

July 18, 2016

Ms. Bridget Bohac  
Office of the Chief Clerk (MC-105)  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

**RE: Request for denial of City of Dripping Springs Application as Proposed for TPDES Permit Number WQ0014488003**

Dear Ms. Bohac,

The Hill Country Alliance (HCA) recognizes that the Texas Commission on Environmental Quality (TCEQ) plays a critical role overseeing the health of our state's water quality, and we are appreciative of the huge effort that is involved in protecting this resource.

Communities throughout the Hill Country are conscious of the economic benefit of keeping their rivers, streams, and aquifers clean. Those water resources provide critical drinking water, recharge aquifers that support countless groundwater wells, support agricultural and domestic uses, and provide recreational opportunities—all of which are critical to the economy.

For the following reasons, HCA respectfully encourages the denial of the City of Dripping Spring's effluent discharge TPDES permit application (WQ0014488003) as proposed. We respectfully request that any action on this application be delayed until scientific study is done to better understand the degree and magnitude of surface water influence from Onion Creek on the Middle Trinity Aquifer and the nearby public water supply wells.

Like most of the Hill Country's creeks, Onion Creek is an ecologically unique and environmentally sensitive stream that currently exceeds fishable and swimmable quality. The receiving segment of Onion Creek (segment # 1427) has the designated use of "Aquifer Protection" and "Public Drinking Water Supply" because it provides significant recharge to the Trinity and the Edwards Aquifers upon which tens of thousands of residents depend on water.

Texas Administrative Code, Ch. 309.12 prohibits TCEQ from issuing a discharge permit that would introduce possible contamination into surface and groundwater sources.

The City of Austin's calibrated and certified Water Quality Analysis Simulation Program (WASP) modeling indicates that the unconditional discharge of 995,000 gallons of treated effluent per day would degrade the water quality of Onion Creek with contaminant levels higher than allowed by state law.

Finally, given the value that fragile Hill Country creek ecosystems bring to real property and to the overall economy of the regions, all possible steps to protect water clarity and health including these proposed rules changes should be put into effect.

In order to maintain the beneficial health qualities of Onion Creek and the two major aquifers that it feeds, ***HCA respectfully encourages the TCEQ to deny the City of Dripping Springs permit to discharge effluent into Onion Creek as proposed***, and we encourage both the TCEQ and the City of Dripping Springs to conduct further investigation into the connectivity between surface water and the groundwater of the Middle Trinity Aquifer before any initial decision is made.

Our comments reflect the collective vision of our Hill Country supporters, stakeholders, businesses and elected officials for the protection of the Hill Country's water resources for current and future generations. Thank you for your consideration of these comments. If you have questions or concerns, please contact me at (512) 694-1121.

Sincerely,

Charlie Flatten  
Water Policy Program Manager  
Hill Country Alliance  
512.694.1121

CC: Patricia Duron, Supervisor/Texas Register, TCEQ; Leo Tynan, Board President, HCA; Katherine Romans, Executive Director, HCA