



Texas Environmental Justice Advocacy Services

October 8, 2024

Comment on Proposed Rulemaking (Rule Project Number 2024-003-039-LS) pg. 1. Additional comments on behalf of Texas Environmental Justice Advocacy Services. (T.E.J.A.S) We are the oldest Latino-led organization in Houston, Texas. As an Environmental Justice Organization committed to advocating for equitable environmental policies, we appreciate the opportunity to comment on the proposed rule changes outlined in Rule Project Number 2024003-039-LS. We recognize that these changes are driven by TCEQ's Sunset bill (Senate Bill 1397) and recommendations from the Sunset Commission's report, particularly concerning public notice procedures. While we support efforts to enhance the regulatory framework, we believe certain aspects of the proposed changes could be improved to better serve marginalized communities and ensure greater transparency and inclusivity.

1. TCEQ must disclose the type of meeting and whether all members of the public can attend and provide public comment. Upon notice of the public meeting, the public needs information on the definition of the type of meeting. These classifications should not be used interchangeably. Meeting classification should be used consistently and with clear communication with the public. For example, public hearings, public meetings, and stakeholder meetings should be explained clearly, and the public should know whether everyone is invited to attend.
2. All TCEQ public meetings should automatically be rescheduled when a disaster declaration is in effect.
3. TCEQ must provide members of the public with as many options as possible for participating in public meetings. These options must include in-person, virtual, and call-in options.
4. TCEQ can require applicants who share materials and information at a public meeting to share the same information within a reasonable time with interpretation services for the public meeting to allow appropriate translation of materials. These materials should also be provided to the public in English and in the translated version on the meeting day.

These recommendations will, we believe, contribute to a more transparent, equitable, and effective rulemaking process that aligns with environmental justice principles. Thank you for considering our input.

Respectfully,  
Deyadira Arellano  
Tejas Staff | Texas Environmental Justice Advocacy Services  
900 N. Wayside, Houston, Texas 77011  
tejasbarrios.org