

Ellie Guerra

From: PUBCOMMENT-OCC
Sent: Friday, March 24, 2023 10:27 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ
Subject: FW: Public comment on Permit Number WQ0016258001

PM

From: dleggett@lcclawfirm.com <dleggett@lcclawfirm.com>
Sent: Thursday, March 23, 2023 12:22 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0016258001

REGULATED ENTY NAME GRAYSON COUNTY WWTP 1

RN NUMBER: RN111610614

PERMIT NUMBER: WQ0016258001

DOCKET NUMBER:

COUNTY: GRAYSON

PRINCIPAL NAME: LANDRA PARTNERS LLC

CN NUMBER: CN606082196

FROM

NAME: Dewey B Leggett

EMAIL: dleggett@lcclawfirm.com

COMPANY: 82 Waterview Ranch, LLC

ADDRESS: 2203 FOREST CRK
MCKINNEY TX 75072-4327

PHONE: 2144603169

FAX:

COMMENTS: I have already commented but received another letter so I am adding comments. We have 3-4 acre 25+' deep pond with a dam that will be threatened by additional Mill Creek erosion. Any additional flow into the creek is almost certain to hasten a failure of the dam and jeopardize people and property downstream. You are welcome to come look. I would request at least a public meeting to see if the Applicant would be willing to construct erosion barriers

in this highly erodible creek bed. At this point we have no idea about the Applicant's plans, exact location of the discharge, quality of the effluent, so it is hard to guess at the ramifications of granting the permit.

Ellie Guerra

From: PUBCOMMENT-OCC
Sent: Tuesday, February 14, 2023 1:22 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ
Subject: FW: Public comment on Permit Number WQ0016258001

PM

From: dleggett@lcclawfirm.com <dleggett@lcclawfirm.com>
Sent: Tuesday, February 14, 2023 10:46 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0016258001

REGULATED ENTY NAME GRAYSON COUNTY WWTP 1

RN NUMBER: RN111610614

PERMIT NUMBER: WQ0016258001

DOCKET NUMBER:

COUNTY: GRAYSON

PRINCIPAL NAME: LANDRA PARTNERS LLC

CN NUMBER: CN606082196

FROM

NAME: Dewey Leggett

EMAIL: dleggett@lcclawfirm.com

COMPANY: 82 Waterview Ranch, LLC

ADDRESS: 2203 FOREST CRK
MCKINNEY TX 75072-4327

PHONE: 2144738686

FAX: 2144738685

COMMENTS: I have a lot of questions about this application and would like to have some answers. A public meeting is requested to ask questions and submit comments. I am concerned about the following, among others: (1) the location of the discharge, (2) what is being discharged (how "clean" is the treated wastewater), (3) what will be the impact on wildlife, (4) will wildlife be able to cross Mill Creek when the discharge is occurring, (5) how often will the discharges occur, (6) has there been a study done on the additional erosion that this will cause to an already badly eroded creek.

Ellie Guerra

From: PUBCOMMENT-OCC
Sent: Thursday, May 4, 2023 2:03 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ
Subject: FW: Public comment on Permit Number WQ0016258001
Attachments: Proposed Permit No. WQ0016258001 Comment_5.4.23.pdf

From: mschmitz@anterogroup.com <mschmitz@anterogroup.com>
Sent: Thursday, May 4, 2023 11:57 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0016258001

REGULATED ENTY NAME GRAYSON COUNTY WWTP 1

RN NUMBER: RN111610614

PERMIT NUMBER: WQ0016258001

DOCKET NUMBER:

COUNTY: GRAYSON

PRINCIPAL NAME: LANDRA PARTNERS LLC

CN NUMBER: CN606082196

FROM

NAME: Michael Schmitz

EMAIL: mschmitz@anterogroup.com

COMPANY: The Antero Group, LLC

ADDRESS: 608 E HICKORY ST Suite 128
DENTON TX 76205-4310

PHONE: 9404657909

FAX:

COMMENTS: Texas Commission on Environmental Quality P.O. Box 13087 Austin, TX 78711-3087 RE: Proposed Permit No. WQ0016258001 Comment by the City of Bells, Texas To Whom It May Concern: The City of Bells, Texas ("City") has been made aware of the application for TPDES Permit for Municipal Wastewater (WQ0016258001) submitted by Landra Partners LLC, located approximately 3,600 feet northwest of the intersection of US Highway 82 and US Highway 69, in

