



2022-014-PET-NR - TCEQ Pristine Streams Rule Change

Office of the Chief Clerk -

The mission of The Trinity Edwards Springs Protection Association (TESPA), a Texas nonprofit organization, is to protect the Trinity and Edwards aquifers from over pumping, the springs that flow from this interconnected system, and the property rights of landowners who depend on and wish to conserve this precious natural resource. The proposed Pristine Streams Rules change will provide much needed protection for streams with no detectable levels of phosphorous (a wastewater indicator) from direct discharges.

Protection of our aquifers, springs, creeks, and rivers is a priority for TESPAs and for all Texans who desire It is a fair and balanced way to protect the remaining 22 pristine rivers for us and for future generations. This is a practical and sustainable approach that utilizes the best knowledge and techniques for protection of this unique karst region and these irreplaceable springs.

Notably, the rule does not prohibit new development on these recognized streams. Developers will be able to apply for a TLAP land irrigation permit and for authorization to reuse their wastewater. Both options have been used very successfully in the two areas where TCEQ has already prohibited new wastewater discharge permits — around the Highland Lakes (since 1986) and in the Edwards Aquifer Recharge Zone (since 1996).

On behalf of the TESPAs Board of Directors and our members, we appreciate the opportunity to provide these comments and enthusiastically urge adoption of the Pristine Streams Rule Change.

Patrick Cox

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