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March 14, 2016

***Via Electronic Filing***

Bridget Bohac, Chief Clerk  
Texas Commission on Environmental Quality  
Building F  
12100 Park 35 Circle  
Austin, Texas 78753

Re: Application of Ventana Development McCrary, Ltd.  
for New TPDES Permit No. WQ0015241001  
TCEQ Docket No. 2016-0144-MWD  
*Applicant's Response to Hearing Requests*

Dear Ms. Bohac:

Enclosed for filing in the above-referenced matter, please find Applicant Ventana Development McCrary, Ltd.'s Response to Hearing Requests. A copy of this filing has been served on the persons identified below.

Thank you for your attention to this matter. If you have any questions concerning this filing, please do not hesitate to contact me at the number above.

Sincerely,



Danny G. Worrell  
Attorney for Ventana Development McCrary, Ltd.

Enclosure

cc: Celia Castro, TCEQ  
David Akoma, TCEQ  
Brian Christian, TCEQ  
Vic McWherter, TCEQ  
Clark T. and Sara A. Blair  
Ronald and Gail Cradit  
Cherie Gleghorn and Shawn Lee  
Al and Darlene Glos  
Russell L. Roy

**TCEQ PERMIT NO. WQ0015241001**

<b>APPLICATION BY</b>	§	
<b>VENTANA DEVELOPMENT</b>	§	<b>BEFORE THE</b>
<b>MCCRARY, LTD. FOR TPDES</b>	§	<b>TEXAS COMMISSION ON</b>
<b>PERMIT NO. WQ0015241001</b>	§	<b>ENVIRONMENTAL QUALITY</b>

**APPLICANT’S RESPONSE TO HEARING REQUESTS**

TO THE HONORABLE COMMISSIONERS:

COMES NOW, Ventana Development McCrary, Ltd. (“Ventana” or “Applicant”) and files this response to the hearing requests regarding the application for Texas Pollutant Discharge Elimination System (“TPDES”) Permit No. WQ0015241001, and respectfully shows the following:

**I. INTRODUCTION**

**A. Facility Description**

Ventana has applied to the TCEQ for a new TPDES permit to authorize the discharge of treated domestic wastewater at a daily average flow not to exceed 100,000 gallons per day (“gpd”) in the Interim Phase, and a daily average flow not to exceed 200,000 gpd in the Final Phase of the McCrary Meadows Wastewater Treatment Facility (“Facility”).

The Facility would be located approximately 0.25 mile north of the intersection of Brandt Road and McCrary Road, on the east side of McCrary Road, in Fort Bend County, Texas. The proposed wastewater treatment Facility would ultimately service the McCrary Meadows subdivision (the “Development”) located in Fort Bend County Municipal Utility District No. 143 (“MUD 143”), which will (by assignment of the permit after issuance) own, operate and maintain the Facility. The treated effluent would be discharged through a 1,530 foot pipeline to an unnamed tributary, then to Jones Creek, and then to Brazos River Below Navasota River in Segment No. 1202 of the Brazos River Basin. The unclassified receiving water uses are limited

aquatic life use for the unnamed tributary and high aquatic life use for Jones Creek. Segment No. 1202 is designated high aquatic life use, public water supply, and primary contact recreation.

The Facility will be an activated sludge process plant operated in the extended aeration mode for both phases. In the Interim Phase, treatment units will include a bar screen, two aerobic sludge digesters, two aeration basins, a final clarifier, and a chlorine contact chamber. In the Final Phase, treatment units will include a bar screen, three aerobic sludge digesters, three aeration basins, a final clarifier, and a chlorine contact chamber. MUD 143 already has employed an operator, Environmental Development Partners, to operate the Facility once the permit is granted and the Facility can begin construction.

