



Member Organizations

Alamo Group of the Sierra Club
Aquifer Guardians in Urban Areas
Austin Regional Sierra Club
Bexar Audubon Society
Boerne Together
Cibolo Nature Center
Citizens Allied for Smart Expansion
Environmental Stewardship
Committees of the Episcopal Church of
Reconciliation & Episcopal Diocese of
West Texas
Environment Texas
First Universalist Unitarian Church of
San Antonio
Friends of Canyon Lake
Fuerza Unida
Government Canyon Natural History
Association
Hays Community Action Network
Helotes Heritage Association
Helotes Nature Center
Hill Country Planning Association
Guardians of Lick Creek
Kendall County Well Owners Association
Kinney County Ground Zero
Medina County Environmental Action
Association
Northwest Interstate Coalition of
Neighborhoods
OST 100
Preserve Castroville
Preserve Lake Dunlop Association
Preserve Our Water-Blanco County
San Antonio Conservation Society
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
Sisters of the Divine Providence
Smart Growth San Antonio
SEED Coalition
Texas Water Alliance
West Texas Springs Alliance
Wildlife Rescue & Rehabilitation
Wimberley Valley Watershed Association

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Submitted at October 18, 2007 Public Hearing

RE: Edwards Aquifer Protection Program--Comments

Dear Mr. Marcyniuk,

Thank you for the opportunity to comment on the TCEQ Edwards Aquifer Protection Program.

The Greater Edwards Aquifer Alliance (GEAA) is composed of 40 member organizations united behind a comprehensive plan to protect the Edwards Aquifer, its springs and watersheds, and the Texas Hill Country. In 2005, GEAA submitted comments on the Edwards Aquifer Protection Program along with 34 other organizations from across the Edwards region, including community, environmental and religious groups, planners, professional engineers, and elected officials. The memberships of these organizations represent a large segment of the population that relies on the Edwards Aquifer for their potable water supply, and a broad consensus on how to best protect the aquifer.

We are disappointed that TCEQ has taken little action to strengthen the Edwards Rules following our 2005 recommendations. **WE REITERATE ALL OUR COMMENTS FROM 2005 AND ASK THAT YOU ACT NOW TO INCORPORATE THESE MEASURES BEFORE FURTHER DEGRADATION OF THE EDWARDS AQUIFER AND ITS ECOSYSTEM OCCURS.**

As detailed in 2005, our recommendations include requiring adequate buffer zones to protect streams, springs and recharge features, limits to impervious cover on the Edwards Recharge and Contributing zones, expanding the pollution reduction standards to include toxic metals, organic chemicals and nutrients, and other measures and strategies that we believe will protect our water quality. We also ask that TCEQ provide adequate funding for trained and experienced staff, and that monitoring and enforcement of the Edwards rules, where appropriate, be delegated to local agencies that are better equipped to handle these duties.