

**Lori Rowe**

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**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, February 2, 2022 8:29 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** colinjudy2002@yahoo.com <colinjudy2002@yahoo.com>  
**Sent:** Tuesday, February 1, 2022 6:28 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Colin Ann Allison

**E-MAIL:** [colinjudy2002@yahoo.com](mailto:colinjudy2002@yahoo.com)

**COMPANY:**

**ADDRESS:** 22727 THREE PINES DR  
HOCKLEY TX 77447-7055

**PHONE:** 2549132321

**FAX:**

**COMMENTS:** What measures are proposed to control the erosion to the creek banks? As this waste water treatment plant will erode the current banks and the creek will increase in size. This area is known to have heavy rains certain times of the year and erosion will happen. What are the plans to protect the banks of the creek and prevent the homes closest to the creek from flooding? How are the creek banks going to be monitored through the year to prevent this? What are developers plans? What is the boards plan to monitor? 2. The elevation difference from 2920 to Spring Creek

is about 65" what is the plan for runoff from the newly established property and how will this impact the creek and surrounding communities? With the drainage increasing, will that cause the communities to flood? What is the plan to prevent this from happening? Has any modeling been done to review this?

**Lori Rowe**

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**Sent:** Wednesday, February 2, 2022 8:28 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** colinjudy2002@yahoo.com <colinjudy2002@yahoo.com>  
**Sent:** Tuesday, February 1, 2022 6:07 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** MRS Judith Allison

**E-MAIL:** [colinjudy2002@yahoo.com](mailto:colinjudy2002@yahoo.com)

**COMPANY:**

**ADDRESS:** 22727 THREE PINES DR  
HOCKLEY TX 77447-7055

**PHONE:** 2549139450

**FAX:**

**COMMENTS:** 1. In the application it states the Spring Creek bed is dry, I have been out to the creek twice, a week apart and it is full of water. I appeared to be at a constant height between the weeks. With the introduction of the waste treatment plant and open ditch concept, how are the developers going to assure the water dumped into the creek is not going to cause harm to our environment? Has any studies been done conducted and shared with the surrounding communities on its safety? 2. It is a known fact that waste water treatment plants can not filter out the large volumes of

nitrites and phosphorus causing build up of algae. This algae can slow down the water ways, cause build up of scum, noxious odors and poor water quality that will harm our environment and make its way into the drinking water of Houstonians. What measures or safe guards will be put in place to assure the community this will not happened? Case in point, Lake Creek near US 183 and South Fork of the San Gabriel river near US 183 has been inundated from Algae caused from a waste water treatment plant. With the development of the Nature trails and Greenway project- Spring Creek from Tomball to HWY 59 - how is the developer going to protect the creek from over production of algae due to the waste water from the treatment plant? 3. In addition, with the build up of algae and slowing down the waterways, pooling of water will occur and the level of mosquito activity will climb. This can potentially be a public health issue with the increase of mosquitoes and increased instance of mosquitoes infecting humans and wildlife with Zika and other mosquitoes transmitted diseases like heart worm, which can be fatal for animals. How will the developer monitor this potential issue and has any studies been conducted?

**Lori Rowe**

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, January 31, 2022 9:14 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

MWD  
123792

**From:** carter\_rc@sbcglobal.net <carter\_rc@sbcglobal.net>  
**Sent:** Saturday, January 29, 2022 1:36 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Rick C Carter

**E-MAIL:** [carter\\_rc@sbcglobal.net](mailto:carter_rc@sbcglobal.net)

**COMPANY:**

**ADDRESS:** 22603 THREE PINES DR  
HOCKLEY TX 77447-7082

**PHONE:** 9363465510

**FAX:**

**COMMENTS:** I oppose the issuance of this permit due to the many discrepancies and concerns associated with it (as detailed in the comments provided by others including Tom Glass and Scott Hill). This is a sensitive environmental area and the proposed development would create numerous issues.

**Melissa Schmidt**

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, June 21, 2021 2:55 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

MWD  
123792

PM

**From:** danitb1212@gmail.com <danitb1212@gmail.com>  
**Sent:** Saturday, June 19, 2021 7:08 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** GALVESTON

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Danielle Comeau

**E-MAIL:** [danitb1212@gmail.com](mailto:danitb1212@gmail.com)

**COMPANY:**

**ADDRESS:** 22314 THREE PINES DR  
HOCKLEY TX 77447-7020

**PHONE:** 3466660163

**FAX:**

**COMMENTS:** To: Texas Commission on Environmental Quality From: Danielle Comeau 22314 Three Pines Dr. Hockley Tx 77447 Re: Proposed Permit: #WQ0015977001 Date: June 19, 2021 To Whom It May Concern: I object to the issuance of this permit and the proposed subsequent use of land for a 440 unit mobile home park based on the following: 1.The parcel of land is home to a pair of Red Cockaded Woodpeckers. They have nested, had chicks and established a home. The red-cockaded woodpecker has been on the endangered species list since October 1970—under a law that preceded

the Endangered Species Act of 1973. The primary threat for these birds is habitat destruction. The development of the property will destroy its habitat, cutting down all trees. Its survival depends on the longleaf pines that are 60 to 80 years old. 2. There are multiple wetlands on the property : 10 acre PFO1A and a fresh water pond, which lies directly in the path of the purposed waste water discharge into Spring Creek, 0.83 acre PEMA1A, 1.01 acre PSS1F/PEM1F and 1.15 acre PFO1A. These wetlands are extremely important to the environment, all the residents that live in this community and our US waterways. They recharge groundwater by holding water for long periods of time and allowing time for the water to infiltrate downward into aquifers or groundwater systems. This ground water may be used for drinking, irrigation, and maintenance of local streams and lakes. They pull pollutants and toxins out of water as they move through it by trapping them and burying them in the soil or converting them to less harmful forms of the chemicals. The development of this property will completely destroy the wetlands. I believe there is not sufficient space to develop around and safely preserve the wetlands once the 200 foot buffer is established. 3. I have erosion damage to my property from water that comes from the proposed development. Without the wetlands to act as a sponge and slow the water down, there will be nothing to help reduce or eliminate flooding in the area. A partially filled or otherwise damaged wetland can only partially meet its potential for flood control. I believe that my property would completely flood and many others in my neighborhood. 4. I believe that we do not have the infrastructure to accommodate 440 more residents with their vehicles. I see no proposed street light, turning lane, how will people access their homes? All of that traffic will create a dangerous situation to the public. Especially with a school less than a mile down the road. 5. I believe the treatment facility will be a public nuisance to myself, other current homeowners, and the tenants within the development itself because of its odor. 6. I believe that the proposed site for the treatment facility is located in or very near an area that is prone to flooding which poses a significant public health risk as well as a risk to local wildlife that use Spring Creek as a source of water or food in the event the facility is compromised due to flooding. Proper measures have to be taken to protect wildlife and preserve our forest and wetlands. Not to mention the safety of the people that live here. We do not have the local infrastructure at this time to accommodate that influx of people. Nor the flood control to handle the amount of water developing 90 acres with no detention ponds will create. I request a public meeting to address my concerns regarding this permit. As part of this meeting I request that appropriate governmental agencies in addition to the TCEQ be available to address my concerns. These agencies include, but are not limited to: TCEQ, Harris County Flood Control and its Montgomery County equivalent, Harris County Sheriff's Office, Rosehill Volunteer Fire Department, the Houston-Galveston Subsidence District, TXDOT, Harris County Constables Pcts 3 and 4.

**Lori Rowe**

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**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, February 2, 2022 11:16 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** cranecindy1@gmail.com <cranecindy1@gmail.com>  
**Sent:** Wednesday, February 2, 2022 10:35 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Cynthia Crane

**E-MAIL:** [cranecindy1@gmail.com](mailto:cranecindy1@gmail.com)

**COMPANY:**

**ADDRESS:** 22811 THREE PINES DR  
HOCKLEY TX 77447-7024

**PHONE:** 4053267237

**FAX:**

**COMMENTS:** To the office of the Chief Clerk, My husband and I have had the privilege of living on Three Pines Drive for the past year. We moved here from the plains of Oklahoma for the atmosphere of the quite forest, wildlife, birds and the elbow room. We have been very happy here, but that is now being threatened by the proposed trailer park in our back yard. This is basicly an Apartment building in middle of our rural acrage setting. We have 40 homes in the same footage you are proposing to put 440. There is abundant wildlife including birds, deer, squirrels, bob cats, racoons and



others that will be displaced by this proposal. The water shed this trailer park impacts, will cause flooding to our already overburdened drainage system. The dumping of huge amounts of water into the creek that feeds directly into Houston's water source will effect everything downstream even if it is clean water, and you know it will not always be clean water. Even the best treatment systems fail when the power goes out. All of these things that negatively impact the people living here will also negatively effect the proposed 440 households. It is not the same as moving to the country if you are crammed in like sardines just like the city, and I feel like these housing additions are misleading. There is nothing country about an apartment complex and once purchased these type of houses are difficult to resell, basically trapping the residence in substandard conditions with no way out. Property values will go down everywhere!! Please consider the long term impacts this density will cause and not just the profit and greed of developers who are motivated only by profit with no regard for the impact on the people and the environment. Thank You, Cindy and Kevin Crane

**Lori Rowe**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 8, 2022 9:01 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** kcendsley@gmail.com <kcendsley@gmail.com>  
**Sent:** Monday, February 7, 2022 6:17 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** KEVIN C ENDSLEY

**E-MAIL:** [kcendsley@gmail.com](mailto:kcendsley@gmail.com)

**COMPANY:**

**ADDRESS:** 22623 THREE PINES DR  
HOCKLEY TX 77447-7082

**PHONE:** 8322655353

**FAX:**

**COMMENTS:** Nearly as much flood damage on Three Pines Drive during heavy storms comes from this property to the east as it does from Spring Creek itself. I do not see plans for a retention pond in this proposed development. How will this developer assure nearby property owners that their plans incorporate the necessary steps to prevent exacerbation of this problem? Why will there not be a retention pond?

**Lori Rowe**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, January 25, 2022 8:56 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

MWD  
123792

**From:** jmepplin@gmail.com <jmepplin@gmail.com>  
**Sent:** Monday, January 24, 2022 8:30 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Jana M Epplin

**E-MAIL:** [jmepplin@gmail.com](mailto:jmepplin@gmail.com)

**COMPANY:**

**ADDRESS:** 22015 THREE PINES DR  
HOCKLEY TX 77447-9369

**PHONE:** 7135945914

**FAX:**

**COMMENTS:** If the proposed 440 mobile home park is put into place with an open ditch flowing into the creek, I want to know how you will prevent: trash, human excrement, illegal dumping, vehicle gas/oil/antifreeze runoff, from flowing into the open ditch into the creek. what security will be provided to make sure this doesn't happen? how will you supply trash collection for 440 mobile homes? There are wetlands on that property, how will they not be disturbed. There are

numerous bald eagles in the area, how will you prove they are not nesting on that property and how will you make sure they are not disturbed or put at risk.

**Lori Rowe**

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, February 7, 2022 11:15 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** betsygardner1@hotmail.com <betsygardner1@hotmail.com>  
**Sent:** Sunday, February 6, 2022 7:36 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME FM 2920 LAND**

**RN NUMBER: RN111244844**

**PERMIT NUMBER: WQ0015977001**

**DOCKET NUMBER:**

**COUNTY: HARRIS**

**PRINCIPAL NAME: FM 2920 LAND COMPANY LTD**

**CN NUMBER: CN605880145**

**FROM**

**NAME: Betsy Gardner**

**E-MAIL: [betsygardner1@hotmail.com](mailto:betsygardner1@hotmail.com)**

**COMPANY: 590**

**ADDRESS: 22510 THREE PINES DR  
HOCKLEY TX 77447-7078**

**PHONE: 2814508940**

**FAX:**

**COMMENTS: I am against the approval of this permit.**

**Lori Rowe**

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, February 7, 2022 11:12 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** betsygardner1@hotmail.com <betsygardner1@hotmail.com>  
**Sent:** Friday, February 4, 2022 5:16 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

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**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM:**

**NAME:** Betsy Gardner

**E-MAIL:** [betsygardner1@hotmail.com](mailto:betsygardner1@hotmail.com)

**COMPANY:**

**ADDRESS:** 22510 THREE PINES DR  
HOCKLEY TX 77447-7078

**PHONE:** 2814508940

**FAX:**

**COMMENTS:** When and how are the people in the surrounding dwellings notified of bacterial or other findings in the water? What is considered unsafe water? How is the water tested to see if it is safe? Who all is notified if there is a bacteria or other findings found at any time? What kind of chemicals are used in the treatment of the water? What levels of bacteria are okay? When and how are the units or surrounding dwellings notified of any problem at the plant? What temperature will the water be in the treatment plant to prevent the growth of bacteria? What does a low flow

rate mean? How will the low flow rate be monitored? What happens if the low flow rate is off or not working properly? What are the names of the biocides used to treat the water? What laws are followed to ensure the safety of the surrounding dwellings water? How will or how should the data be recorded when monitoring the plant? Will there be any raw sewage stored outside? Will there be any sewage mixed with any other liquid stored outside? How will the water waste affect the ecosystem of the creek? Wastewater from treatment plants significantly negatively influences the river ecosystem. How will the river ecosystem be protected? Will the air be sampled for pollutants? How often? How often will aerosol samples be taken? How will the surrounding dwellings be notified of the results of the aerosol testing? What is considered a "normal" aerosol reading? What is considered a high reading? What type of odor control is used, such as activated carbon scrubbing systems, primary clarifier covers, sludge thickener covers. What is done with solid handling? Will the solids be treated onsite? What type of chemical is used in pretreatment?

**Lori Rowe**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 1, 2022 9:40 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** betsygardner1@hotmail.com <betsygardner1@hotmail.com>  
**Sent:** Monday, January 31, 2022 6:14 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Betsy Gardner

**E-MAIL:** [betsygardner1@hotmail.com](mailto:betsygardner1@hotmail.com)

**COMPANY:**

**ADDRESS:** 22510 THREE PINES DR  
HOCKLEY TX 77447-7078

**PHONE:** 2814508940

**FAX:**

**COMMENTS:** When and how are the people in the surrounding dwellings notified of bacterial or other findings in the water? What is considered unsafe water? How is the water tested to see if it is safe? Who all is notified if there is a bacteria or other findings found at any time? What kind of chemicals are used in the treatment of the water? What levels of bacteria are okay? When and how are the units or surrounding dwellings notified of any problem at the plant? What temperature will the water be in the treatment plant to prevent the growth of bacteria? What does a low flow



rate mean? How will the low flow rate be monitored? What happens if the low flow rate is off or not working properly? What are the names of the biocides used to treat the water? What laws are followed to ensure the safety of the surrounding dwellings water? How will or how should the data be recorded when monitoring the plant? Will there be any raw sewage stored outside? Will there be any sewage mixed with any other liquid stored outside? How will the water waste affect the ecosystem of the creek? Wastewater from treatment plants significantly negatively influences the river ecosystem. How will the river ecosystem be protected? Will the air be sampled for pollutants? How often? How often will aerosol samples be taken? How will the surrounding dwellings be notified of the results of the aerosol testing? What is considered a "normal" aerosol reading? What is considered a high reading? What type of odor control is used, such as activated carbon scrubbing systems, primary clarifier covers, sludge thickener covers. What is done with solid handling? Will the solids be treated onsite? What type of chemical is used in pretreatment?

**Lori Rowe**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 1, 2022 9:39 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** betsygardner1@hotmail.com <betsygardner1@hotmail.com>  
**Sent:** Monday, January 31, 2022 6:11 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Betsy Gardner

**E-MAIL:** [betsygardner1@hotmail.com](mailto:betsygardner1@hotmail.com)

**COMPANY:**

**ADDRESS:** 22510 THREE PINES DR  
HOCKLEY TX 77447-7078

**PHONE:** 2814508940

**FAX:**

**COMMENTS:** 1. The land for the plant is in a 100 year floodplain. Have you considered this in your proposed plan? If so, what are your plans? Where will the plant be? 2. The part of the land where the wastewater will be disposed is on a slope and will not directly go into Spring Creek. What are your plans for this? 3. There are registered freshwater wetlands on the property that have to be preserved, what are your plans for development around this to preserve the natural land and species so that it follows all guidelines? 4. There is a homestead that is dated back to the 1940's on

Google maps, which is considered historical since it is over 50 years old. What are your plans knowing this information?

5. Many residents have wells on their property. How will you guarantee our water will not be contaminated at any time? During floods? Heavy rains?

6. What is a sanitary survey?

7. How often will sanitary surveys be conducted?

8. Will the residents be notified of each sanitary survey that is conducted?

9. Where can the sanitary survey information be found for residents?

10. How will you notify the residents of such a sanitary survey?

11. What degree of contamination will the water have?

12. How often will the plant be monitored?

13. Do you have built drawings with criteria used for designing/selecting, as well as detailed technical specifications for the electrical installations, power generation equipment, complete water infrastructure, piping for fresh water and sewage with drawings showing the routings and this must include the piping for the waste water to and from the STP. Please send a copy to surrounding residents.

14. What are the details of all the pumps and other motor driven rotary equipment as installed with information on how these have been selected?

15. In case of flooding, what are the precautions put in place to ensure that our water is not polluted?

16. In case of flooding, how will you guarantee that our well water will not be contaminated?

17. What is the pretreatment process description of the following: target water quality of the proposed pretreatment process method(s) or technologies used; operating parameters, such as chemical dosages, filter loading rates, and empty bed contact times.

18. How often will the facility be monitored?

19. What kind of training do the water treatment employees go through?

20. What are the protocols if there is mechanical failure at the plant?

Lori Rowe

**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, March 31, 2022 8:48 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

MWD  
123792

**From:** Kenny Gardner <kennyegardner@hotmail.com>  
**Sent:** Wednesday, March 30, 2022 8:28 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Re: Public comment on Permit Number WQ0015977001

I have not received a response from my question that I presented to the mobile home company for the waste water treatment facility. They've already torn down the historic homestead. Your hesitation to respond is causing more liability. Please respond to everyone before they start the destruction and pad your pockets.

Get [Outlook for iOS](#)

**From:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Sent:** Tuesday, February 8, 2022 2:22:56 PM  
**To:** [kennyegardner@hotmail.com](mailto:kennyegardner@hotmail.com) <[kennyegardner@hotmail.com](mailto:kennyegardner@hotmail.com)>  
**Subject:** Public comment on Permit Number WQ0015977001

Thank you for your comments.

A copy of your email will be forwarded to the Texas Commission on Environmental Quality (TCEQ) staff responsible for reviewing the application. All timely filed comments will be considered by the staff prior to the final decision on the application. You will be added to the mailing list for this application. After the opportunity to submit comments ends, a copy of the formal written response to all timely filed comments will be mailed to you.

The TCEQ appreciates your interest in environmental issues. You may track the status of matters pending before the Commission for approval or view comments and requests by visiting the following website: <https://www14.tceq.texas.gov/eoic/eCID/>. If you have any further questions, please feel free to contact the Public Education Program staff at 800-687-4040.

Sincerely,  
Office of the Chief Clerk

NOTE: Please do not respond to this email; it will not be answered. If you would like to submit additional comments, please use the online eComments system at: <https://www.tceq.texas.gov/agency/decisions/cc/comments.html>

REGULATED ENTY NAME FM 2920 LAND

RN NUMBER: RN111244844

PERMIT NUMBER: WQ0015977001

DOCKET NUMBER:

COUNTY: HARRIS

PRINCIPAL NAME: FM 2920 LAND COMPANY LTD

CN NUMBER: CN605880145

FROM

NAME: MR Kenny Gardner

E-MAIL: [kennve@gardner@hotmail.com](mailto:kennve@gardner@hotmail.com)

COMPANY:

ADDRESS: 22510 THREE PINES DR  
HOCKLEY TX 77447-7078

PHONE: 2814508990

FAX:

COMMENTS: \*How will the air quality be effected? \*Are the chemicals used to treat the waste dangerous to humans and the environment? \*What happens during a power outage? \*The contamination level in Spring Creek is already high, will dumping treated sewage going to create more contamination?

