

Texas Commission on Environmental Quality

Comments from Joyce M. Moore

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Pending Permit #WUQ0015835001

These comments are in regard to a TCEQ Draft Permit regarding a proposed Texas Pollutant Discharge Elimination System (TPDES) land application-- Permit No. WQ0015835001 for a proposed development known as Honey Creek Ranch.

My name is Joyce Moore—a 5th-generation co-owner of Honey Creek Spring Ranch. Thru no fault of our own, my family's property will be devastated by the approval of this pending TLAP permit. You have received public comment from many groundwater experts—some of whom have spent over 40 years researching and mapping karst systems. Overwhelmingly they support Honey Creek as one of the last remaining streams in Central Texas to be clean, clear, and pristine. This high level of water quality did not occur by accident. It stems directly from private landowner protection & management, public land purchases for aquifer protection, and limited access.

The Honey Creek Ranch high-density development is slated to be built directly upon the known watershed of Honey Creek, and directly above Honey Creek Cave. 100% of treated wastewater effluent and storm runoff from 1,800+ homes will be intentionally pumped into fragile karst limestone strata below the surface—effectively mainlining it into the Honey Creek system and the Trinity Aquifer. No amount of 'green engineering' will change that fact. Over three-hundred thousand extra gallons of water per day will flood this sensitive environment, artificially raising water levels and choking out species of endemic plants and animals—some found only within this system. Of greatest concern to my family, is knowing that this glut of water will also contain high levels of nitrates, phosphates, pharmaceuticals, feminine products, household chemicals, fertilizers, and motor oil, with devastating long-term impacts. Honey Creek will become yet another impaired water body—pretty to look at, but dangerous to swim in or drink from, and no longer able to sustain life. If ever there was a permit that TCEQ should carefully consider, this is it; not because it affects me personally, but because it's approval will have long-lasting negative impacts to the local environment, and to thousands of water users downstream. I would also argue that few other permits under your review have ever had this much sound science to support its denial—data which is based upon years of research, exploration, and water quality testing.

Although my family has nurtured and protected Honey Creek for generations, we now face increased illegal trespass, increased traffic and light pollution, increased vandalism and littering, in addition to the direct contamination of our wells/water supply. I am reasonably certain that Ronnie/Terri Urbanczyk, Silesia Properties, or the Honey Creek Ranch MUD will not be around to be held accountable when breaches or failures occur. But by then, the damage will already have been done. Despite always managing the land wisely as caretakers of this unique natural resource, this TLAP threat is actually more insidious than direct discharge—as we will all receive the 'trickle-down effect' of their actions. This includes thousands of Texans who recreate in two downstream public use areas—lands purchased or maintained with tax dollars (yours and mine) to be held *in the public trust*. Every Texas citizen should be outraged at TCEQ's complete disregard for our water quality by bowing down to those who wish to exploit it and for rubber-stamping these permits. I urge you to do the right thing this time by denying the pending TLAP permit. And I hereby request a Contested Case Hearing regarding this matter, as an affected landowner with standing.

Respectfully Submitted

Joyce M. Moore

Honey Creek Spring Ranch