

**TCEQ DOCKET NO. 2024-1982-MWD**

**APPLICATION BY  
CIELO GARDEN LP FOR NEW TPDES  
PERMIT NO. WQ0016374001**

**§  
§  
§**

**BEFORE  
THE TEXAS COMMISSION  
ON ENVIRONMENTAL QUALITY**

---

**EXECUTIVE DIRECTOR'S RESPONSE TO HEARING REQUESTS**

---

**I.      INTRODUCTION**

The Executive Director (ED) of the Texas Commission on Environmental Quality (the Commission or TCEQ) files this Response to Hearing Requests on the application by Cielo Gardens LP (Applicant) for new Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0016374001. Jane Bessent and Roy Bessent Jr. filed timely requests (Requests) for a Contested Case Hearing (Hearing).

**II.     ATTACHMENTS FOR COMMISSION CONSIDERATION**

- Attachment A - ED's GIS Map

**III.    DESCRIPTION OF THE FACILITY, DISCHARGE ROUTE, AND THE EXECUTIVE  
DIRECTOR'S TECHNICAL REVIEW**

The Applicant applied to TCEQ for new TPDES Permit No. WQ0016374001 to authorize the discharge of treated domestic wastewater (effluent) at a daily average flow not to exceed 0.15 million gallons per day (MGD) in the Interim I Phase, a daily average flow not to exceed 0.30 MGD in the Interim II Phase, a daily average flow not to exceed 0.60 MGD in the Interim III Phase and a daily average flow not to exceed 0.90 MGD in the Final Phase. The Cielo Garden Water Reclamation Facility WWTP (WWTP) will be an activated sludge process operated in the conventional mode. Treatment units in the Interim I Phase will include bar screens, an aeration basin, a final clarifier, a sludge digester, an effluent filter, and a chlorine contact chamber. Treatment units in the Interim II phase will include bar screens, two aeration basins, a final clarifier, two sludge digesters, an effluent filter, and two chlorine contact basins. Treatment units in the Interim III phase will include bar screens, three aeration basins, two final clarifiers, three sludge digesters, two effluent filters, three chlorine contact chambers, and a dechlorination basin. Treatment units in the Final phase will include bar screens, four aeration basins, two final clarifiers, four sludge digesters, two effluent filters, four chlorine contact chambers, and a dechlorination basin. The facility has not been constructed.

The effluent limitations and monitoring requirements for those parameters that are limited in the draft permit are as follows:

### INTERIM I PHASE EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

The daily average flow of effluent shall not exceed 0.15 MGD, nor shall the average discharge during any two-hour period exceed 417 gallons per minute.

Effluent Characteristic	Discharge Limitations			
	Daily Avg mg/l (lbs/day)	7-day Avg mg/l	Daily Max mg/l	Single Grab mg/l
Flow, MGD	Report	N/A	Report	N/A
Carbonaceous Biochemical Oxygen Demand (5-day)	5 (6.3)	10	20	30
Total Suspended Solids	5 (6.3)	10	20	30
Ammonia Nitrogen	2 (2.5)	5	10	15
Total Phosphorus	0.15(0.19)	0.3	0.6	0.9
<i>E. coli</i> colony-forming units or most probable number per 100 ml	126	N/A	N/A	399

The effluent shall contain a total chlorine residual of at least 1.0 mg/L and shall not exceed a total chlorine residual of 4.0 mg/L after a detention time of at least 20 minutes, based on peak flow, and shall be monitored five times per week by grab sample. An equivalent method of disinfection may be substituted only with prior approval of the Executive Director.

The pH shall not be less than 6.0 standard units (SU) nor greater than 9.0 SU and shall be monitored once per month by grab sample. There shall be no discharge of floating solids or visible foam in other than trace amounts and no discharge of visible oil. The effluent shall contain a minimum dissolved oxygen of 4.0 mg/L and shall be monitored once per week by grab sample.

