

Date	Format	Supports High Hazard	Comment Summary
12/12/2017	Written	Yes	Supports high health hazard with no grandfathering. Suggested only approving RPs and no SRVB.
12/12/2017	Written	Yes	Change to RPZ and high health hazard will solve problems with systems with unknown health hazards as well as creating a standard testing cycle. Supports changing term to assemblies. Does not feel necessary to require strainer or filter
12/13/2017	Written	Yes	Clarification of comments on SRVB. Still does not support the use of them in irrigation.
12/18/2017	Written	No	Does not support high health hazard or eliminating double-checks
12/19/2017	Written	No	Does not want to do away with double-checks due or allowing SVBs due to risk of incorrect installation. Supports annual testing of double-checks
12/21/2017	Written	N/A	Supports keeping double-checks for residential systems if above ground. No DCs for commercial applications.
12/21/2017	Written	Yes	Landscape irrigation is a clear health hazard and it is important that we begin to protect our potable water system from this threat. Implement this program by allowing the original double checks to be tested, and replaced only when they can no longer be repaired in-line
12/22/2017	Written	No	Comments unrelated to the changes.
1/9/2018	Oral	No	Retrofits would cause major design changes to existing systems. Pressure lost, cost of changes. Asked for proof of documented backflow events from doublechecks.
1/9/2018	Oral	Yes	Supports petition. These changes would align with national codes. Public education will be key.
1/9/2018	Oral	No	What about existing devices? Cost of testing is higher for RPZ. Will TCEQ hire more staff to enforce? This will create more work done without a license.
1/9/2018	Oral	N/A	Homeowners will not be happy. If we remove from 344, then remove from 290.
1/9/2018	Oral	N/A	TIA does not have an opinion. Hes heard people are concerned about prices for retrofits. How is TCEQ going to enforce this? What about local enforcement? Maybe move toward health hazard over a time, gradually.
1/9/2018	Oral	Yes	Represents manufacturer, irrigation is a health hazard. Supports changes.
1/10/2018	Written	Yes	Supports high health hazard and annual testing, but thinks old double checks should be grandfathered unless they fail annual testing. Supports CEUs for installers and better enforcement.
1/10/2018	Written	Yes	Would like documented cases of properly installed double check testable assemblies where a failure occurred. Agrees that yard irrigation is high hazard, but suggests we re-think implementation of changing existing systems from double-check assembly to high-hazard testable backflow assembly. Recommends rule verbiage warning readers to contact local municipalities because they may have more stringent requirements.
1/11/2018	Written	No	Does not support high health hazard or eliminating double-checks
1/11/2018	Oral	N/A	Enforcement issues with backflow testing, especially doublechecks in the ground.
1/11/2018	Oral	N/A	Houston already doesn't allow double-checks for irrigation. Issues with MUD districts including enforcement and consistency.
1/11/2018	Oral	N/A	Concerns about MUD districts, regulation and enforcement.
1/11/2018	Oral	Yes	Irrigation is a health hazard. Would like enforcement implementation to be considered.
1/11/2018	Oral	N/A	MUD enforcement is an issue, they don't follow 344 irrigation rules. Would like to see the whole state follow whatever rules are implemented.
1/14/2018	Written	N/A	Does not support eliminating double-checks.
1/16/2018	Written	No	Does not support high health hazard or eliminating double-checks.
1/17/2018	Written	Yes	Supports high health hazard. Suggested that no longer allowing double-checks & atmospheric vacuum breakers & adding SRVB is good, but may be cost prohibitive and difficult to enforce and not supported by data. Requiring annual testing of backflow assemblies currently in place should be sufficient.
1/17/2018	Written	N/A	Provided price list
1/17/2018	Oral	Yes	Presented test results from different local areas backflow assemblies showing positive for E.coli and coliform.
1/17/2018	Oral	Yes	Irrigation system water is nasty. Spoke about backflow into drinking water from irrigation and yard waste.
1/17/2018	Oral	Yes	Irrigation is a hazard. Brought worn out backflow components. Presented manufacturers specs that recommend annual testing.