**Lori Rowe**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, February 7, 2022 11:15 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

MWD  
123792

**From:** kennyegardner@hotmail.com <kennyegardner@hotmail.com>  
**Sent:** Sunday, February 6, 2022 7:46 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Kenny Gardner

**E-MAIL:** [kennyegardner@hotmail.com](mailto:kennyegardner@hotmail.com)

**COMPANY:**

**ADDRESS:** 22510 THREE PINES DR  
HOCKLEY TX 77447-7078

**PHONE:** 2814508990

**FAX:**

**COMMENTS:** I do NOT approve of this permit.

**Lori Rowe**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, February 7, 2022 11:11 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** kennyegardner@hotmail.com <kennyegardner@hotmail.com>  
**Sent:** Friday, February 4, 2022 5:29 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME FM 2920 LAND**

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** MR Kenny Gardner

**E-MAIL:** [kennyegardner@hotmail.com](mailto:kennyegardner@hotmail.com)

**COMPANY:**

**ADDRESS:** 22510 THREE PINES DR  
HOCKLEY TX 77447-7078

**PHONE:** 2814508990

**FAX:**

**COMMENTS:** \*How will the air quality be effected? \*Are the chemicals used to treat the waste dangerous to humans and the environment? \*What happens during a power outage? \*The contamination level in Spring Creek is already high, will dumping treated sewage going to create more contamination?

**Melissa Schmidt**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, June 24, 2021 1:50 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** maziengray@sbcglobal.net <maziengray@sbcglobal.net>  
**Sent:** Thursday, June 24, 2021 12:23 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** GALVESTON

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Susan M L Gray

**E-MAIL:** [maziengray@sbcglobal.net](mailto:maziengray@sbcglobal.net)

**COMPANY:**

**ADDRESS:** 22353 MUESCHKE RD  
TOMBALL TX 77377-3442

**PHONE:** 2813510619

**FAX:**

**COMMENTS:** I would like to know who this notice of application was sent to as I am downstream of the proposed water discharge and did NOT receive notification. I think everyone in the Spring Creek watershed will be affected by the addition of 120,000 gallons of water per day in to the creek. Additionally, all properties downslope from the proposed development will face a tremendous amount of rainwater runoff from the new hardscape and loss of woodlands.



**Melissa Schmidt**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, August 24, 2021 9:09 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

MWD  
123792

**From:** tglennhart@aol.com <tglennhart@aol.com>  
**Sent:** Monday, August 23, 2021 9:40 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** GALVESTON

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** MR Terry G Hart

**E-MAIL:** [tglennhart@aol.com](mailto:tglennhart@aol.com)

**COMPANY:** retired

**ADDRESS:** 22219 THREE PINES DR  
HOCKLEY TX 77447-7045

**PHONE:** 7138180961

**FAX:**

**COMMENTS:** 1. I am worried that the treatment plant will not handle salts appropriately. Salts can affect the ecosystem. 2. Will a generator be available to the treatment plant. Our street has been out of power for over 10 days before. 3. Will the plant have enough instrumentation to check all the parameters that will catch problems at their most preventable or reversible stages? 4. Will the distance to the treatment plant be far enough away from houses on three pines to avoid the pests associated with treatment plants that can be a health issue? 5. Since we are so close to the treatment plant

can our HOA have all reports created by the plant? We would also like to understand who will be maintaining this system and be shown that all employees have been properly trained. This is a concern since I have read that this has been one of the major problems when a system has had a major problem. 6. Will the water needed on this development endanger the water supply on our street since we will be pulling from the same water supply? 7. Drainage from the property being developed has been a problem sometimes on three pines, therefore how many retention ponds will be placed in this development? 8. It is my understanding that spring creek is a water shed area for lake Houston, therefore would it be better to have an aerobic system instead of the treatment plant. 9. Traffic backs up on 2920 pass our street going East. What is planned to avoid accidents with all of the traffic coming out of this new development?

**Lori Rowe**

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**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, February 10, 2022 9:40 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Follow-up – Request for TCEQ Site Visit - WQ0015977001

**From:** Brad Patterson <Brad.Patterson@tceq.texas.gov>  
**Sent:** Thursday, February 10, 2022 8:14 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** FW: Follow-up – Request for TCEQ Site Visit - WQ0015977001

**From:** Scott Hill <scott.r.hill@att.net>  
**Sent:** Wednesday, February 9, 2022 5:30 PM  
**To:** Brad Patterson <Brad.Patterson@tceq.texas.gov>  
**Cc:** Brittany Lee <brittany.lee@tceq.texas.gov>  
**Subject:** Follow-up – Request for TCEQ Site Visit - WQ0015977001

Re: Site visit to access a man-made ditch for effluent discharge into Spring Creek

Brad – we thank you for your time, your staff's time, and the opportunity to comment on the referenced proposed waste water treatment plant via the Public Meeting on Monday night 2/07/2022.

The purpose of this e-mail is to follow-up on a TCEQ site visit. You may recall that my wife, Karen, along with others, requested the TCEQ visit the site of this proposed WWTP during the formal comments section of the public meeting after learning that the TCEQ has not yet visited the site during the informal comments.

We believe the TCEQ must visit the site, all the way to the creek, before making a final decision on the man-made ditch that would carry effluent discharge from the WWTP to Spring Creek. More specifically, your visit should include accessing the creek bed from my 5 acres. It is an easy walk to the creek via trails I maintain on my property. Also, I can share my 27-year knowledge of the elevations, natural water flows and drainage which should be evaluated in your decision.

My wife and I are available to meet with the TCEQ at your convenience. We look forward to discussing with you further. Thank you.

Scott and Karen Hill  
832-314-5225  
[scott.r.hill@att.net](mailto:scott.r.hill@att.net)

**Lori Rowe**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 8, 2022 9:12 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** scott.r.hill@att.net <scott.r.hill@att.net>  
**Sent:** Monday, February 7, 2022 8:44 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Scott Hill

**E-MAIL:** [scott.r.hill@att.net](mailto:scott.r.hill@att.net)

**COMPANY:**

**ADDRESS:** 22914 THREE PINES DR  
HOCKLEY TX 77447-7074

**PHONE:** 8323145225

**FAX:**

**COMMENTS:** We request that the date of the FEMA Flood Map used to answer the 100 year flood plain question on the application be verified to be later than Hurricane Harvey August 2017. Our review of same map show dates of 6/2007 and 8/2014. If not later than August 2017, then 100 year flood plain could be incorrect.

**Lori Rowe**

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**From:** PUBCOMMENT-OCC  
**Sent:** Monday, February 7, 2022 11:14 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001  
**Attachments:** TCEQ Written Comments\_final.docx

**From:** scott.r.hill@att.net <scott.r.hill@att.net>  
**Sent:** Sunday, February 6, 2022 11:08 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Scott Hill

**E-MAIL:** [scott.r.hill@att.net](mailto:scott.r.hill@att.net)

**COMPANY:**

**ADDRESS:** 22914 THREE PINES DR  
HOCKLEY TX 77447-7074

**PHONE:** 8323145225

**FAX:**

**COMMENTS:** see attached pdf for our official comments re: WQ0015977001

Prepared by: Scott and Karen Hill, Homeowners  
22914 Three Pines Dr, Hockley TX 77447  
2/06/2022

Page 1 of 3

Based on the WWTP application WQ0015977001 that the TCEQ received on April 15, 2021, and our review of this application, we are opposed to the proposed waste water treatment plant that will service a manufactured home community on 80+ acres immediately to our east. We believe there are several areas within the application that need to be more thoroughly reviewed due to omissions or incorrect responses.

### **Permit Application WQ001597701**

1. **Section 9 Bullet D on page 8 of 21** - Owner of Land where treatment facility is or will be: The applicant answered FM 2920 Land Company, Ltd. However, current public records do not show that FM 2920 Land Company has purchased the acreage where the proposed WWTP and manufactured home park are to be located. Further the applicant replied N/A to the question "If the landowner is not the same person as the facility owner... attach a lease agreement or deed recorded easement.

How has the applicant proven to the TCEQ that it owns this property? If not, shouldn't the applicant be required to prove that they own the land before this permit can move forward?

2. **Supplemental Permit Information Form (SPIF) – Question 5 on page 17 of 21** – The question asks the applicant to provide photographs of any structures 50 years or older on the property. It does not appear the applicant adequately addressed this in his application because the box "Visual effects that could damage or detract from a historic property's integrity" and the box (on top of page 18) "Disturbance of vegetation or wetland" are not checked.

In fact, there is a homestead on the 80+ acres that dates back to 1944 or earlier, which could have significant historical value. The Harris County Historical Society expressed interest in researching this further. Also, there are five documented wetlands listed in the National Wetlands Inventory List located on the 80+ acres of the proposed WWTP and manufactured home site.

3. **SPIF – Question 9 on page 18 of 21** – The question asks applicant to provide a brief history of the property and the applicant responded "Property has not been developed."

However, in the early 1940's, if not earlier, a homestead existed and some structures are still standing. In addition, in the early 1980's, a road with ditches on either side and a cul-de-sac at each end was cut through the woods. This road is shown as Smokey Tree on current maps. The road was to service 52 one-acre homesites that were platted, but the developer at that time abandoned the project.

Has the historical structure been evaluated? Has this property been re-platted to allow manufactured homes?

Prepared by: Scott and Karen Hill, Homeowners  
22914 Three Pines Dr, Hockley TX 77447  
2/06/2022

Page 2 of 3

**4. Domestic Technical Report 1.0 - Section 6 D -1 on page 5 of 80 - Grit and Grease** – The applicant answered “NO” to the acceptance of grit and grease waste, thus leaving the remainder of this section unanswered.

However, this WWTP is to service 440 manufactured homes. How can there be wastewater from 440 kitchens and there not be some amount of grease that needs to be addressed?

**5. Domestic Technical Report 1.0 - Section 6 F on page 9 of 80** – The applicant answered “No” to the question “Does the facility discharge in the Lake Houston watershed?”

While the immediate discharge will be Spring Creek, this creek flows into the West fork of the San Jacinto River which empties into Lake Houston.

**6. Domestic Technical Report 1.1 – Section 5A on page 26 of 80** - The applicant responded Yes to the question “Will the proposed facilities be located **above** the 100-year frequency flood level?” and noted the FEMA Flood Map Service Center as its source.

What is the date of the source map that the applicant is using?

Our independent research using maps available on [msc.fema.gov](https://msc.fema.gov) currently show dates of 6/18/2007 and 8/18/2014, which are 10 years and 3 years before Hurricane Harvey. It is our understanding maps have been revised since Hurricane Harvey, given the historic flooding that occurred where the proposed WWTP will be located.

If the applicant relied on these same dated maps, then it is probable that the 100-year flood plain has changed and will impact the location of the proposed WWTP.

**7. Domestic Technical Report 1.1 – Section 5A on page 26 of 80** - For the question “... will a wetland or part of a wetland be filled?” the applicant checked “No”.

However, the National Wetlands Inventory List has five documented wetlands on the 80+ acres of the proposed WWTP and manufactured home community site. Other public records show these wetlands have existed since 1944 or earlier, and are still thriving today. These wetlands need to be addressed and independently investigated by the proper agencies prior to TCEQ approving the WWTP facility.

**8. Domestic Technical Report Worksheet 2.0 – Section 4A on page 29 of 80** - The applicant checked the “Receiving water type” will be a “Man-made channel or ditch”, however, the more accurate description would be “Stream”. (See comment 9 for more information)

Prepared by: Scott and Karen Hill, Homeowners  
22914 Three Pines Dr, Hockley TX 77447  
2/06/2022

Page 3 of 3

**9. Domestic Technical Report Worksheet 2.0 – Section 4B on page 30 of 80** - The applicant noted through “Personal observation” that the “Flow characteristics” is “Intermittent-dry for at least one week during most years”.

How can the applicant personally observe a man-ditch (which was marked in Section 4A above) that does not currently exist? Thus, the applicant must be referencing Spring Creek.

Our personal observation of the flow characteristics of Spring Creek over more than 25 years is a constant flow, therefore, “Perennial-normally flowing” is a more accurate statement.

**10. Section C – Waterbody aesthetics on page 32 of 80** – the Applicant checked the box “Natural Area... water clarity discolored.

Our personal observations of the waterbody aesthetics of Spring Creek over more than 25 years is one of “Wilderness; outstanding natural beauty, ... wooded..., water clarity exceptional” is more accurate. The waters of Spring Creek may be cloudy for short periods after rainfalls. Then the creek is back to being clear as any mountain stream in Colorado, for example. Spring Creek is a beautiful, fulltime creek and is an ecosystem unto itself. That is one of the things that makes developments such as this such a tragedy. As more and more WWTP and similar facilities get approved, the quality of the creek is compromised until eventually it will no longer be able to sustain life and organisms.

We also reviewed the draft permit obtained electronically and have the following comments and questions.

#### **Draft of TCEQ Permit to Discharge Wastes**

**1. Table on Page 2** - Who specifically is responsible for taking the grab samples up to 5 times per week to test for effluent contaminants? Who specifically is responsible for testing and cataloging the data? Where does the general public go to view the data?

**2. Page 7** - Violations are to be reported by the Permittee. Does the TCEQ honestly believe that Permittees raise their hands when they have a violation so that they can then be fined by the TCEQ?

**3. Page 13 Paragraph 5** - Permittee is responsible for safeguards in the event of a power outage. There is no alternate power feed where the proposed WWTP is to be located. What type of alternate power source will Permittee be using for this WWTP?

**5. Page 34 Paragraph 5** - Permittee shall comply with the 30 TAC 311.36 which requires the facility to install dual-feed chlorination systems capable of automatically changing from one cylinder to another if gaseous chlorination is used for disinfection. What resources, other than the Permittee’s word or TCEQ, are available for the public to know that these requirements are being met?

For the reasons we have noted above, we ask the TCEQ to deny this WWTP application. Thank you.

End of comments



**Melissa Schmidt**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, August 18, 2021 1:59 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-WPD; PUBCOMMENT-OPIC; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001  
**Attachments:** Hill Comments to TCEQ re WQ001597701\_08182021.pdf

MWD  
123792

**From:** scott.r.hill@att.net <scott.r.hill@att.net>  
**Sent:** Wednesday, August 18, 2021 12:52 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME:** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** GALVESTON

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Scott Hill

**E-MAIL:** [scott.r.hill@att.net](mailto:scott.r.hill@att.net)

**COMPANY:**

**ADDRESS:** 22914 THREE PINES DR  
HOCKLEY TX 77447-7074

**PHONE:** 8323145225

**FAX:**

**COMMENTS:** see attached file for comments

Comments re: TCEQ Permit No.: WQ0015977001 – Waste Water Treatment Plant  
Principal Name: FM 2920 LAND COMPANY LTD, CN605880145  
RN Number: RN111244844

Submitted by: Scott and Karen Hill

832-314-5225

scott.r.hill@att.net

We strongly oppose the proposed Waste Water Treatment Plant and the proposed manufactured home community development it will serve for the following reasons.

1. The proposed Waste Water Treatment Plant's open ditch design will run directly through the 500-year and 100 -year flood plains and thus will be under water at times, contaminating adjacent properties.
2. The run off of rain waters from the site of the proposed development directly impacts the 2920 West subdivision, which is adjacent to the property on the west side (i.e., Three Pines Dr.)
3. Based on the drawings submitted as part of the TCEQ application process, the proposed development has no visible flood mitigation measures, and by its current design will contribute to flooding in the area.
4. Since the development will be serviced by a water well and due to the density of the proposed development, there is a substantial risk of increased subsidence in the area. Also, the presence of a new water well may negatively impact our water supply and other residents currently obtaining water via wells.
5. If a fire within the proposed development occurs, there is a high risk of damage to life and property due to the density of the proposed development and the lack of fire hydrants.
6. There are wetlands indicated on the proposed development site per the National Wetlands Inventory maps. We want to make sure all environmental due diligence is completed, including a delineation of Waters of the United States (WOTUS).
7. Due to engineering changes and guidelines regarding waste water treatment plants post Hurricane Harvey, we believe this application should be denied and re-engineered to meet new standards.
8. The proposed development site would destroy a 100 years old forest, which serves as a wild-life habitat.

8-18-2021

**Lori Rowe**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 8, 2022 9:02 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** marlia139@yahoo.com <marlia139@yahoo.com>  
**Sent:** Monday, February 7, 2022 8:08 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Liana Jones

**E-MAIL:** [marlia139@yahoo.com](mailto:marlia139@yahoo.com)

**COMPANY:**

**ADDRESS:** 22718 THREE PINES DR  
HOCKLEY TX 77447-7055

**PHONE:** 7134125576

**FAX:** 7134125576

**COMMENTS:** I request an onsite visit from TCEQ to observe the proposed site and associated property

**Lori Rowe**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, February 7, 2022 11:15 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

---

**From:** marlia139@yahoo.com <marlia139@yahoo.com>  
**Sent:** Sunday, February 6, 2022 7:03 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Liana Jones

**E-MAIL:** [marlia139@yahoo.com](mailto:marlia139@yahoo.com)

**COMPANY:**

**ADDRESS:** 22718 THREE PINES DR  
HOCKLEY TX 77447-7055

**PHONE:** 7134125576

**FAX:**

**COMMENTS:** I oppose the issuance of this permit and request it be denied. I agree with comments/questions stated previously for this permit application and would like to add the following: How will the applicant reduce WWTP air/light/noise pollution from impacting the local property owners and wildlife? When using an open ditch drainage system, how will the applicant ensure that the ditches are free from blockages caused by sediment buildup? Or that debris/trees/plants have not obstructed the flow? What are the regulations covering these issues? A research conducted

by the University of Illinois has shown open drainage systems can also contribute to contamination into bodies of water. With several individual water wells in surrounding properties and drainage into Spring Creek, how will this be prevented? How close would you – personally - want a WWTP to your water source? A wastewater treatment plant is most at risk for flooding when it's in low-lying areas near the bodies of water for which it discharges its final effluent. Pump stations are included in some systems and increases the likelihood of WWTP flooding. The current positioning of the applicant's WWTP is very near – if not within – the 100 year floodplain. What are the regulations and/or requirements to build in this type of situation? Is the TCEQ permit approval allowed without any input from Harris County Flood Control District or Environmental Protection Agency? If the WWTP fails any safeguards and contaminates the creek and surrounding properties, how will property owners near the WWTP and upstream/downstream of the creek be notified? Who is responsible for any remediation? There are 5 wetland areas contained within the development area. Per the National Wetlands mapping, one wetland area, PFO1C, appears to be directly impacted by discharge from this proposed WWTP. The EPA has oversight of the Clean Water Act – its objective is to restore and maintain the chemical, physical, and biological integrity of the nation's waters and wetlands. Why isn't the EPA involved with this permit application? Who is responsible for contacting the EPA for its consideration in this matter – the applicant? Or TCEQ? Per the Houston-Galveston Area Council (H-GAC) website, the TCEQ is working with the H\_GAC to begin a watershed protection plan for Cypress Creek and other waterways in the Houston region. The plan is meant to remedy/reduce high levels of bacteria in waterways using a common-sense approach. How does the TCEQ justify approving this WWTP permit that will contribute more contaminants to an already bacteria impaired stream and thus into navigable waterways? The application has numerous discrepancies – such as, whether there are structures on property, wetlands on property, or releases into a watershed, etc. These questions are included in the application for valid reasons and the answers should be investigated for validity. How does TCEQ allow so many discrepancies within an application? Or pre-approve an application with them?

**Lori Rowe**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 8, 2022 9:12 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** longj4669@outlook.com <longj4669@outlook.com>  
**Sent:** Monday, February 7, 2022 8:44 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** James Paul Long

**E-MAIL:** [longj4669@outlook.com](mailto:longj4669@outlook.com)

**COMPANY:**

**ADDRESS:** 22315 THREE PINES DR  
HOCKLEY TX 77447-7023

**PHONE:** 8326225305

**FAX:**

**COMMENTS:** There are five (5) designated wetlands and a homestead over 70+ yrs old on this property and the applicant specifically stated the opposite in their permit application.

