

# Eli Hilbert

Dear TCEQ Commissioners,

I am writing to comment on the proposed rulemaking to amend 30 TAC Chapter 39 and Chapter 55 on Project Number 2024-003-039-LS.

**Enhanced Public Engagement and Opportunities for Participation**

**Increase Public Engagement:** Hold pre-application informational sessions, workshops, and community meetings at accessible venues to ensure broad participation, especially from marginalized communities.

**Outreach Programs:** Distribute printed materials in multiple languages at public places to inform affected communities of their rights and resources.

**Better Focus on Environmental Justice**

**Application Review:** Ensure thorough application reviews for completeness and accuracy, addressing outreach and translation requirements. Applications should not be approved unless all reviewers have had the chance to sign off on their approval, regardless of internal TCEQ timelines.

**Simplified Language:** Use plain language in notices and provide summaries in multiple languages.

Distribute through an online public database, newspapers, bulletins, and radio.

**Targeted Outreach:** Implement door-to-door canvassing, community meetings, and collaborations with local organizations.

**Cultural Sensitivity:** Ensure notices and hearings are culturally sensitive and accessible in multiple languages.

**Transparency and Information Accessibility**

**Public Accessibility:** Make all documents publicly accessible online in one easy-to-use database and provide physical copies at local facilities.

**Digital and Traditional Notifications:** Use digital platforms and traditional methods like community bulletins, newspapers, and radio for dissemination.

**Real-Time Alerts:** Create a community alert system for real-time emergency communications and air quality data via SMS.

**Clear Communication:** Use non-technical language in notices and summarize key issues, health, and ecological impacts.

**Legal and Technical Assistance**

**Provision of Legal Aid:** Implement free or subsidized legal aid programs, partnering with local non-profits.

**Technical Assistance Programs:** Help the public understand complex permit applications through community workshops.

**Cost Allocation and Accountability**

**Applicant Responsibility for Outreach and Assessments:** Require applicants to fund independent assessments and conduct outreach, including informational sessions and distributing notices.

**Fee Structures:** Develop a fee structure where applicants contribute to a fund supporting public participation and legal assistance.

**Verification and Accountability:** Applicants must submit detailed outreach and assessment plans for TCEQ approval during the application period and be responsible for periodic verification once approved.

#### **Comprehensive and Cumulative Impact Assessments**

**Health Impact Assessments:** Mandate comprehensive health impact assessments and distribute summaries in local health clinics.

**Environmental Impact Statements:** Require detailed environmental impact statements with simplified summaries located digitally and in public facilities.

**Cumulative Impact Assessments:** Include assessments of cumulative impacts from multiple permits and make them accessible in government offices and community centers.

#### **Reduce Consolidated Permit Complexity**

**Enhanced Coordination:** Improve inter-agency coordination and provide updates through community meetings.

**Facilitate Public Participation:** Through hearings and comment periods, offer multiple opportunities for public input on different aspects of the permit.

**Cumulative Impact Assessment:** Require cumulative impact assessments for consolidated permits and make them available in public libraries and community centers.

These recommendations aim to enhance public engagement, transparency, and environmental justice in TCEQ's permitting processes, ensuring better protection of public health and the environment. Thank you for considering these comments.