**B. Procedural Background**

The application in this case was submitted to TCEQ on April 2, 2014 and declared administratively complete on May 15, 2014. The Notice of Receipt and Intent to Obtain a Water Quality Permit (“NORI”) was published in English on May 29, 2014. After publication of the NORI, the Applicant requested a change to the proposed discharge route to accommodate requests of residents outside the MUD 143 area. Originally, the application proposed to discharge to an unnamed tributary, then to Jones Creek, then to Brazos River Below Navasota River in Segment No. 1202 of the Brazos River Basin. To help ameliorate concerns raised by several area landowners who do not reside inside MUD 143, the revised discharge route will be via a 1,520 foot pipeline to an unnamed tributary, then to Jones Creek, and then to Brazos River Below Navasota River in Segment No. 1202 of the Brazos River Basin. *See* Attachment A (Map). To ensure landowners had adequate notice of this change, the Applicant published a combined NORI and Notice of Application and Preliminary Decision (“NAPD”) in the Spanish newspaper, *El Perico*, on August 23, 2015, and in English in the *Houston Chronicle* on August

27, 2015. After the public comment period, the Executive Director (“ED”) issued a Response to Comments (“RTC”) on December 18, 2015. The deadline for requesting a contested hearing or requesting reconsideration of the ED’s decision was January 22, 2016.

## **II. LEGAL STANDARDS GOVERNING HEARING REQUESTS**

Because the application was administratively complete on or after September 1, 1999, it is subject to the procedural requirements adopted pursuant to House Bill 801, 76th Legislature, 1999, and TCEQ rules at 30 Tex. Admin. Code (“TAC”) Chapter 55, Subchapter G, §§ 55.200-55.211.

Commission rules provide that a request for a contested case hearing shall be granted if the request is made by an “affected person” and it:

- (A) raises disputed issues of fact that were raised during the comment period, that were not withdrawn by the commenter by filing a withdrawal letter with the chief clerk prior to the filing of the executive director’s response to comment, and that are relevant and material to the Commission’s decision on the application;
- (B) is timely filed with the chief clerk;
- (C) is pursuant to a right to hearing authorized by law; and
- (D) complies with the requirements of § 55.201<sup>1</sup> of this title (relating to Requests for Reconsideration or Contested Case Hearing).

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<sup>1</sup> Section 55.201 specifies the requirements for reconsideration or contested case hearing. A request for a contested case hearing by an affected person must be in writing, filed with the Chief Clerk no later than 30 days after the Chief Clerk mails (or otherwise transmits) the Executive Director’s decision and response to comments and may not be based on an issue that was raised solely in a public comment withdrawn by the commenter in writing with the Chief Clerk prior to the filing of the ED’s Response to Comments. The hearing request must substantially comply with the following: (1) give the name, address, daytime telephone number, and, where possible, fax number of the person who files the request. If the request is made by a group or association, the request must identify one person by name, address, daytime telephone number and, where possible, fax number, who shall be responsible for receiving all official communications and documents for the group; (2) identify the person’s justiciable interest affected by the application, including a brief, but specific, written statement explaining in plain language the requestor’s location and distance relative to the proposed facility or activity that is the subject of the application and how and why the requestor believes he or she will be adversely affected by the proposed facility or activity in a manner not common

30 TAC § 55.211(c)(2).

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.” 30 TAC § 55.203(a).

Commission rules also provide relevant factors that are to be considered in determining affected person status, including but not limited to, the following:

- (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 the property of the person; and
- (5) likely impact of the regulated activity on use of the impacted natural resource by the person.

30 TAC § 55.203(c).

Commission rules specify that a response to a request for hearing must specifically address the following:

- (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;

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to members of the general public; (3) request a contested case hearing; and (4) list all relevant and material disputed issues of fact that were raised in the public comment period and that are the basis of the hearing request. 30 TAC § 55.201(c) & (d).

- (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 ED'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.

30 TAC § 55.209(e).

### **III. ANALYSIS OF HEARING REQUESTORS' STATUS AS AFFECTED PERSONS**

The timely filed hearing requestors include Clark and Sara Blair, Ronald and Gail Cradit, Darlene and Al Glos, Daniel and Donna Krueger, Cherie Gleghorn and Shawn Lee, Russell Roy, and David and Lisa Denton. Daniel and Donna Krueger and David and Lisa Denton withdrew their hearing requests on September 30, 2015 and October 22, 2015, respectively. Ventana asserts that none of the remaining requestors is an affected person based upon the factors set out in 30 TAC § 55.203(c). In particular, the Applicant submits that the requestors are not affected persons because the distances of their properties from the Facility are so great that they will not be affected by operations at the permitted Facility. Further, none of the requestors own property along the discharge route downstream from the point where the treated effluent would enter the unnamed tributary. *See* Attachment A (Map).