1/18/2018	Oral	N/A	Has had issues enforcing backflow requirements in the area, possibly due to being a WSC.
1/19/2018	Written	N/A	Need viable enforcement plan; also concerned about financial impacts to homeowners that could result in homeowners failing to make repairs which could result in wasted water
1/22/2018	Written	N/A	Does not support elimination of double checks.
1/22/2018	Oral	Yes	Irrigation is a health hazard, supports all changes.
1/22/2018	Oral	Yes	Irrigation is a health hazard, supports all changes. Mansfield TX study is good proof. EPA, IPC, and SPC all consider irrigation a health hazard. Bottom line is the safety of the drinking water.
1/22/2018	Oral	No	Wants a cost benefit analysis. Concerns about vandalism.
1/22/2018	Oral	N/A	Doesn't think the IAC is an objective party.
1/22/2018	Oral	No	Wants a cost benefit analysis. Concerns about vandalism and how the PWS will budget for these changes. Unfunded mandate.
1/23/2018	Written	N/A	Does not support eliminating double-checks, but does support annual or bi-annual testing to ensure devices in compliance and working properly
1/23/2018	Written	Yes	Supports high health hazard and annual testing. Agrees there are quality issues with double checks. Need better regulation and enforcement by state and local municipalities.
1/23/2018	Oral	N/A	Concerns about freezing.
1/23/2018	Oral	N/A	Concerns about freezing. Asked if grandfathering would be considered.
1/23/2018	Oral	N/A	Concerns about freezing.
1/23/2018	Oral	N/A	Concerns about freezing.
1/23/2018	Oral	N/A	Concerns about freezing, warranty issues. Wanted to know results of other stakeholder meetings.
1/23/2018	Oral	N/A	Cost of replacing and maintaining RPZs. Doesn't feel like RPZs are justified and the requirement will have homeowners not wanting irrigation systems due to cost and maintenance.
1/23/2018	Oral	N/A	The TCEQ has been considering annual testing for 30 years and its never been done.
1/23/2018	Oral	N/A	Concerns about freezing, flooding. Supports doublechecks staying in use. PWs should already have cross connection programs that address irrigation systems.
1/23/2018	Oral	N/A	Wanted to know how many IAC members are irrigation contractors.
1/23/2018	Oral	N/A	Concerns about freezing, breaking and failure of RPZs.
1/23/2018	Oral	N/A	Concerns about freezing. No evidence of failure in the area for doublechecks. Pointed out that the IAC minutes are available on TCEQ public website for viewing of motions.
1/23/2018	Oral	No	Concerns about freezing. Doesn't believe irrigation is a health hazard. Doublechecks work fine in the area and he suggested an easy way to protect them from freezing.
1/23/2018	Oral	N/A	wanted to know the source of the petitions. Concerns about RPZs freezing and practicality near water meter or in alleys.
1/23/2018	Oral	N/A	Concerns about freezing, aesthetics, practicality in an alley along with warranty issues. Doesn't support PVBs.
1/23/2018	Oral	N/A	Concerns about cost, this is a burden on property owners.
1/24/2018	Written	No	Does not support. Too costly and issues with freezing.
1/24/2018	Written	N/A	Submitted links to USC's Cross Talk
1/24/2018	Written	No	unnecessary expense. Freezing concerns.
1/25/2018	Written	No	no evidence of failure rate, freezing concerns, financial impact
1/25/2018	Written	No	financial impact, should be left to municipalities
1/25/2018	Written	No	Cost. Visual concerns. Suggested setting a double-check testing frequency
1/25/2018	Written	No	Unnecessary change
1/25/2018	Written	N/A	Against petition. Suggested annual or semi annual testing instead. Freeze concerns.
1/26/2018	Written	No	Presentation on backflow prevention in the Panhandle
1/26/2018	Written	No	Against petition, expensive, freezing concerns.
1/26/2018	Written	No	Against petition
1/26/2018	Written	No	Against petition, cost
1/26/2018	Written	Yes	ok with health hazard but concerns about freezing. Suggested testing double-checks annually instead.

1/26/2018	Written	N/A	Doesn't support. Cost.
