

August 23, 2018

Office of the Chief Clerk
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

VIA ELECTRONIC FILING

RE: PERMIT NO. WQ0010549002 TEXAS POLLUTANT DISCHARGE ELIMINATION SYSTEM (TPDES) PERMIT AMENDMENT APPLICATION for MUNICIPAL WASTEWATER (NAPD)

Executive Director and Commissioners of the Texas Commission on Environmental Quality,

Hill Country Alliance (HCA) and its supporters recognize and appreciate the critical work that the Texas Commission on Environmental Quality (TCEQ) Commissioners and staff perform in their charge of protecting the common resource provided by the iconic and life supporting Blanco River and countless water well owners who rely on them as their sole source of household water from the Trinity and Edwards Aquifers.

HCA recognizes the financial challenges that many Hill Country towns including the City of Blanco face when seeking to responsibly provide for future growth without damaging the very water sources that provide for its long-term economic prosperity.

HCA also recognizes the regional economic value provided by the clean surface and groundwater flows that serve property owners, fish, and wildlife, and ultimately our drinking water aquifers including the Edwards which is designated by the U.S. Environmental Protection Agency as a Sole Source Aquifer under the Safe Drinking Water Act. As a region we must find new ways to institute more efficient water use.

The TCEQ has found the City of Blanco's wastewater discharge permit application administratively complete and the treatment plant is nearing completion. The permit application requests a seven-fold increase in effluent discharge from 225,000-gallons per day (gpd) to 1.6-million gpd into a segment of the Blanco River which is currently rated as exceptional for aquatic life use, public water supply, aquifer protection, and primary contact recreation.

The valuable effluent supply will not be required to be treated to the highest background stream quality standard, and the city has indicated that it will sell as much as it can to willing buyers. HCA applauds the City's plans to reuse this water to meet current and future non-potable beneficial needs.

HCA does not support the discharge of non-potable treated effluent into any Hill Country river or stream - including the Blanco River - for the following water quality and quantity related reasons.

Surface Water Quality

Though the treated effluent will look clean and be free of suspended solids, there are allowances for lingering invisible constituents that can harm the health of the river.

The permit application as drafted allows a phosphate and nitrate outflow that is inconsistent with the health requirements of the Blanco River. Although the TCEQ allows for elevated outflows of nitrates and phosphates, clear running Hill Country rivers and streams are not capable of metabolizing them without substantial quality degradation. Nitrates and phosphates promote and accelerate algae blooms which are dangerous, unsightly, and can create Depleted Dissolved Oxygen (DO) hypoxic conditions that can result in aquatic wildlife die-offs.

The permit application does not call for the removal of residual pharmaceuticals, personal care product chemicals, or micro-plastics that are increasingly found in our water supplies at alarming rates.

Groundwater Quality

Case law and statute recognize that Hill Country rivers and streams including the Blanco River recharge both the Trinity and the Edwards Aquifers. State law prohibits the discharge of effluent on the Edwards Recharge Zone to protect the drinking water of millions of Central Texans from contamination.

Recent Hydro-geologic research has found that the Blanco River recharges both the Trinity and the Edwards Aquifers, and those who rely on the Trinity Aquifer as their sole drinking water source deserve no less protection from well damage than Edwards well owners.

If treated effluent and its residual constituents are part of the river flow, that effluent will recharge the drinking water of our aquifers. Well owners should be able to expect effluent-free water for their daily household use and should not have to worry about slow contamination or quick contamination due to an accidental release of untreated sewage.

Persistent Drought

The nature of the climate in the Hill Country is persistent drought punctuated by occasional flash flooding. We worry about and plan for our water because it is scarce and expensive. In the Hill Country, water of any kind is too valuable to throw away. Especially if it harms folks' water quality downstream.

The economic prosperity of the Hill Country is dependent upon the health of our water. Land owners along the Blanco River and the many thousands of water well owners who rely on the Trinity and Edwards Aquifer as their sole source of drinking water have investment backed economic expectations that must be respected.

The City of Blanco's valuable treated effluent has been put to local beneficial use for decades -- and it should continue to be used in beneficial ways. As the City continues to grow, it should require by code that new development utilize this resource for all non-potable uses (irrigation for example) rather than our extremely valuable drinking water. The City of Blanco should recognize that it will be in its economic best interest to not release any effluent into its main source of economic prosperity.

Our comments reflect the collective vision of our Hill Country supporters, stakeholders, businesses and elected officials for the protection of the Hill Country's natural 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: Garry Merritt, Board President, HCA; Katherine Romans, Executive Director, HCA