



**Barton Springs
Edwards Aquifer**
CONSERVATION DISTRICT

October 20, 2016

sent via email

David Galindo, Director of Water Quality Division
Texas Commission on Environmental Quality, MC 145

RE: City of Austin rule petition related to beneficial reuse of treated wastewater.

Dear Mr. Galindo,

The Barton Springs Edwards/Aquifer Conservation District (District) is in support of the City of Austin's (City) rule-making petition to amend Chapters 222 and 309 of Title 30 of the Texas Administrative Code (TAC) relating to subsurface irrigation and land application of treated wastewater.

Policy-makers in Texas have emphasized the need for conservation and reuse throughout the state. Existing TCEQ rules require redundancy for Texas Land Application Permit holders that also utilize Chapter 210 for beneficial reuse, potentially discouraging maximum beneficial reuse of wastewater effluent. Furthermore, the high cost of land and storage can make TLAP cost prohibitive which is currently driving direct discharge permits to be pursued as the more economic option. The proposed rule amendments will allow permit holders and applicants to receive a credit for the firm water demand used for beneficial reuse, allowing for a reduction in storage and land dedicated for disposal. The District believes this approach will create a more cost effective way of utilizing and incentivizing TLAP as well as beneficial reuse.

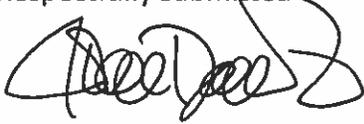
The District is concerned about the long-term, cumulative impacts associated with the direct discharge of treated wastewater effluent into our pristine oligotrophic Hill Country streams. Studies conducted by the City and others have shown that even a small amount of nutrient input from wastewater effluent can have a detrimental impact on water quality and change the trophic level, potentially causing irreversible ecological and economic damage. With the ever-increasing population growth in Texas, water and wastewater issues are paramount. Innovative initiatives will be necessary to solve the mounting challenges. Over the last decade, the District has been involved in multiple initiatives to encourage sustainable management of wastewater. The District's goal is to help prevent the degradation of our sensitive Hill Country streams that recharge the aquifers we have been entrusted to manage and protect while also encouraging water conservation through the beneficial reuse of treated effluent where appropriate.

In order to foster regional collaboration, the City has held multiple meetings with stakeholders representing governmental entities, environmental groups, wastewater engineers and permit holders to bring forth a well-developed and vetted rule petition. The rule amendments include multiple environmental safeguards such as requiring a water balance for firm reclaimed demand areas, buffer zone requirements, and a reduced credit for outdoor use (80%) to minimize the chance of runoff and unauthorized discharges.

While the District understands TCEQ must consider permitting logistics such as accounting and the calculation of firm demand, we believe the City's rule petition is a creative, logical, and balanced solution to a recognized problem that will ultimately protect our natural resources, encourage water conservation, and allow flexibility for the permittee and/or applicant.

Therefore, we urge your favorable consideration in adopting the proposed rule amendments.

Respectfully submitted

A handwritten signature in black ink, appearing to read "John T. Dupnik", written over the text "Respectfully submitted".

John T. Dupnik, P.G.
General Manager