1/26/2018	Written	N/A	Doesn't support. Cost. Freezing
1/26/2018	Written	N/A	Doesn't support.
1/26/2018	Written	N/A	Doesn't support.
1/26/2018	Written	No	hasn't seen irrigation is hazardous. Cost.
1/26/2018	Written	N/A	hasn't seen irrigation is hazardous. Cost.
1/26/2018	Written	N/A	No rule change
1/26/2018	Written	N/A	No rule change, freeze concerns.
1/26/2018	Written	N/A	No rule change, cost.
1/26/2018	Written	N/A	Doesn't support.
1/26/2018	Written	No	Brochure #3 from AWWA, picture, and Cross-Connection Subcommittee minutes from 12/3/14
1/26/2018	Written	N/A	Against petition. Cost.
1/26/2018	Written	N/A	Doesn't support.
1/26/2018	Written	N/A	Doesn't support. Cost, Freeze concerns.
1/26/2018	Written	N/A	Doesn't support.
1/26/2018	Written	N/A	Doesn't support.
1/26/2018	Written	N/A	Doesn't support. Cost.
1/27/2018	Written	N/A	Doesn't support. Freeze concerns.
1/27/2018	Written	N/A	Doesn't support.
1/27/2018	Written	N/A	Doesn't support.
1/29/2018	Written	Yes	Supports petition. Would align 344 with other codes and laws already in existence.
1/29/2018	Written	Yes	Supports all changes.
1/29/2018	Written	Yes	case studies (scans of news articles). Instances of backflow failures and illness
1/29/2018	Oral	Yes	Most of the US doesn't allow double-checks. Didn't approve of SPVs for irrigation. Presented stats on backflow failures from double-checks. Regular testing and enforcement is necessary.
1/29/2018	Oral	Yes	Supports the petitions. Irrigation is a health hazard. Presented EPA article about cross connection from an irrigation system. Talked about health effects from cross-contamination. EPA backflow stats.
1/30/2018	Written	No	Suggested removing doublechecks and not making a health hazard.
1/30/2018	Written	N/A	Require RPZ at commercial properties. Remove wye strainer in front of doublechecks. Freeze concerns for residential RPZs. Test doublechecks on a regular basis.
1/30/2018	Written	N/A	keep doublecheck but test regularly at least on a semi-annual basis
1/31/2018	Written	N/A	Does not support. Too costly and issues with freezing.
1/31/2018	Oral	Yes	Irrigation is a health hazard. Evidence will continue to be presented in stakeholder comments to prove the health hazard.
1/31/2018	Oral	Yes	Supports all parts of petition, irrigation is a health hazard. Grandfather in old systems until they fail.
1/31/2018	Oral	No	Does not support changes. SAWS already has a strong backflow program for irrigation systems. Changes will increase enforcement and manpower needed to manage their existing program. Research doesn't support.
1/31/2018	Oral	No	There is a hazard, but classifying all systems as a health hazard isn't maybe best approach. Use enforcement of existing testing frequencies at a local level.
1/31/2018	Oral	N/A	Doesn't support. Also doesn't support Y-strainers.
1/31/2018	Oral	Yes	Agrees with other commenters that backflows should not be used and irrigation is a health hazard. Doublechecks also often are not maintained like they should.
2/2/2018	Written	Yes	Supports health hazard and the requirement of a RP
2/2/2018	Written	N/A	Wants scientific studies proving failure rates of doublechecks
2/2/2018	Written	Yes	Supports petition as written
2/5/2018	Written	N/A	Doublecheck Low cost and looks better
2/5/2018	Written	N/A	Submitted attachment of irrigation backflow study in Idaho
2/6/2018	Written	N/A	Asking for failure rates of doublechecks.
2/6/2018	Written	N/A	keep doublecheck but test annually. Doesn't support inline filters.
2/6/2018	Written	N/A	Doesn't support. RPZs are an eye sore, freeze, and more expensive
2/6/2018	Written	N/A	Doesn't support.
2/6/2018	Written	N/A	Doesn't support.
