

Posted: May 25, 2026

Fischer Neighbors Reply to TWC Water Service Information Update

Link to TWC Water Service Information Update:

<https://www.txwaterco.com/our-company/community-news/water-service-information-update-development-and-water-supply/>

Fischer Neighbors replies:

There appears to be much confusion about water in this area just now! **Wastewater treatment** and **water treatment** are two different things. **Wastewater** permits (for treatment and discharge) are handled by Texas Commission of Environmental Quality (TCEQ); **water** treatment of well and reservoir water for delivery as drinking water is carried out by Texas Water Company (TWC) for its customers.

About Broken Cedar Ranch and Summit Estates at Fischer...

1)

Fischer Neighbors is working to oppose the **wastewater** treatment and discharge permit application by Lennar for the Broken Cedar Ranch proposed development. This application is now under consideration by TCEQ and the process is ongoing.

2)

Completely unrelated, TWC has temporarily paused 9 proposed developments in Comal County, including Broken Cedar Ranch, due to a lack of water supply. Once a water supply is found, TWC would be able to lift the pause on one or more of the developments.

3)

Interestingly, Summit Estates at Fischer (Summit-Fischer) is the site of proposed significant expansion of infrastructure (no new wells) by TWC, as described in the plan presented to residents of Summit-Fischer. (See TWC slides.) The project is said by TWC to be unrelated to Broken Cedar Ranch; however, the expansion plan itself deserves examination.

4)

In their presentation to the Summit-Fischer HOA, TWC described its infrastructure expansion plans to increase production capacity **ten-fold**. This is not mentioned in the TWC Update section on Recent Social Media Claims, which disavows acquiring new wells or increasing well production. Reading that section, a reader might conclude that production capacity will not increase. On the contrary, increased production, apparently in the form of *increased water treatment capacity*, seems to be a very important part of the project.

TWC estimates current production capacity at Summit-Fischer at .1 million gal/day; a planned 1000% increase means a planned production capacity of 1 million gal/day.

- Planned production: 1 million gal/day (1MGD or 1mgd)
- At 400 gal/day per household (estimated by Comal Trinity GCD), this is enough water for 2500 homes.
- TWC's presentation to Summit-Fischer residents declared expansion plans "designed to meet the buildout demands of the Summit Fischer subdivision." (See TWC slides.)
- Summit-Fischer has ~275 lots.
- **TWC's plan for water production at Summit-Fischer surpasses Summit-Fischer buildout demand by 2225 homes.**
- The Broken Cedar Ranch proposal is for 850 homes in the first phase; future phases are said to be for a total of 2400 homes.

While plans for infrastructure upgrades and improved service for current residents are necessary, the proposed over-expansion of the infrastructure is exorbitant and requires a closer look.

5)

If well production does not increase at Summit Fischer, then it is presumably water treatment capacity that will increase ten-fold. Summit Fischer is destined to be connected to the water infrastructure of Ranch del Lago, the Legends, and Rocky Creek Ranch via the Fir Lane Well Station project. Thus, water from those subdivisions could be treated in the expanded water treatment plant at Summit Fischer. The water supply would then be the various wells in the four subdivisions, along with Canyon Lake water. This could indeed lead to much-improved water quality and reliability in all four subdivisions.

That said, the four subdivisions are composed of a total of 1646 subdivision plats; the number of actual houses will be somewhat less than that. Even over-counting, and again using the same estimate of 400 gal/day per household, we see that .66MGD would completely provision all four subdivisions. Redundancy and reliability would likely not require that all the four subdivisions' water pass through the Summit Fischer treatment plant, but even if it did, 1MGD is 50% over the production requirements of complete redundancy.

What then is the justification for 1MGD treatment production capacity?

6)

The HOA of Summit Estates at Fischer opposes TWC's current expansion plans and has been in continuing discussions with TWC. The (non-resident) landowner of the well lots, in apparent violation of HOA restrictions, changed TWC's original easement to a "blanket easement" to accommodate the expansion plans. The HOA opposes the change of easement that, one can reasonably conclude, would lead to 340,000 gal/day surplus production, over requirements to fully provision all four existing subdivisions.

340,000 gal/day would provision 850 additional homes. Why is this desirable? What is the motivation for a production capacity of 1MGD at Summit Fischer?

7)

The (non-resident) landowner has now petitioned Comal County Commissioners to allow him to cancel his lots in the Summit-Fischer subdivision. This resembles an end-run around the HOA, which opposes the easement changes and the proposed over-expansion of TWC infrastructure at Summit Fischer.

Fischer Neighbors recommends that we write to our Comal County Commissioners, urging them NOT to allow the cancellation of the lots from the Summit Estates at Fischer subdivision. Why?

- Cancellation of the lots would allow TWC to expand infrastructure onto those lots, yielding a 1MGD production capacity that is not useful for Summit-Fischer but that TWC also says is **not intended for external developments**. At complete buildout

on its 275 lots, Summit-Fischer could only ever use around .1MGD, which TWC says is the current production level.

We have not seen TWC affirm that redundancy and reliability in the four existing subdivisions require .9MGD production capacity beyond Summit Fischer's own needs. Until that surplus capacity is explained and motivated, the cancellation cannot be justified.

- It is the **expansion** of the water infrastructure, **not the upgrade** that requires TWC expansion onto the lots in question. TWC wants to take production capacity from .1MGD to 1MGD; however, an infrastructure upgrade does not require a ten-fold expansion of production capacity. Cancellation of the lots and a ten-fold expansion are, according to current TWC explanations, unnecessary for improved service to Summit-Fischer.
- Cancellation of the lots has become the pathway for TWC expansion in what resembles an end run around the Summit-Fischer HOA. The non-resident landowner seems to have violated HOA restrictions in order to grant TWC a blanket easement on the lots. The new easement would have enabled the expansive TWC project. However, faced with HOA legal opposition to that new blanket easement, the landowner is now attempting cancellation of those lots from the subdivision.

The precedent set by allowing the cancellation would be very bad. Any landowner, resident or otherwise, could cancel their lot(s) in a subdivision against objections from the HOA and many residents, in what may simply be

- Cancellation would set a bad precedent, allowing a landowner who is not even a resident to cancel out of a subdivision against objections from the subdivision, in what may simply be a money-making scenario.
- Cancellation and the resulting 1MGD production would super-charge depletion of the Trinity Aquifer in our area, threatening wells and water supply of the entire community. Neighboring wells have already been impacted by low water in the aquifer.
- TWC says the 1MGD project at Summit-Fischer is "not intended to support Broken Cedar or other external developments." On the other hand, tomorrow's intentions may be different from today's. A 1MGD production capacity at Summit-Fischer would furnish roughly a **2500-home surplus** beyond what Summit-Fischer will ever need. Where is that surplus intended to go? Cancellation of the lots and the resulting huge production capacity surplus would indeed enable Broken Cedar Ranch to move ahead, in the face of almost universal community opposition. Cancellation should not be allowed.

Voting NO on this cancellation is an opportunity for our Comal County Commissioners to stand with the community in protecting our water resources. This may also be the

first best chance to oppose unsustainable growth in Comal County and to hold out for responsible growth that benefits everybody. We urge you to vote NO.