

Charles Simmons

October 7, 2026

Texas Commission on Environmental Quality
Edwards Aquifer Protection Program
Attn: Monica Reyes
via <https://tceq.commentinput.com/>

RE: Public Comments, Edwards Aquifer Protection Program Annual Hearing;

In Support of Extension of Edwards Aquifer Protection to Northern Segment of the Edwards Aquifer in Bell County

Dear Commissioners:

I am an engineer and attorney with experience with geologic formations and chemical plants worldwide. I say this to underscore my understanding of the importance of protecting the Edwards Aquifer in Bell County. Limiting discharge into and pollution of the Edwards Aquifer will affect not only drinking water from wells, but the beauty of Salado Creek, the flow of many springs which affect the area, and the health of the threatened Salado Salamander.

Studies, mapping and technical work should be undertaken to extend the EAPP to Bell County.

The Same Aquifer, Without the Same Protection

Bell County lies directly north of Williamson County on the northern Balcones Fault Zone segment of the Edwards Aquifer. That is the same aquifer the Commission already regulates in Williamson, Travis, and Hays Counties, and it continues without interruption into Bell County, discharging at Big Boiling Springs and Robertson Springs near Salado and underlying Belton. Yet Chapter 213 names only Medina, Bexar, Comal, Kinney, Uvalde, Hays, Travis, and Williamson Counties. Because Bell County is not listed, none of the program's core safeguards apply there. These include plan review before construction, geologic assessments, stormwater best-management-practice standards, and rules for plugging abandoned wells that can act as direct conduits to groundwater. A county line on a map should not decide whether a single, connected aquifer is protected.

A Well-Established Path for Expansion

The Commission has taken this step before. Williamson County was added in 1985–86 after a petition by local government, and a USGS/Bureau of Economic Geology study confirmed the hydrologic connection between area streams and the Edwards Aquifer. Travis County and the transition zone followed in 1990, and the contributing zone was added across all eight counties in the 1998–99 "Phase II" rulemaking. In each case the aquifer extended beyond the regulated area, growth was approaching, and local government asked for protection. All these conditions exist in Bell County now. The Interstate 35 corridor is pushing development north into the Salado and Belton areas, bringing the stormwater runoff, wastewater, storage tank, and construction risks the program was built to manage.

Protecting Springs, Creek, and Species

As a karst system, the aquifer allows contaminants to move quickly from the surface into groundwater, where they are very difficult to remove. The consequences reach well beyond wells. The springs that feed Salado Creek define the character, recreation, and economy of the Salado area. They also sustain the Salado salamander, which lives only in the Salado Creek springs and aquifer entrances in Bell County. It is listed as threatened under both the federal Endangered Species Act and Texas law. Many acres, including a 984 foot subsurface radius around Salado Spring and some 262 ft upstream and downstream from Salado Spring on the Creek are part of the designated critical habitat of the Salado Salamander in Bell County. Extending the program would give TCEQ's water-quality protections to the aquifer that feeds this habitat and reduce the risk of more restrictive federal intervention later.

Fewer Hearings and Less Litigation

Extending the program would also make the regulatory process more predictable. Today, proposed discharges to Salado Creek and the Edwards Aquifer are addressed one permit at a time, and these cases draw contested hearings and litigation. Mapped zones and clear, uniform standards set in advance would tell applicants and the public what is required before a project is designed or a permit is filed. I believe that would reduce the number of hearings and the amount of litigation over discharge permits, saving time and expense for the Commission, for applicants, and for the community, while still protecting the resource.

Request

I respectfully request that the Commission:

1. Direct staff to conduct the hydrogeologic mapping needed to delineate the recharge, transition, and contributing zones in Bell County, using the same methods applied in the currently regulated counties;
2. Engage stakeholders, including the Clearwater Underground Water Conservation District, Bell County, Salado, Belton, landowners, developers, and water suppliers; and
3. Initiate rulemaking to add Bell County to Subchapters A and B of Chapter 213.

I also fully support the comment submitted by Mr. Dirk Aaron on September 22, 2026, which likewise asks that the Edwards Aquifer Protection Program be extended to Bell County. Mr. Aaron brings decades of groundwater management experience in Bell County, and I adopt his comments as part of my own. The boundaries should rest on sound science, but the studies need to begin. Thank you for your consideration.

Respectfully submitted,
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