

Alamo, Austin, and Lone Star chapters of
the Sierra Club
Bexar Audubon Society
Austin, Bexar and Travis Green Parties
Bexar Grotto
Boerne Together
Bulverde Neighborhood Alliance
Bulverde Neighbors for Clean Water
Cibolo Center for Conservation
Citizens for the Protection of Cibolo Creek
Comal County Conservation Alliance
Environment Texas
First Universalist Unitarian Church of SA
Friends of Canyon Lake
Friends of Dry Comal Creek
Friends of Government Canyon
Fuerza Unida
Green Society of UTSA
Guadalupe River Road Alliance
Guardians of Lick Creek
Headwaters at Incarnate Word
Helotes Heritage Association
Hill Country Alliance
Kendall County Well Owners Association
Kinney County Ground Zero
Leon Springs Business Association
Native Plant Society of Texas – SA
Northwest Interstate Coalition of
Neighborhoods
Pedernales River Alliance – Gillespie Co.
Preserve Castroville
Preserve Lake Dunlop Association
Preserve Our Hill Country Environment
RiverAid San Antonio
San Antonio Audubon Society
San Antonio Conservation Society
San Geronimo Valley Alliance
San Marcos Greenbelt Alliance
San Marcos River Foundation
Save Barton Creek Association
Save Our Springs Alliance
Scenic Loop/Boerne Stage Alliance
Securing a Future Environment
SEED Coalition
Signal Hill Area Alliance
Sisters of the Divine Providence
Solar San Antonio
Texas Cave Management Association
Trinity Edwards Spring Protection Assoc.
Water Aid – Texas State University
Wildlife Rescue & Rehabilitation
Wimberley Valley Watershed Association
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San Antonio, Texas 78212
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March 8, 2024

Edwards Aquifer Protection Plan Review
Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, TX 78753

**RE: Opposition to the SERVTEX Quarry Plant's Edwards Aquifer
Protection Plan Application (No. 13001861)**

Submitted via email to: eapp@tceq.texas.gov

These comments are submitted on behalf of the fifty-seven member organizations of the Greater Edwards Aquifer Alliance, a 501(c)(3) nonprofit organization that promotes effective broad-based advocacy for the protection and preservation of the Edwards Aquifer, its springs, watersheds, and the Texas Hill Country that sustains it. GEAA has multiple member organizations that would be adversely affected by the proposed development.

1.0 Background

The applicant, Heidelberg Materials Southwest Agg LLC., is proposing to establish a quarry (SERVTEX Quarry Plant) for limestone aggregate and minor quantities of cut bulk limestone within a 1,088-acre property located near Coyote Run in Comal County, Texas. The proposed development will function as an expansion of the adjacent, existing SERVTEX quarry, which currently operates under a separate WPAP (EAPP ID 13000968). The subject site is largely undeveloped and has previously been used for agricultural purposes.

The applicant has submitted an Edwards Aquifer Protection Plan (EAPP) that includes a Water Pollution Abatement Plan (WPAP) for review by TCEQ and concerned parties such as GEAA. The proposed development site is located within the Edwards Aquifer Recharge and Transition Zones.

2.0 Comments on the EAPP

Under the federal Clean Water Act, TCEQ is charged with maintaining the quality of our state's waters and protecting their existing uses. The SERVTEX Quarry Plant as currently proposed will likely degrade Dry Comal Creek, Bear Creek, and local groundwater quality GEAA; therefore, strongly opposes the Heidelberg Materials Southwest Agg LLC's EAPP for the reasons presented in these comments.

2.1 Environmentally-Sensitive Location of the Facility

GEAA understands the location of this quarry is within the 100-year floodplain, and is located on the recharge and transitions zones of the Edwards Aquifer. In numerous places in the WPAP, the applicant states they will obtain permits for mining across a 100-year flood plain at a later date. Mining operations located in the 100-year floodplain have a threat of degrading water quality, lowering natural flood control capabilities, and decreasing groundwater recharge capacity. Further, the Edwards Aquifer is classified as a karst aquifer. This means that high recharge rates can occur from the surface through fractures and faults, surficial karst features (caves), sinkholes, and direct recharge from area streams (such as Dry Comal Creek and Bear Creek). However, the high recharge capability also increases the concern of contaminant loads and pollutant sources entering the Edwards aquifer at a rapid rate. For the SERVTEX Quarry Plant, the increased sediment and residual ammonium nitrate fuel oil mixtures (ANFOs) resulting from mining operations raise a concern for the area's underlying aquifer and groundwater supply.

2.2 Water Quality Concerns

Residual contamination from the explosives used in rock quarries (especially Nitrates) is a huge concern for the local water quality and endangered species. Evidence exists that quarry operations have impacted the Edwards Aquifer in the past due to residuals from ANFOs. The aggregate industry primarily uses ANFOs as an explosive for day-to-day operation, linking quarries to be a known source of nitrate pollution of groundwater. The proposed quarry on the SEVTEX Quarry Plant is located on the Edwards Recharge and Transitions Zones, where the Edwards Limestone is at the surface. If it goes forward as planned it will contribute nitrate contamination to the Edwards Aquifer. In addition to nitrate concerns, ANFOs can be organic compounds, such as residual benzene from fuel oil, which has been shown to impact groundwater resources in the vicinity of mining operations.

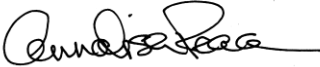
In addition, the location of SERVTEX Quarry Plant falls within the boundaries of the Dry Comal Creek/Comal River Watershed Protection Plan (WPP), a US. Environmental Protection Agency (EPA) sponsored effort to protect this watershed area's natural resources. Since 2017, planning and implementation strategies have been conducted to address water quality concerns to ensure lasting and improved water quality for the Comal River and Dry Comal Creek. Maintaining high-quality flows in these two waterbodies is vital to the local area's recreation, tourism, economic development, and agricultural operations; therefore, GEAA has concerns about the overall environmental integrity of the Dry Comal/Comal River and the impacts of this project on the successful implementation of the WPP.

3.0 Conclusion

With the above comments stated, GEAA encourages TCEQ to deny approval of this plan as currently submitted. We also support the statements made by Preserve Our Hill Country Environment (PHCE) and the City of Garden Ridge.

Thank you for the opportunity to submit these comments.

Respectfully,

A handwritten signature in black ink, appearing to read "Annalisa Peace", with a long horizontal flourish extending to the right.

Annalisa Peace
Executive Director
Greater Edwards Aquifer Alliance