



## MEMORANDUM

**TO:** Mayor and City Council

**THROUGH:** Michael Rogers, Assistant City Manager **MR**

**FROM:** Shay Ralls Roalson, Director, Austin Water **SMR**

**DATE:** June 4, 2025

**SUBJECT:** **June 5 City Council Agenda Item 94 - Response to Environmental Commission Recommendations Regarding Proposed Walnut Creek Wastewater Treatment Plant Permitting Ordinance**

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The purpose of this memorandum is to provide additional information to the City Council in response to your request regarding the Environmental Commission's recommendations from April 2, 2025, concerning May 22 City Council Item 61. The City Council originally postponed this item and it is now reposted as [Item 94](#) on the June 5, 2025 City Council Agenda. Austin Water is seeking City Council approval of an ordinance granting site-specific variances and amendments to City Code Title 25 (Land Development) for the construction of the Walnut Creek Wastewater Treatment Plant (WWTP) Enhancement and Expansion Project.

As noted in the [May 23, 2024 Memo to Mayor and Council](#), this project is unique, time-sensitive and highly complex. In preparation for the City Council's consideration of this ordinance on May 22, 2025, the following briefings and actions occurred:

- April 2, 2025: Austin Water briefed the Environmental Commission, which voted 8-1 to recommend approval of the ordinance and provided recommendations outlined in this memorandum.
- April 22, 2025: Austin Water briefed Planning Commission, which voted 11-0 to recommend approval of the ordinance.
- April 23, 2025: Austin Water briefed the City Council's [Climate, Water, Environment, & Parks Committee](#).
- May 21, 2025: Austin Water responded to City Council questions through the Council agenda questions and answer (Q&A) process.

As noted in the [online Q&A Report](#), Austin Water will be implementing the Environmental Commission recommendations to the extent feasible. This memorandum further outlines Austin Water's commitment to these implementation actions, a number of which are already planned or underway.

**Summary of Austin Water's responses to Environmental Commission Recommendations**

Austin Water appreciates the Environmental Commission's April 2, 2025, recommendations and additional points raised by the Save Our Springs Alliance letter, dated May 21, 2025. Although the recommendations are outside the scope of [Council Resolution 20250327-062](#), which directed staff to bring an ordinance to Council focused on specific amendments to the Land Development Code, Austin Water commits to implementing these recommendations to the extent feasible, as summarized below. Additional information on each recommendation is provided in the Attachment.

**Austin Water commits to implementing the following recommendations administratively:**

- **1, 2:** Increased water conservation marketing & incentives – underway by Austin Water
- **4, 12:** Annual reporting to the Environmental Commission – Austin Water also commits to additional reporting to Council's Climate, Water, Environment and Parks Committee
- **10:** Public open space engagement

**Austin Water commits to implementing the following recommendations, as required by City Code, Specifications, or Texas Commission on Environmental Quality (TCEQ) Permit:**

- **3:** Nutrient Removal Commitments – required for this project through the current TCEQ permit for the Walnut Creek WWTP
- **5:** Natural elements and native plants at base of floodwall – required by City of Austin Standard Technical Specification *Item 609: Native Seeding and Planting for Restoration*
- **6:** Heritage trees – required by City of Austin Standard Technical Specification *ITEM NO. 608 – Planting and Item No. 610 - Preservation of Trees and Other Vegetation*
- **7:** Reduce light pollution with dark skies lighting – required per City Code Title 25-2, Article 2.5
- **8, 9:** Critical Water Quality Zone Mitigation – 150% mitigation included in proposed ordinance, as determined by Watershed Protection to provide the greatest environmental benefit, in accordance with the Environmental Criteria Manual Section 1.5.2.
- **13:** Low carbon concrete – City specification is being finalized that Austin Water will follow

**Austin Water commits to further exploring the following recommendation:**

- **14:** This recommendation regarding a proposed parkland transfer will involve further coordination between Austin Water and the City's Parks and Recreation Department (PARD), through ongoing collaboration efforts. Any such land transfer will require separate Council action that Austin Water and PARD are not yet ready to propose at this time.

