

Alamo, Austin, and Lone Star chapters of
the Sierra Club
Bexar Audubon Society
Austin, Bexar and Travis Green Parties
Bexar Grotto
Boerne Together
Bulverde Neighborhood Alliance
Bulverde Neighbors for Clean Water
Cibolo Center for Conservation
Citizens for the Protection of Cibolo Creek
Comal County Conservation Alliance
Environment Texas
First Universalist Unitarian Church of SA
Friends of Canyon Lake
Friends of Dry Comal Creek
Friends of Government Canyon
Fuerza Unida
Green Society of UTSA
Guadalupe River Road Allia
Guardians of Lick Creek
Headwaters at Incarnate Word
Helotes Heritage Association
Hill Country Alliance
Kendall County Well Owners Association
Kinney County Ground Zero
Leon Springs Business Association
Native Plant Society of Texas – SA
Northwest Interstate Coalition of
Neighborhoods
Pedernales River Alliance – Gillespie Co.
Preserve Castroville
Preserve Lake Dunlop Association
Preserve Our Hill Country Environment
RiverAid San Antonio
San Antonio Audubon Society
San Antonio Conservation Society
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
Signal Hill Area Alliance
Sisters of the Divine Providence
Solar San Antonio
Texas Cave Management Association
Trinity Edwards Spring Protection Assoc.
Water Aid – Texas State University
Wildlife Rescue & Rehabilitation
Wimberley Valley Watershed Association

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August 17, 2026

U.S. Environmental Protection Agency
EPA Docket Center, Office of Water Docket

Submitted electronically at www.Regulations.gov

Re: Comments on Proposed Sixth Unregulated Contaminant Monitoring Rule
(UCMR 6), Docket ID No. EPA-HQ-OW-2023-0469; 91 Fed. Reg. 39952

Please accept the attached comments on behalf of the fifty-nine member groups of
the Greater Edwards Aquifer Alliance.

Dear Office of Ground Water and Drinking Water:

1. Background: The U.S. Environmental Protection Agency (EPA or agency) is
proposing the sixth Unregulated Contaminant Monitoring Rule (UCMR 6). Under
the Safe Drinking Water Act (SDWA), the UCMR program gathers data about
unregulated contaminant occurrence in drinking water. The proposed UCMR 6
would require public water systems (PWSs) to collect national occurrence data for
seven ultrashort organofluorine compounds (including certain PFAS), three
pesticide metabolites, 13 semivolatile organic compounds, and seven purgeable
organic compounds.

Subject to the availability of appropriations, the EPA will require all community and
non-transient non-community water systems (CWSs and NTNCWSs) serving 3,300
or more people, and a representative sample of PWSs serving fewer than 3,300
people, to conduct monitoring. These contaminants are not currently subject to
national primary drinking water regulations (NPDWRs), and the EPA is proposing to
require the collection of drinking water occurrence data to inform agency
decisions. The data collected will be publicly available.

2. Greater Edwards Aquifer Alliance (GEAA): GEAA is a 501 (c)(3) nonprofit
organization located in San Antonio, TX, that promotes effective, broad-based
advocacy for the protection and preservation of the Edwards and Trinity Aquifers,
their springs and watersheds, flora and fauna, and the Texas Hill Country that
sustains them. Our service area extends across 21 south-central Texas counties,
with programming efforts being strengthened and supported by our 59 member
organizations who share a common mission of preserving and protecting our area's
unique ecosystem for the benefit of all residents and future generations.

GEAA supports EPA's continued use of the UCMR program to develop nationally
consistent occurrence data on contaminants not subject to federal primary
drinking water regulations. UCMR data can help identify emerging exposure
concerns, inform future regulatory decisions, and give water providers and the
public a clearer picture of contaminants found in finished drinking water. That
value; however, depends on whether the monitoring design adequately represents
vulnerable groundwater settings and the small and rural systems that serve many
aquifer-dependent communities.

With respect to UCMR 6, the Edwards and Trinity Aquifer region presents conditions that merit particular attention. Karst aquifers can respond rapidly to recharge and contaminant inputs, while public water systems may draw from multiple wells, aquifers, or surface-water sources and may change source proportions throughout the year. Many Hill Country and South-Central Texas communities are also served by small systems with limited staff, treatment options, and alternative supplies. Drawing on GEAA's technical and advocacy work involving source-water protection, wastewater permitting and discharge pathways, development over contributing and recharge zones, water-quality monitoring, and public access to environmental information, our comments focus on monitoring design, source identification, hydrogeologic context, and public data.

3. Comments on UCMR 6

GEAA respectfully recommends that the EPA consider the following when implementing UCMR 6:

- I. Publish the complete small-system selection methodology and evaluate whether the nationally representative sample adequately includes rural, groundwater-dependent, and karst-aquifer systems.
- II. Use State Monitoring Plans and targeted supplemental monitoring to better characterize seasonal and recharge-driven variability in vulnerable karst groundwater systems.
- III. Strengthen the criteria and transparency for Groundwater Representative Monitoring Plans so that hydrogeologically different wells are not treated as interchangeable.
- IV. Expand the reported source-water and operational data to identify the aquifer or watershed, active sources, source proportions, and treatment in operation for each sampling event.
- V. Make results timely, downloadable, geographically useful, and understandable, and provide technical assistance for significant or unexpected detections.

I. Small-system selection and representation: With UCMR 6, the EPA proposes monitoring all eligible community water systems and non-transient non-community water systems serving 3,300 or more people, together with a nationally representative sample of 800 systems serving fewer than 3,300 people. The eligibility determination would use system type and retail population served as reported in Safe Drinking Water Information System (SDWIS) Federal Reporting Services on February 1, 2026. The proposal describes the 800 systems as randomly selected but incorporates EPA's 2021 statistical-design update for the underlying procedure. Under that approach, the sample is not a simple nationwide lottery. EPA uses a population-weighted design stratified by service-size category, groundwater or surface-water source, and state or comparable geographic category. The design allocates at least two systems to each state, then randomly selects systems from the resulting framework.

