

Renee Lyle

From: PUBCOMMENT-OCC
Sent: Thursday, November 16, 2023 8:54 AM
To: PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WQ0016212001
Attachments: Jonah's Rply to Rsps on Comments & HRG Req - FINAL2.pdf

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From: katy@carltonlawaustin.com <katy@carltonlawaustin.com>
Sent: Wednesday, November 15, 2023 4:37 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0016212001

REGULATED ENTY NAME WEIR SUBDIVISION WWTP

RN NUMBER: RN111565321

PERMIT NUMBER: WQ0016212001

DOCKET NUMBER:

COUNTY: WILLIAMSON

PRINCIPAL NAME: VALE BUILDING GROUP LLC

CN NUMBER: CN604294330

NAME: MR Michael L. Parsons

EMAIL: katy@carltonlawaustin.com

COMPANY: The Carlton Law Firm, P.L.L.C.

ADDRESS: 4301 WESTBANK DR Suite B-130
AUSTIN TX 78746-6568

PHONE: 5126140901

FAX: 5129002855

COMMENTS: Attached please find Jonah Water Special Utility District's Reply to the Executive Director's Response to Public Comment and Hearing Request, including its Attachments.

TPDES PERMIT NO. WQ0016212001

APPLICATION BY THE VALE	§	BEFORE THE TEXAS COMMISSION
BUILDING GROUP, LLC FOR TPDES	§	
PERMIT NO. WQ0016212001	§	ON ENVIRONMENTAL QUALITY

**JONAH WATER SPECIAL UTILITY DISTRICT’S REPLY TO THE EXECUTIVE
DIRECTOR’S RESPONSE TO PUBLIC COMMENT AND HEARING REQUEST**

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

COMES NOW, Jonah Water Special Utility District (“Jonah” or the “District”) and files this its Reply to Executive Director’s (“ED”) Response to Public Comment and Hearing Request and, in support thereof, would respectfully show the following:

I. INTRODUCTION

The District filed a timely request for contested case hearing and public comments with the Texas Commission on Environmental Quality (“TCEQ”) on April 25, 2023. On October 16, 2023, the ED filed responses to the public comments. The District disagrees with the ED’s response to the public comments in some respects, reasserts said comments, and requests a contested case hearing.

II. REPLY TO THE EXECUTIVE DIRECTOR

A. No Agreement reached between The Vale and Jonah

The ED has stated in their response to comments that TCEQ received correspondence from Vale Building Group, LLC (“Vale” or the “Applicant”) on July 6, 2023 stating that it is working with the District to build and maintain the plant and that the District will withdraw its comments once the agreement is signed. As of the filing of this document, there is no signed agreement, and the District has not withdrawn its comments.

B. Location of proposed facility.

The facility is proposed to be located on the boundary line between the Weir Water Works’ certificate of convenience and necessity (“CCN”) territory and Jonah’s district boundary and water CCN territory, as reflected on Attachment D to this Reply. Jonah has executed a Purchase and Sale Agreement for the Weir Water Works system (PWS No. 2460017) (“Weir”) and, by contract, is

operating the system until the transfer, including the associated CCN, is complete. The District filed an application for sale, transfer, or merger of facilities and certificate rights with the Public Utility Commission of Texas on October 16, 2023 and is currently in the process of acquiring Weir and incorporating the Weir service area into the District's CCN No. 10970. This application is filed under PUC Docket No. 55699. For these reasons, Jonah is also representing Weir Water Works' interest in this application.

The ED has stated the TCEQ received correspondence from Vale on July 6, 2023 stating that Vale is working with the District to build and maintain the plant and that the District will withdraw its comments once the agreement is signed. As stated in Section A. above, as of the filing of this document, there is no signed agreement, and the District has not withdrawn its comments.

C. Proximity to wells.

Attached to this Reply are four maps:

Attachment A is the National Flood Hazard Layer FIRMette from FEMA which depicts the flood hazard in the immediate vicinity.

Attachment B is a snip of the FEMA National Flood Hazard Layer FIRMette which depicts the approximate location of the proposed facility in relation to a Weir water well.

Attachment C is a map that comes from the Texas Water Development Board's Groundwater Data Viewer Interactive mapping tool. This map depicts the wells in the vicinity of the proposed facility and along the discharge route of the proposed facility.

