

To: Office of the Chief Clerk of the Texas Commission on Environmental Quality  
RE: Docket No. 2022-0091-MWD  
Green Valley Special Utility District (Applicant)  
Request(s) filed on Permit No. WQ0015917001

I would like to request reconsideration on Permit no/ WQ0015917001 for GVSUD.  
I strongly believe the permit must be declined.

My reasons for this request are as follows:

1. TCEQ's own Texas Integrated Report shows the Martinez Creek is listed as Category 5. It is already deemed impaired for bacteria. This plant would cause the degradation to increase.
2. TCEQ's rules require a socio-economic justification when degradation is involved. This has not been provided; therefore, the application needs to be denied.
3. This application needs to be denied because it conflicts with State regionalization policy. TCEQ rules have designated CCMA to service this region. The application must be denied because it overlaps the CCMA service area.
4. TCEQ needs to deny the application because there is a lack of need. Other facilities are in close proximity and already permitted and operational.
5. TCEQ needs to deny the application because your own chapter 351 regulations have not been followed.
6. TCEQ needs to deny the application because your regulations for sludge removal and disposal have not been met.

And on a personal note – We own several generational agriculture properties along the Martinez Creek starting just a few yards from where the Woman Hollering Creek flows into it.

- This sewage plant offers ZERO benefit to any of us residents in Saint Hedwig. Saint Hedwig is almost exclusively zoned as agriculture and farmland. Every single person downstream, and downwind, of this proposed plant are on privately purchased septic systems. None of us have sewers, none!
- We raise cattle, feed for farm animals, have pecan trees and more that utilize the water from the Martinez creek and we cannot risk the added chemical pollution that will end up in the water.
- Woman Hollering Creek is a dry creek bed, it only has running water after heavy rains. During those rainy seasons the creek always floods. If you allow the proposed plants' water release it will inevitably spill the waste chemicals and sludge into the creek(s) which will adversely affect our agriculture and animals.
- Our property values will plummet, and we'll lose all the equity we've worked so hard to build because the stench of the proposed waste plant.
- GVSUD failed to meet the TCEQ's criteria of notifying the neighbors that would be directly impacted by building the facility. This is a clear violation of your filing rules.
- With the added water being released from the proposed plant, all our waterfront properties will erode beyond redemption.

- Who will maintain the roads? Stapper road is already treacherous to navigate, it has blind corners and wavy, uneven pavement. It is so unstable you can only drive about 20 miles an hour over it. This is caused by continued instability of the land itself.
- The proposed plant will require excessive amounts of heavy trucks full of dangerous chemicals. Those trucks will further damage the roads and GVSUD never took into account the road hazards and/or maintenance.
- Young children wait along Stapper road for the bus every morning and afternoon. Think about these children and the danger they would be in with these chemical trucks whizzing by. Who would take responsibility if one of those kids were injured or if one of the truck drivers doesn't anticipate the blind corners and hits a busload of school children?
- The city of Saint Hedwig, the city of Schertz, the city of Cibolo, the Greater Edwards Aquifer alliance, along with a State representative and a Senator have all voiced their objections to this application. GVSUD has not even met your own rules and regulations to submit an application.

In conclusion, we can all see that GVSUD has been radically inadequate in the fulfillment of your rules of application. If TCEQ were to ignore, or choose to overlook, those same rules and approve the permit it would be a gross oversight of your responsibilities and undermine the entire purpose of the TCEQ organization.

Respectfully,

Victoria and Theodore Kosub  
15240 New Berlin Road  
Saint Hedwig, Texas