

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: PUBLIC COMMENT on Permit Application #WQ0015688001 concerning the Silesia Properties, L.P. wastewater discharge permit application from Texas Commission on Environmental Quality (TCEQ) in Comal County, Texas.

Hill Country Alliance (HCA) and its supporters recognize the regional economic value provided by the clean surface and groundwater flows that serve property owners, fish, and wildlife, and ultimately our drinking water supplies including Canyon Lake and clean water aquifers.

HCA also recognizes the value of protecting the iconic and life supporting Honey Creek and Guadalupe River and its adjacent Texas Parks and Wildlife Department (TPWD) assets. These assets represent enormous taxpayer investment and serve as both a park destination and as a bio-reservoir in which aquatic species sanctuary during periods of low/no flow in the Guadalupe River.

In this specific case, issuance of a discharge permit will degrade both public and private property assets that bring considerable value to countless local residents and traveling guests who benefit from the long-term economic prosperity provided by the clean waters of the Honey Creek State Natural Area and Guadalupe River State Park.

Furthermore, HCA notes a proliferation of aquifer recharge features that this proposed discharge may contact and affect. These direct conduits to the Trinity Aquifer recharge the water wells that thousands of citizens rely on for clean drinking water, and they deserve protection from contamination via spills and long-term aquifer degradation from treated effluent contact.

Groundwater Quality

Case law and statute recognize that Hill Country rivers and streams including tributaries of the Guadalupe 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.

Hydro-geologic research has found that the Guadalupe 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 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.

HCA requests this application be denied, and only a non-discharge (land application) permit application should be considered in order to protect riparian land owners, drinking water sources (including Canyon Lake and the Edwards and Trinity Aquifers), and the enormous taxpayer investment in the adjacent TPWD complex.

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; Representative; Senator Donna Campbell, District 25; Kyle Biedermann, Texas House District 73; Carter Smith, Executive Director, TPWD