



Hays Trinity Groundwater Conservation District

"promoting conservation, preservation, recharge & prevention of groundwater waste within western Hays County"

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October 22, 2015

RE: HTGCD Letter of Support, City of Austin Watershed Protection Department

WHEREAS, the stated mission of the Texas Commission on Environmental Quality (TCEQ) is to protect our state's public health and natural resources consistent with sustainable economic development; and

WHEREAS, the stated TCEQ philosophy is to ensure that regulations are effective and current, ensure meaningful public participation in the decision-making process, and to provide flexibility in achieving environmental goals; and

WHEREAS, the TCEQ has regulatory authority to permit the land disposal of treated sewage effluent over 5,000 gallons per day under chapters 222 and 309 of Title 30 of the Texas Administrative Code (TAC); and

WHEREAS, beneficial reuse of treated wastewater effluent (also known as reclaimed water) is authorized by TCEQ for permitted wastewater treatment facilities under 30 TAC 210; and

WHEREAS, the stated purpose of 30 TAC 210 is to allow safe utilization of reclaimed water for conservation of surface and ground water, and to ensure an adequate supply of water resources for present and future needs; and

WHEREAS, central Texas is experiencing rapid population growth that exerts increasing demands on limited surface and ground water supplies; and

WHEREAS, wastewater treatment facilities permitted for land application that also utilize beneficial reuse of reclaimed water are helping to conserve water supplies; and

WHEREAS, existing TCEQ wastewater land application rules do not reflect current development practices, and dedicated land disposal fields are only partially utilized by permittees who also utilize beneficial reuse authorizations acting as an impediment to expansion of existing land application facilities and new land application permits; and

WHEREAS, in 2015 the City of Austin has prepared a rule-making petition to TCEQ for the purpose of providing a flexible means to more sustainably manage wastewater and conserve water supplies through land application in combination with beneficial reuse of reclaimed water, developed in cooperation with multiple governmental entities and wastewater permit holders.

The Hays Trinity Groundwater Conservation District (HTGCD) met on October 22, 2015 during a regularly scheduled Board meeting. HTGCD makes formal request to the Texas Commission on Environmental Quality urging its favorable consideration of the Petition for Rulemaking submitted by the City of Austin that would modify land application of wastewater effluent rules to provide credit for firm demand of reclaimed water for beneficial reuse against the land disposal field size and effluent storage volume requirements.

Reviewed and Approved by the Hays Trinity Groundwater Conservation District Board of Directors on October 22, 2015.

Linda Kaye Rogers
HTGCD Board President

Mark Hastings
HTGCD Board Secretary Treasurer