

Alamo Group of the Sierra Club
Aquifer Guardians in Urban Areas
Austin Regional Sierra Club
Bexar Audubon Society
Bexar Green Party
Boerne Together
Cibolo Nature Center
Citizens Allied for Smart Expansion
Citizens for the Protection of Cibolo Creek
Environment Texas
First Universalist Unitarian Church of
San Antonio
Friends of Canyon Lake
Friends of Government Canyon
Fuerza Unida
Green Party of Austin
Hays Community Action Network
Headwaters Coalition
Helotes Heritage Association
Helotes Nature Center
Hill Country Planning Association
Guadalupe River Road Alliance
Guardians of Lick Creek
Kendall County Well Owners Association
Kinney County Ground Zero
Medina County Environmental Action
Association
Northwest Interstate Coalition of
Neighborhoods
Preserve Castroville
Preserve Lake Dunlop Association
San Antonio Audubon Society
San Antonio Conservation Society
San Geronimo Nature Center
San Geronimo Valley Alliance
San Marcos Greenbelt Alliance
San Marcos River Foundation
Santuario Sisterfarm
Save Barton Creek Association
Save Our Springs Alliance
Scenic Loop/Boerne Stage Alliance
Securing a Future Environment
SEED Coalition
Solar San Antonio
Sisters of the Divine Providence
Smart Growth San Antonio
Water Aid – TSU Chapter
West Texas Springs Alliance
Wildlife Rescue & Rehabilitation
Wimberley Valley Watershed Association

March 13, 2013

Mr. Todd Jones
Texas Commission on Environmental Quality
Region 13
14250 Judson Rd.
San Antonio, TX 78233-4480

Re: Edwards Aquifer, Bexar County

Project: The Ridge at Lookout Canyon Phase II PUD, located at the
northeast corner of Overlook Parkway and Starling Hill;
San Antonio, Texas

Type: Cave/Solutional Opening – Sewage Collection System;
30 TAC §213.5, Edwards Aquifer San Antonio File No. 2713.04

Dear Mr. Jones,

I am writing concerning a cave that was intersected during trenching for sewer lines as part of the Ridge at Lookout Canyon Phase II PUD development. The location and extent of the cave was reported to the Greater Edwards Aquifer Alliance by a concerned citizen, and was also reported by [KENS 5 TV News on March 5, 2013](#). From the pictures I received (attached), the cave appears to have been intersected twice during trenching.

The first time the cave was intersected, it appears the cave was covered up and a sewer pipe was installed. Unless this feature was reported to TCEQ, it appears to be a violation of the TCEQ rule 30 TAC §213.5 occurred. The second time the cave was intersected, we believe that the existence of the cave was only reported after it was announced to the press by some concerned citizens. The developer has recommended that the second trench be sealed with an engineered beam and concrete encasement. However, the photographs from inside the cave (attached) indicate the presence of a sewer pipeline in the cave ceiling, probably from the first trench intersection. There is an unsupported pipe joint clearly visible in the provided photographs which will ultimately fail and release raw sewage into the cave. It is highly likely that such a failure not be detected, even if the release of raw sewage were to result in a threat to public health such as an outbreak of coli form bacterial disease.

The current state of development and placement of sewage infrastructure in the Ridge at Lookout Canyon Phase II PUD raise a number of issues. Was the first intersection of the cave reported to TCEQ and did TCEQ approve a method to support the proposed sewer pipe? Is it sound engineering to leave an unsupported pipe joint hanging from the roof of the cave? Was this engineering remedy approved by a licensed engineer or geologist? Depending on your answers, these questions raise serious issues of trust in the developer to report any previous karst features and any future features, as well as trust in our public agencies' ability to preserve water quality in the Edwards Aquifer.

The second intersection of the cave required the developer to stop construction since the developer knew that the cave had been reported to the press. We are aware that they have filed the appropriate form proposing to utilize the trench and support a sewer pipe

on an I beam and to encase the pipe in concrete. We are concerned that the expanse of the void is too large and that ultimately the beam will fail, resulting in a release of sewage into the cave. Once the pipe is in place and the trench covered, there is no method in place to determine the effectiveness of the repair. In addition, the engineering firm (Pape Dawson Engineers) that evaluated the cave did not appear to report the presence of the first pipe in the cave ceiling, which indicates that they did not thoroughly evaluate the cave or purposely ignored the pipe located in the ceiling of the cave. Either of these are a breach of engineering and geological professional ethics. We will follow up with the appropriate licensing boards regarding this issue.

We would like to have a meeting with you and your staff to discuss the situation and propose some alternatives. We would also like the TCEQ to immediately require the following:

- A breach of engineering, geological, and protection of public health ethics has occurred. The developer should be required to remove all existing trenching fill and pipes to allow for proper inspection. If the developer was willing to cover this major karst feature, there is no reason to believe they haven't covered up others while developing this site.
- The cave should be mapped by geologists experienced with cave mapping and surveying techniques to determine the vertical and horizontal extent of the cave and any important geological features. At a minimum, the geologists should be members of the National Speleological Society for at least 10 years and have specific training and education in cave and karst hydrogeology. You might consult with the Edwards Aquifer Authority about employing geologists on their staff who meet these qualifications.
- The data from the cave map should be used to determine if the proposed development will intersect additional passages in the cave.
- The sewer lines and trenching should be moved to avoid the existing cave.
- Human access to the cave should be maintained for monitoring and research purposes. The cave should be gated per the recommendations of the cave geologists and management of the cave should be turned over to a private non-profit cave management organization with sufficient funding by the developer to maintain the cave. Cave rights under adjoining properties should be deeded to the cave management organization.
- The contractor/developer should be fined for violation of the TCEQ rules.

We appreciate your attention to this matter. Please feel free to contact me at your convenience should you have any questions or concerns.

Sincerely,



Annalisa Peace
Executive Director
210-320-6294
Annalisa@AquiferAlliance.org