

October 1, 2024

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Re: Comment on Proposed Rulemaking (Rule Project Number 2024-003-039-LS)

My name is Ana Parras, I am the Co-Director of Texas Environmental Justice Advocacy Services. (T.E.J.A.S) We are the oldest Latino lead 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 2024-003-039-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. Enhanced Accessibility and Transparency: We urge the TCEQ to ensure that the revised public notice procedures include robust measures to enhance accessibility for all community members, especially those in low-income and minority communities. This includes:

- **Multilingual Notices:** Providing public notices in multiple languages spoken within the community to ensure non-English speakers can fully understand and engage with the information.
- **Accessible Formats:** Offering notices in accessible formats for individuals with disabilities, including large print, braille, and audio formats.

2. Community Engagement: The proposed changes should prioritize meaningful engagement with affected communities. We recommend:

- **Early Notification:** Implementing a requirement for early and proactive notification to communities likely to be impacted by environmental regulations, giving them ample time to review and respond.
- **Community Meetings:** Holding public meetings in accessible locations and at convenient times for working families and those who may face transportation barriers.

3. Feedback Mechanisms: We suggest enhancing mechanisms for receiving and addressing public comments to ensure that community feedback is not only solicited but also thoroughly considered in the decision-making process. This could include:

- **Feedback Summaries:** Providing summaries of public comments and TCEQ's responses to them as part of the rulemaking process.
- **Follow-Up Actions:** Clearly outlining how feedback has influenced the final rules and any subsequent actions taken by TCEQ.

4. Equitable Impact Assessments: We recommend incorporating a requirement for environmental and social impact assessments to evaluate how changes may disproportionately



affect vulnerable communities. These assessments should be publicly available and provide detailed analysis on how equity considerations are addressed.

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

Respectfully,

Ana M. Parras

Co-founder * Co- Director | Administrator

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