

Memo

To: Coordination Committee and Stakeholders

From: Public Input Work Group

Date: May 2, 2022

Re: Recommendation regarding stakeholder and public input to the Improving Austin Streams draft I-Plan

Following the March 24, 2022 meeting, a subgroup of participants met to develop a recommendation regarding whether, and how, additional public and stakeholder input should be obtained on the Draft I-Plan that will be considered for approval at the May 4, 2022 meeting of the Coordination Committee and the larger stakeholder group. The subgroup makes the following recommendation:

- The facilitator will circulate the draft I-Plan to the Coordination Committee and the entire stakeholder list prior to the May 4 meeting.
- The Coordination Committee will discuss the I-Plan draft at its May 4 meeting, and consider input from the larger stakeholder group and other attendees at that meeting. The Coordination Committee will then agree on any changes to be made to the draft I-Plan. No other formal public input will be invited
- Following the May 4 meeting, the facilitator will circulate a revised I-Plan draft to the stakeholders and Coordination Committee. The Coordination Committee will approve the final plan update. The Committee may approve the final updated plan at the scheduled May 26 meeting or via electronically circulated drafts.
- Stakeholders that participated in the development of this plan will encourage public involvement in plan implementation by publicizing the annual meetings that evaluate the progress to their constituent groups, and through activities to educate their constituent groups about the various management measures and control actions of the I-Plan (e.g., newsletter articles, meetings of the participants organization).
- During review of the updated I-Plan, the Coordination Committee will ensure that the Communications Strategy section of the updated plan reflects these efforts.

The following points informed these recommendations:

- Public support of and involvement with the I-Plan is important. This may be generated after the I-Plan is approved in several ways:
 - Through the educational and public outreach activities in the I-Plan.
 - By inviting the public of to the annual meetings to evaluate progress on the I-Plan. The stakeholders who participated in the plan development send such invitations to their constituent groups.

- The majority of I-Plan updates do not incorporate a public comment component to the process.
- The MS4 permit and authorization holders noted that all Stormwater Management Plans (SWMPs) required by MS4 permits go through a public comment period during the renewal phase of the permit.
- Because the timing of the I-Plan review does not coincide with the public review of the MS4 SWMPs, any comments provided by the public about SWMPs to the updated I-Plan could not be meaningfully addressed until the next time the MS4 permittees revise their SWMPs. This delay would probably be discouraging to stakeholders who comment on the updated plan but do not see that any of their comments changed the final updated I-Plan. Also, it might be burdensome for the MS4 organizations to retain and integrate such comments in their next SWMP updates, which have a public engagement and review process of their own.
- Stakeholders and interested parties have been involved through the I-Plan development process since it kicked off June 2021. They have listened to presentations that provide crucial information to help understand the Four Streams I-Plan and the MS4 obligations through the TCEQ stormwater permitting process.
- We realize now that the previous I-Plan goal was unrealistic, so we are now proposing to establish a more attainable goal for reducing bacteria levels in our creeks. We achieved this goal in most streams during our last I-Plan implementation period.
- Most of the MS4 participants have their SWMPs in draft form. Those drafts are still in review by the TCEQ. Therefore, those draft SWMPs cannot be shared for public comment through the I-Plan at this time.