



## Member Organizations

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  
Environmental Stewardship  
Committee of the Episcopal Diocese  
of West Texas  
Environment Texas  
First Unitarian Universalist Church of  
San Antonio  
Friends of Canyon Lake  
Fuerza Unida  
Government Canyon Natural History  
Association  
Hays Community Action Network  
Helotes Heritage Association  
Kendall County Well Owners  
Association  
Kinney County Ground Zero  
Medina County Environmental Action  
Association  
Missionary Catechists of the Divine  
Providence  
Northwest Interstate Coalition of  
Neighborhoods  
Preserve Our Water-Blanco County  
San Antonio Conservation Society  
San Geronimo Watershed Alliance  
San Marcos Greenbelt Alliance  
San Marcos River Foundation  
Santuario Sisterfarm  
Save Barton Creek Association  
Save Our Springs Alliance  
Save Scenic Loop  
Smart Growth San Antonio  
SEED Coalition  
Texas Water Alliance  
Travis County Green Party  
West Texas Springs Alliance  
Wimberley Valley Watershed  
Association

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## Comments for TCEQ Hearing on Edwards Rules – November 30, 2006

My name is Annalisa Peace, and I am speaking on behalf of the Greater Edwards Aquifer Alliance. We are an alliance of 36 member organizations united behind a comprehensive plan to protect the Edwards Aquifer, its springs and watersheds, and the Texas Hill Country that nourishes this resource.

In August of 2005 the Greater Edwards Aquifer Alliance was joined by 34 organizations, including community, environmental and religious groups, planners, professional engineers, and elected representatives from across the Edwards region in submitting recommendations

GEAA will be submitting written comments prior to January 2<sup>nd</sup> 2007. We anticipate that the organizations that signed on to our 2005 comments will be joined by many others with whom we have been working during the past year. The numbers of individuals who comprise the memberships of these various organizations represent a large segment of the population that relies on the Edwards Aquifer for their potable water supply.

We have seen and documented numerous instances of failure and neglect associated with the engineered structures and Water Pollution Abatement Plans that TCEQ has approved. We contend that if these strategies were successful in protecting the aquifer from pollution, we would not be seeing man-made contaminants in the waters of the Edwards.

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 Edwards rules, where appropriate, be delegated to local agencies that are better equipped to handle these duties.

We are aware that studies on surface waters indicate that anthropogenic, or emerging contaminants are being introduced into potable water supplies via treated sewage effluent because current water treatment methods do not remove pharmaceuticals and other chemicals that are contained in treated sewage. It is recognized that the Edwards, as a karst aquifer, is vulnerable to pollutants carried in streams that cross the Edwards Recharge Zone. We will, therefore, be asking that TCEQ prohibit discharge of treated effluent into creeks and streams that are known to be recharge features of the Edwards Aquifer.

In conclusion, I ask, on behalf of the 36 member organizations of the Greater Edwards Aquifer Alliance and those who joined us in submitting recommendations to the Edwards Rules in 2005, that you not only read these recommendations. We ask that you act on them.

Thank you, Annalisa Peace, Executive Director