Attachment D is a map prepared by Jonah's District Engineer using CAD. This map depicts pending and approved wastewater sites, Jonah's wells, Jonah's CCN territory, Jonah's district boundary, Jonah's wastewater master plan study area, discharge point of proposed facility, discharge route, three-mile area surrounding discharge point, and three-mile area surrounding the discharge route.

Weir serves its customers from a well located within approximately 0.76 miles from the outfall. See Attachment B. More crucially, the effluent will flow within approximately 90 feet of the well head and within the 150-foot sanitary control easement. The District disagrees with the ED that simply ensuring that surface water quality is protected means there will be no degradation to groundwater quality. Furthermore, there are other wells in the vicinity in addition to those owned by Weir. See Attachment C to this Reply, a map from the Texas Water Department Board's

("TWDB") groundwater data viewer which depicts wells in the area. The map was prepared using the TWDB's Groundwater Data Interactive mapping tool, adding the location of the proposed facility and depicting the distance of approximately one mile to one of the Weir wells for scale. The location of the proposed facility under TPDES Permit No. WQ0016212001 has been marked with a green arrow and it has been labeled in black font. When comparing this map (Attachment C) to Attachment D, one can identify the dozens of wells within the three-mile area surrounding the discharge point and the discharge route (depicted as the hatched area on Attachment D). The discharge route, shown with a pink line on Attachment D, begins at the proposed facility, traversing to an unnamed tributary, thence to Weir Branch, thence to the San Gabriel/North San Gabriel River in Segment 1248 of the Brazos River Basin and eventually to Lake Granger. Comparing Attachment D to Attachment C will show the wells that are within three miles of the discharge point and discharge route. Please note, the scale of the maps on Attachments C and D are not identical.

D. Contamination during flood event.

The District is concerned that the wells Weir uses could be contaminated during a flood event. One well is within the FEMA Flood Zone A, as shown on the map enclosed as Attachment A. Also enclosed for reference as Attachment B is a snip of the FEMA National Flood Hazard Layer FIRMette depicting the approximate location of the proposed facility in relation to the Weir water well. The District encourages the TCEQ to look at the TWDB map included as Attachment C to see the other wells in the vicinity and compare them to the flood zone. There is the potential for contamination of more than just the Weir well in a flood event. Again, the District disagrees with the ED that simply ensuring that surface water quality is protected means there will be no degradation to groundwater quality.

E. Increases in algal growth and blooms.

The District is also concerned that the effluent from the proposed facility will flow through the District and the District's water CCN territory into the San Gabriel River which flows into Lake Granger, the source of raw water used to serve Jonah's customers. Jonah is concerned about increases in algal growth and blooms, and other unsanitary or unsafe water quality conditions in these creek beds, tributaries, Weir Branch, the San Gabriel River, and eventually Lake Granger.

F. Negative impact on human health of the local community.

As stated above, the effluent will flow through the District's water CCN territory and eventually into Lake Granger. Lake Granger is one of the sources of raw water for the District to serve its customers. Jonah provides water service for approximately 13,500 customers and 35,000 people in its service area. There have been applications for new developments in the District that could increase the number of service connections by almost 30,000. The source of raw water must be protected and contamination prevented so the customers who depend on it will not have disruption in this high growth area.

G. Jonah is an affected person in accordance with TCEQ Rules.

As explained in its hearing request, Jonah is an affected person under TCEQ rules. To grant a contested case hearing, the commission must determine, pursuant to 30 Texas Admin. Code ("TAC") § 55.203, that a requestor is an affected person based on the following criteria:

- (a) For any application, an affected person is one who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application. An interest common to members of the public does not qualify as a personal justiciable interest.
- (b) Governmental entities, including local governments and public agencies with authority under state law over issues raised by the application, may be considered affected persons.
- (c) In determining whether a person is an affected person, all factors shall be considered, including, but not limited to, the following:
 - (1) whether the interest claimed is one protected by the law under which the application will be considered;
 - (2) distance restrictions or other limitations imposed by law on the affected interest;
 - (3) whether a reasonable relationship exists between the interest claimed and the activity regulated;
 - (4) likely impact of the regulated activity on the health and safety of the person, and on the use of property of the person;
 - (5) likely impact of the regulated activity on use of the impacted natural resource by the person; and
 - (6) whether the requester timely submitted comments on the application which were not withdrawn; and
 - (7) for governmental entities, their statutory authority over or interest in the issues relevant to the application.
- (d) In making this determination, the commission may also consider, to the extent consistent with case law:
 - (1) the merits of the underlying application and supporting documentation in the commission's administrative record,

