 22, 2026

To: Texas Commission on Environmental Quality

Re: Edwards Aquifer Protection Program — Public Comments Regarding Wastewater Discharges, Groundwater Protection, and Cumulative Development

To the Texas Commission on Environmental Quality:

My wife and I are longtime-area residents of Canyon Lake in Comal County, Texas. We are deeply concerned about the pace of residential development in our area and whether existing environmental protections are sufficient to preserve our surface water and groundwater resources for future generations.

We submit these comments under Texas Water Code §26.046 and 30 TAC Chapter 213, requesting stronger preventive protections for the Edwards Aquifer Contributing Zone and hydrologically connected watersheds.

1. Require serious consideration of 100% beneficial wastewater reuse.

Two proposed developments in our area, Broken Cedar Ranch and Canyon Ranch, raise significant concerns regarding treated wastewater discharges into sensitive watersheds.

The Broken Cedar Ranch proposal alone would authorize up to 600,000 gallons of treated wastewater per day to an unnamed tributary of Potter Creek, ultimately reaching Canyon Lake.

We ask TCEQ to evaluate amendments to Chapter 213 requiring new wastewater facilities in sensitive contributing zones to demonstrate why 100% beneficial reuse is not feasible before receiving authorization for routine surface water discharge.

Alternatives should include community landscaping, residential irrigation, appropriate agricultural reuse, and other lawful applications of reclaimed water.

Any reuse requirement must also include adequate wet-weather storage, safeguards against runoff and infiltration-related contamination, and enforceable operational standards.

2. Strengthen protection of sensitive geological features and connected aquifers.

The Edwards and Trinity aquifer systems are critically important to Comal County.

Before authorizing wastewater discharges near potentially sensitive geological or groundwater recharge features, TCEQ should require appropriate site-specific geological and hydrological evaluations.

These assessments should identify potential pathways by which contaminants could reach groundwater, private wells, or connected surface waters.

Where significant risks are identified, additional treatment, protective setbacks, alternative disposal methods, or discharge restrictions should be required.

3. Evaluate cumulative development impacts rather than individual projects alone.

Our concern extends beyond any single subdivision.

Hundreds of additional homes are proposed throughout the Canyon Lake region. Each development creates additional demand for water, wastewater treatment, roads, and drainage infrastructure.

Evaluating individual wastewater facilities without adequately accounting for cumulative watershed impacts risks overlooking the combined effects of increasing pollutant loads, impervious cover, stormwater runoff, and drought-related reductions in natural streamflow.

We request that TCEQ consider stronger requirements for cumulative watershed-impact assessments in applicable permitting and aquifer-protection reviews.

4. Address groundwater depletion through appropriate interagency coordination.

Protecting groundwater quality is essential, but protecting the long-term availability of that water is equally important to our community.

Repeated drought conditions and rapid development raise serious questions about whether existing groundwater supplies can sustainably support continued growth.

We recognize that groundwater withdrawal regulation involves groundwater conservation districts and other state and local authorities, not solely TCEQ.

Nevertheless, we urge TCEQ to coordinate with these agencies and the Texas Water Development Board to evaluate the combined implications of groundwater withdrawals, reduced aquifer levels, wastewater management, and groundwater contamination risks.

5. Protect our water resources before irreversible damage occurs.

Canyon Lake is more than a recreational destination. It is a public water supply, an essential environmental resource, and an important part of life for thousands of Texas families.

Our position is straightforward: Development should not move faster than our ability to demonstrate that adequate water supplies, effective wastewater infrastructure, and enforceable environmental protections are in place.

We respectfully ask TCEQ to evaluate stronger Chapter 213 protections, particularly requirements addressing wastewater reuse, sensitive recharge features, low-flow discharge conditions, and cumulative watershed impacts.

We also request that the commission explain what regulatory changes are within its existing authority and identify any additional legislative authority needed to provide adequate protection.

The people who live here today, and the generations who follow, deserve thoughtful planning that protects our water resources before they are damaged.

Thank you for considering our comments.

Respectfully,

C Allyn Cutts & Diane Cutts
1108 Lake Bluff
Canyon Lake, TX 78133
(610) 216-1900
allyn.cutts@gmail.com

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