Grayson County, Texas 75414. The City opposes the approval of Proposed Permit No. WQ0016258001 for the following reasons. First, the applicant did not formally notify the City of their intent and confirm if the City could accept their discharge into the City's current wastewater facility, permit No. WQ0010126001. On December 12, 2022 The Antero Group, serving in its capacity as the City Engineer, responded to an inquiry request by the developer's engineer if the City has the capacity to accept and treat an average daily flow of 0.055 MGD of domestic wastewater on or before January 1, 2024. Antero provided the developer with the response that the City could accept the average daily flow at this time. Additionally, The Antero Group followed up with a request of the developer to provide additional information and data regarding the proposed development and the request to date has not been fulfilled. Second, there are nutrient limit concerns. With a short distance between Mill Creek into Choctaw Creek, (Segment 0202F_01), there are concerns over nitrate and phosphorus levels as this segment is currently listed as impaired for bacteria. Third, the parcel is located within the City's Extraterritorial Jurisdiction, and is thus subject to its ordinances. Per the City's Subdivision Ordinance, Section 2.07 Water and Wastewater Main Extensions, which encompasses the City of Bells and its legally defined Extraterritorial Jurisdiction, "All subdivisions and each lot to be developed within the City of Bells shall be served by an approved water supply and distribution system and by an approved sewage collection and disposal system. No development shall be approved unless adequate assurances are provided that such development will be connected with the City's water supply and distribution system and with the City's wastewater system. "The better procedure is for the subdivision to be included in the City's wastewater treatment system after compliance with and connection pursuant to City ordinances. The City's position is to support a unified and regionalized municipality owned, operated, and maintained wastewater treatment plant and collection system; thus, the City opposes the approval of this permit in favor of a future connection to the City's wastewater collection system, pursuant to City ordinance and requirements. There is currently capacity in the current City wastewater treatment plant. The City has also looked at the potential for a second plant location to better service future development and users. Allowance of this currently proposed permit could negatively impact future land use and future City needs for expansion of its current system to the north. The City has been contacted about other developments and growth to the north and a future City treatment plant for those areas and other multiple users could be impacted by the proposed plant that is designed for a single subdivision. It does not include any planning, future capacity or impact study for future growth, future needs, or the general provision of sewer in this area. The current permit appears to be shortsighted and a potential detriment to other landowners, future growth, and City planning. Sincerely, Eric V. Neagu, PE, LEED AP, AICP Principal Antero Group



May 4, 2023

Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

RE: Proposed Permit No. WQ0016258001 Comment by the City of Bells, Texas

To Whom It May Concern:

The City of Bells, Texas ("City") has been made aware of the application for TPDES Permit for Municipal Wastewater (WQ0016258001) submitted by Landra Partners LLC, located approximately 3,600 feet northwest of the intersection of US Highway 82 and US Highway 69, in Grayson County, Texas 75414.

The City opposes the approval of Proposed Permit No. WQ0016258001 for the following reasons. First, the applicant did not formally notify the City of their intent and confirm if the City could accept their discharge into the City's current wastewater facility, permit No. WQ0010126001. On December 12, 2022 The Antero Group, serving in its capacity as the City Engineer, responded to an inquiry request by the developer's engineer if the City has the capacity to accept and treat an average daily flow of 0.055 MGD of domestic wastewater on or before January 1, 2024. Antero provided the developer with the response that the City could accept the average daily flow at this time. Additionally, The Antero Group followed up with a request of the developer to provide additional information and data regarding the proposed development and the request to date has not been fulfilled.

Second, there are nutrient limit concerns. With a short distance between Mill Creek into Choctaw Creek, (Segment 0202F_01), there are concerns over nitrate and phosphorus levels as this segment is currently listed as impaired for bacteria.

Third, the parcel is located within the City's Extraterritorial Jurisdiction, and is thus subject to its ordinances. Per the City's Subdivision Ordinance, Section 2.07 Water and Wastewater Main Extensions, which encompasses the City of Bells and its legally defined Extraterritorial Jurisdiction, "All subdivisions and each lot to be developed within the City of Bells shall be served by an approved water supply and distribution system and by an approved sewage collection and disposal system. No development shall be approved unless adequate assurances are provided that such development will be connected with the City's water supply and distribution system and with the City's wastewater system. "The better procedure is for the subdivision to be included in the City's wastewater treatment system after compliance with and connection pursuant to City ordinances.

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requirements. There is currently capacity in the current City wastewater treatment plant. The City has also looked at the potential for a second plant location to better service future development and users. Allowance of this currently proposed permit could negatively impact future land use and future City needs for expansion of its current system to the north.

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Sincerely,

A handwritten signature in black ink, appearing to read "Eric V. Neagu". The signature is fluid and cursive, with a long horizontal stroke at the end.

Eric V. Neagu, PE, LEED AP, AICP
Principal
Antero Group