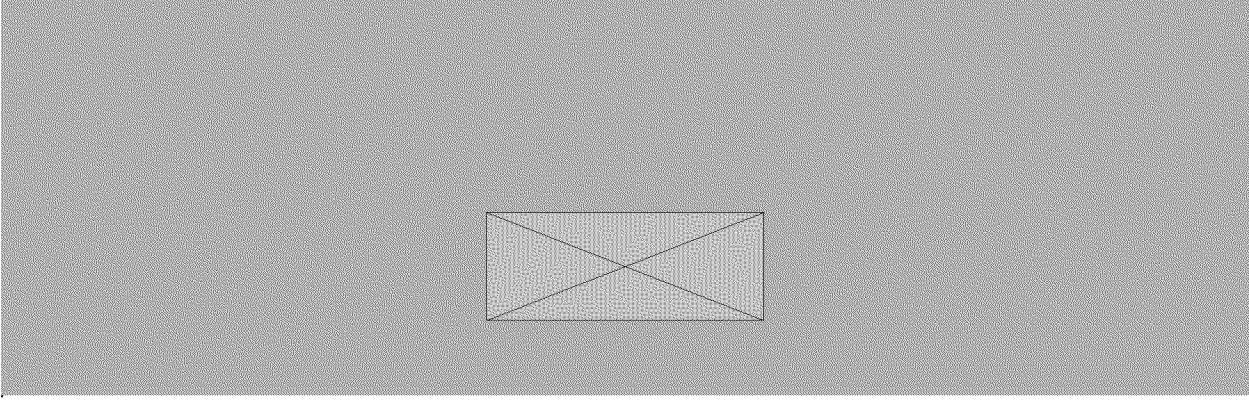


**To:** Jackson, Ryan[jackson.ryan@epa.gov]  
**From:** Green Guy Media  
**Sent:** Wed 9/13/2017 2:02:17 PM  
**Subject:**  Green Guy Media Newsletter  Chattahoochee Riverkeeper Climate Change Conference



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• • •



**To:** Jackson, Ryan[jackson.ryan@epa.gov]  
**From:** Brittingham, Charles II (WAS-CAS)  
**Sent:** Fri 9/8/2017 2:00:05 AM  
**Subject:** Fwd: Hurricane response  
[Coleman Ltr 9.1.17 PDF.pdf](#)  
[ATT00001.htm](#)

FYI -- Bech Bruun from the Texas Water Development Board is meeting with Lee Forsgren on Monday the 11th at 3:45pm to talk about the contents of the attached letter. IF you or Administrator Pruitt can pop into the meeting for a quick hello, I'm sure Bech ("Beck") and Governor Abbott would appreciate it. TWRB is a state agency and prohibited from hiring a lobbyist, but I've worked with Bech before and know his brother Dane very well. Assisting as a friend and not a hired gun.

Thanks for considering, bud. Miss you, so I wouldn't mind seeing you as well.

Charles  
202-412-3106  
Sent from my iPhone

Begin forwarded message:

**From:** Bech Bruun <[Bech.Bruun@twdb.texas.gov](mailto:Bech.Bruun@twdb.texas.gov)>  
**Date:** September 7, 2017 at 9:33:08 PM EDT  
**To:** "[CBrittingham@cassidy.com](mailto:CBrittingham@cassidy.com)" <[CBrittingham@cassidy.com](mailto:CBrittingham@cassidy.com)>  
**Subject:** Fwd: Hurricane response

The attached letter describes what we'll be discussing w/ EPA on Monday at 3:45 p.m.  
Thx!

Bech

Sent from my iPhone

Begin forwarded message:

**From:** Jeff Walker <[Jeff.Walker@twdb.texas.gov](mailto:Jeff.Walker@twdb.texas.gov)>  
**Date:** September 1, 2017 at 2:28:25 PM CDT  
**To:** "[Coleman.sam@Epa.gov](mailto:Coleman.sam@Epa.gov)" <[Coleman.sam@Epa.gov](mailto:Coleman.sam@Epa.gov)>  
**Cc:** "[ferguson.lincoln@epa.gov](mailto:ferguson.lincoln@epa.gov)" <[ferguson.lincoln@epa.gov](mailto:ferguson.lincoln@epa.gov)>, "[wagner.kenneth@epa.gov](mailto:wagner.kenneth@epa.gov)" <[wagner.kenneth@epa.gov](mailto:wagner.kenneth@epa.gov)>, "[sawyers.andrew@epa.gov](mailto:sawyers.andrew@epa.gov)" <[sawyers.andrew@epa.gov](mailto:sawyers.andrew@epa.gov)>, "Shapiro, Mike ([Shapiro.Mike@epa.gov](mailto:Shapiro.Mike@epa.gov))" <[Shapiro.Mike@epa.gov](mailto:Shapiro.Mike@epa.gov)>, "[hosch.claudia@epa.gov](mailto:hosch.claudia@epa.gov)"

<hosch.claudia@epa.gov>, Bech Bruun <Bech.Bruun@twdb.texas.gov>, "grevatt.peter@epa.gov" <grevatt.peter@epa.gov>, "forsgren.lee@epa.gov" <forsgren.lee@epa.gov>

**Subject: Hurricane response**

Administrator Coleman,

I enjoyed meeting with you yesterday though it was a bit chaotic. Attached is a letter with more detail and information related to what we briefly discussed. If you have any questions, please let me know.

