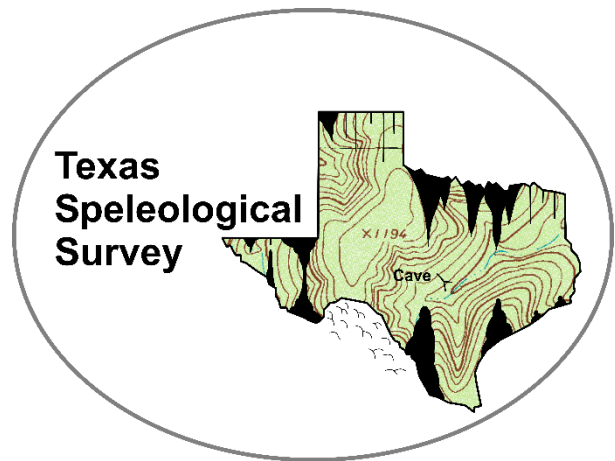




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18 April 2022

The Texas Cave Management Association (TCMA) and the Texas Speleological Survey (TSS) are writing in response to the recent agreement between the Alamo Regional Mobility Authority (Alamo RMA) and the Boring Company (BC) to study the construction of a transportation tunnel between the San Antonio International Airport and downtown San Antonio. Both TCMA and TSS are non-profit organizations dedicated to the protection of Texas caves and karst with TCMA focused on acquisition, management, conservation, and research and TSS focused on documenting and publishing cave data and research. We have major concerns about this project as any direct route will pass through a highly sensitive cave and karst area that contains major springs, historical features, and critical habitat for endangered species.

TCMA owns Robber Baron Cave which is the longest cave known in Bexar County and whose entrance is about 1 mile east of US 281 and southeast of the airport. This major cave has historic significance with a history dating back to the mid-1800s, and also contains two federally listed endangered species, the Robber Baron Meshweaver (*Cicurina baronia*) and the Robber Baron Cave Harvestman (*Texella cokendolpheri*). Importantly, Robber Baron is one of the few remaining accessible entrances to the maze of passages, fissures, and crevices that permeate the geological formation known as the Austin Chalk. The Austin Chalk exposure extends from the former Longhorn Quarry (near Thousand Oaks and I-35) to San Pedro Park. The entire formation is known to be extremely cavernous although most entrances that existed have been covered during development. The caves in this formation have an interconnected maze of passages and fissures that likely extends throughout the region. Major known examples include

The Labyrinth near the Longhorn Quarry, Robber Baron Cave, Holmgreens Hole (just southwest of Robber Baron), and numerous caves that have been documented just northeast of San Pedro Park. According to the cave records held by the TSS, eleven cave entrances have been documented within a 2500-foot distance on either side of US 281 between Basse Road and Mulberry Street.

Evidence for the interconnection of these features comes from the fact that *Cicurina baronia* has been documented in a cave at East Kings Highway and Shook Avenue (just west of Trinity University) as well as in Robber Baron. This cave-adapted species can only survive underground so it must travel through fissures connecting underneath US 281. Further evidence comes from the presence of airflow in Robber Baron, that measurements have shown to connect to passages and fissures that must be more than 75 times greater than the currently known volume of the cave.

Any direct path of a tunnel between the airport and downtown would pass through this sensitive section of the Austin Chalk. The known cave passages in Robber Baron are between 30–70 feet in depth below the surface. Based on reporting of the proposed tunnel, this is the same depth range through which the tunnel would pass. Construction would completely disrupt cave passages along its route and the construction itself would be extremely difficult and costly as the density of passages and fractures is likely to be quite high based on the known nearby caves. Furthermore, the construction process is likely to blow concrete, chemicals, and other contaminants long distances along these fissures impacting areas far from the construction. Between Hildebrand Avenue and Mulberry Avenue, US 281 travels over a Level 2 Karst Zone where it has been determined by the US Fish and Wildlife Service that there is a high likelihood that listed endangered species may be found, and within 1000 feet of a Level 1 Karst Zone where listed species are known to exist. Any tunnel that follows US 281 will disrupt these zones and severely impact the habitat.


Another major risk of this project is to the Edwards Aquifer and specifically to the very headwaters of the San Antonio River, the historic Blue Hole. This is the source of the river that feeds the Riverwalk, the very heart of San Antonio. US 281 is only about 500 feet away from the Blue Hole. Additionally, the project would run close to San Pedro Park, the second oldest municipal park in the country and established around the San Pedro Park Springs. San Antonio was founded around the flow of the Blue Hole and San Pedro Park Springs, which both discharge Edwards Aquifer water from the Austin Chalk.

It is well documented that in karst aquifers, water paths can travel significant distances horizontally before reaching the surface. It is very possible that a tunnel under US 281 would directly encounter the water conduits that feed these springs and the San Antonio River, destroying them forever. This would be a tragedy for our city. Further, since the waters feeding these springs rise directly from the Edwards Aquifer, the potential risk for contamination of the Aquifer from the tunneling process is extremely highly. The entire area along and east of US 281 near Hildebrand is extremely sensitive to potential aquifer contamination, as the TSS has records

of 14 known springs within 2000 ft of US 281 in this area in addition to the 11 springs known at San Pedro Park.

In summary, the proposed BC tunnelling project would pass through an extremely sensitive karst zone containing direct conduits by which contaminants can reach the Edwards Aquifer, zones very likely to contain federally listed endangered species, and a geological formation known to contain a high density of cave passage and fissures that will massively increase the difficulty of construction and expand the radius of the construction impacts well beyond its immediate footprint. There is also the potential that the tunnel could directly encounter and destroy the waters that feed the very source of the San Antonio River. All of these impacts far outweigh and possible benefits to be obtained from the tunnel as proposed by the Boring Company when numerous much less environmentally impactful transportation alternatives exist. The TCMA and TSS strongly oppose this proposed project and hope that the Alamo RMA will reject this project.

Thank you,

A handwritten signature in blue ink, appearing to read "Jim Kennedy", with a stylized flourish at the end.

Jim Kennedy, President  
Texas Cave Management Association

A handwritten signature in black ink, appearing to read "Joe Mitchell", with a stylized flourish at the end.

Joe Mitchell, President  
Texas Speleological Survey