Donna Campbell, M.D.
Texas State Senator
District 25

December 2, 2025

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

RE: Support Motion for Rehearing–TPDES Permit No. WQ0016171001 (Guajolote Ranch Development)

I write in continued and unequivocal **support of the Motion for Rehearing** regarding TPDES Permit No. WQ0016171001. This follows my prior opposition to the permit and the Commission's November 12, 2025 response acknowledging the rehearing process and statutory limitations on ex parte communications.

The administrative record regarding the wastewater discharge permit demonstrate substantial and material deficiencies. The Southwest Research Institute's findings, which concluded that wastewater discharge into the Helotes Creek watershed would degrade the Edwards Aquifer recharge quality, have not been refuted. Setting aside these unchallenged findings directly undermines the technical basis for the permit and compromises the Commission's statutory duty to prevent the degradation of state waters.

Further, concerns raised by local officials and members of the Legislature highlight the well-documented hydrologic connectivity between the Trinity Glen Rose and Edwards Aquifers, which together serve as the primary drinking water supply for surrounding communities and millions of Texans. Potential impacts to these interconnected systems elevate this matter beyond a localized dispute and into the realm of statewide public health and resource protection.

Clarification of inconsistencies between the TPDES program and the Commission's Edwards Aquifer Protection Program is necessary to ensure alignment, transparency, and scientific coherence. This is especially critical in sensitive karst regions where water pathways between the surface and groundwater are well established.

The Motion for Rehearing is the necessary procedural vehicle for a complete, science-based evaluation of the unresolved issues in this matter. Granting it will ensure the Commission can correct procedural deficiencies, fully reassess the record, and verify that the permitting decision aligns with all applicable state and federal requirements, which is essential to upholding both the law and the public interest.

For these reasons, I respectfully urge the Commission to grant the Motion for Rehearing for TPDES Permit No. WQ0016171001.

Sincerely,

Donna Campbell

Senator Donna Campbell, M.D.
Texas Senate District 25
Chair, Senate Committee on Nominations