

BIG I-Plan Comments

Organization	Reference	Comment
HCFC	Executive Summary, Table 1, p. 17, item 1.0	The summary should be reworded as follows: <i>“Increase monitoring requirements, support the authority of TCEQ to impose stricter bacteria limits, require updates to facilities not able to comply with permit limits when there are no viable alternatives, and increase enforcement.”</i>
HCFC	Executive Summary, Table 1, p. 17, item 3.0	The summary should be reworded as follows: <i>“Expand storm water management programs, develop a recognition program, and petition TCEQ to facilitate reimbursement of bacteria reduction measures.</i>
Rodrigo Carreon, Fort Bend County Citizen/ 1/31/11	Implementation Strategy 1.0: Wastewater Treatment Facilities	I am concerned about discharges from wastewater treatment facilities, particularly from MUDs.
Sims Bayou Coalition (Evelyn Merz) 1/31/2011	Implementation Strategy 1.0: Wastewater Treatment Facilities	The largest facilities, in particular, must have permit renewals as required (every five years). (The City of Houston’s Sims Bayou WWTF and 69 th Street Plant were mentioned as examples of large facilities.)
Tom Ivy 2/7/2011	Implementation Strategy 1.0: Wastewater Treatment Facilities	I am concerned that the WWTF permits are not always renewed every five year. If a permit has not been renewed in five years, it should be a priority.
Davis Bonham Smith, Murdaugh, Little & Bonham, L.L.P. 1/27/2011	Implementation Strategy 1.0: Wastewater Treatment Facilities, Activity 1.1	There are concerns at MUDs regarding <i>how</i> to test for bacteria in effluent. Folks want to follow the rules, but they don’t know how.

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HCFC	Implementation Strategy 1.0: Wastewater Treatment Facilities, Activity 1.2, p. 33, second paragraph	This section reads as though the I-Plan requires stricter bacteria limits on WWTF, when in reality “the commission” or TCEQ has the real legal authority to impose stricter bacteria limits (63 MPN/100ml vs. 126 MPN/100ml). We suggest rewording “ <i>the BIG resolves that</i> ” to read, “ <i>the BIG supports the authority of TCEQ to impose stricter bacteria limits in the BIG project area.</i> ”
Sims Bayou Coalition (Evelyn Merz) 1/31/2011	Implementation Strategy 1.0: Wastewater Treatment Facilities, Activity 1.3, p. 34	I have concerns about TCEQ’s ability to enforce WWTF and other permits.
HCFC	Implementation Strategy 1.0: Wastewater Treatment Facilities, Activity 1.5, p. 35	This section and Table 1 imply that WWTFs unable to meet their permit limit are required to upgrade their facility when other options may include regionalization or ceasing operation. We suggest adding “ <i>if there are no other viable alternatives</i> ” to clarify that upgrades are not the only option. The second sentence in this section would therefore read as follows: “ <i>Upgrades or repairs, as appropriate, will be the responsibility of each individual facility in order to comply with individual permits if there are no other viable alternatives.</i> ”
Comment meeting 2/10/2011	Implementation Strategy 1.0: Wastewater Treatment Facilities, Activity 1.6, p. 36	Should we be consolidating wastewater facilities? There seem to be a lot of them.
Rodrigo Carreon, Fort Bend County Citizen/ 1/31/11	Implementation Strategy 1.0: Wastewater Treatment Facilities, and Implementation Strategy 2.0: Sanitary Sewer Systems	Inflow and Infiltration (I&I) is a big problem in Arcola, causing upsets. Manholes are often <i>in</i> a ditch, so if there is an overflow, it goes right into the waterway.