- including whether the application meets the requirements for permit issuance;
 - (2) the analysis and opinions of the ED; and
 - (3) any other expert reports, affidavits, opinions, or data submitted by the ED, the applicant, or hearing requestor.
- (e) In determining whether a person is an affected person for the purpose of granting a hearing request for an application filed before September 1, 2015, the commission may also consider the factors in subsection (d) of this section to the extent consistent with case law.¹

The proposed facility is on the boundary of the District's water CCN territory and if the permit is approved, effluent will flow through Jonah's district boundaries. As previously stated, one of the sources of raw water Jonah uses to serve its customers is Lake Granger (the "Lake") which is fed by the San Gabriel River (the "River"), one of the tributaries that will receive effluent from the proposed facility. As can be seen on the map attached hereto as Attachment D, the River bisects Jonah's CCN territory and District boundaries, running nearly parallel with Highway 29. Because the effluent that would flow from this proposed facility will flow through the District and Jonah's water CCN territory and into the body of water that Jonah uses as its water source, this effluent could negatively impact the water quality of both the River and the Lake, a significant issue over which Jonah has legal authority. Furthermore, Jonah's duty to provide fresh, clean, potable water meeting all of the state and federal water quality standards, makes Jonah's interest in the quality of its source water an interest that is not common to the general public.

Moreover, 30 TAC § 55.203(c)(7) requires that the governmental entity have "statutory authority over *or interest in the issues relevant to the application.*"² This language makes clear that the governmental entity can establish affected person status based in part on an "interest in issues relevant to that application" and not just those over which it has legal authority. As articulated above, the District has a substantial interest in issues relevant to the application. The proposed facility would be entirely surrounded by Jonah's water CCN, adjacent to the Weir CCN boundary that Jonah is acquiring, and, as noted above, all effluent is proposed to be discharged into water bodies that flow through Jonah's district boundaries and into its water source. Given this information, both water quality and regionalization issues, discussed in more detail below, are two of many issues in which Jonah has an interest that are relevant to the application.

¹ 30 TAC § 55.203(d).

² 30 TAC § 55.203(c)(7) emphasis added.

H. Jonah's opposition to the application is in furtherance of the State's Regionalization Policy.

Jonah believes the proposed facility does not comply with the TCEQ's regionalization policy and disputes that Applicant has demonstrated that obtaining wastewater service from Jonah would be cost prohibitive. The ED stated in their response to comment that Vale said they are working to reach an agreement with the District. To this point, no agreement has been reached, and the District continues to assert its comments and requests a contested case hearing.

There are multiple proposed wastewater permits pending in or near Jonah's district boundaries, as reflected in Attachment D. As stated previously, the area within and surrounding Jonah's district boundaries has significant and concentrated growth, and the construction and operation of numerous small wastewater collection, treatment, and disposal facilities, such as proposed for the area, may result in multiple negative impacts to customers served by Jonah and statewide.

As a special utility district that provides water service within its District boundaries, and in this case within additional area under its water CCN, Jonah has authority over regionalization concerns. To further the State's policy regarding regionalization, Jonah has undergone the process to acquire and operate the small water systems that are within its certificated area. For example, Jonah and Foster Consolidated Investments, LLC ("Foster") previously entered into an Asset Purchase and Sale Agreement for the sale of (1) the Chaparral III water system, also known as the McShepherd system (PWS No. 2460047); (2) the Green Acres Water Supply system (PWS No. 2460054); and (3) the Walburg system (PWS No. 2460016), effective June 12, 2015. Additionally, Jonah is in the process of acquiring the Weir system and, by contract, has begun operating the Weir system for Foster. This process ensures consistency in operations by qualified staff, maintenance of equipment, and continuous and adequate service to the area.

Additionally, Jonah provides wholesale wastewater service to an area south of the proposed facility. As a special utility district, Jonah's creation documents grant it all of the rights, powers, privileges, authority, and functions conferred by and shall be subject to all of the duties imposed by, the rules and regulations of the Texas Water Code ("TWC") and the general laws of the State of Texas relating to special utility districts. In accordance with TWC § 65.201(b)(2) these powers include the authority to collect, transport, process, dispose of, store, and control domestic, industrial, or communal wastes whether in fluid, solid, or composite state.

