



February 29, 2012

U.S. Environmental Protection Agency MC 4203M
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Docket ID No. EPA-HQ-OW-2011-0986

The following comments are submitted on behalf of the Water Environment Association of Texas (WEAT) and the Texas Association of Clean Water Agencies (TACWA). WEAT and TACWA members are responsible for the design, operation, and maintenance of publically owned wastewater collection and treatment systems all across Texas.

Thank you for the opportunity to comment on the Draft Integrated Municipal Stormwater and Wastewater Planning Approach Framework under the Clean Water Act. WEAT and TACWA support the concept allowing public utilities the opportunity to develop a comprehensive plan to address stormwater and wastewater needs in a sequenced fashion that will address the most pressing environmental and public health needs first.

WEAT and TACWA generally agree with and endorse the detailed comments that have been presented by the Water Environment Federation (WEF) and the National Association of Clean Water Agencies (NACWA). However, there are a few points that we would like to particularly emphasize as noted below:

- Texas wastewater utilities are disappointed that no stakeholder meetings were held in Region 6, especially given the large number of major municipal permit holders in this region. The fact that Texas utilities were not given easy access to stakeholder meetings

limited input from some of the nation's most innovative utilities. We understand that EPA is considering repeating the stakeholder meeting as a webinar. Texas permittees would be interested in that opportunity.

- We strongly support the idea that plan details be incorporated into permit conditions rather than enforcement documents. This process should be viewed as a voluntary compliance effort on the part of the permittee and the POTW should not be subject to enforcement action as long as it is in compliance with the elements of an approved integrated plan.
- Drinking water infrastructure should be a part of the planning framework. Many wastewater treatment providers also provide drinking water and must balance the needs of both in their decision making and funding actions.
- EPA should work with permittees and national associations, such as WEF and NACWA, to establish a streamlined process for implementation of this planning process. Development of plans, plan approval and incorporation of plans into permits has the potential to become a complicated multi-year process. Unless the States and the EPA develop a streamlined process and make a commitment to dedicate staff resources to this project, the water quality benefits it was designed to enhance will only be delayed.

Thank you for the opportunity to comment. Please feel free to contact me if you need any additional information.

Sincerely,



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