**Lori Rowe**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 8, 2022 9:10 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** longj4669@outlook.com <longj4669@outlook.com>  
**Sent:** Monday, February 7, 2022 8:43 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME FM 2920 LAND**

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** James Paul Long

**E-MAIL:** [longj4669@outlook.com](mailto:longj4669@outlook.com)

**COMPANY:**

**ADDRESS:** 22315 THREE PINES DR  
HOCKLEY TX 77447-7023

**PHONE:** 8326225305

**FAX:**

**COMMENTS:** what is the impact to the developer/applicant if it is found they have lied or knowingly misrepresented facts on the submitted application?

**Lori Rowe**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 8, 2022 9:09 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** longj4669@outlook.com <longj4669@outlook.com>  
**Sent:** Monday, February 7, 2022 8:41 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME:** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** James Paul Long

**E-MAIL:** [longj4669@outlook.com](mailto:longj4669@outlook.com)

**COMPANY:**

**ADDRESS:** 22315 THREE PINES DR  
HOCKLEY TX 77447-7023

**PHONE:** 8326225305

**FAX:**

**COMMENTS:** We would like to formally request the study completed by the applicant/engineering firm in relation to endangered species.



**Lori Rowe**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 8, 2022 9:09 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** longj4669@outlook.com <longj4669@outlook.com>  
**Sent:** Monday, February 7, 2022 8:40 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** James Paul Long

**E-MAIL:** [longj4669@outlook.com](mailto:longj4669@outlook.com)

**COMPANY:**

**ADDRESS:** 22315 THREE PINES DR  
HOCKLEY TX 77447-7023

**PHONE:** 8326225305

**FAX:**

**COMMENTS:** We understand this WWTP is initially planned to discharge an estimated ~120,000 gallons/day of wastewater during PHASE 1 of the developers plan, with an anticipated 480,000 gallons planned for future phases. We ask that TCEQ consider the maximum amount of discharge the developer has in its plans when considering the environmental impact to Spring Creek and the surrounding area.

**Lori Rowe**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 8, 2022 9:09 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** longj4669@outlook.com <longj4669@outlook.com>  
**Sent:** Monday, February 7, 2022 8:40 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** James Paul Long

**E-MAIL:** [longj4669@outlook.com](mailto:longj4669@outlook.com)

**COMPANY:**

**ADDRESS:** 22315 THREE PINES DR  
HOCKLEY TX 77447-7023

**PHONE:** 8326225305

**FAX:**

**COMMENTS:** We understand this WWTP is initially planned to discharge an estimated ~120,000 gallons/day of wastewater during PHASE 1 of the developers plan, with an anticipated 480,000 gallons planned for future phases. We ask that TCEQ consider the maximum amount of discharge the developer has in its plans when considering the environmental impact to Spring Creek and the surrounding area.

**Lori Rowe**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 8, 2022 9:08 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** longj4669@outlook.com <longj4669@outlook.com>  
**Sent:** Monday, February 7, 2022 8:31 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** James Paul Long

**E-MAIL:** [longj4669@outlook.com](mailto:longj4669@outlook.com)

**COMPANY:**

**ADDRESS:** 22315 THREE PINES DR  
HOCKLEY TX 77447-7023

**PHONE:** 8326225305

**FAX:**

**COMMENTS:** We understand this WWTP is initially planned to discharge an estimated ~120,000 gallons/day of wastewater during PHASE 1 of the developers plan, with an anticipated 480,000 gallons planned for future phases. We ask that TCEQ consider the maximum amount of discharge the developer has in its plans when considering the environmental impact to Spring Creek and the surrounding area.

**Lori Rowe**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 8, 2022 9:07 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** longj4669@outlook.com <longj4669@outlook.com>  
**Sent:** Monday, February 7, 2022 8:15 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME FM 2920 LAND**

**RN NUMBER: RN111244844**

**PERMIT NUMBER: WQ0015977001**

**DOCKET NUMBER:**

**COUNTY: HARRIS**

**PRINCIPAL NAME: FM 2920 LAND COMPANY LTD**

**CN NUMBER: CN605880145**

**FROM**

**NAME:** James Paul Long

**E-MAIL:** [longj4669@outlook.com](mailto:longj4669@outlook.com)

**COMPANY:**

**ADDRESS:** 22315 THREE PINES DR  
HOCKLEY TX 77447-7023

**PHONE:** 8326225305

**FAX:**

**COMMENTS:** I request that TCEQ make a formal inquiry re: the wetlands on the affected property, requesting USACE review the wetland(s) status and decision on whether they are, in fact, jurisdictional and associated with navigable waters.

**Lori Rowe**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 8, 2022 9:02 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** longj4669@outlook.com <longj4669@outlook.com>  
**Sent:** Monday, February 7, 2022 8:08 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME:** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** James Paul Long

**E-MAIL:** [longj4669@outlook.com](mailto:longj4669@outlook.com)

**COMPANY:**

**ADDRESS:** 22315 THREE PINES DR  
HOCKLEY TX 77447-7023

**PHONE:** 8326225305

**FAX:**

**COMMENTS:** we formally request that TCEQ make an official on-site visit to the property in question as part of the assessment for this permit application

**Lori Rowe**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 8, 2022 9:01 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** longj4669@outlook.com <longj4669@outlook.com>  
**Sent:** Monday, February 7, 2022 8:02 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** James Paul Long

**E-MAIL:** [longj4669@outlook.com](mailto:longj4669@outlook.com)

**COMPANY:**

**ADDRESS:** 22315 THREE PINES DR  
HOCKLEY TX 77447-7023

**PHONE:** 8326225305

**FAX:**

**COMMENTS:** o (Table 2) Who specifically is responsible for taking grab samples for testing for contaminants? o Who hires the testing agency? o How were eColi estimates determined? Was scale of development taken into consideration as population of development increases? o Are violations to be reported by permittee and in what method are they communicated? o What safeguards are being put in place re: power outage, etc.? o Who oversees the permittee compliance with this requirement?

**Lori Rowe**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, February 8, 2022 9:00 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** longj4669@outlook.com <longj4669@outlook.com>  
**Sent:** Monday, February 7, 2022 5:10 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** James Paul Long

**E-MAIL:** [longj4669@outlook.com](mailto:longj4669@outlook.com)

**COMPANY:**

**ADDRESS:** 22315 THREE PINES DR  
HOCKLEY TX 77447-7023

**PHONE:** 8326225305

**FAX:**

**COMMENTS:** I oppose the issuance of this permit for the following reasons: - 2920 Land Company has been misleading in answers/responses provided on the permit application, including the existence of wetlands, existence of a former homestead - and still standing - structure. Other misrepresentations also exist in this application, all of which should be addressed in this and other resident comments submitted. - Please advise of the minimum distance required between a place of residence (property line) and a WWTP. The current plans place this structure in very close proximity to existing

homes. - I understand that the FM 2920 LAND COMPANY LTD does not own or lease this property. I understand that for a permit to be issued, the entity has to have some connection to the property. How is 2920 Land Company permitted to submit this application under the auspices of owning the land? - The application on page 9 of 80, FM 2920 LAND COMPANY LTD states that the proposed wastewater treatment plant will not release into a watershed that feeds Lake Houston. That is false. Spring Creek, into which they propose to discharge, directly feeds into Lake Houston and the west leg of the San Jacinto River. - FM 2920 LAND COMPANY LTD does not check that wetlands exist on the property (Page 15 of 80) or that it overlaps a designated 100-year frequency flood plain, yet both exist on the property in question. (For wetlands, see the National Wetlands Inventory Map ( <https://www.fws.gov/wetlands/Data/Mapper.html> ). The numbered wetlands on the property on the map are PFO1A and PSS1F.) (For a map of how much of the 100-year floodplain is on the property, see <https://www.harriscountyfemt.org/> ) - It appears from the submitted map for the wastewater treatment plant (WWTP) location and from the Harris County Flood Control map at <https://www.harriscountyfemt.org/> that the WWTP location, itself, is located in the 500 year flood plain. - The flow characteristics response on page 30 of 80 is incorrect. The flow characteristic checked is "Intermittent – dry for at least one week during most years." And that is supported by a check beside "Personal observation." There could be a question about whether the flow in question is that of Spring Creek or the yet-to-be-built manmade ditch into which the discharge is planned to flow. But, the question is about "the area downstream of the discharge." And of course, there cannot be a "personal observation" of a ditch that has yet to be built. And, of course, one would expect that the discharge from a wastewater treatment plant would always be flowing. So, the question has to be about the flow characteristics of Spring Creek. And as one who has lived on Spring Creek for almost 4 years and with a neighbor who has lived on it for over twenty years can tell you from personal observation that Spring Creek's flow here is best described by "Perennial – normally flowing." It is never NOT flowing. - The waterbody aesthetics are improperly described (page 32 of 80). The box that is checked is "Natural Area . . . water clarity discolored. A more descriptive aesthetics is: "Wilderness: outstanding natural beauty, usually wooded or unpastured area; water clarity exceptional." The woods on this plot of land are around 100 years old. The water clarity coming off this property into Spring Creek is coming from an almost untouched property. Sometime in the last decade or so, a dirt pathway has been cut in the woods that is rarely used, but it has virtually no impact on water quality runoff from the property. The property is just across FM 2920 from the Kleb Woods Nature Preserve, and the water quality coming off it is probably more pure and less impacted by humans than water flowing off of Kleb Woods. There is a very small open grassy area in the front of the property close to FM 2920, but the part of the property close to Spring Creek is described well as a 100 year old wooded area that has "outstanding natural beauty." - Describing the distance between the WWTP and Spring Creek as is done on page 30 of 80 as 700 feet is a difficult task. At least four times a year (and moreso as of late during this rainy year), Spring Creek comes out of the normal channel and fills the floodway. During the Tax Day Flood of 2016, the Memorial Day Flood of 2016, and Hurricane Harvey in 2017, Spring Creek took up the 100 year flood plain (and even went into the 500 year flood plain during Harvey). When any of these rain events occur, the distance from the WWTP will be much different than the distance between the WWTP and the wall of the normal channel. The WWTP plant requires functioning electricity to do its job and power is not always reliable in this area. If the design of the plant does not include a backup power source to run the lift station pump described on page 2 of 80, a power outage of any significant duration could create an environmental disaster with this design. Anyone living in Harris County knows that hurricanes can create power outages of weeks in duration.



**Melissa Schmidt**

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**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, June 15, 2021 2:55 PM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015977001  
**Attachments:** Protest Letter\_TCEQ\_061520211.docx

PM

**From:** longj4669@outlook.com <longj4669@outlook.com>  
**Sent:** Tuesday, June 15, 2021 10:53 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME FM 2920 LAND**

**RN NUMBER: RN111244844**

**PERMIT NUMBER: WQ0015977001**

**DOCKET NUMBER:**

**COUNTY: GALVESTON**

**PRINCIPAL NAME: FM 2920 LAND COMPANY LTD**

**CN NUMBER: CN605880145**

**FROM**

**NAME:** James Paul Long

**E-MAIL:** [longj4669@outlook.com](mailto:longj4669@outlook.com)

**COMPANY:**

**ADDRESS:** 22315 THREE PINES DR  
HOCKLEY TX 77447-7023

**PHONE:** 8326225305

**FAX:**

**COMMENTS:** To: Texas Commission on Environmental Quality From: James P Long 22315 Three Pines Drive, Hockley, TX 77447 Date: 15 June 2021 Re: Proposed Permit #WQ0015977001 To Whom It May Concern: I object to the issuance of this permit and the proposed subsequent use of land for a 440 unit mobile home park based on the following: 1) I believe the parcel of land in question is a habitat for 1 or more endangered and/or protected species, according to

federal and state designations. 2) I believe the treatment facility will be a public nuisance to myself, other current homeowners, and the tenants within the development itself because of its odor. 3) I believe that the proposed water well for the development will cause increased subsidence in the area, affecting my property, other current property owners and tenants within the development itself. 4) I believe the proposed discharge of almost half a million gallons of treated sewage into Spring Creek will adversely affect property owners downstream as this area already experiences catastrophic flooding during heavy rain, as recently as May 2021 when the bridge immediately downstream from the proposed development was damaged due to flooding. 5) I believe the proposed development does not have any water retention/detention areas which will increase the risk of flooding to my home, other current home owner's, and, potentially, tenants of the development. 6) I believe that the proposed development is essentially the equivalent of paving a 700' wide by one mile long parcel of land and the lack of any natural green space will increase the risk of flooding in the area, both to neighbors as well as tenants of the development. 7) The property on which the development is proposed already drains onto my neighborhood which has already resulted in increased erosion and damage to the ditches along the east side of Three Pines. 8) I believe that the proposed site for the treatment facility is located in or very near an area that is prone to flooding which poses a significant public health risk as well as a risk to local wildlife that use Spring Creek as a source of water or food in the event the facility is compromised due to flooding. 9) I believe that the development only has one entrance/exit point for vehicles, located a few hundred feet from an already busy intersection, and that local infrastructure is not sufficient at this time and that traffic entering or exiting the development during peak hours will create a public nuisance and possible traffic hazard. 10) I believe that the proposed density of the development, combined with the lack of fire hydrants, poses a significant fire hazard to current local property owners as well as the tenants of the proposed development. 11) I believe that because of the proposed density and nature of the development, there will be an increase in crime and calls for service to local law enforcement which will adversely affect my safety, the safety of other current property owners as well as the tenants of the proposed development. 12) I believe that local Fire/EMS resources are insufficient to adequately service the tenants of the development as well as service other current property owners in the area I request a public meeting to address my concerns regarding this permit. As part of this meeting I request that appropriate governmental agencies in addition to the TCEQ be available to address my concerns. These agencies include, but are not limited to: TCEQ, Harris County Flood Control and its Montgomery County equivalent, Harris County Sheriff's Office, Rosehill Volunteer Fire Department, the Houston-Galveston Subsidence District, TXDOT, Harris County Constables Pcts 3 and 4. Sincerely, James P. Long 832/622-5305

To: Texas Commission on Environmental Quality  
From: James P Long  
22315 Three Pines Drive, Hockley, TX 77447  
Date: 15 June 2021  
Re: Proposed Permit #WQ0015977001

To Whom It May Concern:

I object to the issuance of this permit and the proposed subsequent use of land for a 440 unit mobile home park based on the following:

- 1) I believe the parcel of land in question is a habitat for 1 or more endangered and/or protected species, according to federal and state designations.
- 2) I believe the treatment facility will be a public nuisance to myself, other current homeowners, and the tenants within the development itself because of its odor.
- 3) I believe that the proposed water well for the development will cause increased subsidence in the area, affecting my property, other current property owners and tenants within the development itself.
- 4) I believe the proposed discharge of almost half a million gallons of treated sewage into Spring Creek will adversely affect property owners downstream as this area already experiences catastrophic flooding during heavy rain, as recently as May 2021 when the bridge immediately downstream from the proposed development was damaged due to flooding.
- 5) I believe the proposed development does not have any water retention/detention areas which will increase the risk of flooding to my home, other current homeowner's, and, potentially, tenants of the development.
- 6) I believe that the proposed development is essentially the equivalent of paving a 700' wide by one mile long parcel of land and the lack of any natural green space will increase the risk of flooding in the area, both to neighbors as well as tenants of the development.
- 7) The property on which the development is proposed already drains onto my neighborhood which has already resulted in increased erosion and damage to the ditches along the east side of Three Pines.
- 8) I believe that the proposed site for the treatment facility is located in or very near an area that is prone to flooding which poses a significant public health risk as well as a risk to local wildlife that use Spring Creek as a source of water or food in the event the facility is compromised due to flooding.
- 9) I believe that the development only has one entrance/exit point for vehicles, located a few hundred feet from an already busy intersection, and that local infrastructure is not sufficient at this time and that traffic entering or exiting the development during peak hours will create a public nuisance and possible traffic hazard.

- 10) I believe that the proposed density of the development, combined with the lack of fire hydrants, poses a significant fire hazard to current local property owners as well as the tenants of the proposed development.
- 11) I believe that because of the proposed density and nature of the development, there will be an increase in crime and calls for service to local law enforcement which will adversely affect my safety, the safety of other current property owners as well as the tenants of the proposed development.
- 12) I believe that local Fire/EMS resources are insufficient to adequately service the tenants of the development as well as service other current property owners in the area

I request a public meeting to address my concerns regarding this permit. As part of this meeting I request that appropriate governmental agencies in addition to the TCEQ be available to address my concerns. These agencies include, but are not limited to: TCEQ, Harris County Flood Control and its Montgomery County equivalent, Harris County Sheriff's Office, Rosehill Volunteer Fire Department, the Houston-Galveston Subsidence District, TXDOT, Harris County Constables Pcts 3 and 4.

Sincerely,



James P. Long  
832/622-5305

Ref:

**Regulated Entity Name:**

FM 2920 LAND

**RN Number:**

RN111244844

**TCEQ Permit No.:**

WQ0015977001

**TCEQ Docket No:**

**County:**

GALVESTON

**Principal Name:**

FM 2920 LAND COMPANY LTD , CN605880145

**Lori Rowe**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Tuesday, January 25, 2022 8:55 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** wracer217@hotmail.com <wracer217@hotmail.com>  
**Sent:** Tuesday, January 25, 2022 8:44 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Wayne Joseph Matherne

**E-MAIL:** [wracer217@hotmail.com](mailto:wracer217@hotmail.com)

**COMPANY:**

**ADDRESS:** 20603 NEW KENTUCKY VLG  
HOCKLEY TX 77447-8785

**PHONE:** 3462188203

**FAX:**

**COMMENTS:** I live near the proposed site in New Kentucky Vlg. My home backs up to the Spring Creek and has now flooded 3 times, The Tax Day Flood, the May flood following the Tax Day flood and for Harvey. I worry that any infringement on the creek near me would lend itself to more frequent flood along the creek. Please consider current residents living near the site that will be impacted by this development. I am TOTALLY against this development.  
Sincerely Wayne J. Matherne

**Melissa Schmidt**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, June 14, 2021 8:06 AM  
**To:** PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC  
**Subject:** FW: Public comment on Permit Number WQ0015977001  
**Attachments:** I object to the issuance of this permit and the proposed subsequent use of land for a 440 unit mobile home park based on the following.pdf

PM

**From:** pam@messinateam.com <pam@messinateam.com>  
**Sent:** Sunday, June 13, 2021 2:52 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME:** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** GALVESTON

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Pamela Messina

**E-MAIL:** [pam@messinateam.com](mailto:pam@messinateam.com)

**COMPANY:** Messina Interests LLC

**ADDRESS:** 22351 MUESCHKE RD  
TOMBALL TX 77377-3442

**PHONE:** 7138247151

**FAX:**

**COMMENTS:** I object to the issuance of this permit and the proposed subsequent use of land for a 440 unit mobile home park based on the following: 1) I believe the location of the proposed treatment facility may not have sufficient setback distance from my property line or the property lines of the property owners within the development itself as required by

law. 2) I do not believe the treatment facility will have sufficient setback distance from my private water well or my neighbor's private water wells as required by law. 3) I believe the treatment facility will be a public nuisance to myself, other current homeowners as well as the tenants within the development itself because of its odor and noise while operating. 4) I believe that the proposed water well for the development will cause increased subsidence in the area, affecting my property, other current property owners and tenants within the development itself. 5) I believe the proposed discharge of almost half a million gallons of treated sewage into Spring Creek will adversely affect property owners downstream as this area already experiences catastrophic flooding during heavy rain, as recently as May 2021 when the bridge immediately downstream from the proposed development was damaged due to flooding. It was closed for repair which created a nightmare for commuters! It does not take that much of an increase in the water flow for there to be a problem at this site/bridge. 6) I believe the proposed development does not have any water retention/detention areas which will increase the risk of flooding to my home, other current home owners as well as tenants of the development. 7) I believe that the proposed development is essentially the equivalent of paving a 700' wide by one mile long parcel of land and the lack of any natural green space will increase the risk of flooding in the area, both to neighbors as well as tenants of the development. 8) I know that the property on which the development is proposed already drains onto my property (18 acres on the east side sharing 2000 ft. of property line leading to Spring Creek) which has already resulted in increased erosion. 9) I believe that the proposed site for the treatment facility is located in or very near an area that is prone to flooding which poses a significant public health risk as well as a risk to local wildlife that use Spring Creek as a source of water or food in the event the facility is compromised due to flooding. **\*\*WE ARE PART OF A 180-ACRE CO-OP THAT HAS A WILDLIFE EXEMPTION. WE DO NOT TO SEE ANYTHING THAT COULD COMPROMISE THAT EXEMPTION FROM HCAD.\*\*** 10) I believe that the development only has one entrance/exit point for vehicles, located a few hundred feet from an already busy intersection, and that local infrastructure is not sufficient at this time and that traffic entering or exiting the development during peak hours will create a public nuisance and possible traffic hazard. 11) I believe that the proposed density of the development combined with the lack of fire hydrants, the development poses a significant fire hazard to current local property owners as well as the tenants of the proposed development. 12) I believe that because of the proposed density and nature of the development, there will be an increase in crime and calls for service to local law enforcement which will adversely affect my safety, the safety of other current property owners as well as the tenants of the proposed development. 13) I believe that local Fire/EMS resources are insufficient to adequately service the tenants of the development as well as service other current property owners in the area. I request a public meeting to address my concerns regarding this permit. As part of this meeting I request that appropriate governmental agencies in addition to the TCEQ be available to address my concerns. These agencies include, but are not limited to: TCEQ, Harris County Flood Control and its Montgomery County equivalent, Harris County Sheriff's Office, Rosehill Volunteer Fire Department, the Houston-Galveston Subsidence District, TXDOT, Harris County Constables Pcts 3 and 4.

