

Alamo Group of the Sierra Club
Aquifer Guardians in Urban Areas
Austin Regional Sierra Club
Bexar Audubon Society
Boerne Together
Cibolo Nature Center
Citizens Allied for Smart Expansion
Environmental Stewardship
Committees of the Episcopal Church of Reconciliation & Episcopal Diocese of West Texas
Environment Texas
First Universalist Unitarian Church of San Antonio
Friends of Canyon Lake
Fuerza Unida
Government Canyon Natural History Association
Hays Community Action Network
Helotes Heritage Association
Helotes Nature Center
Hill Country Planning Association
Guardians of Lick Creek
Kendall County Well Owners Association
Kinney County Ground Zero
Medina County Environmental Action Association
Northwest Interstate Coalition of Neighborhoods
OST 100
Preserve Castroville
Preserve Lake Dunlop Association
San Antonio Audubon Society
San Antonio Conservation Society
San Geronimo Valley Alliance
San Marcos Greenbelt Alliance
San Marcos River Foundation
Santuario Sisterfarm
Save Barton Creek Association
Save Our Springs Alliance
Scenic Loop/Boerne Stage Alliance
Securing a Future Environment
Sisters of the Divine Providence
Smart Growth San Antonio
SEED Coalition
Texas Water Alliance
West Texas Springs Alliance
Wildlife Rescue & Rehabilitation
Wimberley Valley Watershed Association

June 28, 2010

Texas Commission on Environmental Quality

Proposed Revisions to Water Quality Standards on the TCEQ Agenda for June 30, 2010

On behalf of the forty eight member organizations of the Greater Edwards Aquifer Alliance (GEAA), I am submitting this public comment to notify you that GEAA joins the Lone Star Sierra Club in strongly urging the TCEQ Commissioners to reject the proposed revisions to the state's bacteria pollution criteria that are being recommended by the agency staff. The TCEQ Commissioners should heed the public outcry over the proposed weakening of protections from bacteria pollution for the state's streams and lakes and take a stand for public health protection over polluter interests. GEAA also joins the Sierra Club in urging Governor Perry, who appointed all three Commissioners, to weigh in opposing this downgrading of water quality for Texas water bodies.

According to the statement issued by the Lone Star Sierra Club, "The fact is that there is no compelling reason to make any changes to the bacteria pollution criteria at this time – indeed there is every reason not to do so. The U.S. EPA, which ultimately must approve any changes to the state's surface water quality standards, is currently working under a consent decree and settlement agreement in a federal lawsuit to conduct science and research in order to publish new or revised recreational water quality criteria by October 2012. The time for TCEQ to consider any appropriate changes in its bacteria pollution standards is after that EPA process is complete. To act now would be premature."

The TCEQ staff itself is aware of the great public opposition to the weakening of the state's bacteria pollution criteria. In a nod to that opposition the staff is providing "options" to the TCEQ Commissioners to retain current bacteria pollution criteria for a number of water bodies in the state, although the staff is not recommending that the Commissioners do so. While retaining bacteria pollution criteria for some water bodies would be preferable to a wholesale downgrading of the criteria for all water bodies, that would not be sufficient for human health protection and does not negate other changes being proposed for monitoring of bacteria pollution, determining recreational use for streams, and analysis of data that would further undermine protection from bacteria pollution."

GEAA wholeheartedly supports the recommendations and comments submitted by the Sierra Club, and urges you to maintain the highest water quality standards for the benefit of all Texas citizens.

Sincerely,



Annalisa Peace
Executive Director