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Blas J. Coy, Jr., *Public Interest Counsel*

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

July 8, 2008

LaDonna Castañuela, Chief Clerk  
Texas Commission on Environmental Quality  
Office of the Chief Clerk (MC-105)  
P.O. Box 13087  
Austin, Texas 78711-3087

CHIEF CLERKS OFFICE

2008 JUL -8 PM 3:37

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY

Re: **CITY OF CASTROVILLE**  
**TCEQ DOCKET NO. 2008-0559-MWD**

Dear Ms. Castañuela:

Enclosed for filing is the Public Interest Counsel's Response to Hearing Requests in the above-entitled matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Eli Martinez".

Eli Martinez, Attorney  
Assistant Public Interest Counsel

cc: Mailing List

Enclosure

REPLY TO: PUBLIC INTEREST COUNSEL, MC 103 • P.O. BOX 13087 • AUSTIN, TEXAS 78711-3087 • 512-239-6363

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • Internet address: [www.tceq.state.tx.us](http://www.tceq.state.tx.us)

**TCEQ DOCKET NO. 2008-0559-MWD**

**IN THE MATTER OF THE  
APPLICATION BY  
CITY OF CASTROVILLE  
FOR TPDES PERMIT NO.  
WQ0010952001**

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**BEFORE THE  
TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY**

**THE OFFICE OF PUBLIC INTEREST COUNSEL'S  
RESPONSE TO HEARING REQUEST**

TO THE HONORABLE MEMBERS OF THE TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY:

COMES NOW, the Office of Public Interest Counsel (OPIC) of the Texas Commission on Environmental Quality (the Commission or TCEQ) and files this Response to Hearing Request in the above-referenced matter.

**I. INTRODUCTION**

The City of Castroville has applied to the TCEQ for a major amendment to its Texas Land Application (TLAP), Permit No. 10952-001, to change from disposal via irrigation at a daily average flow not to exceed 350,000 gallons per day to discharges into water in the state at a daily average flow not to exceed 900,000 gallons per day. The proposed draft permit is structured in four phases. In the Interim Phase I only, the draft permit authorizes the disposal of the treated effluent at a daily average flow not to exceed 350,000 gallons per day via surface irrigation of 26.6 acres of a public access park, and 166.8 acres of non-public access pastureland. Application rates shall not exceed 2.03 acre-feet per year per acre irrigated. The draft permit authorizes the discharge of treated domestic wastewater at a volume not to exceed a daily average flow of 350,000 gallons per day in the Interim II Phase; at a volume not to exceed a

daily average flow of 450,000 gallons per day in Interim III Phase; and at a volume not to exceed a daily average flow of 900,000 gallons per day in the final phase.

The effluent limitations in the Interim I phase of the draft permit, based on a 30-day average, are 20mg/l Biological Oxygen Demand (BOD<sub>5</sub>), 20 mg/l Total Suspended Solids (TSS). The effluent limitations in Interim II, III, and the final phase of the draft permit, based on a 30-day average are 10mg/l BOD<sub>5</sub>, 15 mg/l TSS, 1.0 mg/l Total Phosphorus, and 4.0mg/l Minimum Dissolved Oxygen (DO). The effluent shall contain a chlorine residual of at least 1.0mg/l and shall not exceed a chlorine residual of 4.0 mg/l after a detention time of at least 20 minutes based on peak flow. The treated effluent will be discharged into an unnamed natural drainage swale; then to the Medina River below the Media Diversion Lake in Segment No. 1903 of the San Antonio River Basin. The unclassified receiving water uses are no significant aquatic life use for the unnamed natural drainage swale. The designated uses for Segment No. 1903 are contact recreation, public water supply, and high aquatic life use.

The permit amendment application was received on December 8, 2006 and declared administratively complete on February 15, 2007. The Notice of Receipt of Application and Intent to Obtain a Water Quality Permit (NORI) was published on March 8, 2007 in the *Hondo Anvil Herald*. The Notice of Application and Preliminary Decision for a Water Quality Permit (NAPD) was published on May 31, 2007, in the *Hondo Anvil Herald*. The Notice of Public Meeting was published on October 25, 2007 in the *Hondo Anvil Herald*. The public comment period ended on November 29, 2007.