Finally, Jonah does not consent to service by Applicant within Jonah's district boundaries. TWC § 13.244(c) requires the Applicant to obtain consent from Jonah and provide evidence of Jonah's consent as part of the Application. TWC § 13.244(c) requires that "[e]ach applicant for a certificate or for an amendment shall file with the utility commission evidence required by the utility commission to show that the applicant has received the required consent, franchise, or permit of the proper municipality or other public authority." This includes special utility districts such as Jonah and thus, without Jonah's consent, the Applicant will be legally barred from providing service.³

III. CONCLUSION AND PRAYER

Jonah submitted timely comments and a timely hearing request and has not withdrawn any comments making Jonah's pending hearing request valid. Given the proximity of the proposed facility to Jonah's water CCN territory and its district boundaries, the probable impact of this proposed facility on water quality and water bodies used by Jonah in its provision of water service, and the State's policy regarding regionalization, Jonah has demonstrated that it is an affected person under TCEQ rules.

WHEREFORE, PREMISES CONSIDERED, Jonah Water Special Utility District hereby prays that the Texas Commission on Environmental Quality grants the District's hearing request.

Respectfully submitted,



Michael Parsons

Michael Parsons
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Erin R. Selvera
State Bar No. 24043385
erin@carltonlawaustin.com
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State Bar No. 03817600
john@carltonlawaustin.com
The Carlton Law Firm, P.L.L.C.

³ TWC § 13.244(c) requires that "[e]ach applicant for a certificate or for an amendment shall file with the utility commission evidence required by the utility commission to show that the applicant has received the required consent, franchise, or permit of the proper municipality or other public authority."

4301 Westbank Drive, Suite B-130
Austin, Texas 78746
Telephone: (512) 614-0901
Facsimile: (512) 900-2855

**ATTORNEYS FOR JONAH WATER SPECIAL
UTILITY DISTRICT**

CERTIFICATE OF SERVICE

I hereby certify that I have served or will serve a true and correct copy of the foregoing document on all parties of record on this 15th day of November 2023, as follows:

FOR APPLICANT:

Joshua Welch, Project Manager
Vale Building Group LLC
1165 North Patterson Avenue
Florence, Texas 76527
Via First Class Mail

Aaron Rojas, Professional Engineer
MRB Group
8834 North Capital of Texas Highway
Suite 220
Austin, Texas 78759
Via First Class Mail

FOR PUBLIC INTEREST COUNSEL:

Garrett T. Arthur, Attorney
Texas Commission on Environmental Quality
Public Interest Counsel MC-103
P.O. Box 13087
Austin, Texas 78711-3087
garrett.arthur@tceq.texas.gov

FOR THE EXECUTIVE DIRECTOR:

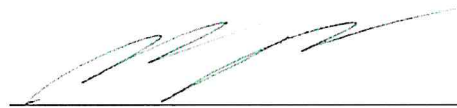
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FOR THE CHIEF CLERK:

Ms. Laurie Gharis, Chief Clerk
TCEQ
Office of Chief Clerk, MC-105
P.O. Box 13087
Austin, Texas 78711-3087
Via Electronic Filing with TCEQ



