

Ana Parras

Good evening my name is Ana Parras, I am the Co-Director of Texas Environmental Justice Advocacy Services. We are the oldest Latino Lead EJ organization in the East End of Houston. Our organization filed a Title VI in 2019 on Language Justice. It has been a lengthy process and part of it is policing TCEQ. Making sure they provide translations, and that Notices are also translated and that translators are trained and certified. Our organization supports the proposed Rule Making that aims to enhance public engagement, accessibility, and transparency in TCEQ's permitting processes. We have the following recommendations:

- Hold pre-application informational workshops, and community meetings at accessible venues, especially for the impacted communities.
  - Thoroughly review applications for completeness and accuracy, addressing outreach and translation requirements.
  - Use plain language in notices and provide summaries in multiple languages.
  - Ensure Language Access in notices, hearings, and responses to comments.
- 2. Improve Transparency and Communication:**
- Make all documents accessible online and in local facilities in multiple languages.
  - Simplify language in notices and use visual aids, when possible, in multiple languages.
  - Enhance inter-agency coordination and provide updates through community meetings.
- 3. Expand Information Availability and Time to Comment:**
- Offer pre-hearing information sessions and extend comment periods to 36 hours across all permit types.
  - Broaden eligibility criteria for contested case hearings to include broader public interest.
  - Provide technical assistance programs to help the public understand and engage in the permitting process in multiple languages.
- 4. Comprehensive and Cumulative Impact Assessments:**
- Require detailed environmental impact statements with simplified summaries in multiple languages.

These recommendations are to ensure that the public is well-informed and able to meaningfully participate in TCEQ's permitting processes, protecting public health, and enhancing transparency.