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Anonymous/ Constant Contact Respondent 2/7/2011	Implementation Strategy 1.0: Wastewater Treatment Facilities, Implementation Strategy 2.0: Sanitary Sewer Systems	Most important strategies: IA I concerning WWTF, bacterial monitoring especially increased enforcement and unannounced inspections. 2.0 concerning SSO particularly better maintenance and power outage suggestions.
HCFCFCD	Implementation Strategy 1.0: Wastewater Treatment Facilities, p. 29, second paragraph	We suggest including the date when bacteria limits began being imposed on new permits and renewal of permits.
HCFCFCD	Implementation Strategy 10.0: Research, p. 78	Replace the word " <i>feasible</i> " with " <i>practicable</i> " to maintain consistency with our MS4 permit terminology.
Anonymous	Implementation Strategy 10.0: Research, p. 78	Please indicate that, while the three research priorities are presented in a numerical order, this is not a rank order.
HCFCFCD	Implementation Strategy 10.0: Research, Priority 10.1, p. 79, fourth sentence	We believe that reference to " <i>smart growth</i> " should be removed since it does not apply to this bacteria I-Plan.
Rodrigo Carreon, Fort Bend County Citizen/ 1/31/11	Implementation Strategy 2.0: Sanitary Sewer Systems	Fort Bend County MUD 141 wants to tap into the City of Arcola WWTF (as a subscriber system), but Arcola only has the capacity now to serve schools, not residential homes.
Jim Wolff	Implementation Strategy 2.0: Sanitary Sewer Systems, Activity 2.3, p. 40, second paragraph	Natural gas-fueled diesel generators or diesel-fueled generators may be more practical than some of the suggestions included in 2.3.

Organization	Reference	Comment
Rodrigo Carreon, Fort Bend County Citizen/ 1/31/11	Implementation Strategy 3.0: On-Site Sewage Facilities	Our community has small lots (50x100) and OSSF and wells. The <i>new</i> OSSF seem to be working. The wells had smelly, yellow water, but the community has begun getting water from a Fort Bend Fresh Water Supply District #1 next to Arcola. The community is looking to have Arcola annex the district so that wastewater and drinking water treatment and delivery can be combined.
Rodrigo Carreon, Fort Bend County Citizen/ 1/31/11	Implementation Strategy 3.0: On-Site Sewage Facilities	For the purpose of irrigation, would like to have actual OSSF equipment retained after connection to sanitary sewer system.
Sims Bayou Coalition (Evelyn Merz) 1/31/2011	Implementation Strategy 3.0: On-Site Sewage Facilities	Would like to see OSSF permit renewals upon transfer of property.
John Burlingame 1/31/2011	Implementation Strategy 3.0: On-Site Sewage Facilities	I think that OSSF inspections should be conducted at least whenever property changes hands, if not more often.
South Montgomery County Stormwater Coalition 1/27/2011	Implementation Strategy 4.0: Storm Water and Land Development	Right now, we are only testing stormwater for ammonia, benzene, soap, and chlorine. Not really sure how bacteria will play into testing stormwater.
South Montgomery County Stormwater Coalition 1/27/2011	Implementation Strategy 4.0: Storm Water and Land Development	Pertaining to the MS4 requirement for education, they are working with the Montgomery County Spring Creek Greenway Nature Center to provide grants for school busses. The education requirements for the permits are really ramping up.
South Montgomery County Stormwater Coalition 1/27/2011	Implementation Strategy 4.0: Storm Water and Land Development	How do you think MS4 Phase II permitted areas will expand?

Organization	Reference	Comment
South Montgomery County Stormwater Coalition 1/27/2011	Implementation Strategy 4.0: Storm Water and Land Development	We have concerns about fertilizer and algae growth in waterways. We would like to know more about selecting and applying fertilizer to prevent algae growth.
South Montgomery County Stormwater Coalition 1/27/2011	Implementation Strategy 4.0: Storm Water and Land Development	Would like to know more about how to retrofit a dry-bottom detention basin to improve water quality.
Anonymous/ Constant Contact Respondent 2/7/2011	Implementation Strategy 4.0: Storm Water and Land Development	Missing? IA 4 for stormwater is too tepid, lacks urgency and entirely too long a time line. Recognize that knowledge is incomplete but this is not going to fix that. Glad it made it into the research IA but again no urgency, no commitment, no one in charge. 25 years way too long a time frame.
Anonymous/ Constant Contact Respondent 2/7/2011	Implementation Strategy 4.0: Storm Water and Land Development	Strategy that faces the most obstacles? IA 4 Stormwater and land development.
HCFCFCD	Implementation Strategy 4.0: Storm Water and Land Development, Activity 4.1, p. 51	Include " where practicable " on the end of the bullet " <i>How to incorporate bacteria reduction elements into flood control features</i> " to maintain consistency with our MS4 permit.
HCFCFCD	Implementation Strategy 4.0: Storm Water and Land Development, Activity 4.3, p. 52	The appropriate terminology for TPDES MS4-permitted programs is Storm Water Management Programs (SWMP) and not storm water quality programs. All references to " <i>storm water quality programs</i> ", including the section title, should be revised to " Storm Water Management Programs " to maintain consistency with the NPDES and TPDES programs.

