Comments to TCEQ Permit #WQ0015835001

From Honey Creek Spring Ranch

Please accept the following comments on behalf of myself Joyce Gass Moore and on behalf of Honey Creek Spring Ranch, LP as an affected property owner with standing, in regard to a request by Silesia Properties, LP for a Texas Pollutant Discharge Elimination System Permit No WQ0015835001 at 26226 State Highway 46 West, Spring Ranch Texas in Comal County. Honey Creek Spring Ranch, LP requests a Contested Case Hearing in this matter.

My family owns Honey Creek Spring Ranch located approximately 1/2 to 1 mile downstream of the proposed Honey Creek Ranch development. Our property is bounded on the east and north by two state-owned properties operated by Texas Parks and Wildlife--Honey Creek State Natural Area and Guadalupe River State Park. My family homesteaded Honey Creek Spring Ranch in 1871 and it has provided our livelihood for 5 generations. For 149 years, we have stewarded this land, and always protected its natural resources--the most significant of which is a perennial stream known as Honey Creek which outcrops from a series of underground karst limestone caverns known as Honey Creek Cave. Today, despite our best efforts, we are no longer able to protect our ranch and our precious groundwater from urban encroachment and development. We have a number of major concerns about the proposed Silesia Properties pending TPDES application.

1) Negative Impacts to Water Quality--The pending TPDES permit authorizes the disposal of treated wastewater effluent via a subsurface drip dispersal system. This type of subsurface drip dispersal system is designed to effectively remove contaminants in areas of deep soils--soils which are required to effectively filter contaminants. Unfortunately, this type of system has not been proven to be effective in an area composed of fragile Hill Country geology known as Glenrose Limestone, or 'karst'. The very nature of this geologic formation is limited by soil type, a minimal soil depth of 6" to 1’ (certainly not what I would call deep), and is accompanied by the presence of hundreds (if not thousands) of recharge features designed to move water quickly from the surface into subterranean aquifers. These recharge features form a conduit directly into Honey Creek Cave, located some 150 feet below the surface. Honey Creek Cave outcrops on my family ranch and forms the headwaters spring which feeds Honey Creek--one of the purest and most diverse waterways anywhere in Texas. At least until now.... Honey Creek then forms my property's eastern boundary as it makes its way toward the Guadalupe River approximately 1.2 mile to the northeast. I have several major concerns with this type of land application permit: namely that it will quickly funnel treated sewage (otherwise known as effluent) into a pristine system--water that will no longer be composed simply of rainwater and some organic debris, but contaminated effluent filled with high levels of nitrogen and phosphorous, household chemicals, pharmaceuticals and feminine products, as well as lawn fertilizers, motor oil, and other chemicals from multiple sources of non-point pollution. Negative impacts to the Honey Creek and to the Honey Creek Cave system will be dramatic and irreversible.... Likewise, negative impacts will also be felt by the Guadalupe River downstream, and to the entire Trinity Aquifer which provides drinking water for thousands.,2) Negative Impacts to Wildlife--The Honey Creek Cave system has been studied by researchers from around the world. It is not only the longest mapped cave in Texas, but it is ranked 7th longest in the world—a true natural wonder. The creek and cave system are also home to a unique diversity of plant and animal species--all of which are endemic to the Texas Hill Country, and several of which are imperiled due to habitat loss. One or two are even proposed for review to receive federal protection. All of these species must live in fresh water. They do not live in contaminated wastewater effluent. Another concern is that a daily influx of 365,000 extra gallons of water (treated or not) will negatively impact cave and creek hydrology. This rate of water infiltration will basically ‘flood the system', thus making it un-inhabitable for these imperiled species. In this way, plans for this development would only speed up their decline.

3) Negative Impacts to the Plant Community—Honey Creek is a diverse Hill Country stream. The plant community currently found there has adapted over the millennia, with stately cedar elm, pecan, sycamore, bald cypress, and palmetto scattered along its banks. Adding 365,000 gallons of additional nutrient-laden water into this environment will no doubt promote the growth of countless invasive species not adapted to the area. Stream flow will also increase from the additional glut of water, and flooding will become more prevalent and more intensified. The vegetative community as we know it will be completely altered—replaced by invasive species such as chinaberry, tree of heaven, and giant reed. Streambank erosion will increase and the stream, unable to heal itself, will become another muddy stream, filled with sediment. Because the stream will basically become contaminated, additional nutrient loads filled with nitrogen and phosphorous will create an algae-filled waterway—a far cry from the beautiful stream it is today.

3) Impact on State-owned Assets and Private Wells—Adjacent lands, Guadalupe River State Park and Honey Creek State Natural Area were purchased and are maintained using public tax dollars. These properties are designed to be held in trust for the people of Texas and operated as recreational areas by Texas Parks and Wildlife. Thousands of visitors flock to these areas annually. If this proposed permit is approved, water quality on both state owned facilities will be negatively affected—particularly during the dry Summer months when the flow in Honey Creek is minimal. It is at this time of year, when treated effluent will represent the majority of stream flow. Families recreating in the Guadalupe River should be made aware of this. It will create an algae-filled waterway and a contaminated stream in which to swim and tube. Likewise, private wells in the area will also be negatively impacted. The wells on Honey Creek Spring Ranch have existed for a short time—just 150 years. They have remained pristine and clear, providing valuable drinking water to my family and others. However, state park wells may also be negatively affected from this action. These wells are public, and the consumers are public.

Closing comments: Although the original threat of direct discharge has been eliminated, the new proposed TPDES application is simply a more insidious way of con,taminating our groundwater and the natural resources that we at Honey Creek Spring Ranch have tried for generations to protect. The TCEQ has previously commented that when approving wastewater permits, they consider baseline conditions in the receiving stream, both physical and hydrological characteristics of the stream, water body uses, and water quality standards that protect those uses. It seems to me that based on the natural diversity of the site, the potential to negatively impact downstream resources, and the site’s proximity to public lands would all indicate that a proposed wastewater facility of any kind is not suitable for the Honey Creek area.

I encourage TCEQ to do the right thing and reject this proposed permit. Again, on behalf of Honey Creek Spring Ranch, LP I request a contested case hearing regarding this matter. Thank you for the opportunity to submit these comments.

Joyce Moore