Jeff Walker

Executive Administrator

Texas Water Development Board

(512) 463-7848

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# Texas Water Development Board

P.O. Box 13231, 1700 N. Congress Ave.  
Austin, TX 78711-3231, [www.twdb.texas.gov](http://www.twdb.texas.gov)  
Phone (512) 463-7847, Fax (512) 475-2053

September 1, 2017

Mr. Samuel Coleman, P.E.  
Acting Regional Administrator  
U.S. Environmental Protection Agency, Region 6  
1445 Ross Avenue  
Suite 1200  
Dallas, Texas 75202-2733

Dear Administrator Coleman:

It was good to talk with you yesterday, even though it was not under the best of circumstances. As was mentioned, you participated in a meeting on August 30 in Corpus Christi, TX with Environmental Protection Agency (EPA) Administrator Pruitt in regards to the catastrophic disaster in our great state caused by Hurricane Harvey. I also understand that Chairman Bech Bruun was in attendance and discussed the efforts of the Texas Water Development Board (TWDB) to assist entities impacted by the events.

Chairman Bruun currently has a meeting scheduled with Office of Water personnel at EPA Headquarters on September 11. The meeting is with Andrew Sawyers, Director of Wastewater Management and other invitees including Lee Forsgren. Based on Administrator Pruitt's expressed interest in Corpus Christi, he may also be interested in attending.

The purpose of the meeting is to discuss how the State Revolving Funds (SRF) can best be used to address immediate recovery and future resiliency efforts. We feel that there are two primary needs in Texas at this time: utilization of the SRF funds as expeditious bridge financing to jumpstart the recovery process and addressing stormwater infrastructure for the future.

We believe that the SRF funds can provide a critical financing bridge between the immediate need for cities to restore their water and wastewater systems and the delivery of federal disaster aid, to which they are eligible, but may be protracted in its delivery. If the SRF funds can be used as bridge financing to enable the systems to get to the business of restoring service without hindering their future ability to access or receive their full amount of disaster funding, the local, state, and national economy benefit.

Additionally, as you know, the Water Resources Development Act of 2016 expanded the eligibilities of the Clean Water SRF to include projects that manage, reduce, treat or recapture stormwater (Section 603 (c) (2)). While there are generally direct and ancillary water quality benefits, the Act does not require a water quality benefit for the projects. The TWDB currently has a \$47 million Clean Water SRF application from the City of Houston for stormwater infrastructure that we anticipate the Board considering for funding in October. We know there is additional need and anticipate future applications from the Harris County area as well as other areas of the state. Continued support of these project eligibilities will greatly strengthen the state and enhance the utilization of the Clean Water SRF.

#### Our Mission

To provide leadership, information, education, and support for planning, financial assistance, and outreach for the conservation and responsible development of water for Texas

#### Board Members

Bech Bruun, Chairman | Kathleen Jackson, Board Member | Peter Lake, Board Member  
Jeff Walker, Executive Administrator

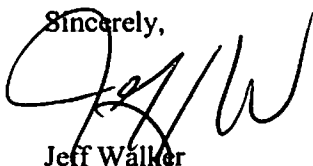
Finally, as the state agency responsible for the administration of the Drinking and Clean Water State Revolving Funds, the TWDB stands ready to assist our communities in the recovery and rebuild/restoration process. I think you will agree with us that funding for recovery efforts should be delivered expeditiously to those in need and should not hinder their ability to deliver clean drinking water and to protect the water quality of our streams, lakes and bays. Additionally, we should be preparing for future events of this type and building resiliency into our systems.

To deliver SRF funding promptly, we have reviewed current federal codes and state rules governing the State Revolving Funds and propose the following:

- As mentioned above, allow interim financing for communities to begin rebuilding/reconstruction of infrastructure until federal disaster funding is obtained at which time, the interim loan will be reimbursed from the federal disaster aid without reduction in aid eligibility.
- Bypassing the Intended Use Plan process relating to submittal of a Project Information Form, public comment period and invitation process. The state proposes to outline information required of all political subdivisions and posting on our website.
- Expedite the Environmental Review process for the Clean Water SRF.
- For Categorical Exclusions (CE), modify the current prohibition on issuing CE's if the project will provide capacity to serve a population 30% greater than the existing population. We propose for emergency projects, setting the limit to growth not exceeding 30% of the design population. 40 CFR §6.204(a)(1)(ii)
- Approval to allow entities impacted by the disaster to modify the scope of their currently ranked projects to specifically address replace/rehab of their systems without loss of points or reranking
- Allow all SRF funds to provide the match requirements for federally funded projects, such as Federal Emergency Management Agency or the U.S. Army Corps of Engineers.
- Expansion of the public interest de minimus waiver of the American Iron and Steel requirements to expand beyond the 5% allowance.
- Allow a general public interest waiver for Texas emergency projects similar to the waiver that was granted to the state of Washington on October 5, 2015.

We believe that these allowances and procedural changes will assist communities in rebounding and continue contributing to a robust economy without jeopardizing the SRFs, the disaster recovery process, or the environment. If you have any questions or comments, please do not hesitate to contact me. Chairman Bruun is looking forward to the meeting on September 11 and hopes to see the Administrator there as well.

Sincerely,



Jeff Walker  
Executive Administrator