

Protect Lake Travis Association

Lonnie Moore, President

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March 16, 2010

Mr. Michael Parrish

Office of Legal Services

Texas Commission on Environmental Quality

P. O. Box 13087

Austin, TX 78711-3087

Re: Rule Project Number 2007-002-307-EN, Revisions to Texas Surface Water Quality Standards

Dear Sir:

Protect Lake Travis Association (PLTA) appreciates the opportunity to provide comments on the proposed revisions to the Texas Surface Water Quality Standards.

Background of Protect Lake Travis Association and its involvement in this issue

Protect Lake Travis Association is a 501(c)(3) nonprofit organization formed in 1982. Our members are property owners, business owners and recreational users of Lake Travis. We are opposed to degradation of our Texas lakes and streams in general, and to degradation of Lake Travis in particular.

PLTA concerns with the proposed revisions

Lake Travis is one of the clearest reservoirs in Texas and is extensively used for contact recreation. Modeling performed by Lower Colorado River Authority shows that Lake Travis is very sensitive to even small changes in nutrient loads (both phosphorous and nitrogen).

- PLTA opposes the lowering of the bacterial standards from the current 126 (colonies/100 mL) to 206. There is no scientific basis shown for the relaxation of the current standard, particularly in reservoirs like Lake Travis that have extensive contact recreation. In addition to the human costs, an increase in human infections resulting from a lowered bacterial standard could have a serious negative impact on recreational activities, and thus a negative impact on the economy of the region.

In addition, more stringent bacterial standards should be considered for any stream segments upstream of Lake Travis that might otherwise be classified at a lower level of aquatic recreational use. If higher bacterial levels are allowed in these tributaries it could result in the contamination reaching the higher use areas of Lake Travis, which include the coves and arms of the lake.

- As noted by LCRA, Travis County and others, the criteria for chlorophyll *a* levels specified in Appendix F and Alternative Appendix F are much higher than ambient levels in Lake Travis and would result in degradation from increased nutrient loading. The more stringent levels proposed by LCRA should be used.

- The proposed screening levels for total phosphorus and for transparency should not be used as an additional test for whether or not nutrient standards are being violated if the chlorophyll *a* criteria are exceeded.
- Lake Travis is a long, narrow lake with numerous arms and coves. These arms and coves are among the most heavily used portions of the lake, and often have a low exchange rate with the main body of the lake. TCEQ needs to address nutrient loading in these arms and coves within the standards.

Summary

No changes that weaken the existing clean water standards should be considered. Relaxing the standards in order to decrease workload or cost to TCEQ or to others is not justified and would be bad policy.

Thank you for your consideration of our position.

Sincerely,

A handwritten signature in cursive script that reads "Lonnie Moore".

Lonnie Moore, President