I object to the issuance of this permit and the proposed subsequent use of land for a 440 unit mobile home park based on the following:

- 1) I believe the location of the proposed treatment facility may not have sufficient setback distance from my property line or the property lines of the property owners within the development itself as required by law.
- 2) I do not believe the treatment facility will have sufficient setback distance from my private water well or my neighbor's private water wells as required by law.
- 3) I believe the treatment facility will be a public nuisance to myself, other current homeowners as well as the tenants within the development itself because of its odor and noise while operating.
- 4) I believe that the proposed water well for the development will cause increased subsidence in the area, affecting my property, other current property owners and tenants within the development itself.
- 5) I believe the proposed discharge of almost half a million gallons of treated sewage into Spring Creek will adversely affect property owners downstream as this area already experiences catastrophic flooding during heavy rain, as recently as May 2021 when the bridge immediately downstream from the proposed development was damaged due to flooding. It was closed for repair which created a nightmare for commuters! It does not take that much of an increase in the water flow for there to be a problem at this site/bridge.
- 6) I believe the proposed development does not have any water retention/detention areas which will increase the risk of flooding to my home, other current home owners as well as tenants of the development.
- 7) I believe that the proposed development is essentially the equivalent of paving a 700' wide by one mile long parcel of land and the lack of any natural green space will increase the risk of flooding in the area, both to neighbors as well as tenants of the development.
- 8) I know that the property on which the development is proposed already drains onto my property (18 acres on the east side sharing 2000 ft. of property line leading to Spring Creek) which has already resulted in increased erosion.
- 9) I believe that the proposed site for the treatment facility is located in or very near an area that is prone to flooding which poses a significant public health risk as well as a risk to local wildlife that use Spring Creek as a source of water or food in the event the facility is compromised due to flooding. **\*\*WE ARE PART OF A 180-ACRE CO-OP THAT HAS A WILDLIFE EXEMPTION. WE DO NOT TO SEE ANYTHING THAT COULD COMPROMISE THAT EXEMPTION FROM HCAD.\*\***
- 10) I believe that the development only has one entrance/exit point for vehicles, located a few hundred feet from an already busy intersection, and that local infrastructure is not sufficient at this time and that traffic entering or exiting the development during peak hours will create a public nuisance and possible traffic hazard.
- 11) I believe that the proposed density of the development combined with the lack of fire hydrants, the development poses a significant fire hazard to current local property owners as well as the tenants of the proposed development.



12) I believe that because of the proposed density and nature of the development, there will be an increase in crime and calls for service to local law enforcement which will adversely affect my safety, the safety of other current property owners as well as the tenants of the proposed development.

13) I believe that local Fire/EMS resources are insufficient to adequately service the tenants of the development as well as service other current property owners in the area.

I request a public meeting to address my concerns regarding this permit. As part of this meeting I request that appropriate governmental agencies in addition to the TCEQ be available to address my concerns. These agencies include, but are not limited to: TCEQ, Harris County Flood Control and its Montgomery County equivalent, Harris County Sheriff's Office, Rosehill Volunteer Fire Department, the Houston-Galveston Subsidence District, TXDOT, Harris County Constables Pcts 3 and 4.

**Melissa Schmidt**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, June 7, 2021 2:16 PM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

**From:** ross@messinateam.com <ross@messinateam.com>  
**Sent:** Monday, June 7, 2021 12:34 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** GALVESTON

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Ross J Messina

**E-MAIL:** [ross@messinateam.com](mailto:ross@messinateam.com)

**COMPANY:**

**ADDRESS:** 22351 MUESCHKE RD  
TOMBALL TX 77377-3442

**PHONE:** 7135941755

**FAX:**

**COMMENTS:** I am trying to get all information possible including map with location of structure, use of land etc. The letter I received gave me a website with 50+ letters, numbers, and others that would not open and also said I could go by Northwest Branch Library for copies and they had nothing on file or any record of that permit number. All assistance we be helpful! Thank You

**Lori Rowe**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, February 7, 2022 11:17 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Threatened wetlands and possible heritage site (WQ0015977001)  
**Attachments:** Wetland and Permit Issues.pdf

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**From:** Melanie Renazco <melanierenazco@hotmail.com>  
**Sent:** Saturday, February 5, 2022 6:08 PM  
**To:** WQAP <WQAP@tceq.texas.gov>  
**Subject:** Fw: Threatened wetlands and possible heritage site (WQ0015977001)

Please see the attached letter and attendant documents.

Thank you,  
Melanie W. Renazco

*Honest scales and balances are from the Lord; all the weights in the bag are of His making. Proverbs 16:11*

*Melanie W. Renazco  
Attorney at Law  
24215 Kingsland Boulevard  
Katy, Texas 77494  
(832) 489-3594  
(832) 437-1132 fax  
[melanierenazco@hotmail.com](mailto:melanierenazco@hotmail.com)*

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**From:** Melanie Renazco  
**Sent:** Saturday, February 5, 2022 7:06 PM  
**To:** [wqap@tceq.texas.gov](mailto:wqap@tceq.texas.gov) <[wqap@tceq.texas.gov](mailto:wqap@tceq.texas.gov)>  
**Subject:** Threatened wetlands and possible heritage site (WQ0015977001)

Please see the attached letter and attendant documents.

Thank you,  
Melanie W. Renazco

*Honest scales and balances are from the Lord; all the weights in the bag are of His making. Proverbs 16:11*

*Melanie W. Renazco  
Attorney at Law  
24215 Kingsland Boulevard  
Katy, Texas 77494*

*(832) 489-3594*

*(832) 437-1132 fax*

*[melanierenazco@hotmail.com](mailto:melanierenazco@hotmail.com)*

THE LAW OFFICE  
OF  
MELANIE W. RENAZCO

24215 Kingsland Blvd.  
Katy, Texas 77494

Telephone: (832) 489-3594  
Fax: (832) 437-1132

U.S. Army Corps of Engineers  
Office of Counsel  
2000 Fort Point Road  
Galveston, TX 77550

Certified Letter No. 70162070000016339142  
RRR

U.S. Army Corps of Engineers  
Regulatory Branch, Compliance Section  
Attn: Chief of Compliance  
PO Box 1229  
Galveston, Texas 77553-1229

Certified Letter No. 70162070000016339159  
RRR

February 4, 2022

To whom it may concern,

My name is Melanie W. Renazco. I am an attorney and resident of Hockley, Texas, Harris County. It has come to my attention (and to the attention of many residents) that certain developers (FM 2920 Land Group, LLC; **FM 2920 Land Company, Ltd (permit applicant)**, Jacob White Construction Company and Jacob White Development, LLC – all owned and operated by the same individuals) plan on building a waste water treatment plant and 440 manufactured home sites on 82 acres of near-pristine forest in Hockley, Texas where 5 designated wetlands exist as well as an early 1900's homestead, complete with a home and corrals, etc.

The current legal descriptions of this property are: (see Exhibit # 1)

- (1) TR 4A ABST 7 S brown – Address 0 Waller Tomball Road, Hockley, TX 77447
- (2) TR 33B ABST 7 S Brown, 0 FM 2920 Hockley, TX 77447 &
- (3) TR 4 ABST 7 S Brown, 0 FM 2920 (Off) Rd, Hockley TX 77447

**Wetlands** - The developer(s) has submitted a permit request to TCEQ (WQ0015977001), in March 2021, for the construction of a waste water treatment plant for the purpose of serving the 440 units. However, this heavily forested 82 acres contains at least 5 nationally designated wetlands located on the U.S. Fish and Wildlife Service's National Wetlands Inventory (see Exhibits # 2). Despite the existence of these wetlands on the property and their close proximity to other wetlands and Spring Creek, the developer informs TCEQ, via his application, that he will "not fill in wetlands" (see Exhibit 3). Nor does he disclose that his construction of the development, including a man-made ditch, will cause "Disturbance of vegetation or wetlands" and even goes so far as to state he will be "Clearing and grubbing for future development" (see

**Exhibit 4).** Based on the developer's proposed map (see attached Exhibit # 5), of the 440 unit complex and the waste water treatment plant's location, I do not see how they could possibly avoid filling in and disturbing the wetlands or the vegetation through its construction activities. Finally, the developer's waste water treatment plans include waste water runoff to flow through surrounding designated wetlands and into Spring Creek. Spring Creek flows directly into the jurisdictional waters of the San Jacinto River.

**Presence of Possible Heritage Site** - The subject property also contains an early 1900's abandoned homestead, complete with a cabin and corrals, etc. The presence of this building and its attendant structures has not been disclosed on the developer's application to TCEQ (see Exhibit 4). In fact, The developer's application states, under oath, that the "property has not been developed." And he does not provide details or the required photos of the site when the application asked him to submit photos of any structure that is "50 years or older on the property." (see Exhibit 6).

**Flooding Issues** - Not only will the wetlands be greatly impacted by the developer(s) planned construction, but it will affect water flow issues as this area is very prone to flooding. In the past years, with just average rainfall, the neighborhood of Three Pines, immediately adjacent to the subject property, has overwhelmed drainage systems. This allows the neighborhood road and some of the homes to partially flood from the runoff. I cannot imagine that the developer could possibly eliminate this in any effective way, especially if they are filling in the present wetlands. The water has to flow somewhere. It will most likely greatly add to the flooding issues in this neighborhood.

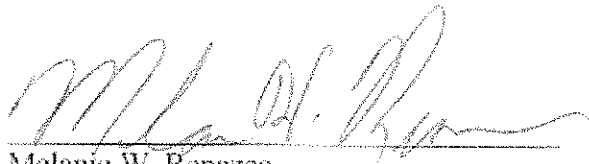
**Water Quality Issues** - Run-off from the water treatment plant will most certainly enter our groundwater from whence we get our drinking water and water for our livestock etc. We all worry about the potential contaminants that will flow into our water from these developers' 440 units that cannot be broken down by the waste water treatment plant. The same sewage and toxins will then eventually flow to the San Jacinto River from Spring Creek.

**Environmental Equity and Justice** - There is also the issue of environmental equity and justice here at stake. The surrounding community and neighborhoods have a high population of elderly residents in this area who have been here for 30 plus years. If flooding and water pollution is allowed to overrun their homes and neighborhoods, they will have no means by which to move or mitigate the issues. This population is severely at risk as they are mostly on fixed incomes and cannot afford the luxury of moving to another location; especially during a pandemic where real estate and consumer goods prices are exorbitant!

I am personally asking, and on behalf of my neighbors and the surrounding community, for the United States Army Corps of Engineers (USACE) to intervene in this environmental matter. We do not believe that this developer has contacted USACE to seek a permit or a letter to proceed without a permit. I also do not believe that TCEQ was made aware of the presence of the potential jurisdictional wetlands on this property. My initial legal assumption is that these wetlands are indeed jurisdictional under the "Significant Nexus" test proposed by Justice Kennedy in *Rapanos v. USACE* and in compliance with USACE's pre-2015 determination factors.

Thank you for your time and consideration in this matter. I look forward to discussing this situation with a USACE agent soon.

Sincerely,



Melanie W. Renazco  
Attorney at Law

**Enclosures:**

- Exhibit 1: Legal Descriptions of 2 of 3 parcels recorded by Harris County Appraisal District (3 pages)
- Exhibit 2: U.S. Fish and Wildlife Service National Wetlands Inventory (Mapper) – (4 pages)
- Exhibit 3: Texas Commission on Environmental Quality (TCEQ) Application for waste water permit pg. 26 of 80.
- Exhibit 4: Texas Commission on Environmental Quality (TCEQ) Application for waste water permit pg. 18 of 21.
- Exhibit 5: Developers' Map of Proposed waste water treatment plant, overflow of waste water run-off and 440 Manufactured Home units on property.
- Exhibit 6: Texas Commission on Environmental Quality (TCEQ) Application for waste water permit pg. 17 of 21.

Cc: U.S. Environmental Protection Agency (EPA)  
Region 6  
1201 Elm Street, Ste. 500  
Dallas, Texas 75270-2102

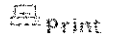
U.S. EPA Office of Inspector General  
Environmental Services  
1200 Pennsylvania Ave. NW  
Washington, District of Columbia 20460, US

Texas Commission on Environmental Quality  
PO Box 13087  
Austin, Texas 78711-3087

Certified Mail No. 70180040000058085741  
RRR

HARRIS COUNTY APPRAISAL DISTRICT  
 REAL PROPERTY ACCOUNT INFORMATION  
 0401890000011

Tax Year: 2021



Owner and Property Information								
Owner Name & Mailing Address:				KELLEY JOEL 7910 TWINING OAKS LN SPRING TX 77379-4541		Legal Description:		TR 4 ABST 7 5 BROWN
						Property Address:		0 FM 2920 (OFF) RD HOCKLEY TX 77447
State Class Code	Land Use Code	Land Area	Total Living Area	Neighborhood	Neighborhood Group	Market Area	Map Facet	Key Map <sup>1/4</sup>
E3 -- Real, Vacant Lots/Tracts (Not in City)	2000 -- Residential Vacant	2,175,495 SF	0 SF	2610	3001	210 -- ISD 03 - Waller ISD	44708	286K

Value Status Information		
Value Status	Notice Date	Shared CAD
Noticed	03/31/2021	Yes

Exemptions and Jurisdictions						
Exemption Type	Districts	Jurisdictions	Exemption Value	ARB Status	2020 Rate	2021 Rate
None	003	WALLER ISD		Certified: 08/06/2021	1.366400	1.320900
	040	HARRIS COUNTY		Certified: 08/06/2021	0.391160	0.376930
	041	HARRIS CO FLOOD CNTRL		Certified: 08/06/2021	0.031420	0.033490
	042	PORT OF HOUSTON AUTHY		Certified: 08/06/2021	0.009910	0.008720
	043	HARRIS CO HOSP DIST		Certified: 08/06/2021	0.166710	0.162210
	044	HARRIS CO EDUC DEPT		Certified: 08/06/2021	0.004993	0.004990
	648	HC EMERG SRV DIST 21		Certified: 08/06/2021	0.100000	0.099212
	673	HC EMERG SRV DIST 3		Certified: 08/06/2021	0.100000	0.099186

Texas law prohibits us from displaying residential photographs, sketches, floor plans, or information indicating the age of a property owner on our website. You can inspect this information or get a copy at HCAD's information center at 13013 NW Freeway.

Valuations			
Value as of January 1, 2020		Value as of January 1, 2021	
	Market	Appraised	
Land	762,300		Land 762,300
Improvement	0		Improvement 0
Total	762,300	762,300	Total 762,300 762,300

Land												
Market Value Land												
Line	Description	Site Code	Unit Type	Units	Size Factor	Site Factor	Appr O/R Factor	Appr O/R Reason	Total Adj	Unit Price	Adj Unit Price	Value
1	2000 -- Res Vacant Override	AC6	AC	15.0000	1.00	1.00	1.00	--	1.00	15,246.00	15,246.00	228,690.00
2	2000 -- Res Vacant Override	AC7	AC	34.9425	1.00	1.00	1.00	--	1.00	15,246.00	15,246.00	532,733.00

**Building**  
 Vacant (No Building Data)

*Exhibit 1 (3 pgs.)*



HARRIS COUNTY APPRAISAL DISTRICT  
 REAL PROPERTY ACCOUNT INFORMATION  
 0401690000331

Tax Year: 2021

Print

Owner and Property Information								
Owner Name & Mailing Address: <b>KELLEY JOEL 7910 TWINING OAK SPRING TX 77379-4541</b>				Legal Description: <b>TR 4A ABST 7 S BROWN</b>				
				Property Address: <b>0 WALLER TOMBALL RD HOCKLEY TX 77447</b>				
State Class Code	Land Use Code	Land Area	Total Living Area	Neighborhood	Neighborhood Group	Market Area	Map Facet	Key Map
C3 -- Real, Vacant Lots/Tracts (Not in City)	2000 -- Residential Vacant	1,151,290 SF	0 SF	2610	3001	210 -- ISD 03 - Waller ISD	4471D	286F

Value Status Information		
Value Status	Notice Date	Shared CAD
Noticed	03/31/2021	Yes

Exemptions and Jurisdictions						
Exemption Type	Districts	Jurisdictions	Exemption Value	ARB Status	2020 Rate	2021 Rate
None	003	WALLER ISD		Certified: 08/06/2021	1.366400	1.320900
	040	HARRIS COUNTY		Certified: 08/06/2021	0.391160	0.376930
	041	HARRIS CO FLOOD CNTRL		Certified: 08/06/2021	0.031420	0.033490
	042	PORT OF HOUSTON AUTHY		Certified: 08/06/2021	0.009910	0.008720
	043	HARRIS CO HOSP DIST		Certified: 08/06/2021	0.166710	0.162210
	044	HARRIS CO EDUC DEPT		Certified: 08/06/2021	0.004993	0.004990
	648	HC EMERG SRV DIST 21		Certified: 08/06/2021	0.100000	0.099212
	673	HC EMERG SRV DIST 3		Certified: 08/06/2021	0.100000	0.099186
Texas law prohibits us from displaying residential photographs, sketches, floor plans, or information indicating the age of a property owner on our website. You can inspect this information or get a copy at HCAD's information center at 13013 NW Freeway.						