With respect to Mr. Russell, Mr. and Ms. Cradit, Mr. and Ms. Glos, and Ms. Gleghorn and Mr. Lee, Applicant objects to any determination that these individuals are affected persons, because none of these individuals own property bordering or adjacent to the proposed Development, Facility, or along the proposed discharge route. *See* Attachment A (Map). The point of Mr. Russell's property closest to the Facility is 1,319.9 feet away from the 150-foot buffer zone that would surround the Facility. The point of Mr. and Ms. Cradit's property closest

to Facility is 1,728.6 feet away. The point of Mr. and Ms. Glos's property closest to the Facility is 1,637.6 feet away. The point of Ms. Gleghorn and Mr. Lee's property that is closest is 4,904.4 feet away. Due to the distance of the requestors' properties from the Facility site, the interests of these individuals are no different from that of the general public, and therefore, they should not be considered affected persons.

With respect to Mr. and Ms. Blair, the Applicant objects to any determination that these individuals are affected persons because their property is located upstream from the proposed discharge point, does not border nor is it adjacent to the proposed Facility, and it is well outside the 150-foot buffer zone (616.4 feet at the closest point). Mr. and Ms. Blair do not own property along the discharge route. Under the original application, effluent would have been discharged from the Facility to an unnamed tributary whose path runs partially through Mr. and Ms. Blair's property. To address Mr. and Ms. Blair's concerns, the Applicant revised the discharge route so that effluent will be discharged via pipeline to the tributary at a point downstream of Mr. and Ms. Blair's property. *See Attachment A (Map)*. As a result of this change, Mr. and Ms. Blair's property is upstream of the proposed discharge. Further, as additionally discussed below, the Blairs have raised no issues evidencing personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the application. The interests the Blairs raise relate to concerns regarding the proximity of the proposed Facility and discharge point to their property, but they provide no explanation as to specific impacts either concern may have on their interests. They also raise concerns regarding flooding and drainage and potential contamination associated with flooding and drainage as a result of the proposed Facility and discharge (discussed further below), neither of which are issues the Commission considers in determining

to issue the permit in this case. Consequently, the Blairs' interests are no different from that of the general population and, therefore, they should not be considered affected persons.

#### IV. POTENTIAL ISSUES FOR REFERRAL

If the Commission were to determine that one or more hearing requestors is an affected person, the Commission must determine if there are issues that meet statutory requirements for referral to the State Office of Administrative Hearings ("SOAH") for consideration in a contested case hearing. *See* Tex. Water Code § 5.556.<sup>2</sup> Section 5.556 also requires the Commission to limit the number and scope of issues that are referred to SOAH for hearing. *Id.*

Most of the issues in this case were raised by multiple hearing requests and many have been addressed by the ED's RTC, dated December 18, 2015. As discussed above, the Applicant objects to the affected person designation of all the requestors, but the analysis below considers the issues raised by Mr. and Ms. Blair, Mr. and Ms. Cradit, Ms. and Mr. Glos, Ms. Gleghorn and Mr. Lee, and Mr. Roy. Where applicable, this analysis will attempt to track the RTC's review.

1. Proximity to Private Property (ED's RTC No. 2)<sup>3</sup>

Mr. and Ms. Blair comment they are opposed to the Facility due to its proposed location "in close proximity to our impacted property." The permitting process is limited to controlling the discharge of pollutants into waters of the state and protecting the water quality of the state's rivers, lakes, and coastal waters. As noted in the ED's RTC, TCEQ rules do not allow the ED to determine or mandate a different facility location, discharge location, or alternative means of conveyance and disposal than what is proposed by an applicant if the proposed facility complies

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<sup>2</sup> The Commission may refer issues to SOAH only if it determines that the issue: (1) involves a disputed question of fact; (2) was raised during the public comment period; and (3) is relevant and material to the decision on the application. Tex. Water Code § 5.556(d).