**One recommendation needs further evaluation:**

- **11:** Solar panel installation needs further evaluation – a May 22 Item from Council for full City evaluation of locations and properties suitable for solar panels will provide current feasibility.

**Conclusion**

Austin Water respectfully requests that the City Council approve the Land Development Code amendments as proposed, in order to enable this major wastewater infrastructure project to continue moving forward without further delays. Austin Water commits to implementing the Environmental Commission's recommendations as noted in this memorandum and will continue

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to keep the City Council updated through future meetings of Council's Climate, Water, Environment and Parks Committee.

Should you have additional questions or concerns, please contact Austin Water Director Shay Ralls Roalson, PE at [Shay.Roalson@austintexas.gov](mailto:Shay.Roalson@austintexas.gov) or 512-972-0108.

cc: T.C. Broadnax, City Manager  
Erika Brady, City Clerk  
Corrie Stokes, City Auditor  
Mary Jane Grubb, Municipal Court Clerk  
Judge Sherry Statman, Municipal Court  
CMO Executive Team  
Department Directors

**Attachment:** Austin Water Detailed Responses

**ATTACHMENT**  
**Detailed Responses to April 2, 2025 Environmental Commission Recommendations and  
May 21, 2025 Letter from Save Our Springs Alliance – Walnut Creek Wastewater Treatment  
Plant**

Below are Austin Water's detailed responses to the Save Our Springs letter to the Mayor and City Council dated May 21, 2025, related to the Environmental Commission's fourteen recommendations from their April 2, 2025 vote to recommend approval of the ordinance proposed via June 5, 2025 Council Item 94.

**Recommendations 1-2: Increased Conservation Marketing.**

**Environmental Commission Recommendations:**

- 1. Increase marking and interpretation of wastewater conservation programs to everyone in the service area.**
- 2. Improve incentives for new and remodel construction to utilize water conservation programs.**

For Fiscal Year 2026, Austin Water has proposed a budget enhancement to further elevate public awareness efforts. Two key initiatives under this proposal include the *Educational Water Conservation Campaign* and *TV Advertising Enhancement*, are noted below.

**Educational Water Conservation Campaign**

This contract involves the execution of an expanded, high-impact water conservation and education campaign. The campaign supports Council Resolution Number 20241121-004, which formally adopted the 2024 Water Conservation Plan. Additionally, during the Water Forward 2024 update process, it was again emphasized by the Water Forward Task Force members, the Water and Wastewater Commission, and various Council offices that additional advertising and education is crucial. A professional agency will develop this high-profile campaign to help achieve the goals outlined in the 2024 Water Conservation Plan, specifically focusing on lowering the Gallons Per Capita Per Day (GPCD) through television and media outlets. This is a two-year contract, with funding of \$1 million allocated for Fiscal Year 2026 (FY26) and another \$1 million for Fiscal Year 2027 (FY27).

**TV Advertising Enhancement**

To increase awareness about the importance of water conservation in the Austin community, this campaign will enhance Austin Water's advertising efforts in FY26 by adding television spots to the current print, digital, and radio advertisements. In FY2025, Austin Water initiated preliminary campaigns in partnership with KXAN, KVUE, and CBS Austin. Funding from FY2026 will build on these existing campaigns with additional outlets to further support Austin's comprehensive water conservation goals. Furthermore, the Water Forward Task Force, the Water and Wastewater Commission, and the Austin City Council Offices recommend intensified efforts to educate and encourage the community to conserve our most precious resource: water.

The inclusion of language aimed at expanding Austin Water's conservation efforts and marketing for water conservation is beyond the scope outlined in Council Resolution No. 20250327-062. The Ordinance currently under consideration pertains to the City's permitting process for the expansion of the Walnut Creek wastewater treatment plant (WWTP). This expansion is necessary to meet the

projected wastewater flow demands resulting from Austin's population growth. The Council approved the related contracts for this necessary plant expansion on May 30, 2024. Although this inclusion is outside the Ordinance's scope, water conservation is fundamental to our mission, and Austin Water is already taking steps to increase its efforts in this area, as noted above.