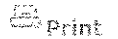
Value as of January 1, 2020			Value as of January 1, 2021		
	Market	Appraised		Market	Appraised
Land	344,361		Land	344,361	
Improvement	0		Improvement	0	
<b>Total</b>	<b>344,361</b>	<b>344,361</b>	<b>Total</b>	<b>344,361</b>	<b>344,361</b>

Land												
Market Value Land												
Line	Description	Site Code	Unit Type	Units	Size Factor	Site Factor	Appr O/R Factor	Appr O/R Reason	Total Adj	Unit Price	Adj Unit Price	Value
1	2000 -- Res Vacant Override	ACB	AC	21.3060	1.00	1.00	1.00	--	1.00	15,246.00	15,246.00	324,831.00
2	2000 -- Res Vacant Override	--	AC	5.1240	1.00	1.00	0.25	--	0.25	15,246.00	3,811.50	19,530.00

**Building**  
 Vacant (No Building Data)

HARRIS COUNTY APPRAISAL DISTRICT  
 REAL PROPERTY ACCOUNT INFORMATION  
 040189000434

Tax Year: 2021



Owner and Property Information											
Owner Name & Mailing Address:				<b>KELLEY JOEL 7910 TWINING OAKS LN SPRING TX 77379-4541</b>				Legal Description:		<b>TR 33B ABST 7 S BROWN</b>	
								Property Address:		<b>0 FM 2920 HOCKLEY TX 77447</b>	
State Class Code	Land Use Code	Building Class	Total Units	Land Area	Building Area	Net Rentable Area	Neighborhood	Market Area	Map Facet	Key Map <sup>1/2</sup>	
C2 -- Real, Vacant Commercial	8003 -- Land Neighborhood Section 3		0	391,212 SF	0	0	9050.05	210 -- ISD 03 - Waller ISD	44708	286K	

Value Status Information		
Value Status	Notice Date	Shared CAD
Noticed	04/02/2021	Yes

Exemptions and Jurisdictions						
Exemption Type	Districts	Jurisdictions	Exemption Value	ARB Status	2020 Rate	2021 Rate
None	003	WALLER ISD		Certified: 08/06/2021	1.366400	1.320900
	040	HARRIS COUNTY		Certified: 08/06/2021	0.391160	0.376930
	041	HARRIS CO FLOOD CNTRL		Certified: 08/06/2021	0.031420	0.033490
	042	PORT OF HOUSTON AUTHY		Certified: 08/06/2021	0.009910	0.008720
	043	HARRIS CO HOSP DIST		Certified: 08/06/2021	0.166710	0.162210
	044	HARRIS CO EDUC DEPT		Certified: 08/06/2021	0.004993	0.004990
	648	HC EMERG SRV DIST 21		Certified: 08/06/2021	0.100000	0.099212
	673	HC EMERG SRV DIST 3		Certified: 08/06/2021	0.100000	0.099186

Texas law prohibits us from displaying residential photographs, sketches, floor plans, or information indicating the age of a property owner on our website. You can inspect this information or get a copy at HCAD's information center at 13013 NW Freeway.

Valuations			
Value as of January 1, 2020		Value as of January 1, 2021	
	Market	Appraised	
Land	871,200	Land	782,424
Improvement	0	Improvement	0
Total	871,200	Total	782,424

Land												
Market Value Land												
Line	Description	Site Code	Unit Type	Units	Size Factor	Site Factor	Appr O/R Factor	Appr O/R Reason	Total Adj	Unit Price	Adj Unit Price	Value
1	8003 -- Land Neighborhood Section 3	4300	SF	391,212	1.00	1.00	1.00	--	1.00	2.00	2.00	782,424.00

**Building**  
 Vacant (No Building Data)



U.S. Fish and Wildlife Service  
National Wetlands Inventory

Subject Property (South) Facing FM 2920  
Exhibit 2 (4093.)



January 31, 2022

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

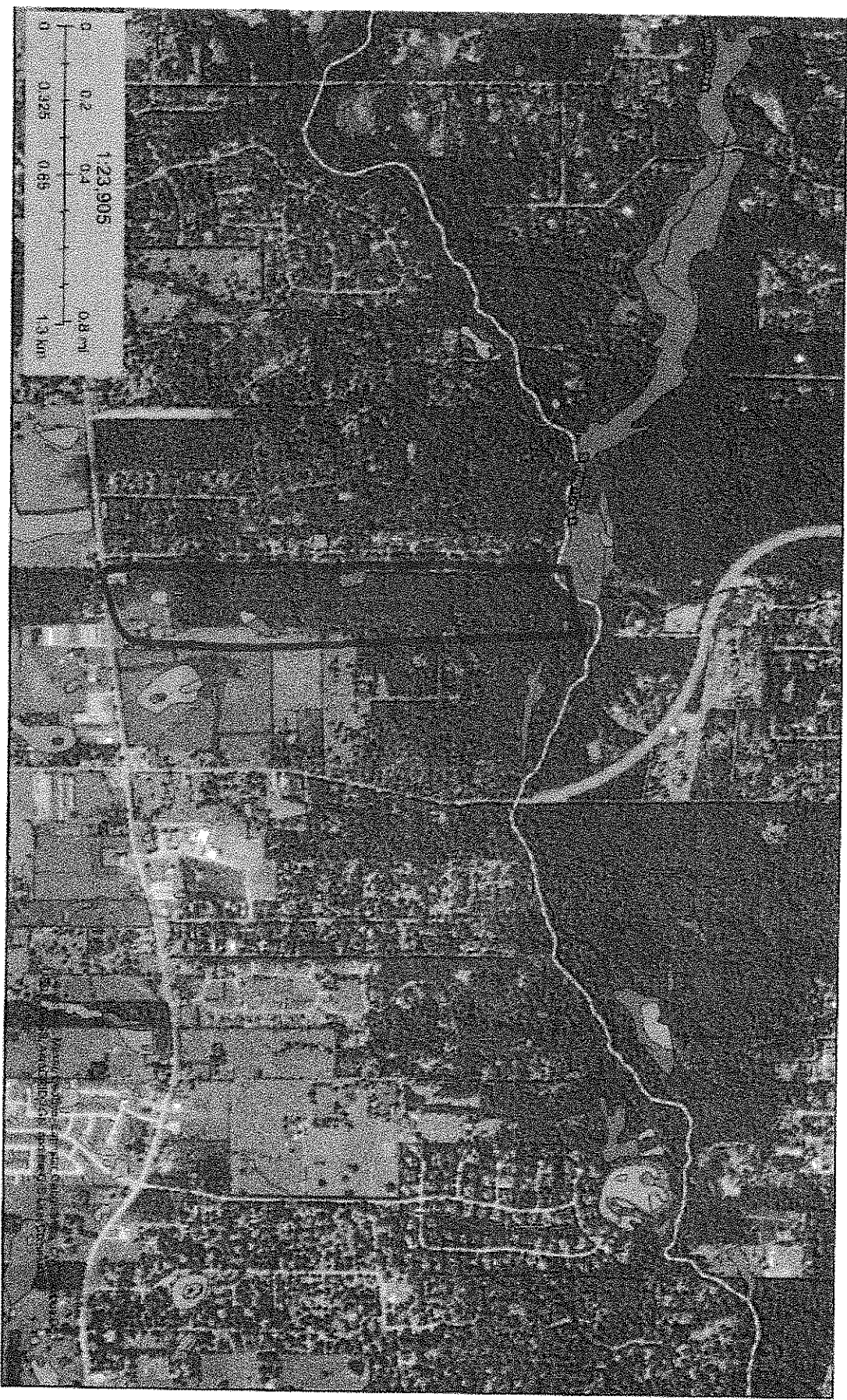
This map is for general reference only. The U.S. Fish and Wildlife Service is not responsible for the accuracy or currency of the base data shown on this map. All wetlands-related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



U.S. Fish and Wildlife Service  
National Wetlands Inventory

Subject Property

Overview of  
subject property



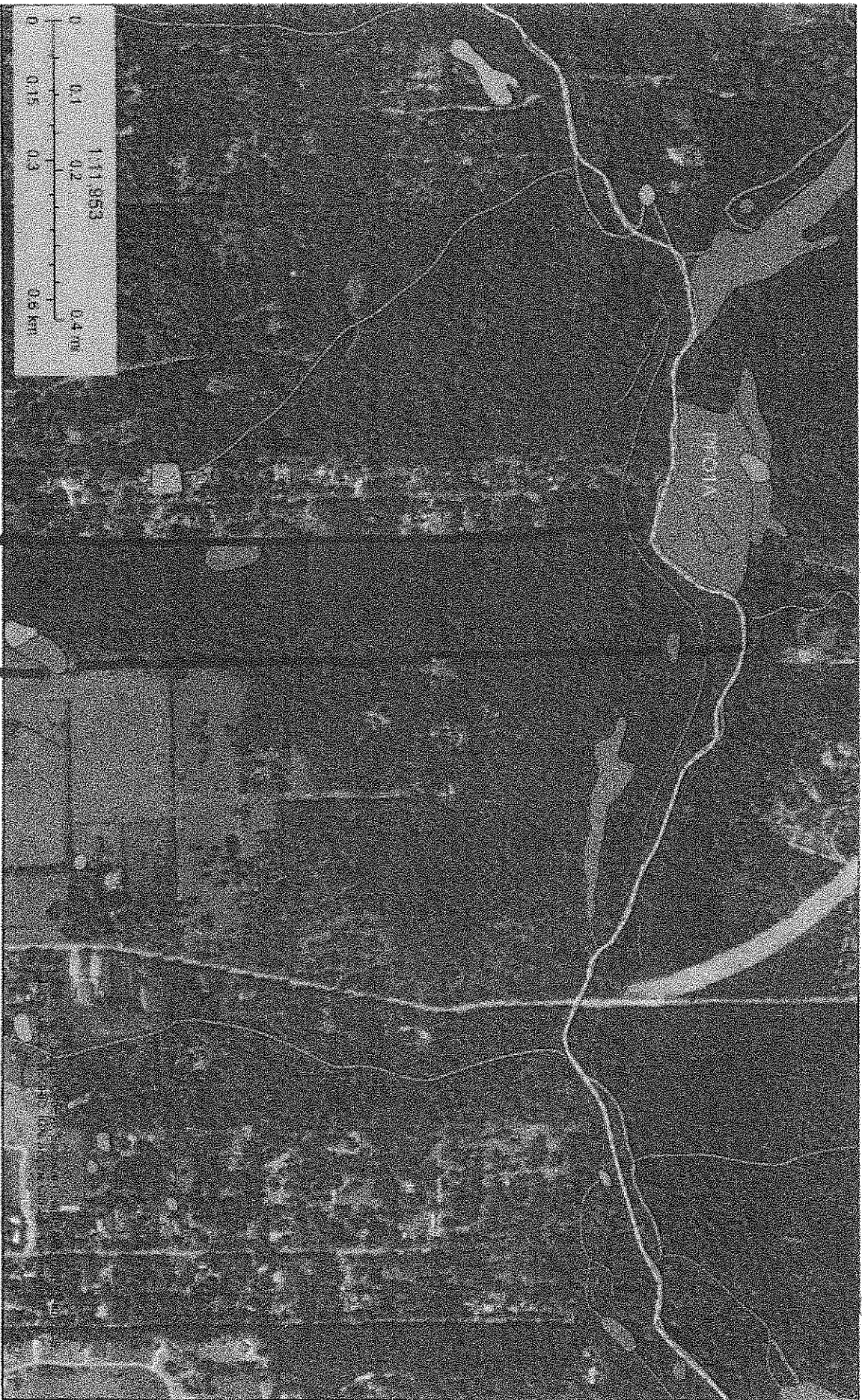
January 31, 2022

- Wetlands**
- Estuarine and Marine Deepwater
  - Estuarine and Marine Wetland
  - Freshwater Emergent Wetland
  - Freshwater Forested/Shrub Wetland
  - Freshwater Pond
  - Lake
  - Other
  - Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



Subject Property Back (North) Towards S  
Spring Creek



January 31, 2022

**Wetlands**

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currency of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



January 31, 2022

**Wetlands**

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland



- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

- Lake
- Other
- Riverine

This map is for general reference only. The U.S. Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the types metadata found on the Wetlands Mapper web site.

**Section 5. Facility Site Instructions Page 63**

**A. 100-year floodplain**

Will the proposed facilities be located above the 100-year frequency flood level?

Yes  No

If no, describe measures used to protect the facility during a flood event. Include a site map showing the location of the treatment plant within the 100-year frequency flood level. If applicable, provide the size and types of protective structures.

[Empty box for describing flood protection measures]

Provide the source(s) used to determine 100-year frequency flood plain.

FEMA Flood Map Service Center

For a new or expansion of a facility, will a wetland or part of a wetland be filled?

Yes  No

If yes, has the applicant applied for a US Corps of Engineers 404 Dredge and Fill Permit?

Yes  No

If yes, provide the permit number:

If no, provide the approximate date you anticipate submitting your application to the Corps:

**B. Wind rose**

Attach a wind rose. Attachment: J: Wind rose

**Section 6. Permit Authorization for Sewage Sludge Disposal (Instructions Page 69)**

**A. Beneficial use authorization**

Are you requesting to include authorization to land apply sewage sludge for beneficial use on property located adjacent to the wastewater treatment facility under the wastewater permit?

# Exhibit 4

Disturbance of vegetation or wetlands

6. List proposed construction impact (surface acres to be impacted, depth of excavation, sealing of caves, or other karst features):

Approximately 90 acres to be developed into a Manufactured Home Community.

7. Describe existing disturbances, vegetation, and land use:

Clearing and grubbing for future development.

THE FOLLOWING ITEMS APPLY ONLY TO APPLICATIONS FOR NEW TPDES PERMITS AND MAJOR AMENDMENTS TO TPDES PERMITS

8. List construction dates of all buildings and structures on the property:

Estimated construction start date: 10/15/2022. Estimated waste disposal start date: 10/01/2022.

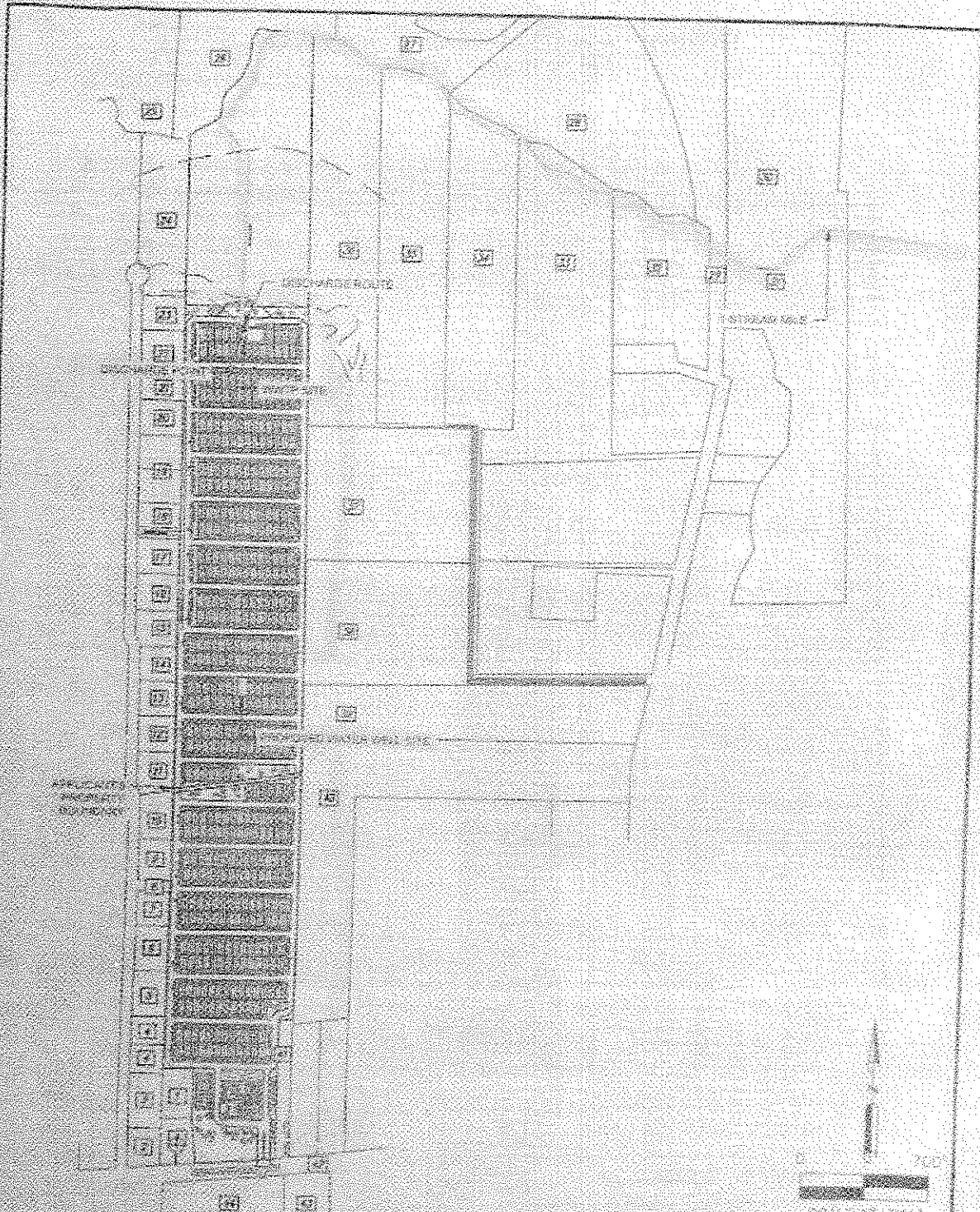
Homestead  
NOT  
Mentioned

9. Provide a brief history of the property, and name of the architect/builder, if known.

Property has not been developed.



# Exhibit 5

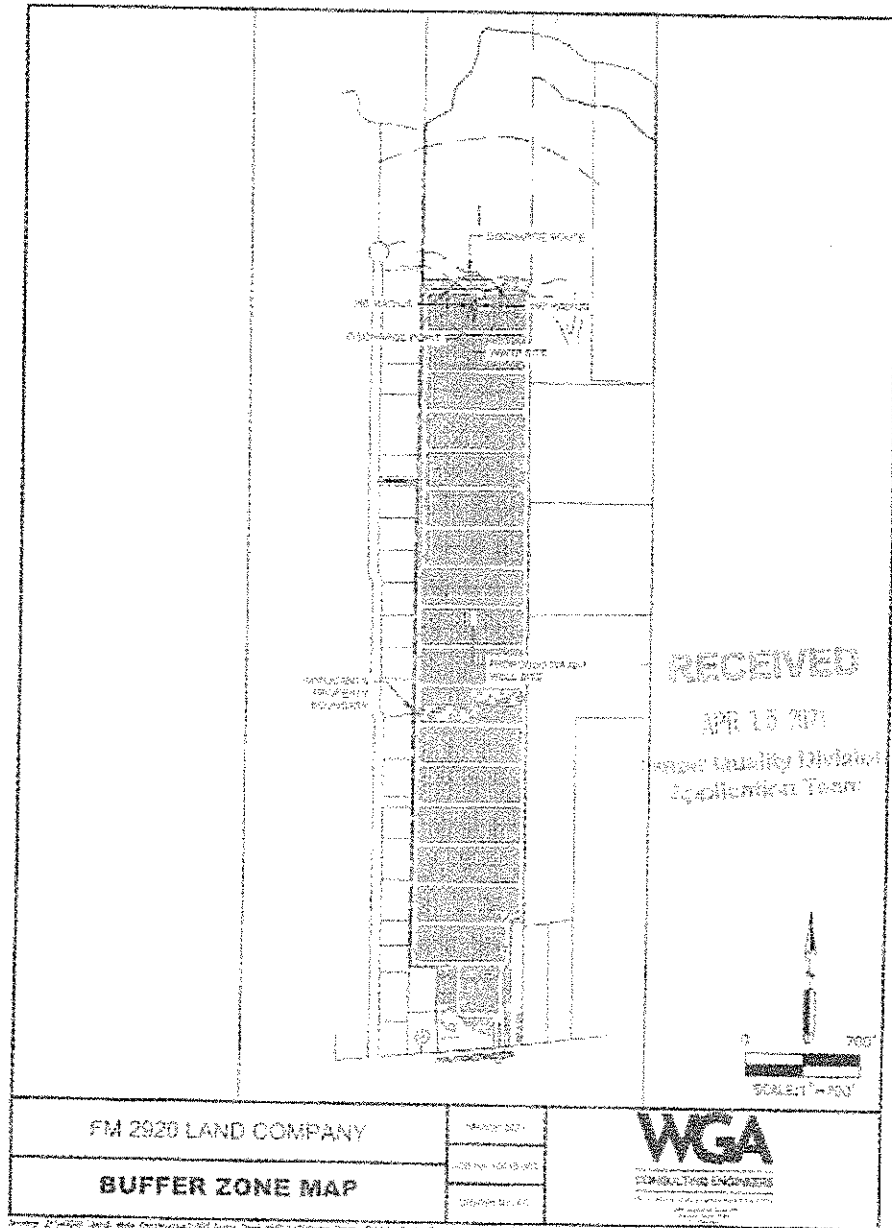


<p>FM 2920 LAND COMPANY</p>	<p>OWNER</p>	<p><b>WGA</b></p>
<p><b>LANDOWNER MAP</b></p>	<p>DATE: 10/15/2008</p>	<p>CONSULTING ENGINEERS  <small>PROFESSIONAL ENGINEERS AND ARCHITECTS</small></p>

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Exhibit 5  
(Pg. 2)

Attachment A  
WQ0015977001-FM 2920 Land Company, Ltd.  
FM 2920 Land WWTP



# Exhibit 6

Provide the name, address, phone and fax number of an individual that can be contacted to answer specific questions about the property.