Michael Parsons

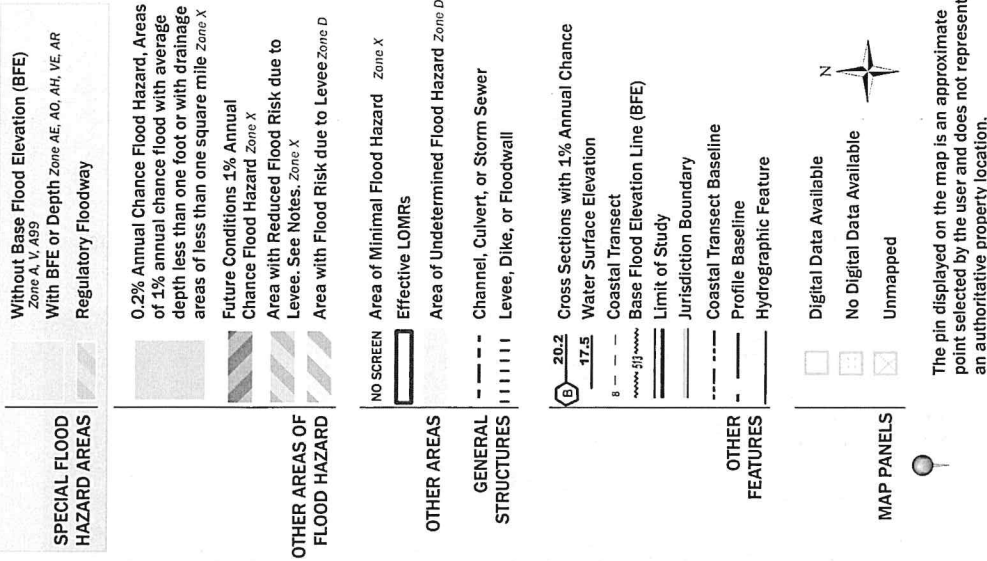
National Flood Hazard Layer FIRMette

97°35'57"W 30°40'58"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT



This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 4/25/2023 at 3:56 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.



0 250 500 1,000 1,500 2,000 Feet 1:6,000
Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020
97°35'57"W 30°40'58"N