Organization	Reference	Comment
South Montgomery County Stormwater Coalition 1/27/2011	Implementation Strategy 5.0: Construction	Enforcement of SWPPPs is difficult. The folks (developers and construction workers) from Harris County seem to understand stormwater requirements (even if they don't like it), but the folks who don't work in Harris County often do not understand or are not aware of requirements.
Tom Ivy 2/7/2011	Implementation Strategy 5.0: Construction	I would like to see rewards for contractors doing a good job with construction (e.g., the contractors at Piney Point Elementary).
HCFCFCD	Implementation Strategy 5.0: Construction, Activity 5.1, p. 55, fourth sentence	The second to last sentence referencing turbidity limits being added to CGPs is no longer accurate since EPA has issued a stay to reconsider the numeric limits. http://water.epa.gov/scitech/wastetech/guide/construction/index.cfm We suggest deleting this sentence or updating it to reflect this recent change.
HCFCFCD	Implementation Strategy 5.0: Construction, p. 55, first sentence	In the opening sentence, what is the difference between " <i>new structures and infrastructure?</i> " We suggest changing to " <i>new and expanded infrastructure.</i> "
HCFCFCD	Implementation Strategy 5.0: Construction, p. 55, third and final sentences	Does data exist to support the conclusion that construction runoff is a source of nutrients? If so, this should be referenced. If not, we suggest deleting the last sentence and reference to "nutrients" in the third sentence.
South Montgomery County Stormwater Coalition 1/27/2011	Implementation Strategy 6.0: Illicit Discharges and Dumping	I see that people are dumping 55-gallon drums in the middle of the night. Same for tires, lawnmowers...
Tom Ivy 2/7/2011	Implementation Strategy 6.0: Illicit Discharges and Dumping, Activity 6.1	It is important to walk the channels and identify problems.
Comment meeting 2/10/2011	Implementation Strategy 7.0: Agriculture and Animal Sources	Runoff from agricultural sources should have more attention. The rancher downstream is screaming the loudest. Aren't there regulatory measures that can be enforced against agriculture?

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Comment meeting 2/10/2011	Implementation Strategy 7.0: Agriculture and Animal Sources	The plan passes the buck to voluntary activities.
Comment meeting 2/10/2011	Implementation Strategy 7.0: Agriculture and Animal Sources, Activity 7.2	Feral hogs are overemphasized in the plan; they are a red herring.
Bettie Moss, League City resident 2/7/2011	Implementation Strategy 8.0: Residential	Once we pick up after our dog, what do we do with it? If we put it in the garbage, it just goes to a landfill. What happens to it then?
Bettie Moss, League City resident 2/7/2011	Implementation Strategy 8.0: Residential	Agrees that fertilizer should not be applied at rates greater than those specified in the instructions for the fertilizer. Fertilizer can often be used less frequently than that.
Comment meeting 2/10/2011	Implementation Strategy 8.0: Residential	I hadn't thought about the number of pets that might be contributing to water quality problems.
Comment meeting 2/10/2011	Implementation Strategy 8.0: Residential	People don't value the waterways, or recognize that they are something worth saving. We need to help people understand the value of our waterways. The majority of public opinion is that the waterways are only for drainage.
Comment meeting 2/10/2011	Implementation Strategy 8.0: Residential	Animals in residential areas may be a problem.
Anonymous	Implementation Strategy 8.0: Residential, p. 67, general comment/question	Didn't the City [of Houston] recently begin requiring parking to be on impervious cover?