### **Recommendation 3: Nutrient Removal Commitments**

#### **Environmental Commission Recommendation:**

#### ***3. Request additional downstream nutrient meters beyond TCEQ requirements.***

The recent SOS letter incorrectly states that Austin Water has made no written commitments to reduce nutrient levels in discharged water of Walnut Creek WWTP. The discharge of water is regulated by TCEQ, which has issued a permit (WQ0010543011) requiring the plant's discharge to have a daily average not to exceed 1.0 mg/L total phosphorous once the flows have exceeded 75 MGD annual average.

Upon the completion of the 25 MGD plant expansion and the modification of the existing 75 MGD plant, the new treatment process, biological nutrient removal (BNR), will be implemented. This advanced process is designed to significantly reduce nutrient levels. Upon completion the total phosphorous in the discharge water will be reduced by 60% from the current average of 2,120 lbs/day to a maximum of 834 lbs/day. This new advanced treatment process will also reduce nitrogen discharge by approximately 50%.

Austin Water is committed to meet TCEQ's written permit limits as evidenced by the recent award from the National Association of Clean Water Agencies (NACWA) Platinum Award given to wastewater treatment plants that had no discharge permit violation in five years.

Austin Water monitors the discharge water as it enters the Colorado River. Monitoring downstream water quality in the Colorado River is performed by the Texas Commission of Environmental Quality (TCEQ), the Lower Colorado River Authority (LCRA), and the City of Austin Watershed Protection Department (WPD) all of whom have the resources, equipment, and access to the river.

### **Recommendations 4, 12: Annual Reporting to the Environmental Commission**

#### **Environmental Commission Recommendations:**

#### ***4. Report back to the Environmental Commission annually on all administrative variance approvals.***

#### ***12. Receive an annual report at the Environmental Commission of the project through completion.***

Austin Water regularly provides informational briefings to Boards and Commissions including the Environmental Commission upon request. These briefings serve as a platform for ongoing communication, allowing Commission members to stay informed about key infrastructure projects, regulatory updates, operational changes, and environmental initiatives. Austin Water values this engagement as an important component of collaborative governance.

Austin Water, in conjunction with the Watershed Protection Department (WPD), will provide a report to the Environmental Commission of approved administrative variances for the Walnut Creek WWTP Expansion and Enhancements and provide briefings to the Environmental Commission upon request. Austin Water will also provide reports and briefings as requested to the City Council's Climate, Water, Environment and Parks Committee.

Including provisions in the proposed ordinance for routine communication to Board and Commissions falls outside the scope of the ordinance that the City Council directed staff to bring back through Resolution No. 20250327-062.

#### **Recommendation 5: Natural Elements and Native Plants at Base of Floodwall**

##### **Environmental Commission Recommendation:**

- 5. *Incorporate natural elements and native Texas plants along the base of the floodwall to increase biodiversity.***

Austin Water will implement this recommendation and is fully committed to carrying out this action administratively to provide native seeding in accordance with the City of Austin Standard Technical Specification *Item 609: Native Seeding and Planting for Restoration*. Since this recommendation is covered under the standard technical specification, it can be effectively implemented without requiring inclusion in the ordinance.

#### **Recommendation 6: Heritage Trees**

##### **Environmental Commission Recommendation:**

- 6. *Incorporate a tree management plan for the heritage trees and trees planted on the property and mitigation property.***

Austin Water will implement this recommendation and is fully committed to carrying out this action administratively to provide a tree management and mitigation plan in accordance with the City of Austin Standard Technical Specification *ITEM NO. 608 – Planting* and *Item No. 610 - Preservation of Trees and Other Vegetation*. Since this recommendation is covered under the standard technical specification, it can be effectively implemented without requiring inclusion in the ordinance.