## II. REQUIREMENTS OF APPLICABLE LAW

This application was declared administratively complete after September 1, 1999, and is subject to the requirements of Texas Water Code § 5.556 added by Acts 1999, 76<sup>th</sup> Leg., ch 1350 (commonly known as "House Bill 801"). Under the applicable statutory and regulatory requirements, a hearing request must substantially comply with the following: give the name, address, daytime telephone number, and, where possible, fax number of the person who files the request; identify the requestor's personal justiciable interest affected by the application showing why the requestor is an "affected person" who may be adversely affected by the proposed facility or activity in a manner not common to members of the general public; request a contested case hearing; list all relevant and material disputed issues of fact that were raised during the comment period that are the basis of the hearing request; and provide any other information specified in the public notice of application. 30 TEXAS ADMINISTRATIVE CODE (TAC) § 55.201(d). Under 30 TAC § 55.203(a), an affected person is "one who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application." This justiciable interest does not include an interest common to the general public. 30 TAC § 55.203(c) also provides relevant factors that will be considered in determining whether a person is affected. These factors include:

- 1) whether the interest claimed is one protected by the law under which the application will be considered;
- 2) distance restrictions or other limitations imposed by law on the affected interest;
- 3) whether a reasonable relationship exists between the interest claimed and the activity regulated;
- 4) likely impact of the regulated activity on the health and safety of the person, and on the use of property of the person;
- 5) likely impact of the regulated activity on use of the impacted natural resource by the person; and

- 6) for governmental entities, their statutory authority over or interest in the issues relevant to the application.

The Commission shall grant an affected person's timely filed hearing request if: (1) the request is made pursuant to a right to hearing authorized by law; and (2) the request raises disputed issues of fact that were raised during the comment period and that are relevant and material to the commission's decision on the application. 30 TAC §55.211(c).

The Commission has also set forth specific criteria for judging whether a group or organization should be considered an "affected person." 30 TAC § 55.205(a) states that a group or association may request a hearing if:

- 1) one or more members of the group or association would otherwise have standing to request a hearing in their own right;
- 2) the interests the group or association seeks to protect are germane to the organization's purpose; and
- 3) neither the claim asserted nor the relief requested requires the participation of the individual members in the case.

Any group or association which meets all of these criteria shall be considered an "affected person."

Accordingly, pursuant to 30 TAC § 55.209(e), responses to hearing requests must specifically address:

- 1) whether the requestor is an affected person;
- 2) which issues raised in the hearing request are disputed;
- 3) whether the dispute involves questions of fact or law;
- 4) whether the issues were raised during the public comment period;
- 5) whether the hearing request is based on issues raised solely in a public comment withdrawn by the commenter in writing by filing a withdrawal letter with the chief clerk prior to the filing of the Executive Director's response to Comment;
- 6) whether the issues are relevant and material to the decision on the application; and
- 7) a maximum expected duration for the contested case hearing.

### III. DISCUSSION

#### A. Determination of Affected Person Status

The Office of the Chief Clerk received timely-filed requests for a contested case hearing on the issuance of Applicant's permit from fifty-three residents<sup>1</sup> and the Texas Rivers Protection Association (TRPA).

##### I. Texas Rivers Protection Association

John Hohn, on behalf of TRPA, submitted a timely-filed hearing request asserting that the TRPA is a non-profit organization in good standing comprised of over 500 members, some of whom own property near down-stream of the effluent route. Mr. Hohn raises the concern that permitted treatment levels would have "unjustified adverse affects upon the water quality and the use and enjoyment of the Medina River downstream of the discharge point."<sup>2</sup> Although the matters of water quality and use and enjoyment of property are material and relevant factors in the commission's permitting decision, at least one member of the association must have a personal interest in those factors in a manner not common to the general public for an association to qualify as an affected person under 30 TAC §55.205(a).

While the TRPA's hearing request states that, "among the approximate 500 members of the TRPA are individuals who own Medina River front property with associated riparian rights

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<sup>1</sup> The requestors are: Donna Schueling, Janet Stock, Craig Tingey, R L Wagner, Jim Warnke, Dennis Wengenroth, Ray Youngblood, John Ramsey, Rodney Reus, Stephen Reus, Jerry Rihn, Stanley Rihn, Bryan Royal, Ike Salinas, Joseph Schott, Harvey Leekunze, Constance Mangold, Matt Mangold, L R McBroom, Shane Menchaca, Loretta Moczygemba, James Mueller, John Mueller, Rosaelia Navarre, Ray Packard, Cheryl & David Parker, Patrick Hitzfelder, Royce Hitzfelder, John Hohn, Janis Hunt, Jim Hunt, Debra Jungman, Virgil Jungman, Curtis Keller, Joseph Keller, Ladislaus Kowalik, Albert Krueger, Crystal Krueger, Cynthia Lange, Rose Aldape, Evangeline Bippert, Brenda Bowman, Roberto Chapa, David Chavez, Concerned Citizen, Brittney Conn, Laurel D'Orsogna, Clinton Groff, Sidney Groff, Janice Haby, John Hall, Jennifer & Russell Hinson, Anna Mae Hitzfelder