Organization	Reference	Comment
Harris County PID-A&E 2/14/2010	Implementation Strategy 9.0: Monitoring and Plan Revision, Activity 9.2 Implement Targeted Monitoring	Please add to the bulleted list: * Changes in bacteria levels throughout the day in our bayou systems This is relevant due to the University of Houston research that concluded that bacteria levels in the bayous are significantly higher in the morning hours than they are in the afternoon hours. As all Clean Rivers Program samples are taken in the morning hours, this could have considerable impact on our area. Efforts should be made to confirm the results and use that understanding to better describe the impairment and instream dynamics.
HCFCD	Implementation Strategy 9.0: Monitoring and Plan Revision, Activity 9.2.2, page 74	HCFCD is directing and funding the development of the regional BMP effectiveness database and has retained the services of PBS&J as a consultant to assist in developing this database. However, PBS&J is operating under HCFCD's direction and is not responsible for this new database. Therefore, we suggest deleting reference to PBS&J in this section.
HCFCD	Implementation Strategy 9.0: Monitoring and Plan Revision, Activity 9.2.3, p. 75	Replace the word " <i>feasible</i> " with " <i>practicable</i> " to maintain consistency with our MS4 permit terminology.
HCFCD	Implementation Strategy 9.0: Monitoring and Plan Revision, Activity 9.3, p. 75	It should be clarified that MS4 permit holders may provide their Annual Report to update the tracking of activities implemented each year rather than developing a separate report. We suggest inserting the following sentence after " <i>Each year, the individual stakeholders will provide a report...regarding the activities</i> ": " MS4 permit holders may provide their Annual Report submitted to TCEQ. "

Organization	Reference	Comment
Harris County PID-A&E 2/14/2010	Research Priority 10.1: Evaluate the Effectiveness of Storm Water Implementation Activities	Please remove discussion of <u>smart growth</u> as a storm water implementation activity as it does not apply to this bacteria I-Plan. Or at a minimum, the inclusion of this element should be reverted to the Land Development Committee for discussion as this really is a land development issue.
Rodrigo Carreon, Fort Bend County Citizen/ 1/31/11	Various, including Implementation Strategy 3.0: On-Site Sewage Facilities, Activity 3.3.3: Biennial Review	Regarding Chapter 285 as it pertains to OSSF—can we require that gray water be separated and directed to stormwater systems? That way, we can reduce the amount of water going to wastewater treatment facilities, and reduce I&I. I would like to know how to be involved in review of Chapter 285, especially how it pertains to gray water.
Harris County PID-A&E 2/14/2010	Appendix E: Local OSSF Amendments	<u>Changes to Harris County's local order</u> for OSSF's were just approved and adopted by TCEQ last week. The appendix will need to be updated with our new rules when they go into effect. Once we get it in the mail from TCEQ and ensure they didn't change anything, we'll get you a copy.

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HCFC	Appendix F: Local Examples of Stormwater Programs	<p>Add information about HCFC stormwater program:</p> <p>“As a member of the JTF, the District participates in a variety of storm water programs with the other co-permittees and manages programs associated with the District’s flood damage reduction infrastructure. The District’s Storm Water Management Program includes regular assessments of water quality impacts by flood control projects, and requires that new flood control structures be designed and constructed to provide pollutant removal to the maximum extent practical. The District maintains channels to reduce erosion, remove debris and litter (including floatables), control nuisance species, and sustain flood damage reduction. Monitoring of floatables within flood control facilities is conducted on an annual basis. The District also maintains an ongoing water quality monitoring program within detention basin sites throughout the County to study BMP effectiveness, and within channels to monitor ambient and wet weather flows. In order to track BMP effectiveness, the District is developing a Regional BMP database to store, share, and analyze water quality monitoring data. Additionally, the District works closely with Harris County to support programs for Construction Site Runoff Control, Illicit Discharge Detection and Elimination, and Public Education. More information can be found at http://www.hcfc.org/.”</p>