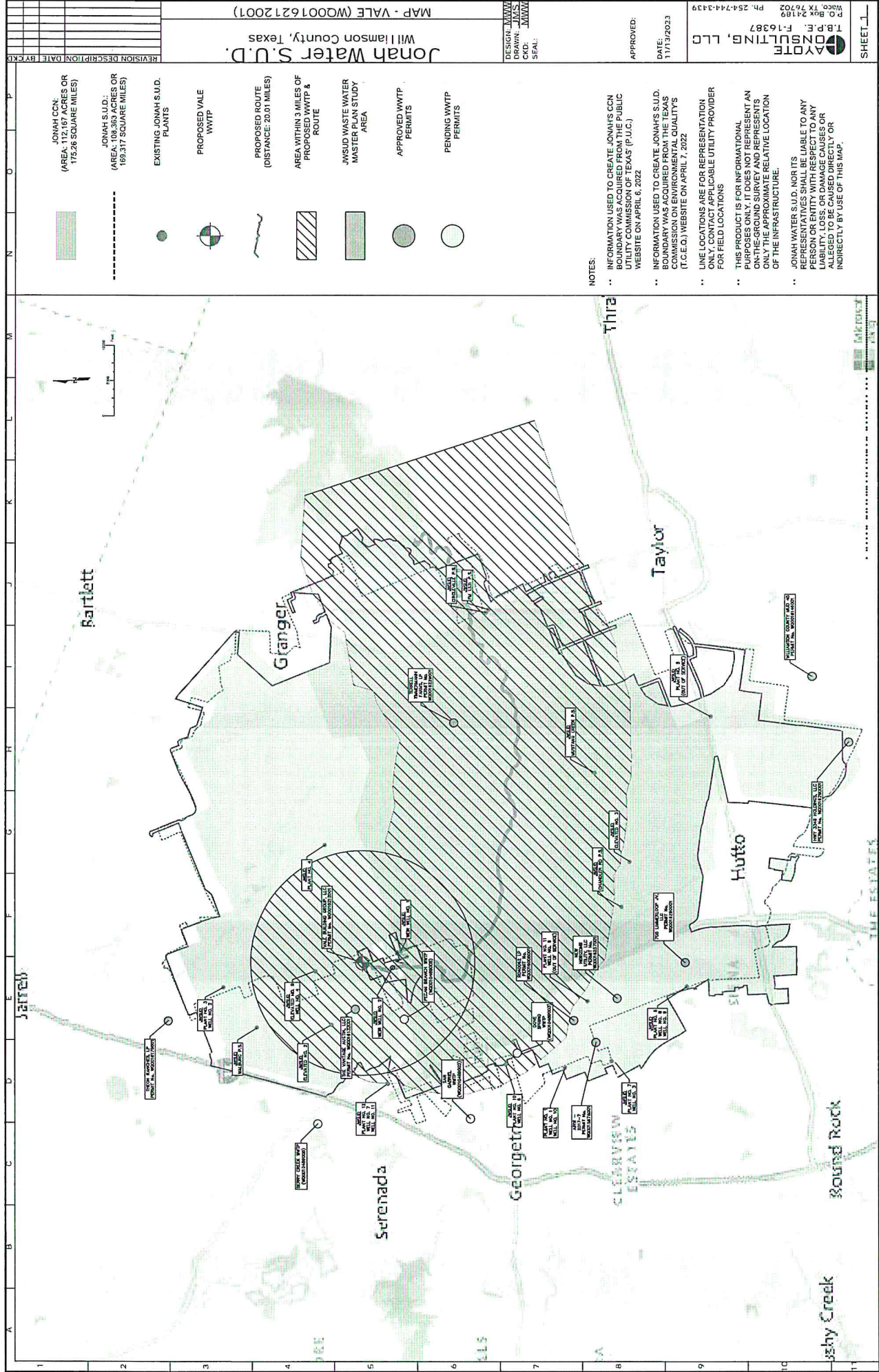
Attachment B

Snip of the FEMA Nation Flood Hazard Layer FIRMette depicting approximate the location of the proposed facility in relation to the Weir water well





Attachment D



Christina Bourque

From: PUBCOMMENT-OCC
Sent: Wednesday, April 26, 2023 7:26 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ
Subject: FW: Public comment on Permit Number WQ0016212001
Attachments: Jonah Water SUD Comments and Hearing Request on WQ0016212001.pdf

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PML+

From: katy@carltonlawaustin.com <katy@carltonlawaustin.com>
Sent: Tuesday, April 25, 2023 4:30 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0016212001

REGULATED ENTY NAME WEIR SUBDIVISION WWTP

RN NUMBER: RN111565321

PERMIT NUMBER: WQ0016212001

DOCKET NUMBER:

COUNTY: WILLIAMSON

PRINCIPAL NAME: VALE BUILDING GROUP LLC

CN NUMBER: CN604294330

FROM

NAME: Erin R Selvera

EMAIL: katy@carltonlawaustin.com

COMPANY: The Carlton Law Firm, P.L.L.C.

ADDRESS: 4301 WESTBANK DR Suite B-130
AUSTIN TX 78746-6568

PHONE: 5126140901

FAX: 5129002855

COMMENTS: This office represents Jonah Water Special Utility District, and I am writing on its behalf to provide comments and request a contested case hearing.

The Carlton Law Firm, P.L.L.C.

4301 Westbank Drive, Suite B-130
Austin, Texas 78746

Phone: (512) 614-0901
Facsimile: (512) 900-2855

Erin Selvera
Erin@carltonlawaustin.com

April 25, 2023

VIA e-file to: www14.tceq.texas.gov/epic/eComment/

Ms. Laurie Gharis, Chief Clerk (MC 105)
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Re: Jonah Water Special Utility District's Comments and Request for Contested Case Hearing on Vale Building Group, LLC's Application for a proposed Texas Pollutant Discharge Elimination System Permit No. WQ0016212001 to Authorize a Domestic Wastewater Treatment Facility and the Discharge of Treated Domestic Wastewater in Williamson County, Texas.

Dear Ms. Gharis:

On behalf of Jonah Water Special Utility District ("Jonah"), please accept this letter as Jonah's comments and request for contested case hearing in opposition to the above-referenced permit application submitted by Vale Building Group, LLC's. Jonah further requests to be placed on the permanent mailing list to receive all future public notices on this application.

Jonah is a political subdivision of the State of Texas operating under Texas Water Code Chapter 65 and the holder of Certificate of Convenience and Necessity ("CCN") for water number 10970, in Williamson County, Texas. Jonah provides water service for approximately 9,000 customers and 30,000 people in its service area and sewer service to portions of the district. The proposed facility is located on the border between Weir Water Works' CCN and Jonah's district boundary and water CCN territory. Jonah has executed a Purchase and Sale agreement for the Weir Water Works system (PWS No. 2460017) ("Weir") and, by contract, is operating the system until the transfer, including the associated CCN is complete.

According to the notice for this application, the treated effluent will be discharged to an unnamed tributary, thence to Weir Branch, thence to the San Gabriel/North San Gabriel River Segment No. 1248 of the Brazos River Basin. This puts the outfall in current and future Jonah water CCN territory. Weir serves its customers from a well located within approximately 0.76 miles from the outfall. More crucially, the effluent will flow within approximately 90 feet of the well head and within the 150-foot sanitary control easement. Because the well is within the FEMA Flood Zone A as shown on the map enclosed as Attachment A, Jonah has concerns that the effluent may contaminate the well head during a flood event. Also enclosed for reference as Attachment B, is a Snip of the FEMA Nation

Flood Hazard Layer FIRMette depicting the approximate location of the proposed facility in relation to the Weir water well.