<sup>2</sup> See John Hohn Esq. "Request for Contested Case Hearing, City of Castroville" dated April 22, 2008.

located near downstream of the proposed diversion,”<sup>3</sup> he identifies no specific person. Without a specific name, location, and distance from the discharge point, there is no basis to find that TRPA has a member who is an affected person. OPIC therefore cannot find that TRPA has demonstrated that at least one member would otherwise have standing to request a hearing in their own right as required by 30 TAC §55.205(a).

## II. Resident Proximity to Discharge Route and Affected Person Status

Thirty-two of the fifty-three residents who requested a contested case hearing provided addresses that could not be located on the aerial map of the plant site generated by the Executive Director's Geographic Information Systems Team.<sup>4</sup> Of the remaining twenty-one residents, only Britney Conn, Albert Krueger, Janice Haby, and Ladislaus Kowalik are located within the over two-mile purview of the executive director's map. Only Brittney Conn and Albert Krueger are located on the map as being within two miles downstream of the discharge route. Additionally, OPIC notes that while Harvey Leekunze's property is not identified on the map, he expressly states that his property lies within one mile of the discharge point. For these reasons, and without further information showing the specific location of the property held by the other requestors who were not located on the map, OPIC cannot find that these requestors are affected persons. Therefore, OPIC's further analysis below will focus solely on Brittney Conn, Albert Krueger, and Harvey Leekunze.

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<sup>3</sup> Id.

<sup>4</sup> Residents who could not be located: Donna Schueling, Craig Tingey, Dennis Wengenroth, Ray Youngblood, Jerry Rihn, Bryan Royal, Joseph Schott, Harvey Leekunze, L R McBroom, Shane Menchaca, James Mueller, John Mueller, Ray Packard, Cheryl & David Parker, Patrick Hitzfelder, Royce Hitzfelder, John Hohn, Janis Hunt, Jim Hunt, Debra Jungman, Virgil Jungman, Curtis Keller, Joseph Keller, Cynthia Lange, Evangeline Bippert, Roberto Chapa, David Chavez, Concerned Citizen, Laurel D'Orsogna, Clinton Groff, Sidney Groff, Jennifer & Russell Hinson, Anna Mae Hitzfelder

### III. Brittney Conn and Albert Krueger

Brittney Conn and Albert Kruger filed a common form letter for their individual requests. These requests raise the concerns that the permitted activities will negatively affect the health and safety of the general public utilizing the Castroville Regional Park, the health of wildlife exposed to the effluent, and the water quality of the Medina River, as well as precipitate ground and surface water pollution. Ms. Conn and Mr. Kruger also claim that the application is deficient with respect to the requirements for discharge routing, compliance history, and notice, while additionally improperly considering public comment, Texas Parks and Wildlife reviews, "Federal Water Quality Act" strictures, and alternative wastewater treatment options.

Other than the issues concerning use of the Castroville Regional Park by the general public, consideration of public comment or Texas Parks and Wildlife reviews, alternative options for wastewater treatment, and compliance with the "Federal Water Quality Act," these issues are protected by the law under which the application will be considered.<sup>5</sup> However, as noted in the request, these issues are concerns shared by the general public. The request fails to identify any likely impact on specific interests of Brittney Conn or Albert Kruger. For this reason, OPIC cannot recommend a finding that Brittney Conn and Albert Krueger are affected persons. OPIC will reconsider its recommendation in light of any timely filed reply showing how the regulated interest may impact Ms. Conn and Mr. Kruger's specific personal interests.

### IV. Harvey Leekunze

Harvey Leekunze provided a timely-filed hearing request listing only a PO Box address. However, Mr. Leekunze states in his request that he owns property "within one mile of the

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<sup>5</sup> 30 TAC § 55.203(c)(1).

discharge point of the proposed City of Castroville wastewater plant.”<sup>6</sup> Mr. Leekunze states that he and his family use the subject watercourse for swimming and fishing. He is further concerned about the potential effects of the discharge on shallow wells that are used as a source of drinking water. These issues are protected by the law under which the application will be considered.<sup>7</sup> However, without more information about the exact location of Mr. Leekunze’s property in relation to the discharge point, especially concerning whether he is upstream or downstream of the discharge and whether his property is adjacent to the discharge route, OPIC cannot evaluate the likely impact of the regulated activity on his interests. OPIC further notes that while the request states that drinking water is “also derived” from nearby wells, the request is ambiguous as to whether Mr. Leekunze and his family actually rely on these wells for their drinking water. Therefore, OPIC cannot recommend granting this request without further information. OPIC will reconsider its recommendation in light of any timely filed reply showing the specific location of Mr. Leekunze’s property and clarifying his interests concerning drinking water.

