

April 5, 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: Rule Project 2016-033-PET-NR -- Wastewater disposal permit rule change petition

Dear Ms. Bohac,

The Texas Commission on Environmental Quality (TCEQ) plays a critical role overseeing the health of our state's water quality, and the Hill Country Alliance is appreciative of the huge effort that is involved in protecting this resource. We would like to respectfully encourage the adoption of the City of Austin's proposed effluent discharge rules changes (Rule Project 2016-033-PET-NR)

Communities throughout the Hill Country are experiencing population growth that requires the acquisition of new water supplies while simultaneously increasing their effluent production.

These communities 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 that equate to tourism dollars.

Part of this clean water stewardship has included the practice of land application (TLAP) of treated effluent. With the increase in property values, the long preferred land application method of effluent disposal has become more and more expensive. At the same time most of our Hill Country communities have instituted beneficial reuse programs to take advantage of the effluent that they used to dispose of.

Given the immediate and future water needs of the State of Texas due to population increases and increasing demand on traditional sources, beneficial water reuse should be optimized and given full consideration as a viable resource; and, its use should be optimized in rule and in practice.

Furthermore, given the rise in property values due to these population increases, land application permits should be allowed to account for reuse by reduction of acreage per permit needed to reflect the increase in beneficial reuse as an offset.

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 achieve the benefits inherent in these proposed rules changes, HCA respectfully encourages the TCEQ to incorporate the proposed effluent waste water rules changes submitted by the City of Austin. 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, Interim Executive Director, HCA; Joseph G Pantalion, PE, Director, City of Austin Watershed Protection Department; Chris Herrington, PE, City of Austin Watershed Protection Department