# Tom McIver

TCEQ Representatives,

TCEQ policy regarding the permitting process for high volume WWTF's over the Edwards Aquifer Contributing Zone needs comprehensive review and revision to preserve both groundwater quality and quantity.

As residents of an unincorporated area of northern Comal County our family relies on Trinity Edwards Aquifer water wells for domestic supply and agricultural operations.

The historically documented Potters Creek Spring on our property that has created a half-mile run of bald cypress trees, some exceeding 25' in base circumference, has ceased flow and the creek bed, once a major tributary of the Guadalupe River, is completely dry. This unique natural system has provided a water source for human habitation and wildlife for hundreds of years. Numerous large, mature native pecan trees in the creek bottom that survived the infamous drought of the 1950's have died. We are told by forestry experts that this is happening throughout the Hill Country as the result of declining groundwater levels caused by unchecked, high density growth.

Regarding TCEQ's mandated mission to protect groundwater quality, there appears to be little concern by the agency in permitting WWTF's that discharge effluent over known and documented geologic features such as faults and fractures in the Edwards Contributing Zone without benefit of an environmental impact study. Two such examples are the discharge routes for Juniper Ranch WWTF (permit # WQ0015866001) and the proposed Broken Cedar Ranch WWTF (permit # WQ0016660001).

Groundwater quality and quantity both are affected by the proliferation of high volume WWTF's and TCEQ's lenient permitting policy in the geologically sensitive Edwards Contributing Zone. Simply put, the WWTFs enable high density growth that degrades groundwater and natural spring flow through increased drawdown and potential pollution from WWTF discharge and impervious cover runoff. The Texas Hill Country is losing its natural heritage and, consequently, its quality of life and long-term property value. I implore the agency to adopt policies and procedures that recognize and protect the unique geologic features of the region.

Respectfully submitted,

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