

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Private/Before Publication)
Date: Tuesday, November 12, 2024 10:45:24 AM

From: Texas Sunset Advisory Commission <sunset.website@brightleafgroup.com>
Sent: Tuesday, November 12, 2024 10:43 AM
To: Sunset Advisory Commission <sunset@sunset.texas.gov>
Subject: Public Input Form for Agencies Under Review (Private/Before Publication)

Submitted on Tue, 11/12/2024 - 09:00

Submitted by: Visitor

Submitted values are:

Choose the agency that you would like to provide input about

[Texas Department of Criminal Justice](#)

Public Comments

1

First Name

Lola

Last Name

Rucker

Title

Research Associate

Organization you are affiliated with

Texas Prisons Community Advocates (TPCA)

Email

City

San Marcos

State

Texas

Your Comments or Concerns

Hi there, I am a researcher named Sloan Rucker who has been investigating water quality in TDCJ. I used TCEQ data from 2019-2023, supplemented by TPCA data from incarcerated Texans and loved ones. I found that between 2019 and 2023, out of the 16 active TDCJ water systems, 6 had lead results exceeding action levels (37.50%) and one unit, Ferguson, had copper results exceeding action levels (6.25%). One unit, Clemens, had a level of herbicide (e.g., atrazine) that exceed the EPA limit; this is alarming as atrazine may increase one's risk of developing cancer and reproductive issues. 4 units had trace levels of arsenic (25.00%), and the Chase Field complex which houses Garza West had levels of arsenic that, when rounded to the nearest hundredth, met the EPA's limit and therefore was considered in exceedance. 6 units had at least one sample with coliform present (37.50%) and one water system (e.g., Ramsey Area) tested positive for E. Coli as well (6.25%). The total number of coliform samples between the 6 locations samples rose during the timeframe, indicating a decrease in water quality amongst these units. Of note, half of the units with coliform, a bacteria that can come from fecal matter, contained agribusiness/cattle on the premises (e.g., Coffield, Ramsey area, Memorial). This connection between cattle farming and coliform in units with groundwater wells must be explored further. Preliminary survey results from loved ones also indicate concerns around water quality, and letters sent to TPCA by incarcerated Texans illustrate a bevy of water-related complaints ranging from unsanitary handling of ice and water for distribution, visually contaminated water, and allegations such as arsenic, lead, and H. pylori in the water, the latter of which is not investigated by TCEQ. Reports of H. pylori thus cannot be confirmed but should not be ignored. During our given period, 15 of the 16 systems (93.75%) had violations documented by the TCEQ's Water System Search database according to local lab tests.

Your Proposed Solution

We offer a few proposed solutions. In terms of short term solutions, the state can provide bottled water, filtration or proper boiling systems, improve sanitation procedures, and ensure immediate water quality monitoring and advisories so incarcerated Texans are informed of boil water notices and can act accordingly. The grievance process must be improved to allow incarcerated people avenues to justice and ensuring their human rights, in addition to their right to lawsuits over clean water violations. Routine comprehensive testing must be conducted and may be done so cost effectively through wastewater monitoring. Testing must be expanded to detect other contaminants that can be transmitted through water such as H. pylori. Additionally, the size and scope of Texas prisons should be reduced, starting with unsafe, unfit units with issues regarding water quality, deteriorated infrastructure, etc. Not only is this a common sense measure but it is also less costly than overhauling existing infrastructure in prisons. Lastly, incarcerated Texans deserve access to regular medical testing for waterborne illnesses, knowledge of their health status, and treatment- a right that many allege they have not regularly or adequately received inside Texas correctional facilities. TDCJ must prioritize clean, safe drinking water for its incarcerated individuals. Not only does failing to do so put its some 130,000 inhabitants at risk of preventable illnesses; but also, there is legal precedent that failure to ensure compliance constitutes a human right violation.

Attachment

[Water Report - One Pager 2024.pdf](#) (1.33 MB)

My Comments Will Be Made Public

Yes