<sup>3</sup> This issue is discussed in the ED's RTC Response to Comment 2, but it was not in response to a comment from a hearing requestor. The Blairs' comment on this issue was submitted to the TCEQ after the RTC was issued.

with the rules and statutes. The TCEQ rules identify unsuitable site characteristics for wastewater treatment plants. 30 TAC § 309.13. One of these rules requires a 150-foot buffer zone between wastewater treatment plants and residential structures. 30 TAC § 309.13(e). The hearing requestors do not dispute that the Facility will meet this requirement. In fact, the closest hearing requestors' property, the Blair's property, is more than 600 feet from the edge of the Facility's 150-foot buffer zone. Consequently, this is not an issue for referral to SOAH, because it is not a disputed fact, nor is it relevant and material.

2. Property Values (ED's RTC No. 4)

Mr. Roy, Mr. and Ms. Cradit, Mr. and Ms. Glos, Ms. Gleghorn, and Mr. Lee raise the concern of the degradation of property values. As discussed in the ED's RTC, TCEQ has no jurisdiction to consider impact on property values. Consequently, this issue is not a relevant or material issue for consideration at a contested case hearing in this matter.

3. Drainage and Potential Flooding (ED's RTC No. 7)

Mr. and Ms. Blair raise concerns about potential flooding and state that it is their belief that the proposed Facility site lies within the 100-year flood plain. They also state that the area of the proposed site has not been formally studied in detail by FEMA, and that "[p]reliminary information suggests that the true 100-year flood plain along the unnamed tributary adjacent to the proposed wastewater treatment facility site is significantly higher and broader than what is shown on the current FEMA map." Mr. and Ms. Blair raise a related concern about drainage. They state that the location of the proposed site for the Facility has been subject to recent flooding and that this flooding has led to water accumulating on their property. Finally, Mr. and Ms. Blair express concern that a drainage report approved by the Fort Bend County Drainage District ("FBCDD"), which sets forth a plan for the Applicant to create a large drainage channel

from the Facility site, does not establish a timeline for the creation of a drainage channel and has not been approved by other regulatory agencies.

As discussed in the RTC, TCEQ does not have jurisdiction to address flooding or drainage unless there is a potential impact to water quality. Further, Mr. and Ms. Blair's statement that the Facility site lies within the 100-year floodplain is incorrect. TCEQ siting requirements do not allow wastewater treatment plants to be located in the 100-year floodplain unless the plant unit is protected from inundation and damage that may occur during the flood event. 30 TAC § 309.13(a). According to the application and to current and former FEMA maps, the proposed site is located outside the zone labeled "Special Flood Hazard Areas Subject to Inundation by the 1% Annual Chance Flood."<sup>4</sup> Whether FEMA has "formally studied in detail" the proposed site is not within TCEQ's jurisdiction to consider.

Although flooding and drainage are not issues that are material and relevant to the issuance of this permit, the plan set forth in the FBCDD drainage report will help address these concerns. The Applicant's development is within the boundaries of MUD 143. Therefore, both the Applicant and MUD 143 will build a large drainage channel to significantly improve the drainage and reduce flooding on McCrary Road in accordance with FBCDD instructions. In fact, MUD 143 has bonds authorized but unissued for the construction of all public water, sanitary sewer and drainage facilities to serve all of Applicant's property that will be served by the Facility. Being a political subdivision of the State of Texas, MUD 143 is subject to the continuing jurisdiction of the TCEQ and therefore operating the Facility as well as the public

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<sup>4</sup> The FEMA map submitted with the application shows the Facility site to be in Zone X (unshaded), described in the Legend as "areas determined to be outside 500-year floodplain." The 2014 FEMA map, which was unavailable at the time the application was submitted, shows the Facility site as being located in Zone X (shaded), which is labeled in the legend with the description, "Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood."

water, sanitary sewer and drainage facilities will be done in accordance with TCEQ rules and regulations.