2/6/2018	Written	Yes	supports high hazard and using RPZ and PVBs
2/6/2018	Written	N/A	Doesn't support. Questioned resources for enforcement of rule if implemented
2/6/2018	Written	N/A	Cost of implementing as written. Suggested testing doublechecks regularly as an alternative. TCEQ should hire more investigators.
2/6/2018	Written	No	Doesn't support.
2/6/2018	Written	N/A	Doesn't support. Cost.
2/6/2018	Written	N/A	Doesn't support. Cost. Appearance. Design.
2/6/2018	Written	N/A	Doesn't support, leave rules as is.
2/6/2018	Written	N/A	Doesn't support. Doesn't think there are hazards with an irrigation system, cost.
2/6/2018	Written	N/A	Doesn't support.
2/6/2018	Written	N/A	Doesn't support. Cost.
2/6/2018	Written	Yes	Supports. Irrigation is a high hazard.
2/6/2018	Written	No	Irrigation is not a hazard. Cost.
2/6/2018	Written	N/A	Require doublechecks to be tested at least every three years. RPZs too costly.
2/6/2018	Written	N/A	Install PVBs and RPs next to service meter (or behind building line to prevent frost issues). Suggested annual doublecheck testing and oxidation resistant handles.
2/6/2018	Written	N/A	Does not support. Cost, enforcement concerns. Recommended better enforcement on existing devices
2/6/2018	Written	N/A	Does not support. Cost and visual appearance are negatives.
2/6/2018	Written	N/A	Does not support.
2/6/2018	Written	No	Does not support. Cost and freeze concerns.
2/6/2018	Written	N/A	Does not support.
2/6/2018	Written	Yes	In favor of high hazard. Grandfathering should be used to implement (existing systems replace once backflow is irreparable).
2/6/2018	Written	N/A	Doesn't support as written. Suggested backflows be tested either every other year or every 5 years.
2/7/2018	Written	N/A	Does not support.
2/7/2018	Written	Yes	Supports, irrigation is a health hazard.
2/7/2018	Written	N/A	Does not support.
2/7/2018	Written	N/A	Does not support. Suggested mandatory testing of existing backflow devices.
2/7/2018	Written	N/A	Does not support. Cost.
2/7/2018	Written	N/A	Does not support. Cost.
2/7/2018	Written	N/A	Does not support. Cost, freeze concerns
2/7/2018	Written	N/A	Doesn't support. Cost.

2/7/2018	Written	N/A	Doesn't support.
2/7/2018	Written	Yes	Supports, irrigation is a health hazard. If the language isn't accepted, install all backflows at 12 inches above grade.
2/7/2018	Written	Yes	Supports, irrigation is a health hazard. Rebuttal to Longhorn's 1/31/18 mass email.
2/7/2018	Written	Yes	Supports. Irrigation is a high hazard. Requested an irrigation study. Provided summary of failure rates and other considerations.
2/8/2018	Written	N/A	Does not support. Cost, freeze concerns
2/8/2018	Written	No	Does not support. Cost, freeze concerns.
2/8/2018	Written	N/A	Does not support. Suggested mandatory resting of existing devices.
2/8/2018	Written	Yes	Supports as written.
2/8/2018	Written	N/A	Does not support, however does support annual testing of doublechecks
2/8/2018	Written	N/A	Doesn't support because of cost
2/8/2018	Written	N/A	Doesn't support, however supports better enforcement of existing assemblies
2/9/2018	Written	No	Doesn't support because of cost, freezing
2/9/2018	Written	N/A	Does not support because of cost
2/9/2018	Written	N/A	Does not support because of cost, freezing
2/10/2018	Written	No	Does not support. Inspect doublechecks annually and require stainless steel handles.
2/10/2018	Written	Yes	Supports. Irrigation is a health hazard and precautions should be in place.
2/11/2018	Written	N/A	Does not support.
2/11/2018	Written	N/A	Does not support. Need more homeowner education. Wants clearer rules and regulations.
2/12/2018	Written	Yes	Supports petition, irrigation is a health hazard and proper protection should be required.
2/12/2018	Written	N/A	Does not support, however does support annual testing of doublechecks, regulated at a local level
2/12/2018	Written	N/A	Does not support. Visual appearance. Get backflows tested regularly.