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TxDOT	Appendix F: Local Examples of Stormwater Programs	Add information about TxDOT's role in the JTF: "As with other JTF members, the Texas Department of Transportation monitors stormwater run-off and collects stormwater samples for laboratory analysis from specified locations. TxDOT also monitors its outfalls for illicit discharges, and TxDOT has some control over the volume and flow of third party discharges to its MS4. TxDOT also offers training in preventive work practices to its personnel. However, unlike other JTF members, TxDOT does not have direct enforcement authority, so our main tools are education and preventive measures. TxDOT's "Don't Mess With Texas" public education effort is well known and proven. The Adopt a Highway program for public involvement is emulated nationwide and in other countries. Both programs are effective in education and prevention. More information is available at http://dontmesswithtexas.org/ and http://www.dot.state.tx.us/trv/aah/ ."
Sims Bayou Coalition (Evelyn Merz) 1/31/2011	Appendix I: Maps	Would like to see a map of the project area that shows segment numbers and assessment units in addition to names.
Gerhard Meinecke 2/1/2011	Appendix I: Maps	Would like a map that shows the locations of WWTF 10 MGD or larger, for example the 69 th Street plant and the Sims Bayou Plant.
Anonymous	Appendix K: I-Plan Matrix, p. 168	The term " <i>I-Plan Matrix</i> " is not adequately descriptive. Recommend specifying, " <i>I-Plan Matrix comparing implementation activities to the nine elements of a Watershed Protection Plan</i> "
Rodrigo Carreon, Fort Bend County Citizen/ 1/31/11	General	Could landfills be a source of bacteria loading? A landfill (Permit no. MSW1505A) upstream of the Shadow Creek neighborhood near Pearland has a permit that does not reference federal or state waterways in the permit application, yet all of the stormwater drains into the Clear Creek watershed. (The community gets its drinking water from wells right now, and the community has concerns that the landfill may be leaking benzene.)

Organization	Reference	Comment
Rodrigo Carreon, Fort Bend County Citizen/ 1/31/11	General	I would like to participate in citizen surface water quality testing. (Said in the context of WWTF.)
Rodrigo Carreon, Fort Bend County Citizen/ 1/31/11	General	Concerns regarding Fort Bend County MUDs 23, 24. (Do these drain to Chocolate Bayou?)
Sims Bayou Coalition (Evelyn Merz) 1/31/2011	General	The draft is not specific enough to be a useable actions plan. The lack of real deadlines and specifics regarding funding will make this a “shelf-sitter.”
Maria Modelska 1/31/2011	General	There is no information about the BIG on the EPA’s Surf Your Watershed website (http://cfpub.epa.gov/surf/locate/index.cfm). You may want to share information through this forum.
Davis Bonham Smith, Murdaugh, Little & Bonham, L.L.P. 1/27/2011	General	Seems to make sense
Huitt-Zollars 1/27/2011	General	Why isn’t Carpenter’s Bayou in the project area? We help utilities down there, and they are among the oldest utilities they work with.
South Montgomery County Stormwater Coalition 1/27/2011	General	Very comprehensive.
Gerhard Meinecke 2/1/2011	General	Why aren’t all of the areas working together? The solutions to these problems will have many common elements. I live in the Dickinson Bayou watershed, and I do not want to start over. Would like to explore the possibility of using the draft I-Plan as a starting point.
Gerhard Meinecke 2/1/2011	General	The plan would benefit from timelines, funding, and additional enforcement.

Organization	Reference	Comment
Anonymous	General	What does this mean for special purpose districts? I am in a drainage district in Galveston County.
Jack Murphy City of League City 2/1/2011	General	What can you do, realistically? The plan answers that question in a way that everyone can agree.
Panelists, CFH Symposium 1/28/2011	General	[General comments from panelists will be transcribed/summarized here once the video is available. Comments generally positive.]
Traceymarg, Chron.com commenter 1/25/2011	General	A terrible thing happened to my house on Friday, Jan. 21. Sewage backed up into my home, ruining my bathroom floors, baseboards, and bedroom carpet. It was determined the line from my home was clear, the city's line was clogged. Guess what? Since the city is at fault for the sewer backup, my homeowner's insurance refuses to pay for the damages. The city is also claiming they are not responsible for the damages even though they failed to maintain clear sewer lines. A law should be passed requiring cities to routinely inspect sewer lines and perform necessary repairs to protect the tax paying, water/sewer bill paying citizens. A city should also not be allowed to hide behind sovereign immunity if it has been negligent in maintaining properly working sewer lines.
writerdude, Chron.com commenter 1/25/2011	General	Artificial wetlands, catchments, and green roofs are a few good places to start. All passive treatment methods.
Watch4Us2, Chron.com commenter	General	This sounds vague, expensive, and governmental. A trifecta of trouble.