Additionally, the effluent will flow through the district and Jonah's water CCN territory into the San Gabriel River which flows into Lake Granger, the source of raw water used to serve Jonah's customers. Jonah is concerned about increases in algal growth and blooms, and other unsanitary or unsafe water quality conditions in these creek beds, tributaries, Weir Branch, and the San Gabriel River. The proposed facility will have a negative impact on the local community within Jonah's CCN. Jonah has an interest in maintaining its CCN areas and protecting its investments in its infrastructure, and the quality of water sources used to serve its customers, that may be adversely affected by the outcome of this Application.

Jonah believes the proposed facility does not comply with TCEQ's regionalization policy and disputes that Applicant has demonstrated that obtaining wastewater service from Jonah would be cost prohibitive. The TCEQ has adopted a policy of regionalization as a means to safeguard water quality in the state. Texas Water Code ("TWC") § 26.081 provides that the Commission should "encourage and promote the development and use of regional and area-wide waste collection, treatment, and disposal systems to serve the waste disposal needs of the citizens of the state and to prevent pollution and maintain and enhance the quality of water in the state."¹ Similarly, TWC § 26.0282 allows the Commission, when considering the issuance of a wastewater permit, to deny a proposed permit based on consideration of need, including "the availability of existing or proposed areawide or regional waste collection, treatment, and disposal systems"²

Applicant's permit application is for a development located within Jonah's CCN, that Applicant has already negotiated with Jonah to provide water service for. The Applicant's proposed facility is planned to service the development of a 100 residential unit community located on an approximately 145.17-acre tract of land immediately north of the proposed facility. On July 12, 2022, Jonah executed a Non-Standard Service Agreement with Vale Building Group, LLC.

Jonah has also conducted a wastewater master plan that includes area near the proposed facility. Jonah is willing and able to provide wastewater service to Applicant for future residential customers within the proposed service area and pursuant to Jonah's tariff. Nothing in the Application indicates that Applicant requested wastewater service from Jonah, nor that Jonah is unable or unwilling to provide such service. Jonah believes the Application is insufficient for that reason.

¹ TWC § 26.081.

² TWC § 26.0282.

The Carlton Law Firm, P.L.L.C.
Page 3

Thank you for your attention to this matter. Please contact me at (512) 614-0901 or erin@carltonlawaustin.com if you have any questions regarding these comments.

Sincerely,

THE CARLTON LAW FIRM, P.L.L.C.

A handwritten signature in cursive script that reads "Erin Selvera".

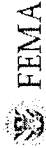
Erin Selvera
Attorney for Jonah Water Special Utility
District

Enclosure(s) as stated.