Finally, the Facility Site will have a water retention facility for the purpose of water retention during periods of heavy rainfall on a twelve-acre tract adjacent to the 200-acre single family residential Development. Based on the FBCDD-approved drainage study, the Development is not likely to increase the existing storm water runoff conditions. Consequently drainage and flooding are not relevant or material issues for TCEQ's issuance of this permit. To the extent this issue is referred to SOAH, Ventana respectfully requests that it be described as follows: "Whether the application complies with TCEQ regulations at 30 TAC § 309.13(a)."

4. Nuisance Claims (ED's RTC Nos. 7 and 9)

Mr. Roy, Mr. and Ms. Cradit, Mr. and Ms. Glos, Ms. Gleghorn and Mr. Lee list as concerns noise pollution and light pollution from the proposed Facility and state a concern about the potential negative impact to their quality of life. TCEQ does not have jurisdiction to address nuisance claim issues such as light and noise pollution and the impairment of quality of life, but issuance of this permit would not preclude landowners from seeking common law remedies for trespass, nuisance, or other causes of action in the courts. Therefore, these issues are not relevant or material issues for TCEQ's issuance of this permit.

5. Potential Contamination from Lateral Drainage and Runoff (ED's RTC No. 10)

Mr. Roy, Mr. and Ms. Cradit, Mr. and Ms. Glos, Ms. Gleghorn and Mr. Lee list as a concern potential contamination from lateral drainage from the unnamed tributary. Mr. and Ms. Blair also raised this same concern: that the discharge would cause flooding onto their

property from the unnamed tributary and would affect the water quality of the water backing up on their property.<sup>5</sup>

As the ED notes in its RTC, TCEQ does not address contamination from lateral drainage in the wastewater permitting process for incidents of runoff from the receiving stream after discharge to the stream. Such flood waters from the receiving stream could entrain contaminants from a variety of sources, such as agricultural pesticides/herbicides and livestock droppings. TCEQ does not regulate such flood waters and even if it had jurisdiction of such flows, preventing contamination of such flows would be resource intensive and, from a practical standpoint, almost impossible.

Although not an issue raised by the hearing requestors, the draft permit meets applicable water quality standards. The draft permit includes effluent limitations and other requirements that the Applicant must meet at all times, including rainfall events. The effluent limitations in the draft permit comply with the Texas Surface Water Quality Standards at 30 TAC Sections 307.1 through 307.10. Additionally, the draft permit contains effluent limitations that meet the requirements for secondary treatment and disinfection in accordance with 30 TAC Chapter 309, Subchapter A. The Standards Implementation and Water Quality Assessment preliminary review found that the proposed Facility will meet the final effluent limitations required by the permit. Therefore, under the proposed permit, lateral drainage would have no impact on water quality.

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<sup>5</sup> The Blairs also *appear* to raise a water quality concern. They state: “We are opposed to the site of the proposed facility due to adverse conditions related to the impact of the water quality and outfall with its proposed location in close proximity to our impacted property.” Jan. 22, 2016, Correspondence from Clark and Sara Blair to the Texas Commission on Environmental Quality. This statement and correspondence was made after Ventana’s commitment to pipe treated effluent to a discharge point on the unnamed tributary downstream of the Blairs’ property. Thus, as noted above, any concerns regarding the discharge the Blairs may have concerning water quality downstream of their property is no different than that of the general public.

Mr. and Ms. Blair commented that the drainage path (*i.e.* the unnamed tributary) would run directly through their property, making portions of their property unusable and harmful to children, livestock, and animals. *See* Attachment A (Map). Since that comment was filed, the Applicant committed to conveying treated effluent first to a pipeline, then an unnamed tributary, thus avoiding the Blairs' property altogether. The Applicant committed to convey by pipeline treated effluent to a discharge point on the unnamed tributary east of and downstream of the Blairs' property and, consequently, removes the possibility that treated effluent from the Facility would traverse their property via the unnamed tributary. For all of the above reasons, this issue is not a relevant or material issue for consideration at a contested case hearing in this matter.

6. Location of Drainage Path

Mr. Roy, Mr. and Ms. Cradit, Mr. and Ms. Glos, Ms. Gleghorn and Mr. Lee list as a concern the extended drainage path of the effluent not being at a point closest to the waters of the U.S. The requestors apparently believe the proposed Facility should be located further south, closer to major streams. As noted in Section IV.1 regarding proximity to private property, TCEQ rules do not give the Commission jurisdiction to determine facility location, discharge location, or means of conveyance. Consequently, this is not a relevant or material issue for hearing.