Prefix (Mr., Ms., Miss): Mr.

First and Last Name: Jeff Mickler

Credential (P.E., P.G., Ph.D., etc.):

Title: Authorized representative

Mailing Address: 2000 West Parkwood Avenue

City, State, Zip Code: Friendswood, TX 77546

Phone No.: 281-286-6666 Ext.:

Fax No.:

E-mail Address: Jeff.Mickler@JacobWhitert.com

- List the county in which the facility is located: Harris
- If the property is publicly owned and the owner is different than the permittee/applicant, please list the owner of the property.

N/A

- Provide a description of the effluent discharge route. The discharge route must follow the flow of effluent from the point of discharge to the nearest major watercourse (from the point of discharge to a classified segment as defined in 30 TAC Chapter 307). If known, please identify the classified segment number.

From the treatment plant, the water will be discharged into a man-made ditch located along the western property boundary there flowing for 700 feet thence to Spring Creek.

- Please provide a separate 7.5-minute USGS quadrangle map with the project boundaries plotted and a general location map showing the project area. Please highlight the discharge route from the point of discharge for a distance of one mile downstream. (This map is required in addition to the map in the administrative report).

Provide original photographs of any structures 50 years or older on the property.

Does your project involve any of the following? Check all that apply.

- Proposed access roads, utility lines, construction easements
- Visual effects that could damage or detract from a historic property's integrity
- Vibration effects during construction or as a result of project design
- Additional phases of development that are planned for the future
- Sealing caves, fractures, sinkholes, other karst features

No pics of structure attached or drawings lodged

**WATER QUALITY PERMIT  
PAYMENT SUBMITTAL FORM**

Use this form to submit the Application Fee, if the mailing the payment.

- Complete items 1 through 5 below.
- Staple the check or money order in the space provided at the bottom of this document.
- Do not mail this form with the application form.
- Do not mail this form to the same address as the application.
- Do not submit a copy of the application with this form as it could cause duplicate permit entries.

Mail this form and the check or money order to:

**BY REGULAR U.S. MAIL**

Texas Commission on Environmental Quality  
Financial Administration Division  
Cashier's Office, MC-214  
P.O. Box 13088  
Austin, Texas 78711-3088

**BY OVERNIGHT/EXPRESS MAIL**

Texas Commission on Environmental Quality  
Financial Administration Division  
Cashier's Office, MC-214  
12100 Park 35 Circle  
Austin, Texas 78753

Fee Code: WQP      Waste Permit No:

1. Check or Money Order Number: 83496
2. Check or Money Order Amount: \$850.00
3. Date of Check or Money Order: 03/01/2021
4. Name on Check or Money Order: Jacob White Construction

**5. APPLICATION INFORMATION**

Name of Project or Site: FM 2920 Land Company

Physical Address of Project or Site: located on FM 2920 approximately 550 feet east from intersection of FM 2920 and Three Pines Drive in Harris County. If the check is for more than one application, attach a list which includes the name of each Project or Site (US) and Physical Address, exactly as provided on the application.

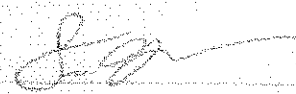
**JACOB | WHITE**

CONSTRUCTION  
200 N PARKWOOD, SUITE 100  
HOUSTON, TX 77022

83496

Pay: \*\*\*\*\*Eight hundred fifty dollars and no cents\*\*\*\*\*  
DATE: March 1, 2021      CHECK NO.: 83496      AMOUNT: \*\*\*\*\*850.00

**PAY TO THE ORDER OF** Texas Commission on Environmental Quality



⑆083496⑆ ⑆111122055⑆ 04 2021 01⑆

**Lori Rowe**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Monday, February 7, 2022 11:11 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001  
**Attachments:** Letter to USACE Wetlands.doc

**From:** melanierenazco@hotmail.com <melanierenazco@hotmail.com>  
**Sent:** Saturday, February 5, 2022 6:42 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Melanie W Renazco

**E-MAIL:** [melanierenazco@hotmail.com](mailto:melanierenazco@hotmail.com)

**COMPANY:** The Law Office of Melanie W. Renazco

**ADDRESS:** 24215 KINGSLAND BLVD  
KATY TX 77494-2976

**PHONE:** 8324893594

**FAX:**

**COMMENTS:** Please see attached letter.

THE LAW OFFICE  
OF  
**MELANIE W. RENAZCO**

24215 Kingsland Blvd.  
Katy, Texas 77494

Telephone: (832) 489-3594  
Fax: (832) 437-1132

U.S. Army Corps of Engineers  
Office of Counsel  
2000 Fort Point Road  
Galveston, TX 77550

Certified Letter No. 70162070000016339142  
RRR

U.S. Army Corps of Engineers  
Regulatory Branch, Compliance Section  
Attn: Chief of Compliance  
PO Box 1229  
Galveston, Texas 77553-1229

Certified Letter No. 70162070000016339159  
RRR

February 4, 2022

To whom it may concern,

My name is Melanie W. Renazco. I am an attorney and resident of Hockley, Texas, Harris County. It has come to my attention (and to the attention of many residents) that certain developers (FM 2920 Land Group, LLC; **FM 2920 Land Company, Ltd (permit applicant)**, Jacob White Construction Company and Jacob White Development, LLC – all owned and operated by the same individuals) plan on building a waste water treatment plant and 440 manufactured home sites on 82 acres of near-pristine forest in Hockley, Texas where 5 designated wetlands exist as well as an early 1900's homestead, compete with a home and corrals, etc.

**The current legal descriptions of this property are: (see Exhibit # 1)**

**(1) TR 4A ABST 7 S brown – Address 0 Waller Tomball Road, Hockley, TX 77447**

**(2) TR 33B ABST 7 S Brown, O FM 2920 Hockley, TX 77447 &**

**(3) TR 4 ABST 7 S Brown, 0 FM 2920 (Off) Rd, Hockley TX 77447**

**Wetlands** - The developer(s) has submitted a permit request to **TCEQ (WQ0015977001)**, in March 2021, for the construction of a waste water treatment plant for the purpose of serving the 440 units. However, this heavily forested 82 acres contains at least 5 nationally designated wetlands located on the U.S. Fish and Wildlife Service's National Wetlands Inventory (see Exhibits # 2). Despite the existence of these wetlands on the property and their close proximity to other wetlands and Spring Creek, the developer informs TCEQ, via his application, that he will “not fill in wetlands” (see **Exhibit 3**). Nor does he disclose that his construction of the development, including a man-made ditch, will cause “Disturbance of vegetation or wetlands” and even goes so far as to state he will be “Clearing and grubbing for future development” (see

**Exhibit 4).** Based on the developer's proposed map (see attached Exhibit # 5), of the 440 unit complex and the waste water treatment plant's location, I do not see how they could possibly avoid filling in and disturbing the wetlands or the vegetation through its construction activities. Finally, the developer's waste water treatment plans include waste water runoff to flow through surrounding designated wetlands and into Spring Creek. Spring Creek flows directly into the jurisdictional waters of the San Jacinto River.

**Presence of Possible Heritage Site** - The subject property also contains an early 1900's abandoned homestead, complete with a cabin and corrals, etc.. The presence of this building and its attendant structures has not been disclosed on the developer's application to TCEQ (see Exhibit 4). In fact, The developer's application states, under oath, that the "property has not been developed." And he does not provide details or the required photos of the site when the application asked him to submit photos of any structure that is "50 years or older on the property." (see Exhibit 6).

**Flooding Issues** - Not only will the wetlands be greatly impacted by the developer(s) planned construction, but it will affect water flow issues as this area is very prone to flooding. In the past years, with just average rainfall, the neighborhood of Three Pines, immediately adjacent to the subject property, has overwhelmed drainage systems. This allows the neighborhood road and some of the homes to partially flood from the runoff. I cannot imagine that the developer could possibly eliminate this in any effective way, especially if they are filling in the present wetlands. The water has to flow somewhere. It will most likely greatly add to the flooding issues in this neighborhood.

**Water Quality Issues** – Run-off from the water treatment plant will most certainly enter our groundwater from whence we get our drinking water and water for our livestock etc. We all worry about the potential contaminants that will flow into our water from these developers' 440 units that cannot be broken down by the waste water treatment plant. The same sewage and toxins will then eventually flow to the San Jacinto River from Spring Creek.

**Environmental Equity and Justice** - There is also the issue of environmental equity and justice here at stake. The surrounding community and neighborhoods have a high population of elderly residents in this area who have been here for 30 plus years. If flooding and water pollution is allowed to overrun their homes and neighborhoods, they will have no means by which to move or mitigate the issues. This population is severely at risk as they are mostly on fixed incomes and cannot afford the luxury of moving to another location; especially during a pandemic where real estate and consumer goods prices are exorbitant!

I am personally asking, and on behalf of my neighbors and the surrounding community, for the United States Army Corps of Engineers (USACE) to intervene in this environmental matter. We do not believe that this developer has contacted USACE to seek a permit or a letter to proceed without a permit. I also do not believe that TCEQ was made aware of the presence of the potential jurisdictional wetlands on this property. My initial legal assumption is that these wetlands are indeed jurisdictional under the "Significant Nexus" test proposed by Justice Kennedy in *Rapanos v. USACE* and in compliance with USACE's pre-2015 determination factors.

Thank you for your time and consideration in this matter. I look forward to discussing this situation with a USACE agent soon.

Sincerely,

---

Melanie W. Renazco  
Attorney at Law

**Enclosures:**

- Exhibit 1: Legal Descriptions of 2 of 3 parcels recorded by Harris County Appraisal District (3 pages)
- Exhibit 2: U.S. Fish and Wildlife Service National Wetlands Inventory (Mapper) – (4 pages)
- Exhibit 3: Texas Commission on Environmental Quality (TCEQ) Application for waste water permit pg. 26 of 80.
- Exhibit 4: Texas Commission on Environmental Quality (TCEQ) Application for waste water permit pg.18 of 21.
- Exhibit 5: Developers' Map of Proposed waste water treatment plant, overflow of waste water run-off and 440 Manufactured Home units on property.
- Exhibit 6: Texas Commission on Environmental Quality (TCEQ) Application for waste water permit pg.17 of 21.

Cc: U.S. Environmental Protection Agency (EPA)  
Region 6  
1201 Elm Street, Ste. 500  
Dallas, Texas 75270-2102

U.S. EPA Office of Inspector General  
Environmental Services  
1200 Pennsylvania Ave. NW  
Washington, District of Columbia 20460, US

Texas Commission on Environmental Quality  
PO Box 13087  
Austin, Texas 78711-3087

Certified Mail No. 70180040000058085741  
RRR



THE LAW OFFICE  
OF  
**MELANIE W. RENAZCO**

24215 Kingsland Blvd.  
Katy, Texas 77494

Telephone: (832) 489-3594  
Fax: (832) 437-1132

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2000 Fort Point Road  
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RRR

MWD  
123792

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Attn: Chief of Compliance  
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REVIEWED

FEB 08 2022

by GCW

February 4, 2022

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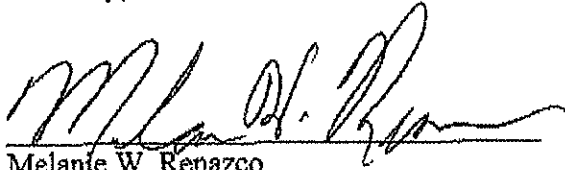
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Attorney at Law

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Region 6  
1201 Elm Street, Ste. 500  
Dallas, Texas 75270-2102

U.S. EPA Office of Inspector General  
Environmental Services  
1200 Pennsylvania Ave. NW  
Washington, District of Columbia 20460, US

Texas Commission on Environmental Quality  
PO Box 13087  
Austin, Texas 78711-3087

Certified Mail No. 70180040000058085741  
RRR

HARRIS COUNTY APPRAISAL DISTRICT  
 REAL PROPERTY ACCOUNT INFORMATION  
 0401890000011

Tax Year: 2021

Print

Owner and Property Information								
Owner Name & Mailing Address: <b>KELLEY JOEL 7910 TWINING OAKS LN SPRING TX 77379-4541</b>				Legal Description: <b>TR 4 ABST 7 S BROWN</b>				
				Property Address: <b>0 FM 2920 (OFF) RD HOCKLEY TX 77447</b>				
State Class Code	Land Use Code	Land Area	Total Living Area	Neighborhood	Neighborhood Group	Market Area	Map Facet	Key Map <sup>1/2</sup>
C3 -- Real, Vacant Lots/Tracts (Not in City)	2000 -- Residential Vacant	2,175,495 SF	0 SF	2610	3001	210 -- ISD 03 - Waller ISD	4470B	286K

Value Status Information		
Value Status	Notice Date	Shared CAD
Noticed	03/31/2021	Yes

Exemptions and Jurisdictions						
Exemption Type	Districts	Jurisdictions	Exemption Value	ARB Status	2020 Rate	2021 Rate
None	003	WALLER ISD		Certified: 08/06/2021	1.366400	1.320900
	040	HARRIS COUNTY		Certified: 08/06/2021	0.391160	0.376930
	041	HARRIS CO FLOOD CNTRL		Certified: 08/06/2021	0.031420	0.033490
	042	PORT OF HOUSTON AUTHY		Certified: 08/06/2021	0.009910	0.008720
	043	HARRIS CO HOSP DIST		Certified: 08/06/2021	0.166710	0.162210
	044	HARRIS CO EDUC DEPT		Certified: 08/06/2021	0.004993	0.004990
	648	HC EMERG SRV DIST 21		Certified: 08/06/2021	0.100000	0.099212
673	HC EMERG SRV DIST 3		Certified: 08/06/2021	0.100000	0.099186	

Texas law prohibits us from displaying residential photographs, sketches, floor plans, or information indicating the age of a property owner on our website. You can inspect this information or get a copy at **HCAD's information center at 13013 NW Freeway.**

Valuations			
Value as of January 1, 2020		Value as of January 1, 2021	
	Market	Appraised	
Land	762,300		Land
Improvement	0		Improvement
Total	762,300	762,300	Total

Land												
Market Value Land												
Line	Description	Site Code	Unit Type	Units	Size Factor	Site Factor	Appr O/R Factor	Appr O/R Reason	Total Adj	Unit Price	Adj Unit Price	Value
1	2000 -- Res Vacant Override	AC6	AC	15.0000	1.00	1.00	1.00	--	1.00	15,246.00	15,246.00	228,690.00
2	2000 -- Res Vacant Override	AC7	AC	34.9425	1.00	1.00	1.00	--	1.00	15,246.00	15,246.00	532,733.00

**Building**  
 Vacant (No Building Data)

*Exhibit 1 (3 pgs.)*

HARRIS COUNTY APPRAISAL DISTRICT  
 REAL PROPERTY ACCOUNT INFORMATION  
 0401890000331

Tax Year: 2021

Print

Owner and Property Information								
Owner Name & Mailing Address: <b>KELLEY JOEL 7910 TWINING OAK SPRING TX 77379-4541</b>				Legal Description: <b>TR 4A ABST 7 S BROWN</b>				
				Property Address: <b>0 WALLER TOMBALL RD HOCKLEY TX 77447</b>				
State Class Code	Land Use Code	Land Area	Total Living Area	Neighborhood	Neighborhood Group	Market Area	Map Facet	Key Map <sup>1/2</sup>
C3 -- Real, Vacant Lots/Tracts (Not In City)	2000 -- Residential Vacant	1,151,290 SF	0 SF	2610	3001	210 -- ISD 03 - Waller ISD	4471D	286F

Value Status Information		
Value Status	Notice Date	Shared CAD
Noticed	03/31/2021	Yes

Exemptions and Jurisdictions						
Exemption Type	Districts	Jurisdictions	Exemption Value	ARB Status	2020 Rate	2021 Rate
None	003	WALLER ISD		Certified: 08/06/2021	1.366400	1.320900
	040	HARRIS COUNTY		Certified: 08/06/2021	0.391160	0.376930
	041	HARRIS CO FLOOD CNTRL		Certified: 08/06/2021	0.031420	0.033490
	042	PORT OF HOUSTON AUTHY		Certified: 08/06/2021	0.009910	0.008720
	043	HARRIS CO HOSP DIST		Certified: 08/06/2021	0.166710	0.162210
	044	HARRIS CO EDUC DEPT		Certified: 08/06/2021	0.004993	0.004990
	648	HC EMERG SRV DIST 21		Certified: 08/06/2021	0.100000	0.099212
673	HC EMERG SRV DIST 3		Certified: 08/06/2021	0.100000	0.099186	

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Valuations			
Value as of January 1, 2020		Value as of January 1, 2021	
	Market	Appraised	
Land	344,361		Land
Improvement	0		Improvement
Total	344,361	344,361	Total
			Market
			Appraised
			344,361
			0
			344,361

Land												
Market Value Land												
Line	Description	Site Code	Unit Type	Units	Size Factor	Site Factor	Appr O/R Factor	Appr O/R Reason	Total Adj	Unit Price	Adj Unit Price	Value
1	2000 -- Res Vacant Override	ACB	AC	21.3060	1.00	1.00	1.00	--	1.00	15,246.00	15,246.00	324,831.00
2	2000 -- Res Vacant Override	--	AC	5.1240	1.00	1.00	0.25	--	0.25	15,246.00	3,811.50	19,530.00

**Building**  
 Vacant (No Building Data)

HARRIS COUNTY APPRAISAL DISTRICT  
 REAL PROPERTY ACCOUNT INFORMATION  
 0401890000434

Tax Year: 2021

Print

Owner and Property Information										
Owner Name & Mailing Address:					Legal Description:					
KELLEY JOEL 7910 TWINING OAKS LN SPRING TX 77379-4541					TR 33B ABST 7 S BROWN 0 FM 2920 HOCKLEY TX 77447					
Property Address:										
State Class Code	Land Use Code	Building Class	Total Units	Land Area	Building Area	Net Rentable Area	Neighborhood	Market Area	Map Facet	Key Map <sup>1/2</sup>
C2 -- Real, Vacant Commercial	8003 -- Land Neighborhood Section 3		0	391,212 SF	0	0	9050.05	210 -- ISD 03 - Waller ISD	4470B	286K

Value Status Information		
Value Status	Notice Date	Shared CAD
Noticed	04/02/2021	Yes

Exemptions and Jurisdictions						
Exemption Type	Districts	Jurisdictions	Exemption Value	ARB Status	2020 Rate	2021 Rate
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	042	PORT OF HOUSTON AUTHY		Certified: 08/06/2021	0.009910	0.008720
	043	HARRIS CO HOSP DIST		Certified: 08/06/2021	0.166710	0.162210
	044	HARRIS CO EDUC DEPT		Certified: 08/06/2021	0.004993	0.004990
	648	HC EMERG SRV DIST 21		Certified: 08/06/2021	0.100000	0.099212
	673	HC EMERG SRV DIST 3		Certified: 08/06/2021	0.100000	0.099186
Texas law prohibits us from displaying residential photographs, sketches, floor plans, or information indicating the age of a property owner on our website. You can inspect this information or get a copy at <b>HCAD's information center at 13013 NW Freeway.</b>						

Valuations			
Value as of January 1, 2020		Value as of January 1, 2021	
	Market	Appraised	
Land	871,200		Land
Improvement	0		Improvement
Total	871,200	871,200	Total
			Market
			Appraised
			782,424
			0
			782,424