cc: Bill Brown, General Manager, Jonah Water Special Utility District

National Flood Hazard Layer FIRMette

97°35'57"W 30°40'58"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

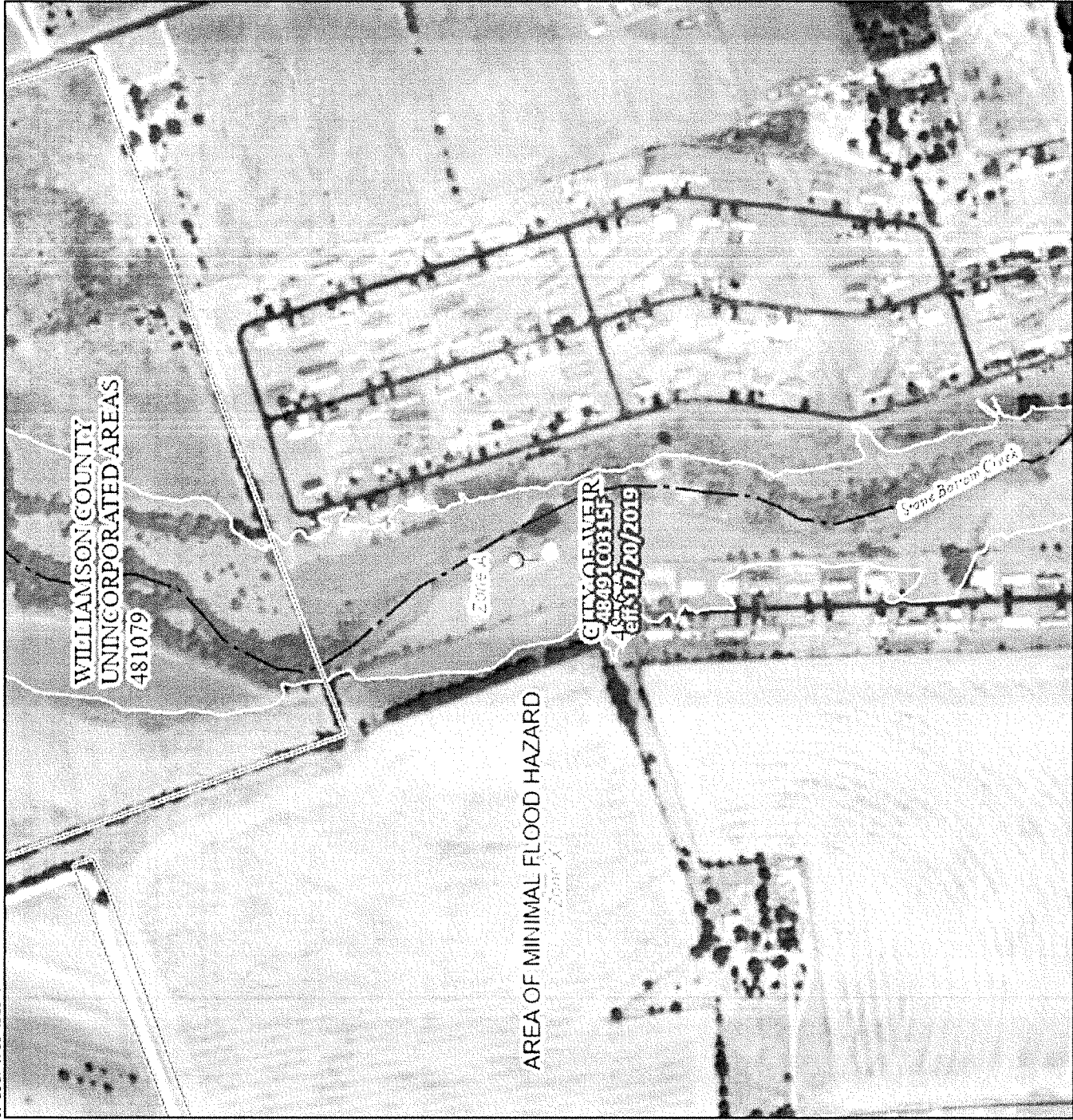
SPECIAL FLOOD HAZARD AREAS	Without Base Flood Elevation (BFE) <i>Zone A, V, X, AP</i>
	With BFE or Depth <i>Zone AE, AO, AH, VE, AR</i>
	Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD	0.2% Annual Chance Flood Hazard. Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile <i>Zone X</i>
	Future Conditions 1% Annual Chance Flood Hazard <i>Zone X</i>
	Area with Reduced Flood Risk due to Levee. See Notes. <i>Zone X</i>
OTHER AREAS	Area with Flood Risk due to Levee <i>Zone D</i>
	NO SURVEIN
	Area of Minimal Flood Hazard <i>Zone D</i>
GENERAL STRUCTURES	Effective LOMRs
	Area of Undetermined Flood Hazard <i>Zone D</i>
	Channel, Culvert, or Storm Sewer Levee, Dike, or Floodwall
OTHER FEATURES	Cross Sections with 1% Annual Chance Water Surface Elevation
	Coastal Transect
	Base Flood Elevation Line (BFE)
MAP PANELS	Limit of Study
	Jurisdiction Boundary
	Coastal Transect Baseline
MAP PANELS	Profile Baseline
	Hydrographic Feature
	Digital Data Available
MAP PANELS	No Digital Data Available
	Unmapped

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards.

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0 250 500 1,000 1,500 2,000 Feet
Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020
97°35'19'W 30°40'27'N

Attachment B

Snip of the FEMA Nation Flood Hazard Layer FIRMette depicting approximate the location of the proposed facility in relation to the Weir water well