2/12/2018	Written	No	Does not support. Visual appearance. Get backflows tested regularly.
2/13/2018	Written	No	Does not support.
2/14/2018	Written	N/A	Prefers to use PVBs instead of RPZs. Monitors all devices for freeze
2/14/2018	Written	N/A	Does not support. Enforcement is poor. Y-strainers are cross connections.
2/15/2018	Written	No	Does not support. Cost, vandalism.
2/15/2018	Written	No	Request to abandon the IAC's petition due to increasing regulatory burden.
2/18/2018	Written	Yes	Either make irrigation a health hazard OR require annual testing of all devices.
2/19/2018	Written	N/A	does not want to get rid of double-checks. Wants TCEQ to require annual testing and for the agency to do the enforcement of the program
2/19/2018	Written	Yes	Supports. Irrigation is a health hazard and TCEQ should have changed this years ago.
2/19/2018	Written	Yes	Attachment with various other 30 TAC 344 rule changes. Specifically relating to local regulation and inspection.
2/19/2018	Written	N/A	supports the use of a PVB in lawn irrigation
2/19/2018	Written	N/A	Does not support.
2/19/2018	Written	N/A	Does not support. Cost.
2/19/2018	Written	No	Does not support. Lack of enforcement already exists.
2/20/2018	Written	Yes	Cost shouldn't be an issue, the hazard is the most important. Strongly supports petition.
2/20/2018	Written	N/A	Does not support. Too costly to implement and enforce locally.
2/20/2018	Written	Yes	Supports, Irrigation is a health hazard and this change is overdue.
2/21/2018	Written	N/A	Does not support.
2/21/2018	Written	Yes	Supports. Irrigation is a health hazard. Added statistics and an attachment of specific examples.
2/22/2018	Written	N/A	Water can contain waterborne pathogens and can cause illness. Proper use of backflow seems like a reasonable barrier to issues
2/22/2018	Written	Yes	Supports. Wichita KS switched to health hazard in the 1990s and it was successful.
2/22/2018	Written	Yes	Supports. Thinks most systems would fail if annual testing was mandated.
2/22/2018	Written	N/A	Supports, despite the cost. Would like to see fewer regulations as well.
2/23/2018	Written	Yes	Supports. Annual testing supports protection of the drinking water. There isn't more evidence of contamination and failure because of the lack of regular testing.
2/24/2018	Written	No	Does not support. Better enforcement. Cost.
2/25/2018	Written	Yes	Supports, Irrigation is a high hazard. Attached 9 different reports.
2/26/2018	Written	Yes	Supports, irrigation is a high hazard.
2/26/2018	Written	Yes	Supports, Irrigation is a high hazard. Attached a report from Special Pathogens lab about legionella. Attachment from KHOU about Legionella. Woodlands incident attachment.
2/26/2018	Written	N/A	Does not support. Cost, evidence.
2/26/2018	Written	N/A	Does not support. Unfunded mandate.
2/26/2018	Written	N/A	Does not support.
2/26/2018	Written	No	Does not support. Design issues, cost, testing.
2/26/2018	Written	N/A	Does not support. Cost, vandalism.
2/26/2018	Written	N/A	Does not support. Cost.
2/26/2018	Written	N/A	Does not support. Cost.
2/27/2018	Written	N/A	Does not support.
2/27/2018	Written	N/A	Does not support.
2/27/2018	Written	N/A	Does not support.
2/27/2018	Written	N/A	Does not support.
2/27/2018	Written	N/A	Does not support.
2/27/2018	Written	N/A	Does not support.
2/27/2018	Written	N/A	Does not support. Cost and design.
2/27/2018	Written	N/A	Does not support.
2/27/2018	Written	N/A	Does not support.
2/27/2018	Written	N/A	Does not support.
2/27/2018	Written	N/A	Does not support.
2/27/2018	Written	N/A	Does not support. Cost.
2/27/2018	Written	Yes	Supports. This will protect irrigation systems from contamination.
2/27/2018	Written	N/A	Does not support. Cost.
2/27/2018	Written	N/A	Does not support.