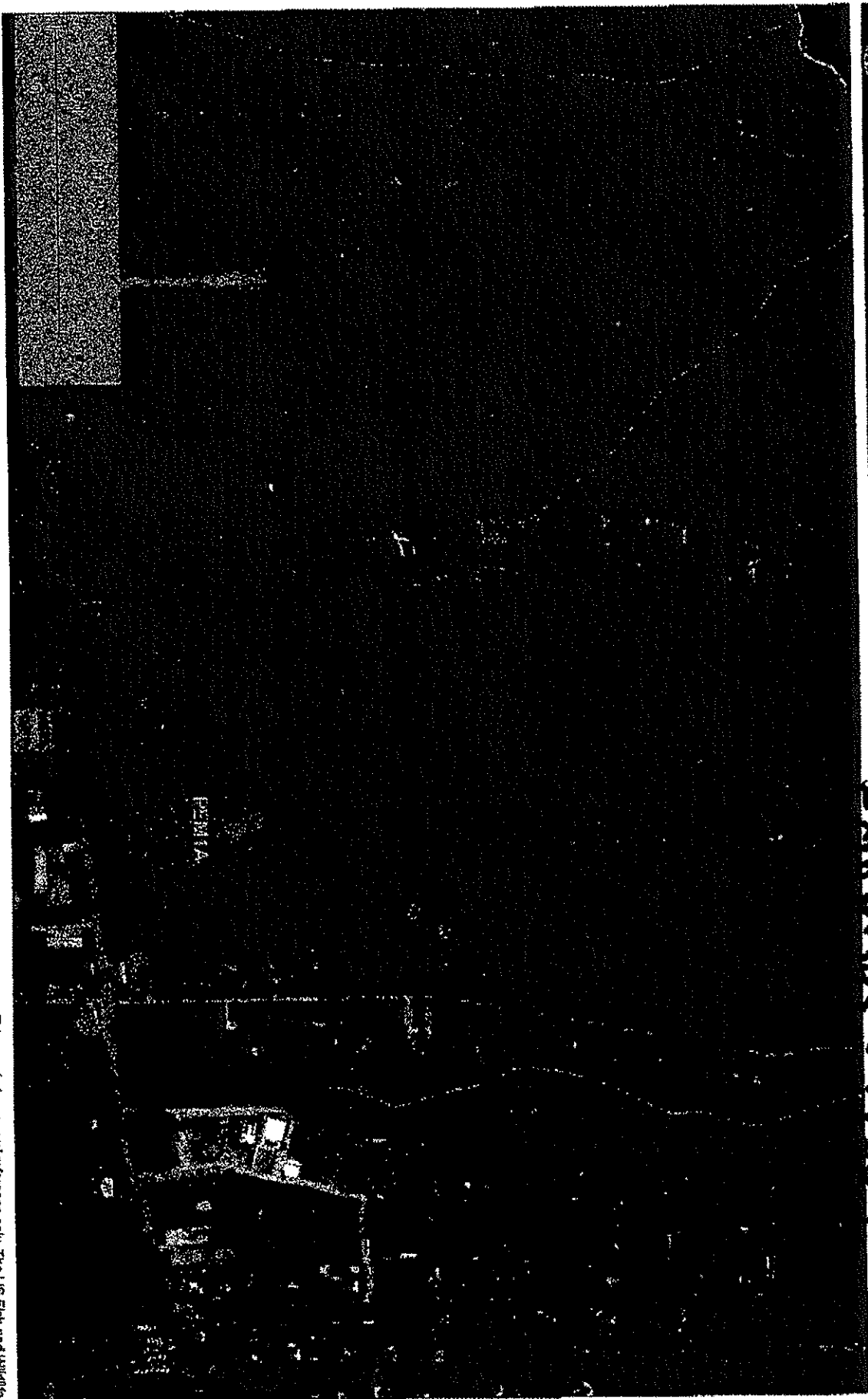
Land												
Market Value Land												
Line	Description	Site Code	Unit Type	Units	Size Factor	Site Factor	Appr O/R Factor	Appr O/R Reason	Total Adj	Unit Price	Adj Unit Price	Value
1	8003 -- Land Neighborhood Section 3	4300	SF	391,212	1.00	1.00	1.00	--	1.00	2.00	2.00	782,424.00

**Building**  
 Vacant (No Building Data)



U.S. Fish and Wildlife Service  
National Wetlands Inventory

Subject Property (South) Facing FM 2920  
Exhibit 2 (4093.)



January 31, 2022

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

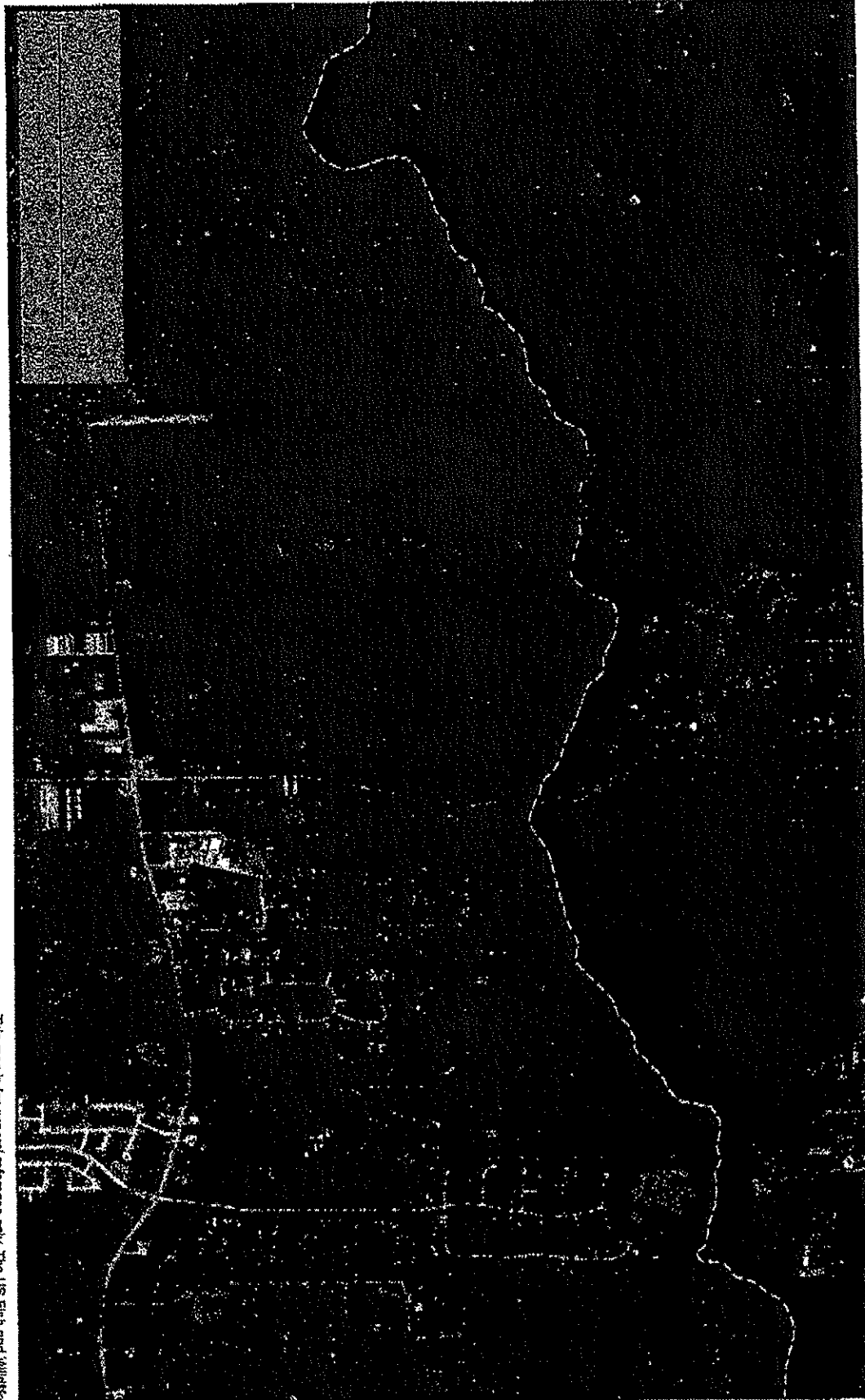
- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or completeness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.





Subject Property




*Overview of  
subject property*






January 31, 2022

Wetlands

-  Estuarine and Marine Deepwater
-  Estuarine and Marine Wetland

-  Freshwater Emergent Wetland
-  Freshwater Forested/Shrub Wetland
-  Freshwater Pond

-  Lake
-  Other
-  Riverine

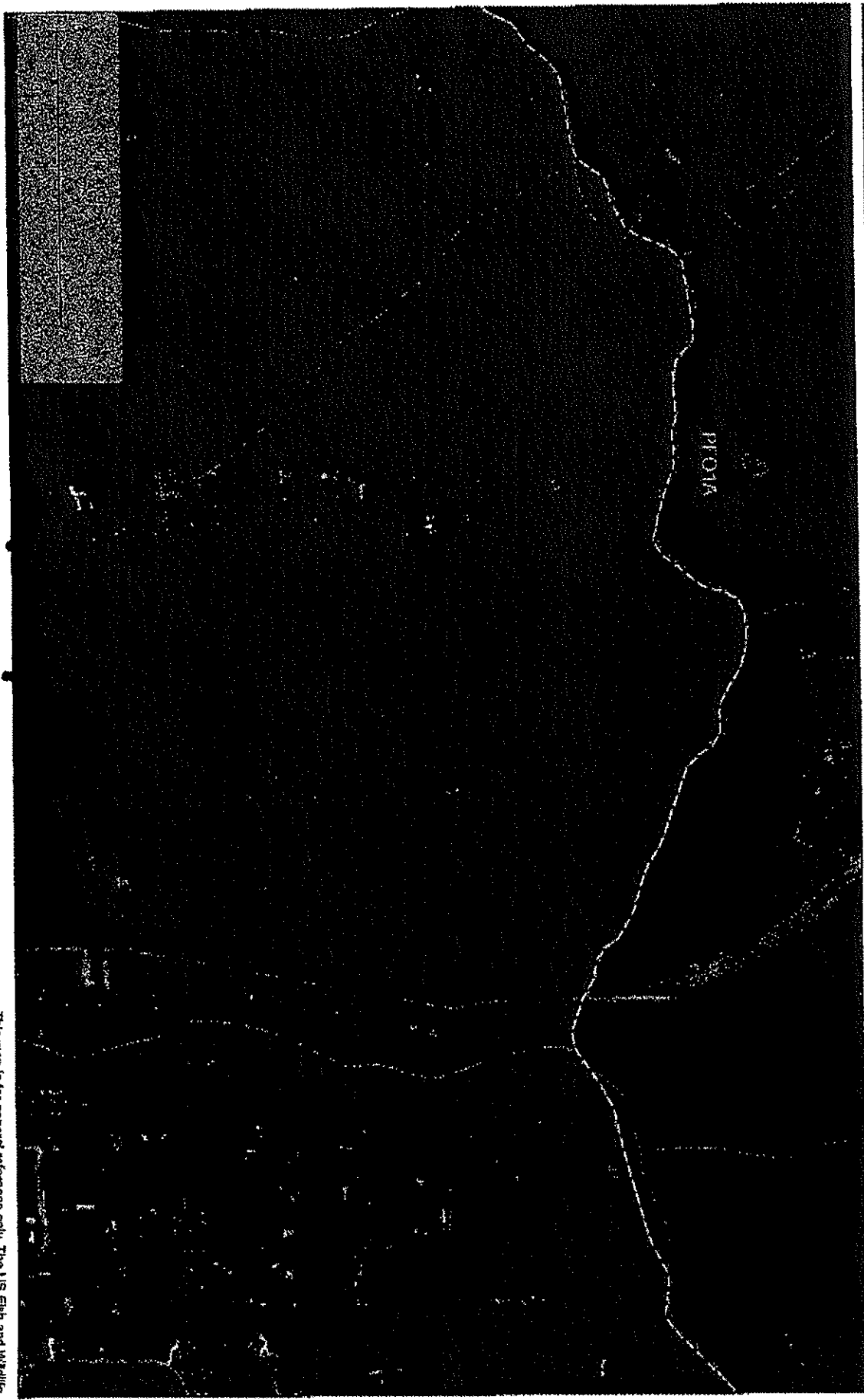
This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or completeness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.





U.S. Fish and Wildlife Service  
National Wetlands Inventory

Subject Property Back (North) Towards St  
Spring Creek



January 31, 2022

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

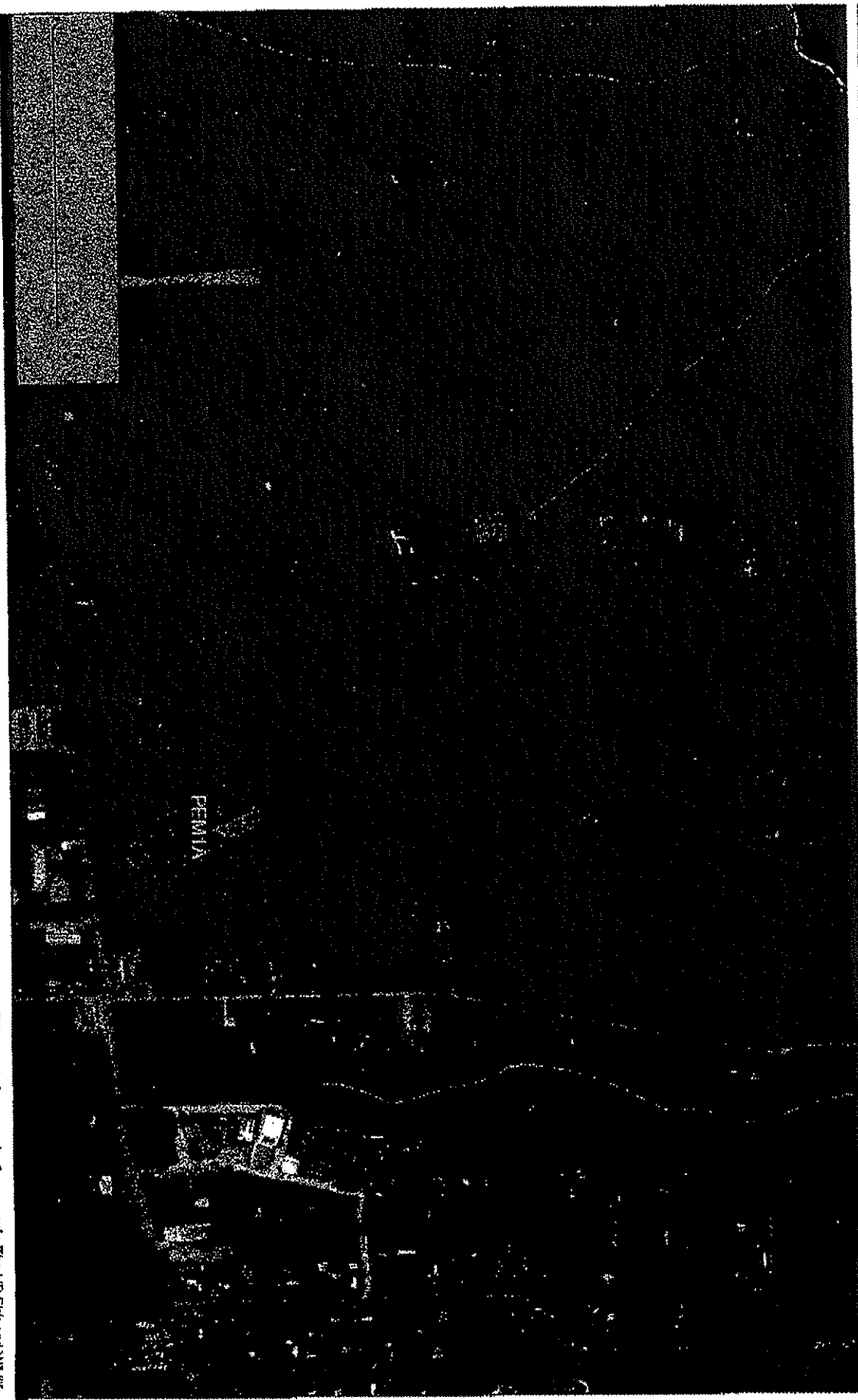
- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the buyer materials found on the Wetlands Mapper web site.



U.S. Fish and Wildlife Service  
National Wetlands Inventory

Subject Property (South) Facing FM 2920



January 31, 2022

Wetlands



Estuarine and Marine Deepwater  
Estuarine and Marine Wetland



Freshwater Emergent Wetland  
Freshwater Forested/Shrub Wetland  
Freshwater Pond



Lake  
Other  
Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currency of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



# Exhibit 4

Disturbance of vegetation or wetlands

list proposed construction impact (surface acres to be impacted, depth of excavation, sealing of caves, or other karst features)

Approximately 90 acres to be developed into a Manufactured Home Community.

Describe existing disturbances, vegetation, and land use clearing and grading for future development.

THE FOLLOWING ITEMS APPLY ONLY TO APPLICATIONS FOR NEW TPDES PERMITS AND MAJOR AMENDMENTS TO TPDES PERMITS

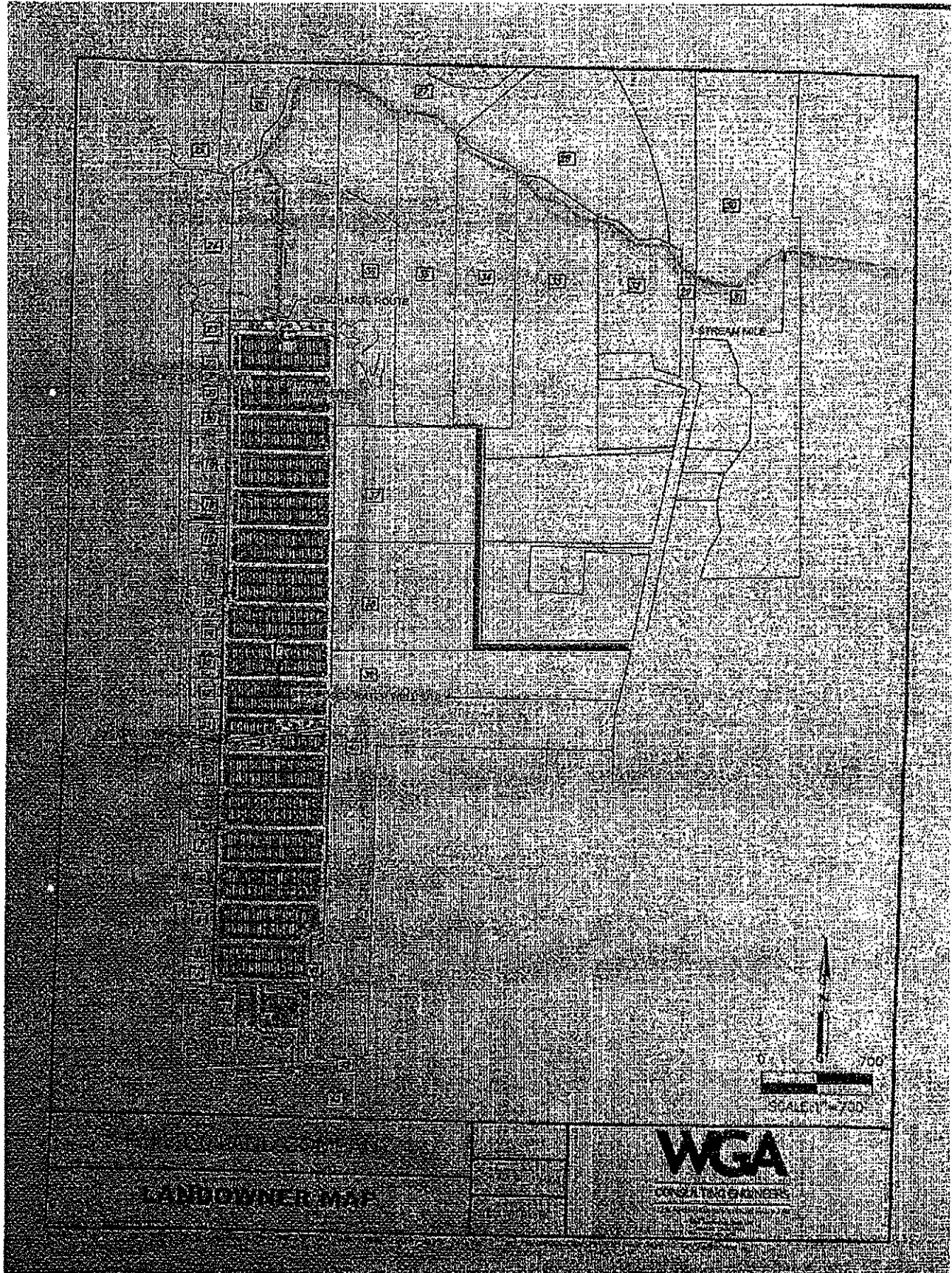
List dates, titles, dates of all buildings and structures on the property

Estimated construction start date: (03/15/2022). Estimated waste disposal start date: (07/01/2022).

