November 10, 2016

Bridget C. Bohac, Chief Clerk
MC105
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Re: Greater Edwards Aquifer Alliance Comment on Proposed Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0014488003

Dear Ms. Bohac:

Thank you for the opportunity to submit comments. The comments below are in reference to proposed permit No. WQ0014488003 submitted by the City of Dripping Springs.

The Greater Edwards Aquifer Alliance, comprised of fifty-two member organizations, is concerned about this draft TPDES permit due to water quality concerns. In the context of the thin soils, numerous springs, and sensitive Texas Hill Country streams, rivers, and aquifers, any wastewater effluent system represents a threat of permanent and significant degradation. Only by soundly based and strictly enforced regulations can we balance provision of wastewater infrastructure to suburban residences with protection of the natural streams and springs that draw people to these areas.

If this permit allows for a greater volume of discharge than that of the Belterra permit, it will set a new precedent whereby other development in Hays County will also try to discharge effluent directly into creeks. Hays County is the fastest growing county in Texas and the 5th fastest growing county nationally. In this development climate, allowing any discharge into Onion Creek is likely to cause a domino effect whereby the aggregate impacts will significantly degrade water quality in Onion Creek, Barton Springs Pool, and Lady Bird Lake—potentially to hazardous levels for recreation, drinking water, and ecosystems. This will undermine the tireless work we have done since before the original SOS ordinance to protect water quality in Barton Springs and all of our watersheds.

In that cumulative impacts are not considered for TCEQ TPDES permits, we are greatly troubled by the prospect of large volumes of treated effluent ultimately contributing recharge to the Edwards through introduction into intermittent creeks such as Onion Creek. The same scenario is playing out within the Dry Comal Creek and Cibolo Creek watersheds, where numerous TPDES applications have been granted or are being considered.

The Edwards is a uniquely prolific aquifer characterized by rapid groundwater recharge and rapid open channel flow. Little to no filtration is provided as water enters directly into the Aquifer through faults, stream beds, and terrain characterized by uniquely porous Edwards limestone. It is estimated that up to 75-

Member Organizations

Alamo, Austin, and Lone Star chapters of the Sierra Club
Aquifer Guardians in Urban Areas
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 Dry Comal Creek
Friends of Government Canyon
Fuerza Unida
Green Party of Austin
Headwaters at Incarnate Word
Hays Community Action Network
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
Leon Springs Business Association
Medina County Environmental Action Association
Native Plant Society of Texas – SA
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
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
Texas Water Alliance
Travis County Green Party
West Texas Springs Alliance
Water Aid – Texas State University
Wildlife Rescue & Rehabilitation
Wimberley Valley Watershed Association

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80% of recharge occurs when streams and rivers cross the permeable formation and go underground. Therefore, we would like to see the practice of directly discharging sewage effluent into waterways that recharge the Edwards Aquifer prohibited, and hope to have legislation restricting this practice introduced during the 85th Legislative Session.

At a hearing of HB 595, which called for a restriction on permits authorizing discharges of sewage effluent into any water in the contributing or recharge zone of the San Antonio or Barton Springs segment of the Edwards Aquifer during the 81st Legislative Session, a member of the House Natural Resources Committee asked if we would oppose direct discharge if sewage effluent was treated to drinking water standards. We replied that we would not. It is the introduction of effluent treated to a lower standard directly into our water supplies that we object to. The potential to negatively impact nearby wells, as well as Barton and Comal Springs is, in our opinion, a filthy practice and an unnecessary risk.

Given the water quality concerns this permit poses, the Greater Edwards Aquifer Alliance requests that the permit be denied. We further recommend necessary regulatory changes to protect the character and quality of Texas Hill Country streams and springs against an onslaught of expanding development and larger wastewater effluent volumes that come with increased human habitation. We hope you will act accordingly to revise the Edwards Rules to include protection, as warranted, for any areas deemed essential to Edwards Aquifer Recharge.

Thank you for the opportunity to comment.

Respectfully,

Annalisa Peace
Executive Director