#### **Recommendation 7: Reduce light pollution with dark skies lighting**

##### **Environmental Commission Recommendation:**

- 7. *Reduce light pollution with dark skies lighting.***

Austin Water will meet the requirements of City Code Title 25-2, Article 2.5 Lighting which includes the requirements of fully shielded light fixtures, a fundamental dark sky lighting principle in the design of the proposed expansion. An exception would be temporary lighting for maintenance activities to be conducted at night. The proposed Ordinance is not seeking a variance from City Code Title 25-2.

#### **Recommendations 8, 9: Critical Water Quality Zone Mitigation**

##### **Environmental Commission Recommendation:**

- 8. *Prioritize purchasing adjacent properties that would increase the critical water quality zone (CWQZ).***
- 9. *Extend the CWQZ associated with the southernmost segment of Walnut Creek from 150% to 200%.***

Adjacent properties that are not owned by the City of Austin and are not currently within a Critical Water Quality Zone (CWQZ) are encumbered by the CapMetro railroad, existing private residences, or commercial developments. As a result, this recommendation was deemed infeasible.

Austin Water and the Watershed Protection Department are proposing, through the ordinance, a 150% CWQZ buffer mitigation area in accordance with the Environmental Criteria Manual Section 1.5.2. This proposal aims to provide the greatest environmental benefit to the riparian corridor of Walnut Creek.

**Recommendation 10: Public open space engagement**

**Environmental Commission Recommendation:**

***10. Enhance and improve the public benefit with birding, walking, nature exploration, and other benefits.***

For safety and security, the operating areas of the Walnut Creek WWTP plant are not accessible. However, the pond located north of the plant, fronting FM 969, is publicly accessible and will remain open for public use. This area includes designated parking that serves both the pond and Walnut Creek Trail. Approximately 1.2 miles of trails are located on the WWTP site west of Walnut Creek.

Additionally, Austin Water will coordinate with the Arts in Public Places (AIPP) program to explore the potential use of the proposed flood wall fronting FM 969 as a possible surface for public art installation.

**Recommendation 11: Solar panel installation**

**Environmental Commission Recommendation:**

***11. Require installation of solar panels to be used onsite or produce energy for the region.***

*Per an Item from Council passed May 22, Building Services and the Office of Climate Action and Resilience, in partnership with Austin Energy, will assess current feasibility of rooftops and City properties for potential solar panel installation.*

**Recommendation 13: Low carbon concrete**

**Environmental Commission Recommendation:**

***13. Utilize low-carbon concrete in the project.***

The City of Austin is developing a low-carbon concrete specification which is scheduled to be included in the City's Specification for Fiscal Year 2026. Upon acceptance, the specification will be incorporated into the project.

**Recommendation 14: Parkland transfer**

**Environmental Commission Recommendation:**

***14. Explore the feasibility of transferring or utilizing 50 acres to the Parks and Recreation Department as parkland.***

Austin Water and the Parks and Recreation Department (PARC) maintain a coordinated approach to the management and evaluation of excess land throughout the city. At the Walnut Creek Wastewater Treatment Plant (WWTP), the remaining available site area—excluding land within the existing floodplain, the Critical Water Quality Zone (CWQZ), the CWQZ mitigation area, and the Walnut Creek Trail alignment—does not offer sufficient space to accommodate a 50-acre park.

Furthermore, the site is constrained by the CapMetro Railroad to the east and south, which limits potential connectivity.

For informational purposes, PARD currently owns two adjacent parcels of land south of the Walnut Creek WWTP, measuring 33.6 acres and 31.52 acres, respectively. These parcels are located along the Colorado River and are connected to the east to the 330-acre John Treviño Jr. Metropolitan Park. In addition, PARD is in active negotiations to acquire the former Driveway Austin Motorsports site, which closed in 2021 and is currently owned by Oracle. This additional 43.4-acre parcel would enhance connectivity to both the John Treviño Jr. Metropolitan Park and the Colorado River corridor.