#### **B. Issues Raised in the Hearing Requests**

In the event the Commission determines to grant a hearing based on the pending request and any additional timely filed replies from the requestors, OPIC provides the following analysis of the issues raised by Brittney Conn, Albert Kruger and Harvey Leekunze:

- 1) Brittney Conn and Albert Kruger assert the permit does not properly consider public comment.
- 2) Brittney Conn and Albert Kruger assert the permit does not properly consider Texas Parks and Wildlife reviews.
- 3) Brittney Conn and Albert Kruger assert that superior alternative wastewater treatment options exist.

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<sup>6</sup> See Harvey Leekunze, “RE:City of Castroville Texas TPDES Permit No. WQ0010952001,” dated April 2, 2008.

<sup>7</sup> 30 TAC § 55.203(c)(1).

- 4) Brittney Conn and Albert Kruger are concerned the permitted activity will affect the health and safety of the general public utilizing the Castroville Regional Park.
- 5) Brittney Conn and Albert Kruger assert the applicant's compliance history warrants denial of the permit.
- 6) Brittney Conn and Albert Kruger assert the permit does not comply with "Federal Water Quality Act" strictures.
- 7) Brittney Conn and Albert Kruger assert proper notice of the application was not provided.
- 8) Brittney Conn and Albert Kruger assert that the discharge route is not a natural stream and in violation of discharge permits requiring effluent be treated before being pumped on land.
- 9) Mr. Leekunze is concerned the discharge route will not function as expected.
- 10) Mr. Leekunze is concerned the permitted activity will affect the health of himself and his family.
- 11) Each requestor is concerned the permitted activity will affect the health of wildlife exposed to the discharge.
- 12) Each requestor is concerned the permitted activity will result in pollution of water exposed to the effluent.

**C. Issues raised in Comment Period**

All of the issues raised in the hearing request were raised in the comment period and have not been withdrawn. 30 TAC §§55.201(c) & (d)(4), 55.211(c)(2)(A).

**D. Disputed Issues**

There is no agreement between the requestors and the Applicant or Executive Director on the issues raised in the hearing request.

**E. Issues of Fact**

If the Commission considers an issue to be one of fact, rather than one of law or policy, it is appropriate for referral to hearing if it meets all other applicable requirements. *See* 30 TAC

§55.211(b)(3)(A) and (B). The issues concerning improper consideration of public comments and reports by the Texas Parks and Wildlife, alternative wastewater treatment options, and the effect on the general public who utilize Castroville Regional Park are matters of policy inappropriate for referral to the State Office of Administrative Hearings (SOAH). Furthermore, the assertion that the permit does not comply with "Federal Water Quality Act" strictures, which presumably refers to the Federal Clean Water Act (CWA), is a question of law also inappropriate for referral to SOAH. The EPA has delegated the National Pollutant Discharge Elimination System to the State of Texas, and without specific reference to violation of a Texas Surface Water Quality Standard or TCEQ rule or regulation, the issue cannot be referred.

Brittney Conn and Albert Kruger also assert proper notice of the application was not provided to landowners upstream of the discharge point. 30 TAC §305.48(a)(2) requires that the application for a wastewater treatment facility show ownership of tracts of land for a reasonable distance "along the watercourse from the proposed point of discharge." The Office of the Chief Clerk thereafter mails the Notice of Receipt of Application and Intent to Obtain Permit to those named landowners in compliance with §39.418(b)(2). Nineteen adjacent and downstream owners were named on the application, and OPIC finds that Applicant and the Chief Clerk's Office complied with the requirements of 30 TAC §350.48(a)(2) by providing mailed notice to only those landowners. For all other residents, notice of the NORI and NAPD was published in the *Hondo Anvil Herald* as required under 30 TAC §39.551(c)&(d), and the Applicant has attested that a copy of the NORI, NAPD, and draft permit were posted at the Castroville City Hall. Based on this information, OPIC finds that notice was given in accordance with applicable agency regulations.

