

I am reading this statement on behalf of Bob Wickman. He is a resident of Canyon Lake, TX, has lived for over 25 years in Comal County, and is one of the founders of Friends of Canyon Lake (FoCL), the 700+ member citizens' organization formed to protect Canyon Lake and the Guadalupe River. Bob has spent countless hours networking with other environmental organizations, and in the bowels of TCEQ, from back when it was TNRCC. At great expense, FoCL has been involved in fruitless litigation against TCEQ up to and including the Texas Supreme Court, and in Federal District Court, all in an effort to protect some of the best surface waters in Texas.

Canyon Lake is a premier contact recreation facility, with an estimated four million user-visits per year for drinking, swimming, skiing, boating and fishing, and is allegedly used by residents of about 100 surrounding counties. Tens of thousands of folks tube in the tailrace of Canyon Dam. Wastewater treatment discharge is adjacent to swimming and picnicking areas. The odor of H₂S from seasonal turnover can be overwhelming. As an organization, we have fought GBRA over excess pumping, and pleaded with TCEQ over excessive discharge and incomplete treatment of wastewater into the lake. We believe they are poor custodians.

By way of background, I am a retired Air Force colonel who, at retirement, was vice commander of the largest civil engineering organization in all of DoD. At that time, I held a Texas wastewater discharge/treatment license, as well as a number of other certificates (pesticide application, asbestos removal, etc.) because of my personal belief that to supervise technicians, one needs to understand their duties and responsibilities.

I also formed and led the first comprehensive base-level environmental office in the Air Force, which has since been established as the norm, and received recognition for same.

I mention these credentials not to impress you, but to establish that I am more knowledgeable about environmental management than the average individual.

To cut to the chase, we became aware that the Fort Sam Houston Recreation Area wastewater treatment plan discharge permit No. WQ0012074001 was up for renewal. I used to have responsibility for that plant, before I retired more than 20 years ago. It is now 44 years old, has not been updated, was permitted for 10-15 treatment only, and has a record of, as I recall, 12 violations in the last 77 inspections. We generated many letters and emails to TCEQ requesting a public meeting, which TCEQ finally, reluctantly granted. At that meeting, Army officials admitted to the age, the violations, etc., but stated that their pleas for upgrade money from the Army went unrewarded. They asked for unconditional renewal.

At that July meeting, our State Representative, Doug Miller, asked TCEQ to either deny the renewal or renew it for only one or two years to force the Army to devote some resources to an upgrade. County Commissioner Jan Kennady endorsed his appeal.

Recently, however, we were recently notified that TCEQ commissioners denied that request and approved the renewal without conditions.

Having spent many hours talking with staff members of TCEQ at their location in Austin, I know that Staff recommendations are frequently overridden by the ED and commissioners. I suspect they are overridden for political reasons. We also note that the Highland Lakes west of Austin have a statutory prohibition of ANY wastewater discharge. In that context, we believe we are more than reasonable. We simply want a cleaner wastewater discharge stream.

We are frustrated. We have sent formal comment to the Sunset Advisory Committee on behalf of our organization and the residents and users of the lake and river. I have also notified personnel and member organizations in the Greater Edwards Aquifer Alliance, whose executive director suggested I contact you directly.

The bottom line is, we need your help in getting Texas to protect its surface waters. Can you help?