

3/29/2022

To: TCEQ Commissioners

From: Joanna Wolaver, Board President, Austin Outside

Re: Pristine Streams Petition

The mission of [Austin Outside](#) is to champion outdoor places for all throughout Greater Austin. We're a coalition of nonprofits and businesses who believe in the power of our collective impact.

Austin Outside supports the Pristine Streams Petitions because it would protect some of the most beautiful and beloved rivers and creeks in Central Texas. TCEQ's rules currently allow treated sewage to be discharged into these streams. This has already caused algae pollution on several of them, including the South San Gabriel and Blanco Rivers. The rule proposed by the petition would not prohibit development, since TCEQ will still be able to issue land irrigation permits and beneficial reuse authorization on these streams.

Concerns that should be considered include:

- Research shows that the discharge of treated wastewater with phosphorus into pristine streams with very little phosphorus causes algae blooms and other degradation.
- The Legislature has already made progress on the issue. Last year the House passed HB 4146 — which would have created a similar discharge prohibition — on a bipartisan vote. TCEQ can finish what the Legislature started.
- Zero-discharge alternatives such as land irrigation and beneficial reuse are practical, proven, and affordable. These alternatives have been used extensively for 36 years around the Highland Lakes, where TCEQ has already prohibited new discharge permits.
- TCEQ shouldn't favor one group of landowners over another. If the proposed rule is adopted, any landowner or developer on a pristine stream will still be able to get a zero-discharge permit. But if the rule isn't adopted, downstream landowners will suffer from algae and other pollution caused by upstream discharge facilities. TCEQ should choose the solution that will cause the least harm to everyone.
- Discharge permits with problems are rarely fixed once they've been issued. After TCEQ issued a discharge permit for Liberty Hill with an extremely high phosphorus limit, algae exploded almost immediately on the South San Gabriel River. TCEQ is currently planning to renew Liberty Hill's permit with a phosphorus limit that's still 25-50 times higher than what occurs naturally in the river.
- The discharge prohibition would only affect less than 1% of all classified stream segments in Texas. Discharge permits will still be allowed on more than 90% of all other streams in the state.
- Most of these streams are in the Hill Country, where they contribute to a thriving tourism and recreation economy. From wineries and hotels to game ranches and tubing outfitters, many businesses depend on the region's statewide reputation for scenic — and clean — streams.

Austin Outside is asking you to vote yes on the Pristine Streams Petition.