



SAN ANTONIO
RIVER AUTHORITY

Primary Contact Recreation Standard POSITION PAPER

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POSITION STATEMENT

The San Antonio River Authority (SARA) is dedicated to attaining a water quality standard throughout the San Antonio River Basin that meets the Texas Commission on Environmental Quality's (TCEQ) primary contact recreation classification. This means the water quality in the rivers and creeks of the San Antonio River Basin will be suitable for activities such as wading, swimming, kayaking and canoeing.

IMPORTANCE TO THE SAN ANTONIO RIVER WATERSHED

The 4,194 square miles of watershed that feed the San Antonio River contain diverse sources of contaminants that may affect water quality in the River and its tributaries. Reducing these sources to achieve a water quality standard in the river and creeks within the basin that is consistently safe for human contact would generate lasting and recognized improvements to the health of the overall watershed, enhance community appreciation for the San Antonio River and its tributaries and ensure that the rivers and creeks contribute to an improved quality of life for all residents.



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SUMMARY

The TCEQ bases its contact recreation standard on the level of E. coli bacteria in a river or creek. SARA has an extensive water quality monitoring program that compiles and reports data on bacteria levels and other water quality parameters to the State. Based on this data, out of a total of 13 classified stream segments in the basin, 7 currently do not consistently meet the TCEQ's primary contact recreation standard. SARA has determined that the most significant contribution to the elevated bacteria level is non-point source pollution from stormwater runoff. During rain events, bacteria are accumulated from various land uses and multiple sources and is then discharged through stormwater system outfalls into rivers and creeks. These bacteria sources are considered non-point sources of pollution because they do not come from one source and are often difficult to locate and mitigate.

Through our water quality monitoring program, SARA staff is working to identify and reduce these non-point sources of bacteria through creating and implementing watershed protection plans, influencing public policy decisions made by partner government entities and educating developers, business owners and the public. SARA has already seen positive results in the reduction of bacteria sources through these efforts and will continue to proactively address sources as they are identified.

Some groups within the State believe that setting a high quality standard on rivers and creeks, particularly in urbanized areas or other river segments where contact recreation may not be encouraged, is inappropriate and have urged the TCEQ to allow some rivers and creeks to have a higher level of E. coli bacteria while still meeting State standards. While this would potentially allow the State to remove many stream segments from the list of impaired water bodies, it relaxes the standard without any improvement in water quality. Allowing higher levels of bacteria will discourage efforts to address and reduce the sources of pollution thereby further degrading the health of the State's rivers and creeks. SARA does not support the relaxation of water quality standards on any river or creek within the San Antonio River Basin. SARA continues to promote cost effective land use practices that reduce bacteria sources. Our goal is having all rivers and creeks within the basin consistently meet TCEQ's contact recreation standard by 2020.

River Authority Executive Committee Approved on February 8, 2012. Revised and Approved January 2020.