Organization	Reference	Comment
1/25/2011		
TXPatriotGal, Chron.com commenter 1/25/2011	General	Sometimes PUBLIC COMMENT is the only thing standing between BigBro and the citizenry. Everyone might want to check this out and find out what exactly the plan entails, and what, if any costs to the taxpayers/customers are attached to it. Gov't is doing a LOT behind-the-scenes right now -- it's a good idea to stay INFORMED.
Anonymous/ Constant Contact Respondent 2/7/2011	General	<p>General Comment:</p> <p>I know this is a consensus document and noone wants to shoulder any added costs, but it seems too relaxed. The Clean Water Act has been around for more than 40 years and after all that time we get a lot of "if resources are /become available" someone maybe will undertake to conduct an educational program. The IA for WWTF is stronger and that's good, also the IA for sanitary sewer systems but those are IA's where there are permit holders and it is easier to gain their cooperation - in theory. 25 more years is too long and noone I fear will give these IAs another thought until year 20 and then we'll start over and the bayous will be no better. I hope not but that's my fear.</p>

Organization	Reference	Comment
<p>“ABC” (received via e-mail) 2/11/2011</p>	<p>General</p>	<p>I went to the BIG page and have these comments/questions (for starters) concerning the TMDL/Bacteria Implementation Group:</p> <ol style="list-style-type: none"> 1. how is the term "public" ("representing" column) defined? how did that come about (process)? Most names in the column represent "entities/companies with the exception of "Tom Ivy" who is a Water Quality Volunteer. 2. does this plan work to complement any other TMDL/Bacteria plan available (be it in draft or not) in the (surrounding) area, by any other entity? I believe there is 1 on the TCEQ Commissioners' desk since last summer (with comments)... If there are more than 1, who is the overseer/coordinator/central point of contact to be sure we can all share the "lessons learned"? <p>Thanks, A Galveston County citizen</p>
<p>Grace Martinez 2/9/2011</p>	<p>General</p>	<p>--Not much background information is provided in the plan—specifically how high the bacteria levels are, what sort of risk the bacteria levels represent, and what defines contact recreation</p> <p>--how do people know about the bacteria in the water?</p> <p>--Should people with compromised immune systems be swimming in the water?</p> <p>--There needs to be money to test the sanitary sewer systems to see if they are leaking.</p> <p>-- if the plan gets approved/accepted by TCEQ, will it do anything?</p> <p>--what are major milestones?</p> <p>--how much will it cost?</p> <p>--the plan contains little concrete information about costs and major milestones.</p>
<p>Comment meeting 2/10/2011</p>	<p>General</p>	<p>In Terry Hershey Park, the wastewater facility has a strong, foul odor.</p>

Organization	Reference	Comment
Comment meeting 2/10/2011	General	I kayak and surf, but won't go in the water in the summer. I didn't realize you shouldn't go in the water after a rain event.
Comment meeting 2/10/2011	General	I think it is great that this project is in the works. I'd like to know that I could go swimming and not get a rash. If there is a way to clean up the waterways, then I'm all for it.
Comment meeting 2/10/2011	General	Are there opportunities for MUDs to get together and discuss issues?
Comment meeting 2/10/2011	General	The lack of zoning in Houston is a problem.
Comment meeting 2/10/2011	General	The plan should focus on protecting the natural jewels—the ones that aren't polluted. Would love to see some of the waterways reforested—there is too much clearcutting along waterways.
Comment meeting 2/10/2011	General	Is there a relationship between observed diurnal patterns in bacteria levels and flushing patterns?
Comment meeting 2/10/2011	General	Is reducing bacteria as popular as reducing chemicals in the water?
Comment meeting 2/10/2011	General	Is there public reporting or public education to report offenders?
Comment meeting 2/10/2011	General	Are bacteria levels effected by stagnant vs. moving water? Does the operation of the reservoirs effect bacteria levels?
TAEP conference, Aston Hinds, Port of Houston Authority	General	How much will this plan cost?
Tom Ivy 2/7/2011	General	Are regulations and consequences sufficient to make sure these activities occur? What can be done to make these enforceable?
Tom Ivy 2/7/2011	General	Why are some areas—for example, lower portions of Sims or Cedar Bayou—not included in the plan?