2/27/2018	Written	No	Does not support. Cost, vandalism.
2/27/2018	Written	Yes	Supports. Irrigation is a health hazard.
2/27/2018	Written	No	Does not support, cost and appearance. Test existing backflows annually.

2/27/2018	Written	No	Does not support hazard change, cost and appearance. Test existing backflows annually. Does support adding SPVA.
2/28/2018	Written	Yes	Supports. Irrigation is a health hazard. Leave existing doublechecks but require annual testing. More public education.
2/28/2018	Written	No	Does not support. Failure rate, cost, design and pressure concerns.
2/28/2018	Written	N/A	Does not support. Cost, administration of the program, TCEQ enforcement.
2/28/2018	Written	N/A	Does not support. Freeze concerns, city resources, cost.
2/28/2018	Written	N/A	Does not support. Enforce the current rules.
2/28/2018	Written	N/A	Does not support. Keep double-checks
2/28/2018	Written	Yes	Supports. Annual testing should be required. Eliminate double-checks. Irrigation is a health hazard
2/28/2018	Written	No	Does not support. Cost.
2/28/2018	Written	Yes	Supports.
2/28/2018	Written	No	Does not support. Test existing devices annually.
2/28/2018	Written	Yes	Supports. Provided their comments including their studies
2/28/2018	Written	N/A	Partially supports. Do away with AVB. Do not put irrigation back under plumbers.
2/28/2018	Written	Yes	All backflows should be tested annually. All irrigation is a health hazard.
2/28/2018	Written	Yes	Provided information on winterizing backflow devices and protecting against freeze.
2/28/2018	Written	Yes	Supports all changes in 344 petition and supplement information. Backflow and local enforcement are the two biggest concerns.
2/28/2018	Written	Yes	Supports. Annual testing and enforcement of it is necessary.
2/28/2018	Written	No	No case studies document proof hazard should be changed. Current enforcement needs to change first.
2/28/2018	Written	Yes	Doublechecks below grade do not protect against hazard. Reclassify irrigation as a health hazard.
2/28/2018	Written	Yes	Irrigation is a hazard. PWS is at risk if hazard isn't changed.
2/28/2018	Written	Yes	Irrigation is a hazard. Price shouldn't be a factor for protecting the water supply. Cost will come down when the demand goes up.
2/28/2018	Written	N/A	Supports annual testing of all backflow prevention assemblies. Has firsthand experience that irrigation can contaminate the PWS
2/28/2018	Written	N/A	Do not eliminate doublechecks. Freeze and cost concerns.
2/28/2018	Written	No	Do not eliminate doublechecks. Current assemblies should be maintained and tested regularly.
2/28/2018	Written	No	Doublechecks perform well. Current rules are not being enforced for installation, permitting, and testing.
2/28/2018	Written	Yes	Irrigation is a health hazard. Witnessed many backflow events at his time at SAWS. Perform a scientific study to determine the hazard is unbiased.
2/28/2018	Written	No	Does not support. Cost, appearance, freeze concerns, vandalism. Make rule changes to improve the current 344 rules.
2/28/2018	Written	No	Does not support. No evidence to support this change. Keep doublechecks but maintain and test regularly.
2/28/2018	Written	Yes	Mansfield backflow map attachment. Commercial backflow devices vs residential.
2/28/2018	Written	No	Does not support. Test regularly.
2/28/2018	Written	N/A	Supports. Protection against health hazards outweighs the problems.
2/28/2018	Written	Yes	Supports. Irrigation is a health hazard and about 30% of the state already uses health hazard by ordinance.
2/28/2018	Written	Yes	Supports. Irrigation is a health hazard that can cause illness or death.
2/28/2018	Written	Yes	Supports. Is a backflow tester and feels doublechecks in ground are not good long term.
2/28/2018	Written	No	Does not support. Unfunded mandate. People already don't follow the 344 rules. How will existing devices be handled? Cost.
2/28/2018	Written	No	Does not support. Cost, freezing. There are no studies showing this is a problem.
2/28/2018	Written	Yes	Supports. Manufacturers do not support doublechecks in the ground (they are also low hazard assemblies).