

## Honey Creek Ranch, yet another example of inappropriate development in the Edwards Aquifer Watershed

In the fall of 2018 Developers of Honey Creek Ranch applied for a TPDES<sup>1</sup> permit, which allows direct discharge of treated sewage effluent into Texas waterways, to release up to 500,000/gallons per day of treated sewage effluent from a planned subdivision of 2,396 new homes on 592 acres directly into an unnamed tributary that flows into Honey Creek just upstream of the [Honey Creek State Natural Area](https://tpwd.texas.gov/state-parks/honey-creek) and [Guadalupe River State Park](https://tpwd.texas.gov/state-parks/guadalupe-river)<sup>3</sup>.

Guadalupe River State Park, immediately downstream of the confluence of Honey Creek and the Guadalupe River, has long been one of our state’s most popular places to toss in a tube and ‘float the Guadalupe.’ During average conditions, a substantial portion of the flow into the State Park would have consisted of nutrient-laden effluent, impacting recreational activities such as swimming, fishing, canoeing, and inner tubing on the river.



<sup>1</sup> TPDES (Texas Pollutant Discharge Elimination System) program. The Texas Commission for Environmental Quality (TCEQ) has federal regulatory authority over discharges of pollutants to Texas surface water.

<sup>2</sup> <https://tpwd.texas.gov/state-parks/honey-creek>

<sup>3</sup> <https://tpwd.texas.gov/state-parks/guadalupe-river>

The two watersheds in the Honey Creek State Natural Area<sup>4</sup> are in the catchment area of the Edwards Aquifer about 25 miles north of San Antonio. The catchment area, adjacent to the Edwards Aquifer Recharge Zone, comprises the upper parts of drainage basins of streams that lose water to the Edwards Aquifer as the streams cross the recharge zone. The watersheds are drained by ephemeral, first order streams that are tributaries to Honey Creek<sup>5</sup>, a tributary to the Guadalupe River.

As of 2017, of all the development that has been built within the Edwards Aquifer watershed, only two had applied for TPDES permits to discharge sewage effluent directly into streams that recharge the Edwards Aquifer. The far more common, and safer practice was to apply effluent to the land (Texas Land Application Permit or TLAP). As land prices rose in the Hill Country, we have seen an uptick in the number of TPDES permits for residential developments within the Edwards Aquifer watershed. As of spring 2020, GEAA has been engaged in contesting fifteen TPDES permits that threatened to pollute the Edwards and Trinity aquifers.

In December 2019, Silesia Properties, developer of the Honey Creek Ranch, withdrew their application for a TPDES permit and applied for a TLAP. This was a minor victory and, in most cases, GEAA would be content with the application for the TLAP rather than the direct discharge permit.

In this case, however, our baseline water quality studies of the Honey Creek indicate that this is probably one of the cleanest natural streams in the whole state of Texas. Preliminary water quality testing of the receiving water body conducted by the GEAA and the [Meadows Center for Water and the Environment](#) indicate that Honey Creek is one of the clearest-flowing streams in the Texas Hill Country. GEAA and others<sup>6</sup> do not believe that Texas regulations are sufficient to protect Honey Creek. Given that the state has invested substantially in the Honey Creek State Natural Area to preserve this treasure, as well as in the Guadalupe State Park - popular water recreational area immediately downstream, we feel that the risk of both waste water and stormwater pollution from an extremely high density subdivision at Honey Creek Ranch is something we should make every effort to mitigate.

The planned Honey Creek Ranch development creates at least three major problems regarding stormwater runoff in the area:

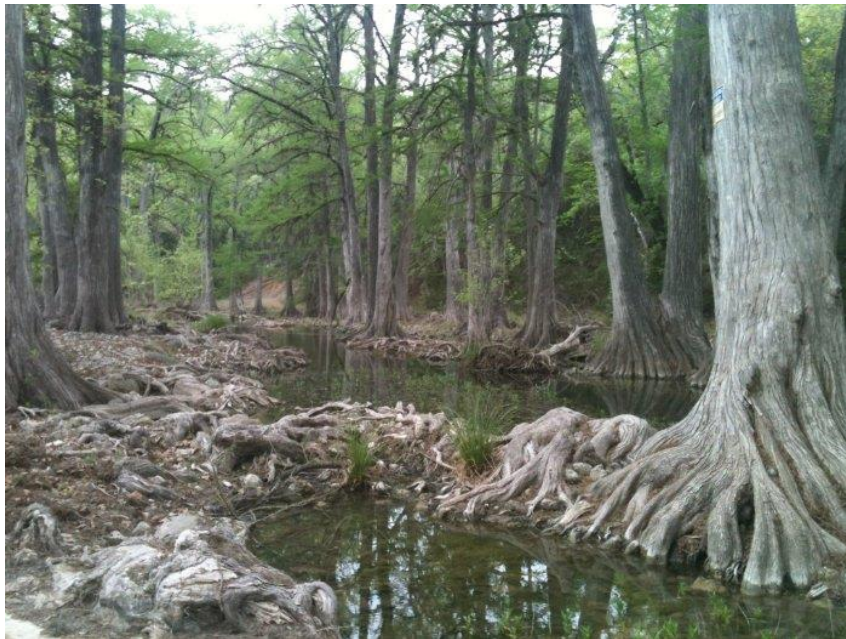
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<sup>4</sup> <https://pubs.usgs.gov/ds/2006/200/>

<sup>5</sup> [https://www.usgs.gov/centers/tx-water/science/effects-brush-management-water-budget-and-water-quantity-honey-creek-state?qt-science\\_center\\_objects=0#qt-science\\_center\\_objects](https://www.usgs.gov/centers/tx-water/science/effects-brush-management-water-budget-and-water-quantity-honey-creek-state?qt-science_center_objects=0#qt-science_center_objects)

<sup>6</sup> Meadows Center for Water and the Environment, Texas Cave Management Association, Bexar Grotto, Texas Parks and Wildlife Department, Texas Rivers Protection Association, Bulverde Area Republican Women, and local economic development agencies, as well as local residents

- 1) over 100 acres of new impervious cover from the housing units, streets, sidewalks, and other non-permeable surfaces will increase the volume and velocity of water flowing into the Creek, thus scouring and permanently altering the riparian area
- 2) additional nutrient inputs to Honey Creek associated with fertilizing yards, pet waste, and other point and non-point sources of nutrient pollution in the storm runoff will deliver additional contaminants including sediment, bacteria, oil and grease, trash, pesticides, and metals.
- 3) the amount of land Honey Creek Ranch is setting aside for irrigation is not sufficient to accommodate full build out of the development. As is common practice, they may apply to amend the TLAP to a direct discharge (TPDES) permit as they commence with completion of all phases of the subdivision. A waterlogged 84-acre TLAP field which, due to the high land application rates will act as mostly impervious cover.



The Greater Edwards Aquifer Alliance is taking the lead in organizing opposition and raising funds to cover the legal expenses of contesting this permit.

You can learn more about the impact of sewage on Hill Country waterways and about this cause on GEAA's Waste Water page at <https://aquiferalliance.org/waste-water-discharge/>. You can sign up to receive e-mail alerts by sending your e-mail address to [info@AquiferAlliance.org](mailto:info@AquiferAlliance.org). (Be sure to write Honey Creek in the subject line). And, you can enter the discussion, post pictures, and keep up with the latest news at the [Save Honey Creek Face Book page](#).