Provide a brief history of the property, and name of the architect/builder, if known, for any areas that have been developed.

From  
NO  
Me

# Exhibit 5



irefox

Exhibit 5  
(Pg. 2)

Attachment A  
WQ0015977001-FM 2920 Land Company, Ltd.  
FM 2920 Land WWTP

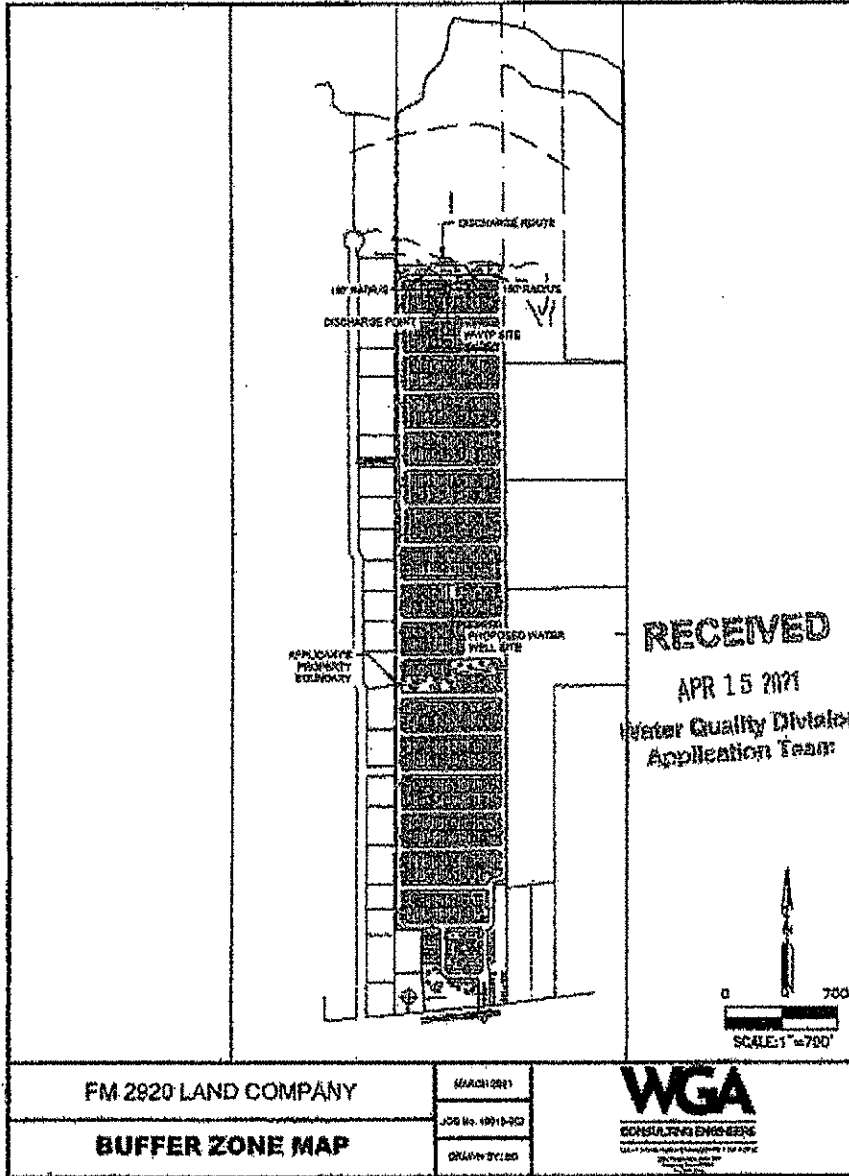


Exhibit 6

Provide the name, address, phone and fax number of an individual that can be contacted to answer specific questions about the property.

Prefix (Mr., Ms., Miss), M.

First and Last Name: Jeff Mickler

Credential (P.E., P.C., Ph.D., etc.)

Title: Authorized representative

Mailing Address: 2000 West Parkwood Avenue

City, State, Zip Code: Friendswood, TX 77546

Phone No.: 281-286-6666 Ext.

Fax No.:

E-mail Address: Jeff.Mickler@jacowhitecc.com

List the county in which the facility is located: Harris

If the property is publicly owned and the owner is different than the permittee/applicant, please list the owner of the property.

N/A

Describe the location of the effluent discharge route. The discharge route must follow the flow of the stream from the point of discharge to the nearest major watercourse (from the point of discharge to a classified segment as defined in 30 TAC Chapter 307). If known, please identify the discharge point number.

Describe the treatment plant. The water will be discharged into a man-made ditch located along the western property boundary then flowing for 700 feet thence to Spring Creek.

Please provide a separate 7.5-minute USGS quadrangle map with the project boundaries outlined and a general location map showing the project area. Please highlight the discharge route from the point of discharge for a distance of one mile downstream. (This map is required in addition to the map in the administrative report).

Provide original photographs of any structures 50 years or older on the property.

Does your project involve any of the following? Check all that apply.

- Proposed access roads, utility lines, construction easements
- Disturbance that could damage or detract from a historic property's integrity
- Disturbance during construction or as a result of project design
- Additional phases of development that are planned for the future
- Dams, levees, structures, other least features

No pics of structure attached or acknowledged

# WATER QUALITY PERMIT PAYMENT SUBMITTAL FORM

- 1. Use this form to submit the Application Fee. If the mailing the payment.
- 2. Complete items 1 through 5 below.
- 3. Staple the check or money order in the space provided at the bottom of this document.
- 4. Do not mail this form with the application form.
- 5. Do not mail this form to the same address as the application.
- 6. Do not submit a copy of the application with this form as it could cause duplicate permit entries.

Mail this form and the check or money order to:

### BY REGULAR MAIL

Texas Commission on Environmental Quality  
 Financial Administration Division  
 Cashier's Office, MC-214  
 P.O. Box 18088  
 Austin, Texas 78711-8088

### BY OVERNIGHT/EXPRESS MAIL

Texas Commission on Environmental Quality  
 Financial Administration Division  
 Cashier's Office, MC-214  
 12100 Park 35 Circle  
 Austin, Texas 78753

Permit Code: WQ Waste Permit No.

Check or Money Order Number: 83486

Check or Money Order Amount: \$850.00

Date of Check or Money Order: 03/01/2021

Name of Check or Money Order: Jacob White Construction

### 2. APPLICATION INFORMATION

Name of Project or Site: FM 2920 Land Company

Physical Address of Project or Site: Located on FM 2920 approximately 550 feet east from intersection of FM 2920 and Three Pines Drive in Harris County. If the check is for more than one application, attach a list which includes the name of each Project or Site (NE) and Physical Address exactly as provided on the application.

PROSPERITY BANK

83486

Eight hundred fifty dollars and no cents

DATE	CHECK NO.	AMOUNT
MARCH 01, 2021	83486	\$*****850.00

Signature of Applicant



**Paul Worrall**

**From:** eFax Corporate <message@inbound.efax.com>  
**Sent:** Saturday, February 5, 2022 7:00 PM  
**To:** Fax3311  
**Subject:** Corporate eFax message from "8324493330" - 18 page(s)  
**Attachments:** FAX\_20220206\_1644109181\_981.prod.afc\_did2-1644108557-15122335236-981.pdf

Login

## Service Notification

You have received a 18 page fax at 2022-02-05 18:59:41 CST.

\* The reference number for this fax is usw2b.prod.afc\_did2-1644108557-15122335236-981. Please [click here](#) if you have any questions regarding this message or your service. You may also contact Corporate Support:

### US

Email: [corporatesupport@mail.efax.com](mailto:corporatesupport@mail.efax.com)  
Phone: 1 (323) 817-3202 or 1 (800) 810-2641

### EU

Email: [corporatesupporteu@mail.efax.com](mailto:corporatesupporteu@mail.efax.com)  
Phones:  
+44 2030055252  
+33 171025330  
+49 800 0003164  
+35 314380713

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#### Phone:

1(323) 817-3202  
1(800) 810-2641 (toll-free)

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12/16/2016 10:35AM

=== COVER PAGE ===

TO: \_\_\_\_\_

FROM: RENAZCO

FAX: 8324493330

TEL: 8324493330

COMMENT:

THE LAW OFFICE  
OF  
MELANIE W. RENAZCO

24215 Kingsland Boulevard  
Katy, Texas 77494

Telephone: (832) 489-3594  
Fax: (832) 437-1132

Date: 2/5/2022

To: Office of the Chief Clerk

From: Melanie Renazco, JD

Fax: 512-239-3311

Phone:

# of Pages Including Cover Sheet: 17

Re: Permit Application No. WQ0015977001

**CONFIDENTIAL**

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING THE MESSAGE TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DESSIMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE, AND RETURN THE ORIGINAL MESSAGE TO US VIA FIRST CLASS MAIL.

Lori Rowe

---

**From:** PUBCOMMENT-OCC  
**Sent:** Thursday, January 20, 2022 11:39 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

MWD  
123792

**From:** Vic.Smart@sbcglobal.net <Vic.Smart@sbcglobal.net>  
**Sent:** Thursday, January 20, 2022 9:23 AM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** HARRIS

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** MR Vci T Smart

**E-MAIL:** [Vic.Smart@sbcglobal.net](mailto:Vic.Smart@sbcglobal.net)

**COMPANY:**

**ADDRESS:** 22427 THREE PINES DR  
HOCKLEY TX 77447-7080

**PHONE:** 2817037153

**FAX:**

**COMMENTS:** The water discharge will be into a body of water that is a habitat for 1 or more endangered and/or protected species, according to federal and state designations. Specifically alligator snapping turtles which have been found in Spring Creek. The proposed water well for the development may cause increased subsidence in the area, affecting my property, other current property owners and tenants within the development itself. The plat for the mobile

home development does not allow for water detention/retention which will cause an increased chance of flooding on our property.

**Melissa Schmidt**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, June 9, 2021 11:13 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001

PM

**From:** mstahlin@hotmail.com <mstahlin@hotmail.com>  
**Sent:** Tuesday, June 8, 2021 9:50 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** GALVESTON

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Mark Stahlin

**E-MAIL:** [mstahlin@hotmail.com](mailto:mstahlin@hotmail.com)

**COMPANY:** Mark stahlin

**ADDRESS:** 22830 THREE PINES DR  
HOCKLEY TX 77447-7021

**PHONE:** 9366487340

**FAX:**

**COMMENTS:** I would also like to request a public meeting regarding the issuance of this permit due to my belief that endangered and threatened animal species reside in the area impacted by the discharge of the proposed treatment plant as well as on the site of the proposed development itself. I would like to know if an Environmental Site Survey or Land Assessment Survey has been performed in order to identify whether any endangered or threatened animal, insect, plant or other organisms would be impacted by this proposed development.

**Melissa Schmidt**

---

**From:** PUBCOMMENT-OCC  
**Sent:** Wednesday, June 9, 2021 11:23 AM  
**To:** PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ  
**Subject:** FW: Public comment on Permit Number WQ0015977001  
**Attachments:** Map of Planned 440 Unit Mobile Home Park with Wastewater Treatment Plant (WWTP) Location.pdf

PM

**From:** mstahlin@hotmail.com <mstahlin@hotmail.com>  
**Sent:** Tuesday, June 8, 2021 7:17 PM  
**To:** PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>  
**Subject:** Public comment on Permit Number WQ0015977001

**REGULATED ENTY NAME** FM 2920 LAND

**RN NUMBER:** RN111244844

**PERMIT NUMBER:** WQ0015977001

**DOCKET NUMBER:**

**COUNTY:** GALVESTON

**PRINCIPAL NAME:** FM 2920 LAND COMPANY LTD

**CN NUMBER:** CN605880145

**FROM**

**NAME:** Mark Stahlin

**E-MAIL:** [mstahlin@hotmail.com](mailto:mstahlin@hotmail.com)

**COMPANY:**

**ADDRESS:** 22830 THREE PINES DR  
HOCKLEY TX 77447-7021

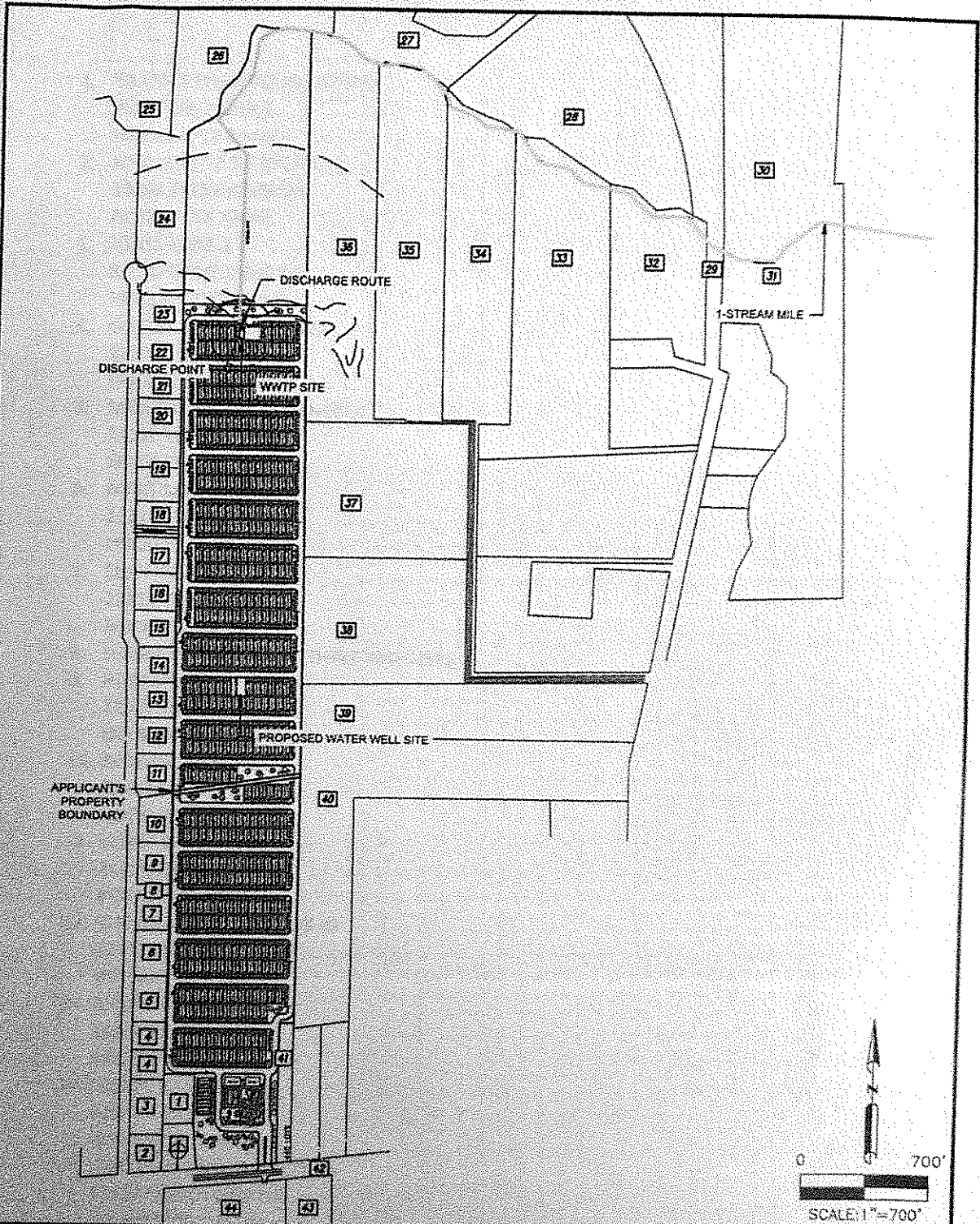
**PHONE:** 9366487340

**FAX:**

**COMMENTS:** I object to the issuance of this permit and the proposed subsequent use of land for a 440 unit mobile home park based on the following: 1) I believe the location of the proposed treatment facility does not have sufficient setback distance from my property line or the property lines of the property owners within the development itself as required by

law 2) I do not believe the treatment facility will have sufficient setback distance from my private water well or my neighbor's private water wells as required by law 3) I believe the treatment facility will be a public nuisance to myself, other current homeowners as well as the tenants within the development itself because of its odor 4) I believe that the proposed water well for the development will cause increased subsidence in the area, affecting my property, other current property owners and tenants within the development itself 5) I believe the proposed discharge of almost half a million gallons of treated sewage into Spring Creek will adversely affect property owners downstream as this area already experiences catastrophic flooding during heavy rain, as recently as May 2021 when the bridge immediately downstream from the proposed development was damaged due to flooding 6) I believe the proposed development does not have any water retention/detention areas which will increase the risk of flooding to my home, other current home owners as well as tenants of the development 7) I believe that the proposed development is essentially the equivalent of paving a 700' wide by one mile long parcel of land and the lack of any natural green space will increase the risk of flooding in the area, both to neighbors as well as tenants of the development 8) I know that the property on which the development is proposed already drains onto my neighborhood which has already resulted in increased erosion and damage to the ditches along the east side of Three Pines 9) I believe that the proposed site for the treatment facility is located in or very near an area that is prone to flooding which poses a significant public health risk as well as a risk to local wildlife that use Spring Creek as a source of water or food in the event the facility is compromised due to flooding 10) I believe that the development only has one entrance/exit point for vehicles, located a few hundred feet from an already busy intersection, and that local infrastructure is not sufficient at this time and that traffic entering or exiting the development during peak hours will create a public nuisance and possible traffic hazard 11) I believe that the proposed density of the development combined with the lack of fire hydrants, the development poses a significant fire hazard to current local property owners as well as the tenants of the proposed development 12) I believe that because of the proposed density and nature of the development, there will be an increase in crime and calls for service to local law enforcement which will adversely affect my safety, the safety of other current property owners as well as the tenants of the proposed development 13) I believe that local Fire/EMS resources are insufficient to adequately service the tenants of the development as well as service other current property owners in the area I request a public meeting to address my concerns regarding this permit. As part of this meeting I request that appropriate governmental agencies in addition to the TCEQ be available to address my concerns. These agencies include, but are not limited to: TCEQ, Harris County Flood Control and its Montgomery County equivalent, Harris County Sheriff's Office, Rosehill Volunteer Fire Department, the Houston-Galveston Subsidence District, TXDOT, Harris County Constables Pcts 3 and 4. I have attached a copy of the proposed development for your review.





<p>FM 2920 LAND COMPANY</p> <p><b>LANDOWNER MAP</b></p>	<p>APRIL 2021</p> <p>JOB No. 40018-003</p> <p>DRAWN BY: EC</p>	<p><b>WGA</b></p> <p>CONSULTING ENGINEERS</p> <p><small>TEXAS REGISTERED ENGINEERING FIRM P-3754</small></p> <p><small>3007 Engineering Blvd. 120 Houston, Texas 77056 713.966.7600</small></p>
---	--	---

Drawing: D-140018 (Acad. Mills Development) 1003 Kirby Creek MAP (240) Kirby Creek - L&A - Buffer Overlay. Last Printed: Thu Apr 26 2021 - 8:08am By: scherman