

COMMENTS:

My name is Michelle Molina and I am President of Bulverde Neighbors for Clean Water (BNCW). Our group is 90 members strong. We are all Texans and Honey Creek belongs to the citizens of Texas. On behalf of BNCW, I am requesting a Contested Case Hearing for Silesia Properties LP, Proposed Permit #WQ0015835001. BNCW is thankful Silesia Properties LP withdrew the TPDES and applied for the TLAP. This new TLAP permit must include TAC Chapter 222 and Chapter 309. In addition to coupling these two new beneficial reuse Chapters to the TLAP, review and use of an appropriate TLAP wastewater system i.e. Individual Onsite Wastewater Systems, Clustered Wastewater Systems or Non-Discharging Centralized Wastewater Systems must be utilized to lessen the devastating effects of polluting Honey Creek Cave and Creek. The Non-Discharging Centralized Wastewater System for a small community collection and treatment system has been used in Texas, including for a 75-home resort community located on Lake Belton and a 184-home system in New Braunfels. These communities can be contacted as a resource. Honey Creek Ranch can be broken into small communities within the development. Silesia, their TLAP representatives, engineers and staff must read these two reports from the Meadows Center. Preferred Wastewater Systems for the Texas Hill Country and Over the Edwards Aquifer: Economic and Environmental Considerations. Author Susan Parten, P.E. <https://gato-docs.its.txstate.edu/jcr:7cd99555-9be7-43cf-9e41-d522245a4325> Regulatory Impediments to Implementing One Water in Texas <https://gato-docs.its.txstate.edu/jcr:461305d9-e80e-47df-9b89-dc5b37c7193f> Authors: Vanessa Puig-Williams, Puig-Williams Law, PLLC and Robert E. Mace, Ph.D., P.G. , The Meadows Center for Water and the Environment – Texas State University Pg. 25, To address these concerns, in December 2019, the Commission adopted rules amending 30 TAC, Chapter 222 and 30 TAC, Chapter 309 to allow a Texas Land Application Permit applicant to receive a credit for the beneficial reuse of reclaimed water that can be demonstrated to be consistently used. In other words, reclaimed water that will not go to the applicant's irrigation disposal area and that, instead, will be beneficially used on a continual basis, can be removed from the calculations used to determine the required minimum size of the applicant's irrigation disposal area. The credit allows the applicant to reduce the amount of land she would otherwise be required to purchase or lease under current rules. Under the new rules, the beneficial reuse credit is based on the firm reclaimed water demand demonstrated by water use data from the applicant's reclaimed water users. If Silesia Properties insists on developing Honey Creek Ranch, they must use the most protective TLAP available to protect Honey Creek Cave and Spring.

Based on TCEQ rule Section 1.10(h), the TCEQ General Counsel has waived the filing requirements of Section 1.10(c) to allow the filing of comments, requests, or withdrawals using this online system. The General Counsel also has waived the requirements of Section 1.10(e) so that the time of filing your electronic comments or requests is the time this online system receives your comments or requests. Comments or requests are considered timely if received by 5:00 p.m. CST on the due date.