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Texas Commission on Environmental Quality
Attn: TCEQ Chief Clerk
Mail Code 105
PO Box 13087
Austin, Tx 78711-3087

March 10, 2022

RE: Permit number: 2022- 014-PET-NR

On behalf of the Wimberley Valley Watershed Association, we are writing to express our strong support for the Pristine Streams Petition (Permit number: 2022- 014-PET-NR).

The Watershed Association counts over 19,000 members across our shared Blanco River basin, the Hill Country, and all of Texas. As a non-profit organization located in the heart of the Texas Hill Country, born out of a love for water, the Watershed Association has been working since 1996 to protect groundwater, springs, creeks, and rivers for generations to come.

We strongly urge TCEQ's commissioners to accept the Pristine Streams Petition. Less than 1% of all classified stream segments in Texas can still be called truly pristine. Many of these streams are located in the Hill Country, where they provide a foundation for the region's thriving tourism and recreation businesses.

We have collaborated with the City of Blanco and Protect Our Blanco through the Blanco Water Reclamation Task Force to mitigate and minimize direct discharges to the Blanco River. Wastewater discharge has already caused algae growths and other harms on the Blanco River. The Council and community recognize the importance of clean, clear water for the economy, water supplies, and quality of life in the basin.

One of the features of very pristine streams is that they have very low levels of phosphorus. Scientists measure phosphorus in streams to assess their water quality. Too much phosphorus can degrade water quality, causing algae blooms and other pollution. Treated domestic wastewater has high levels of phosphorus, because phosphorus is a byproduct of the treatment process itself.

The solution is clear: Prohibit new wastewater discharge permits on our state's last remaining pristine streams. The Pristine Streams Petition is asking TCEQ to adopt a rule doing just that.

New wastewater discharge permits would be prohibited on classified stream segments with phosphorus levels below 0.06 milligrams per liter. This would include 22 stream segments covering 1,373 miles. The rule would protect several of Texas's most iconic streams, including the Blanco, Guadalupe, and Llano Rivers, as well as Barton, Cypress, and Onion Creeks.

The rule would not prohibit new development on these 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).

The rule proposed by the petition is fair, balanced, and necessary to protect our state's last few pristine streams.

Sincerely,



David Baker
Founder and Executive Director



Robin H. Gary
Managing Director