Dear GEAA member group leaders and friends,

We are enlisting your support in making the Texas Commission on Environmental Quality (TCEQ) aware that new rules are needed to protect Hill Country waterways from pollution from direct discharges of sewage effluent.

TCEQ will conduct public hearings to receive comments from the public on actions the commission should take to protect the Edwards Aquifer from pollution, as required under Texas Water Code, §26.046. **The deadline for submitting comments is 5:pm on Friday, October 27th.**

You can submit your written comments via e-mail to macy.beauchamp@tceq.texas.gov or mail them to Ms. Macy Beauchamp, TCEQ Program Support Section, MC 174, PO Box 13087, Austin, Texas 78711-3087. Learn more about attending public meetings in San Antonio and Austin, and how to submit comments here.

Attached and below are some talking points about the need for prohibiting direct discharges of sewage effluent on the Edwards Aquifer Contributing Zone. The language below will be included in GEAA's more comprehensive comments, which will be posted on our web site later this week. Feel free to copy and submit as your own.

Wastewater discharge should be prohibited in the Contributing Zone of the Edwards Aquifer. Disposal of wastewater is one of the greatest threats to maintaining water quality in the contributing watersheds. Current rules only prevent wastewater discharge within the Recharge Zone. Discharges in the Contributing Zone, even in compliance with current rule, would significantly alter the quality of these oligotrophic surface waters and degrade the aquifer, as demonstrated by recent analysis of a proposed discharge permit to Onion Creek. The quality of water in the Contributing Zone directly impacts the quality of discrete recharge in the Recharge Zone. Direct discharge of wastewater should be prohibited not only within the Recharge Zone, but also within the Contributing Zone of the Barton Springs and San Antonio segments of the Edwards Aquifer. Existing discharge permit procedures should be re-evaluated relative to 2006 U.S. Fish and Wildlife Service recommendations.

We encourage you to share the notice with your friends. In order to have an impact, we need to flood them with comments.

Please feel free to contact our office if you have any questions or need assistance.

Annalisa Peace

Executive Director

Greater Edwards Aquifer Alliance

210-320-6294

www.AquiferAlliance.org

Check out GEAA's Facebook Page

Wastewater Discharge Regulations and Impacts on Ranches, Surface Waters and Edwards Aquifer Recharge in the Texas Hill Country

OVERVIEW: The surface waters of the Texas Hill Country are world renowned, providing exceptional recreational opportunities for Texans throughout. These clear flows add enormous value to ranches, parks and the quality of life of local Hill Country communities. Unfortunately, government adversely impacts that value by imposition of wastewater (sewage system) discharges directly into these same streams and rivers, resulting in degradation of water quality, devaluation of waterfront property, and damage to recreational opportunities.

Hill Country flows are the primary source of recharge of the Edwards Aquifer through cracks and fissures in limestone river and creek beds. Scientists confirm surface waters degraded by sewage system effluent also degrade the Edwards Aquifer, damaging pure water supplies. Senate Bill 1796 (Menéndez) and House Bill 3036 (King of Uvalde) propose to end wastewater discharges in streams and rivers in the contributing zone of the Edwards Aquifer and, by amendments, replace that outmoded practice with the modern practice of land applications systems that recycle and reuse wastewater effluent.

KEY POINTS:

1. The Edwards Aquifer is a critical sources of pure water for ranchers and communities in the Texas Hill Country.

2. The TCEQ definition of the Edwards Aquifer Contributing Zone is not the entire contributing zone

· The Texas Commission on Environmental Quality defines the contributing zone of the Edwards Aquifer, but it does not include all of the watershed that feed streams in the contributing zone.

3. The quality of water in the aquifer is driven by the quality of surface water in the contributing zone

· During dry periods, streams in the contributing zone may naturally stop flowing. With wastewater discharge, the only water in streams under those conditions would be wastewater effluent so no dilution of contaminants would occur.

4. Scientific evidence clearly demonstrates the sensitivity of the Edwards Aquifer to wastewater discharge

· Streams in the contributing and recharge zones of the Edwards Aquifer currently have exceptionally high water quality and clarity due to low nutrient levels, and are very sensitive to wastewater discharge. Even highly treated wastewater will have extreme adverse water quality impacts due to phosphates and nitrates in treated effluent. These chemicals function as "fertilizer" in clear streams and rivers, causing microbial growth, algae blooms and choking moss beds.

· Additional contaminants like pharmaceutical and personal care products in wastewater effluent may impact human health but are not currently regulated by the EPA or TCEQ.

5. There is no prohibition on wastewater discharge in the contributing zone.

· Although there are rules prohibiting wastewater discharges in the recharge zone, there are currently no prohibitions on discharge in the contributing zone of Edwards Aquifer. The TCEQ has the authority to approve discharge permits over the objections of downstream landowners and ranchers.

· Impacts on private water wells is of concern.

· Contesting a wastewater discharge permit application is a daunting task for a downstream property owner, consuming large amounts of time and money.

6. Land application is the primary alternative to direct discharge of wastewater

· Land application of wastewater effluent is more protective of water quality than discharge due to the infiltration of effluent on land and the absorption of the nutrients in effluent by green spaces.

· Land application of treated wastewater effluent is currently required for wastewater disposal in the contributing zone of the Barton Springs Segment of the Edwards Aquifer and in the vicinity of the Highland Lakes due to these protections, although, according to experts, current rules for land application systems contain unnecessary redundancy provisions that inflate costs to build and maintain such systems.

You can donate to GEAA on line or mail a check to PO Box 15618, San Antonio, Texas 78212

You can always keep up with interesting water news on GEAA's Face Book page