June 28, 2010

Texas Commission on Environmental Quality

Proposed Revisions to Water Quality Standards on the TCEQ Agenda for June 30, 2010

On behalf of the forty eight member organizations of the Greater Edwards Aquifer Alliance (GEAA), I am submitting this public comment to notify you thatGEAA joins the Lone Star Sierra Club in strongly urging the TCEQ Commissioners to reject the proposed revisions to the state’s bacteria pollution criteria that are being recommended by the agency staff. The TCEQ Commissioners should heed the public outcry over the proposed weakening of protections from bacteria pollution for the state’s streams and lakes and take a stand for public health protection over polluter interests. GEAA also joins the Sierra Club in urging Governor Perry, who appointed all three Commissioners, to weigh in opposing this downgrading of water quality for Texas water bodies.

According to the statement issued by the Lone Star Sierra Club, “The fact is that there is no compelling reason to make any changes to the bacteria pollution criteria at this time – indeed there is every reason not to do so. The U.S. EPA, which ultimately must approve any changes to the state’s surface water quality standards, is currently working under a consent decree and settlement agreement in a federal lawsuit to conduct science and research in order to publish new or revised recreational water quality criteria by October 2012. The time for TCEQ to consider any appropriate changes in its bacteria pollution standards is after that EPA process is complete. To act now would be premature. The TCEQ staff itself is aware of the great public opposition to the weakening of the state’s bacteria pollution criteria. In a nod to that opposition the staff is providing “options” to the TCEQ Commissioners to retain current bacteria pollution criteria for a number of water bodies in the state, although the staff is not recommending that the Commissioners do so. While retaining bacteria pollution criteria for some water bodies would be preferable to a wholesale downgrading of the criteria for all water bodies, that would not be sufficient for human health protection and does not negate other changes being proposed for monitoring of bacteria pollution, determining recreational use for streams, and analysis of data that would further undermine protection from bacteria pollution.”

GEAA wholeheartedly supports the recommendations and comments submitted by the Sierra Club, and urges you to maintain the highest water quality standards for the benefit of all Texas citizens.

Sincerely,

Annalisa Peace
Executive Director