This approach is designed to support unbiased estimates of national contaminant occurrence. It does not necessarily provide representative information for an individual state, watershed, aquifer, or hydrogeologic setting. Nothing in the proposal guarantees that the Texas allocation will include a small system drawing from the Edwards or Trinity Aquifer, a system located in an aquifer contributing or recharge zone, or a system supplied by rapidly responding karst groundwater. That limitation is important in GEAA's service area. Many small and rural systems rely on one or a few groundwater wells and may have limited treatment, blending, staffing, and alternative-supply options. Please note, this concern is not limited to small systems. Even a public water system as large as San Antonio Water System is generally not required to apply the full conventional treatment process used for surface-water

supplies to Edwards Aquifer groundwater, although the water must still be disinfected and meet applicable drinking-water standards.

At the same time, faults, fractures, caves, sinkholes, losing streams, and other recharge features can create rapid connections between surface activities and groundwater. A sample that omits these systems may remain statistically valid at the national level while providing little information about occurrence in some of the country's most vulnerable drinking-water settings. GEAA supports preserving the full monitoring requirement for systems serving 3,300–10,000 people and the nationally representative sample of 800 smaller systems. GEAA also recognizes that EPA cannot spend funds that Congress has not appropriated. EPA can; however, make the selection process and its limitations transparent and determine whether additional targeted sampling is needed.

II. Karst hydrologic variability: The proposal generally calls for two sampling events, five to seven months apart, at groundwater systems, while surface-water, mixed-source, and groundwater under the direct influence of surface water systems would be sampled quarterly. That distinction may be administratively workable at the national scale, but a uniform two-sample schedule may not fully characterize occurrence in karst groundwater that responds rapidly to recharge, runoff, and seasonal pumping changes.

GEAA is not suggesting that all karst groundwater systems should be classified as groundwater under the direct influence of surface water. Rather, the monitoring design should recognize that regulatory source categories do not always capture the variability of a vulnerable karst aquifer. Two samples collected under similar hydrologic conditions could miss intermittent occurrences or produce results that cannot be interpreted in the context of recharge conditions. In fact, EPA already relies on State Monitoring Plans to implement UCMR sampling. Those plans provide a reasonable vehicle for identifying a limited subset of groundwater systems where additional timing or contextual information would materially improve the national dataset.

III. Ground Water Representative Monitoring Plans: EPA proposes to continue allowing a groundwater system with multiple entry points to submit a Groundwater Representative Monitoring Plan (GWRMP) and monitor at fewer representative entry points. GEAA understands the need to avoid unnecessary duplicative sampling. Representative well approaches can be appropriate where wells truly have comparable source water and operational conditions.

In a karst and multi-aquifer setting; however, geographic proximity alone does not establish that wells are representative of one another. Wells may draw from different aquifers or geologic formations, have different depths and construction, receive recharge from different contributing areas, or operate under different pumping and blending patterns. Those differences can materially affect contaminant occurrence. The proposal also appears to allow previously approved GWRMPs to remain in use unless a system has experienced significant configuration changes. That approach should be accompanied by a sufficiently broad and clear definition of significant change and by periodic confirmation that the representative relationship remains valid.

IV. Source, blending, and treatment information: EPA's proposed data elements would identify the public water system, facility, broad source type, entry point, treatment type, collection and analysis information, and result. Those elements are useful but may not be sufficient to interpret a detection at a system that uses multiple aquifers, multiple wells, or a mix of groundwater and surface water.

For occurrence data to support source-water protection, EPA and the public need to know more than whether a sample is broadly categorized as groundwater, surface water, mixed, or groundwater under the direct influence of surface water. A finished-water sample may reflect one source, several blended sources, or a temporary operational configuration. Without that context, it may be impossible to associate a result with the relevant aquifer or watershed or to compare results across sampling events.

EPA can limit additional burden by pre-populating information already held in SDWIS, state databases, source-water assessments, or water-system inventories and asking systems to verify or update it for the sampling event.

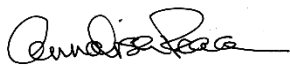
V. Publicly usable results and technical assistance: UCMR data are most valuable when water systems, communities, researchers, and source-water protection organizations can access and interpret them. The public should not have to reconstruct basic aquifer, watershed, source, and sampling context from multiple databases. GEAA recommends that EPA promptly release validated results in downloadable, machine-readable formats and through a geographic interface suitable for aquifer and watershed analysis. EPA should also provide clear English-language explanations distinguishing minimum reporting levels, health-based reference concentrations, and enforceable maximum contaminant levels, along with communication templates and technical assistance for small systems.

For significant or unexpected detections, EPA should establish a consultation protocol to help systems evaluate potential sources, treatment, and additional sampling needs. EPA should also coordinate with state and local partners to provide nearby private-well owners with appropriate testing and interpretation guidance while clarifying that private wells are not regulated under UCMR.

4. Conclusion: GEAA supports EPA's effort to generate nationally consistent occurrence data for unregulated drinking-water contaminants. UCMR 6 will be most useful if its monitoring design includes the small and rural systems that serve aquifer-dependent communities, reflects the variability of vulnerable karst groundwater, and preserves enough source and operational context to interpret the results.

Thank you for considering these comments and for EPA's work to improve the information available to public water systems and the communities they serve.

Sincerely,



Annalisa Peace
Executive Director
Greater Edwards Aquifer Alliance



Nathan Glavy
Technical Director
Greater Edwards Aquifer Alliance