## **V. MAXIMUM DURATION OF HEARING**

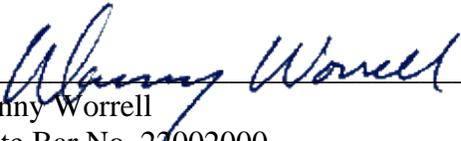
Should the Commission decide to refer this case to SOAH for a hearing, given the limited number and scope of issues Applicant believes may be appropriate in this case, the maximum expected duration of a hearing on this application and draft permit should be no longer than six months from the first date of the preliminary hearing until the proposal for decision is issued.

## VI. CONCLUSION

For the reasons set forth above, Ventana respectfully requests that the Commission deny Protestants' hearing requests, not refer this matter for a contested case hearing, and issue to Ventana Development McCrary, Ltd. Permit No. WQ0015241001. Should the Commission decide to grant the Protestants' hearing requests, Applicant respectfully requests that the Commission limit the issues addressed in the contested case hearing to only those that the Commission determines to be relevant and material to this permit application as we have identified herein and for the duration specified above.

Respectfully submitted,

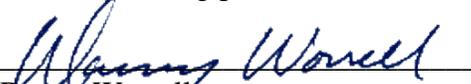
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By:   
\_\_\_\_\_  
Danny Worrell  
State Bar No. 22002000  
Katie Hobson  
State Bar No. 24082680

ATTORNEYS FOR  
VENTANA DEVELOPMENT MCCRARY, LTD.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of Applicant's Response to Hearing Requests has been sent via certified mail, return receipt requested, to the following parties on March 14, 2016.

  
\_\_\_\_\_  
Danny Worrell

FOR THE EXECUTIVE DIRECTOR

Celia Castro, Staff Attorney  
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FOR THE PUBLIC INTEREST COUNSEL

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Fax: (512) 239-6377  
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REQUESTERS