## F. Relevant and Material Issues

Brittney Conn and Albert Kruger further assert that the discharge location is a man-made open ditch, not a natural stream, and in violation of discharge permits requiring effluent be treated before being pumped on land. As indicated on the Executive Director's Response to Comments, the fact that the drainage ditch or swale is man-made or natural does not impact the application process as long as surface waters of the state are involved. Texas Surface Water Quality Standards apply to all surface waters in the state, whether those waters cross constructed or naturally occurring geographic features. OPIC therefore finds that the issue of quality standards for man-made features along the effluent route is not a relevant or material issue in this particular application.

However, the remaining issues stated in the hearing requests are relevant and material to the Commission's decision under the requirements of 30 TAC §§ 55.201(d)(4) and 55.211(c)(2)(A). Relevant and material issues are those that are governed by the substantive law under which this permit is to be issued.<sup>8</sup> In order to refer an issue to the State Office of Administrative Hearings (SOAH), the Commission must find that the issue is relevant and material to the Commission's decision to issue or deny this permit.<sup>9</sup> Pursuant to Texas Water Code §§ 26.027(a) and 26.003, the Commission may issue permits for wastewater discharges based upon the draft permit's effectiveness in maintaining the water quality of the state, public health and enjoyment,<sup>10</sup> and "the propagation and protection of terrestrial and aquatic life."<sup>11</sup>

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<sup>8</sup> *Id.*

<sup>9</sup> See *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248-251(1986) (in discussing the standards applicable to reviewing motions for summary judgment the Court stated "[a]s to materiality, the substantive law will identify which facts are material. ... it is the substantive law's identification of which facts are critical and which facts are irrelevant that governs.")

<sup>10</sup> See also 30 TAC § 60.3(a)(4)(A)(i).

Furthermore, the Commission may consider compliance history when evaluating whether to amend a permit under Texas Water Code Chapter 26. Therefore, the issues raised by the protestants concerning the permitted activity's effect on human health, aquatic and terrestrial life, water quality, the Applicant's compliance history, and proper functioning of the discharge route as modeled are all relevant and material to this Commission's decision on the application and appropriate for referral to SOAH.

#### **G. Issues Recommended for Referral**

In the event the Commission finds that the requestors have provided sufficient information showing they are affected persons, OPIC would recommend that the following disputed issues of fact be referred to the State Office of Administrative Hearings for a contested case hearing:

- 1) Brittney Conn and Albert Krueger's concern that Applicant's compliance history warrant denial of the permit.
- 2) Mr. Leekunze's concern that the permitted activity will affect human health.
- 3) Mr. Leekunze's concerned the discharge route will not function as expected.
- 4) Each requestor's concern that the permitted activity will affect the health of wildlife exposed to the discharge.
- 5) Each requestor's concern that the permitted activity will result in pollution of water exposed to the effluent.

#### **H. Maximum Expected Duration of Hearing**

Commission Rule 30 TEX. ADMIN. CODE § 55.115(d) requires that any Commission order referring a case to SOAH specify the maximum expected duration of the hearing by stating a date by which the judge is expected to issue a proposal for decision. The rule further provides

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<sup>11</sup> Texas Water Code §26.003

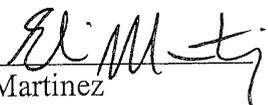
that no hearing shall be longer than one year from the first day of the preliminary hearing to the date the proposal for decision is issued. To assist the Commission in stating a date by which the judge is expected to issue a proposal for decision, and as required by 30 TEX. ADMIN. CODE §55.209(d)(7), OPIC estimates that the maximum expected duration of a hearing on this application would be nine months from the first date of the preliminary hearing until the proposal for decision is issued.

#### IV. CONCLUSION

OPIC cannot find that the requestors have demonstrated affected persons status. If Brittney Conn, Albert Kruger and Harvey Leekunze file timely replies, OPIC will reconsider its position. If a hearing is granted, OPIC recommends referring to SOAH the issues recommended above.

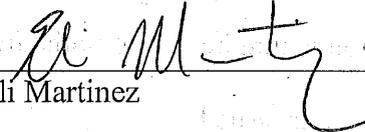
Respectfully submitted,

Blas J. Coy, Jr.  
Public Interest Counsel

By   
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**CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 2008 the original and eleven true and correct copies of the Office of Public Interest Counsel's Response to Hearing Requests were filed with the Chief Clerk of the TCEQ and a copy was served to all persons listed on the attached mailing list via hand delivery, facsimile transmission, Inter-Agency Mail or by deposit in the U.S. Mail.

  
Eli Martinez

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TCEQ DOCKET NO. 2008-0559-MWD**

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*See attached list.*

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