

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

**PO Box 15618  
San Antonio, Texas 78212  
(210) 320-6294**

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-

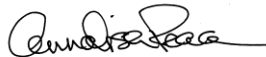
80% of recharge occurs when streams and rivers cross the permeable formation and go underground. Therefore, we would like to see the practice of directly discharging sewage effluent into waterways that recharge the Edwards Aquifer prohibited, and hope to have legislation restricting this practice introduced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

A handwritten signature in black ink, appearing to read "Annalisa Peace". The signature is fluid and cursive, with a long horizontal stroke at the end.

Annalisa Peace  
Executive Director