Executive Committee

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Katharine C. Lord, **Executive Director**

February 14, 2011

Bacteria Implementation Group
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Re: Public Comments on the Bacteria Implementation Group (BIG)
Implementation Plan (I-Plan)

Rachel,

The Bayou Preservation Association (BPA) has been engaged in the discussion and decision making of the various Total Maximum Daily Load (TMDLs) for bacteria that led to the current BIG I-Plan. BPA is a stakeholder in the BIG and an active participant in some of the Workgroups, particularly Stormwater and Research. The BPA supports the consensus I-Plan issued as a draft for public comment on December 8, 2010. BPA's support is based principally on the inclusion of an adaptive management approach as described on page 27 of the draft. We remain skeptical, however, that the implementation activities, as currently listed, will achieve the plan's goal of reducing bacteria levels to contact recreational standards.

Throughout the BIG stakeholder meetings BPA has consistently advocated for a higher level of implementation for the improvement of water quality. Our major concerns are: 1) too little is being done to reduce indicator bacteria in stormwater, 2) nothing is being done to reduce nutrient discharges from wastewater treatment facilities (WWTFs), and 3) sediment from in-stream erosion is not addressed. We understand the reasons these features were not incorporated into the I-Plan is that more research is needed to justify such measures. BPA's support is based on the promise of effective implementation of the active management plan and continued enhancement of standards as all parties gain experience and data from the active management process.

Bacteria are naturally occurring in the environment and essential for the decomposition of naturally occurring contaminants in the environment. Health risks to humans increase when levels of indicator bacteria exceed natural amounts. For this reason, standards established by EPA and TCEQ need to be strictly enforced. Cleaning up our waterways will continue to be costly. We acknowledge intense competition for limited tax dollars makes environmental concerns seem a low priority. Still we reject arguments that cleaning up our waterways is infeasible and not practicable.

Dissolved nutrients discharged from WWTFs, such as compounds containing nitrogen, phosphorus and carbon, promote growth of bacteria. Efforts should be accelerated to reduce the concentrations of dissolved nutrients discharged from WWTP as well as via storm water.

Trash washed into our bayous through the storm drainage system also promotes bacteria growth by impeding sunlight penetration that would otherwise control some bacterial and the trash becomes a substrate for bacterial growth and biofilms. Pipes connecting storm water inlets to the outfalls are unimpeded and litter and solid waste dumping pass through this conveyance. If we had significantly less improperly managed solid waste, this would not matter. We concede that current data is insufficient to mandate modifying standard stormwater outfall details. This does not justify continuing to construct drainage conveyance that perpetuates this problem.

Sediment transport of bacteria is a problem in our natural streams because storm surge inflows caused by development exceed natural levels and accelerate erosion along the banks. Efforts to detain storm surges are helping, but more work is still required. We propose using nature as model to restore our waterways. A particular problem exists on Buffalo Bayou where discharges from Addicks and Barker Reservoirs are held artificially high for prolonged times. Plants that would normally stabilize the lower portions of the soil, large areas frequently slough off into the bayou. Efforts should continue to reduce the effects of development that accelerate runoff rates. These include detention and retention facilities and Low Impact Development features

BPA will continue to participate as a stakeholder in the BIG. We look forward to the research and monitoring that will be reported in the annual reviews as opportunities to revise the I-Plan and add these measures essential to improving water quality. As the I-Plan goes forward, BPA will be attentive to seeking funding opportunities that will assist the BIG with further water quality monitoring and research.

Sincerely,



Bruce Heiberg,
VP Projects

Cc: Kevin Shanley, Chairman of the Board
Ty Kelly, President,
Jack Sakolosky, VP Water Quality
Kathy Lord, Executive Director
Steve Hupp, Water Quality Director