

Mr. Ron Stein, Program Lead  
Total Maximum Daily Load Program  
Texas Commission on Environmental Quality  
MC-203  
P.O. Box 13087  
Austin, TX 78711-3087

Subject: Letter of Support from the Jarbo Bayou TMDL Plan Coordination Committee for the Inclusion of the Jarbo Bayou Watershed within the BIG Project Area

Dear Mr. Stein:

The Jarbo Bayou Implementation Plan Coordination Committee (Coordination Committee) requests that TCEQ consider allowing the committee to join the Bacteria Implementation Group (BIG) and begin implementing the BIG implementation plan. In merging with the BIG, the Coordination Committee would satisfy the requirement to develop an implementation plan to achieve bacteria reductions in the Jarbo Bayou watershed. This plan is the effort developed by local and regional stakeholders to achieve the water quality standard for contact recreation in the region's bayous and tributaries.

The Jarbo Bayou plan process was initiated in December 2013 with a public meeting. A coordination committee representing the region's cities, counties and political subdivisions, and private sector agriculture/business, non-profits, and residents was formed March 6, 2014. The committee designated four technical work groups that met to review excerpts of TCEQ-approved implementation plans and to consider the question of whether to join the BIG in implementing its plan, or to develop a standalone implementation plan for their watersheds. The Coordination Committee deliberated the recommendations of the technical work groups and voted eight to one to join with the BIG. In an effort to encourage implementation and familiarize watershed stakeholders with the plan, the Coordination Committee approached other local entities, and their letters of support are attached to this letter.

Coordination Committee members found that common stakeholders, similar concerns, cost efficiencies, and the desire to initiate implementation were reasons among others to support joining the BIG. The Jarbo watershed lies adjacent to the BIG Project Area. There are several organizations on the Coordination Committee affected by the BIG as a portion of the jurisdiction that is included in the BIG Project Area. Additionally, the Coordination Committee found that they share many common bacteria sources with the BIG, from wastewater treatment facilities and on-site sewage facilities, to stormwater management and residents, which were adequately addressed in the BIG's plan. The Coordination Committee found that joining the BIG presents an opportunity to conserve costs while allowing for a shorter timeframe from which to begin implementation.

The Coordination Committee noted during this planning process that the Jarbo Bayou watershed is unique in some ways when compared to the BIG Project Area. Specifically, the Jarbo watershed will bring to the BIG features found in coastal areas such as boaters and marinas, which are a potential source of bacteria. To address these differences, the

Coordination Committee will recommend in its petition to join the BIG, that the BIG consider the following modifications to the plan or implementation planning process:

- 1) Address a lack of representation on the BIG from coastal communities;
- 2) Continue to allow the Jarbo Coordination Committee to meet;
- 3) Encourage a broader more unified region-wide educational and environmental awareness campaign concerning bacteria and the BIG; and
- 4) Consider addressing the topic of boaters and marinas within the BIG implementation plan.

Thank you for the opportunity to work together on improving water quality in the region.

Sincerely,

[Signatures]

The Jarbo Bayou Implementation Plan Coordination Committee