



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1446 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

July 11, 2017

Mark Wyatt  
Director, Program Administration  
Water Supply & Infrastructure  
Texas Water Development Board  
1700 North Congress Avenue  
Austin, Texas 78711-3231

Dear Mr. Wyatt,

Thank you for your inquiry regarding the City of Houston's request to use the Texas Water Development Board's Clean Water State Revolving Funds (CWSRF) for channel modifications, bridge modifications, and construction of regional stormwater detention basins as part of the Bayou Brays project. We have determined that while there are many aspects of the Bayou Brays project that would be eligible for CWSRF funding, the bridge replacement and/or modification is not eligible under 603(c)(5) nor any other section of Water Resources Reform and Development Act. Though the project description makes it clear that flooding is causing a number of problems, the Brays Bayou project is more about reducing flood risks than water quality.

Other aspects of the Bayou Brays project are eligible for the CWSRF, such as the construction of the stormwater detention basins. Regarding utilization of the CWSRF for channel widening, we have determined that Section 603(c)(7) is not the most viable resource to address increased resilience of a treatment works system. We suggest that the City of Houston consider an alternative approach such as constructing berms around the treatment works system to protect the system against possible impacts of future flood events. We understand that sanitary sewer overflows resulting from flooding of the Brays Bayou is also a concern for the City of Houston. While this may be a factor, a more pressing concern may be that sanitary sewer overflows are occurring due to inflow and infiltration during wet weather events. We suggest the City of Houston consider the replacement of impacted pipe to address this inflow and infiltration issue.

Because we have consulted with Sheila Platt, Team Leader of the United States Environmental Protection Agency's CWSRF Program regarding the eligibilities of various aspects of this project, we are copying her on this response. If you have any questions, you can contact me at 214-665-3172 or [howard.amber@epa.gov](mailto:howard.amber@epa.gov), or David Reazin of my staff at 214-665-7501 or [reazin.david@epa.gov](mailto:reazin.david@epa.gov).

Sincerely yours,

A handwritten signature in cursive script that reads "Amber Howard".

Amber Howard  
Acting Chief  
Community Infrastructure Section  
Water Division

eCC: Sheila Platt, EPA