



# CITY OF HOUSTON

**Sylvester Turner**

Mayor

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The Honorable J.M. Lozano  
Chair, House Environmental Regulation Committee  
Texas House Representatives  
P.O. Box 2910  
Austin, Texas 78768

Dear Chairman Lozano,

Illegal tire disposal has been a rampant problem in Texas for years. More than 36 million tires are discarded each year in Texas, roughly one and a half tires for every person residing in the state. If not transported and disposed of properly, these tires can lead to dangerous outcomes including costly, environmentally hazardous tire piles and increased fire, pollution, and public health and safety risks, such as increases in vector-borne illnesses like Zika, West Nile, and dengue fever. Illegal dumping is often a result of unlicensed scavengers culling and stealing used tires from generators then dumping their rejects. These tires are transported illegally and dumped, costing the state millions of dollars in cleanup.

In 2015 the City reinstated its own local program for enforcing regulations around the proper storage, transportation and disposal of scrap tires. If the state made their program more robust by strengthening manifest requirements, reinstating the per-tire fee, and allocating appropriate resources to enforcement, it would support and strengthen local efforts.

The TCEQ has the regulation in place to mitigate the scrap tire problem, however, they do not have an adequate number of inspectors going around the state to check on the manifests being produced by businesses involved with used and/or scrap tires.

With this in mind, I strongly favor passage of House Bill 3854, authored by Representative Armando Walle. HB 3854 would require a bond or other financial assurance as a condition of issuing a registration for the transportation, storage, or processing of scrap tires. The amount of the bond or other financial assurance required must be sufficient to cover the reasonable expenses of an immediate remedial or removal action. While I would prefer to see a funding component to cover the administrative, oversight and enforcement of the State's rules, HB 3854 is a step in the right direction.

Sincerely,

Sylvester Turner,  
Mayor