Clark T. and Sara Blair  
3525 McCrary Road  
Richmond, TX 77406-9184

Ronald and Gail Cradit  
3927 Dawn Lane  
Richmond, TX 77406-7662

Cherie Gleghorn and Shawn Lee  
2619 McCrary Road  
Richmond, TX 77406-8183

Al and Darlene Glos  
3917 Empress Lane  
Richmond, TX 77406-8135

Russell L. Roy  
4011 Brynmawr Dr.  
Richmond, TX 77406-8136

# **Attachment A**

# MCCRARY MEADOWS

HEARING REQUESTS EXHIBIT

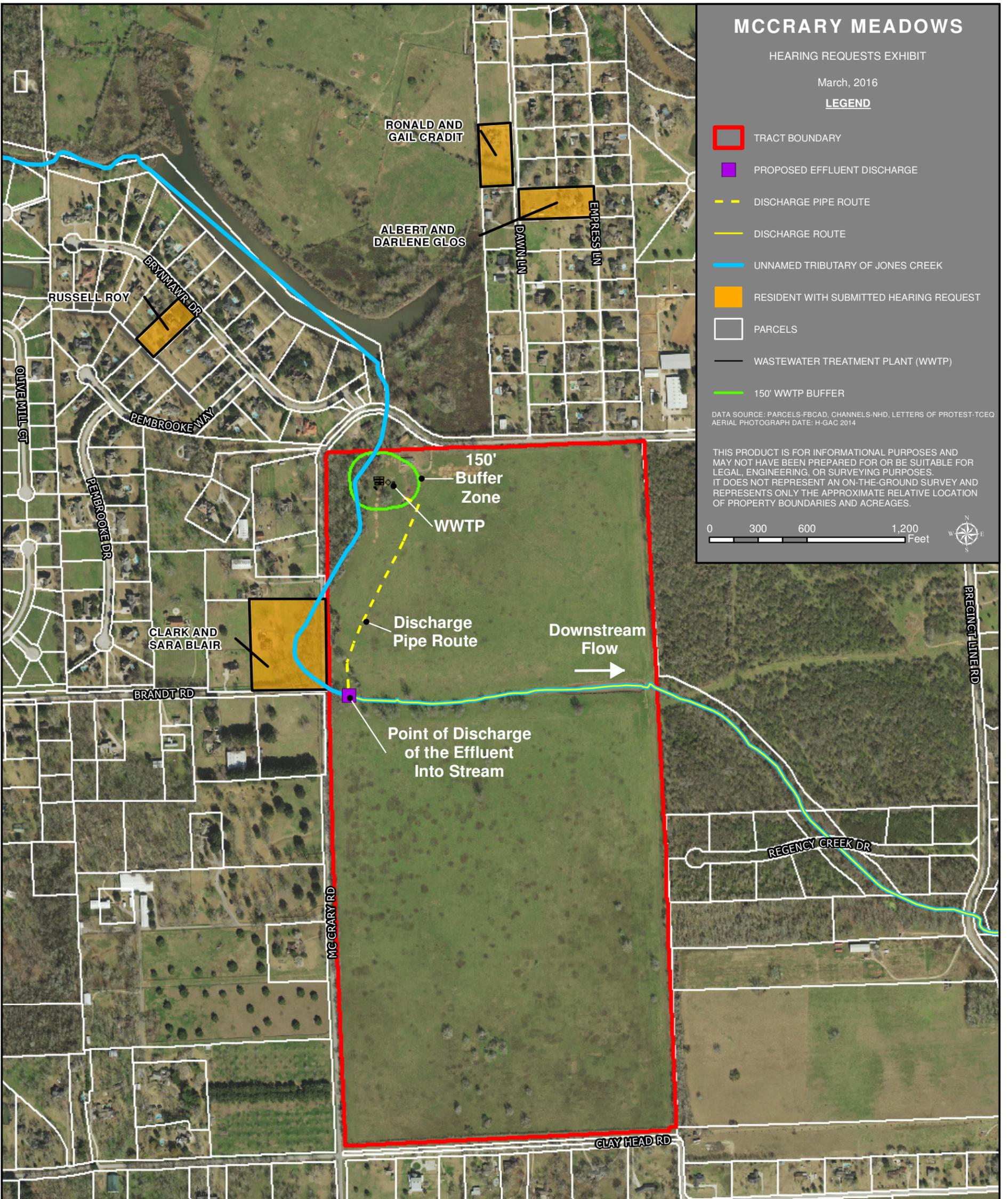
March, 2016

## LEGEND

- TRACT BOUNDARY
- PROPOSED EFFLUENT DISCHARGE
- DISCHARGE PIPE ROUTE
- DISCHARGE ROUTE
- UNNAMED TRIBUTARY OF JONES CREEK
- RESIDENT WITH SUBMITTED HEARING REQUEST
- PARCELS
- WASTEWATER TREATMENT PLANT (WWTP)
- 150' WWTP BUFFER

DATA SOURCE: PARCELS-FBCAD, CHANNELS-NHD, LETTERS OF PROTEST-TCEQ  
AERIAL PHOTOGRAPH DATE: H-GAC 2014

THIS PRODUCT IS FOR INFORMATIONAL PURPOSES AND MAY NOT HAVE BEEN PREPARED FOR OR BE SUITABLE FOR LEGAL, ENGINEERING, OR SURVEYING PURPOSES. IT DOES NOT REPRESENT AN ON-THE-GROUND SURVEY AND REPRESENTS ONLY THE APPROXIMATE RELATIVE LOCATION OF PROPERTY BOUNDARIES AND ACREAGES.



Owner Name	Owner Address	Distance to WWTP 150' Buffer (ft.)
Clark and Sara Blair	3525 McCrary Rd. Richmond, TX 77406-9184	616.4
Russell Roy	4011 Brynmawr Dr. Richmond, TX 77406-8136	1,319.9
Albert and Darlene Glos	3917 Empress Ln. Richmond, TX 77406-8135	1,637.6
Ronald and Gail Credit	3927 Dawn Ln. Richmond, TX 77406-7662	1,728.6
Cherie Gelghorn and Shawn Lee	2619 McCrary Rd. Richmond, TX 77406-8183	4,904.4