



Donna Campbell, M.D.

Texas State Senator
District 25

October 30, 2025

Ms. Brooke Paup, Chairwoman
Texas Commission on Environmental Quality
MC 100
P.O. Box 13087
Austin, TX 78711-3087

RE: Opposition to TPDES Permit WQ0016171001 – Guajolote Ranch Development

Dear Chairwoman Paup:

I strongly oppose the issuance of TPDES Permit WQ0016171001, which would allow wastewater discharge into the Helotes Creek watershed within Senate District 25. This proposal threatens groundwater integrity, endangered species habitat, and public health, while disregarding TCEQ's statutory duties under state and federal law.

Scientific and Environmental Integrity

The proposed discharge site lies within habitat supporting federally protected species, including *Eurycea rathbuni* and *Etheostoma fonticola*. Excluding these species from review contradicts Section 7 of the Endangered Species Act and the recommendations of the Office of Public Interest Counsel. Furthermore, the 2020 Southwest Research Institute study—commissioned under San Antonio's Edwards Aquifer Protection Program—concluded unequivocally that any wastewater discharge within the Helotes Creek watershed would degrade Edwards Aquifer recharge quality. To date, this finding has not been scientifically refuted.

Reports of Regulatory and Procedural Concerns

Changes to the administrative record following public hearings, without notice or comment, appear inconsistent with Texas Government Code §2001.058(e). Additionally, the applicant's removal of the originally proposed retention pond—previously essential to effluent compliance—renders prior modeling invalid under Texas Water Code §26.121. Proceeding under these circumstances compromises the transparency and integrity of the permitting process.

Policy and Public Confidence

TCEQ staff reportedly have made statements that groundwater impacts are “not considered” in TPDES decisions contradict the Commission's own Edwards Aquifer Protection Program, which recognizes direct surface-to-groundwater connectivity in karst regions. Similarly, public assurances that effluent would be “safe to drink” conflict with the permit's failure to meet Type I reclaimed water standards. Such inconsistencies erode public trust and obscure the legitimate environmental risks associated with discharge in sensitive recharge zones.



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In light of these deficiencies, I respectfully request that the Commission:

1. **Deny TPDES Permit WQ0016171001;**
2. Formally incorporate and address the findings of the Southwest Research Institute study;
3. Publicly clarify statements made regarding effluent safety; and
4. Reconcile TCEQ's conflicting positions on groundwater protection between TPDES and Edwards Aquifer programs.

Texas has long led in balancing responsible development with strong environmental stewardship. Protecting the Edwards and Trinity Aquifers is not only an environmental imperative but also a public trust obligation.

I respectfully request a **written response within thirty days** of this letter addressing these concerns and detailing the corrective measures the Commission intends to pursue.

Sincerely,

A handwritten signature in black ink that reads "Donna Campbell".

Senator Donna Campbell, M.D.
Texas Senate District 25
Chair, Senate Committee on Nominations
Vice Chair, Senate Committee on Education K-16