## INTERIM II PHASE EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

The daily average flow of effluent shall not exceed 0.30 MGD, nor shall the average discharge during any two-hour period exceed 833 gallons per minute.

Effluent Characteristic	Discharge Limitations			
	Daily Avg mg/l (lbs/day)	7-day Avg mg/l	Daily Max mg/l	Single Grab mg/l
Flow, MGD	Report	N/A	Report	N/A
Carbonaceous Biochemical Oxygen Demand (5-day)	5 (13)	10	20	30
Total Suspended Solids	5 (13)	10	20	30
Ammonia Nitrogen	2 (5.0)	5	10	15
Total Phosphorus	0.15 (0.38)	0.3	0.6	0.9
<i>E. coli</i> colony-forming units or most probable number per 100 ml	126	N/A	N/A	399

The effluent shall contain a total chlorine residual of at least 1.0 mg/L and shall not exceed a total chlorine residual of 4.0 mg/L after a detention time of at least 20 minutes, based on peak flow, and shall be monitored five times per week by grab sample at each chlorine contact chamber. An equivalent method of disinfection may be substituted only with prior approval of the Executive Director.

The pH shall not be less than 6.0 standard units (SU) nor greater than 9.0 SU and shall be monitored once per month by grab sample. There shall be no discharge of floating solids or visible foam in other than trace amounts and no discharge of visible oil. The effluent shall contain a minimum dissolved oxygen of 4.0 mg/L and shall be monitored once per week by grab sample.

### INTERIM III PHASE EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

The daily average flow of effluent shall not exceed 0.60 MGD, nor shall the average discharge during any two-hour period exceed 1,667 gallons per minute.

Effluent Characteristic	Discharge Limitations			
	Daily Avg mg/l (lbs/day)	7-day Avg mg/l	Daily Max mg/l	Single Grab mg/l
Flow, MGD	Report	N/A	Report	N/A
Carbonaceous Biochemical Oxygen Demand (5-day)	5 (25)	10	20	30
Total Suspended Solids	5 (25)	10	20	30
Ammonia Nitrogen	2 (10)	5	10	15
Total Phosphorus	0.15 (0.75)	0.3	0.6	0.9
<i>E. coli</i> colony-forming units or most probable number per 100 ml	126	N/A	399	N/A

The effluent shall contain a total chlorine residual of at least 1.0 mg/L after a detention time of at least 20 minutes, based on peak flow, and shall be monitored daily by grab sample at each chlorine contact chamber. The permittee shall dechlorinate the chlorinated effluent to a less than 0.1 mg/L total chlorine residual and shall monitor total chlorine residual daily by grab sample after the dichlorination process. An equivalent method of disinfection may be substituted only with prior approval of the Executive Director.

The pH shall not be less than 6.0 standard units (SU) nor greater than 9.0 SU and shall be monitored twice per month by grab sample. There shall be no discharge of floating solids or visible foam in other than trace amounts and no discharge of visible oil. The effluent shall contain a minimum dissolved oxygen of 4.0 mg/L and shall be monitored once per week by grab sample.

### FINAL PHASE EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

The daily average flow of effluent shall not exceed 0.90 MGD, nor shall the average discharge during any two-hour period exceed 2,500 gallons per minute.

Effluent Characteristic	Discharge Limitations			
	Daily Avg mg/l (lbs/day)	7-day Avg mg/l	Daily Max mg/l	Single Grab mg/l
Flow, MGD	Report	N/A	Report	N/A
Carbonaceous Biochemical Oxygen Demand (5-day)	5 (38)	10	20	30
Total Suspended Solids	5 (38)	10	20	30
Ammonia Nitrogen	2 (15)	5	10	15
Total Phosphorus	0.15 (1.1)	0.3	0.6	0.9
<i>E. coli</i> colony-forming units or most probable number per 100 ml	126	N/A	399	N/A

The effluent shall contain a total chlorine residual of at least 1.0 mg/L after a detention time of at least 20 minutes, based on peak flow, and shall be monitored daily by grab sample at each chlorine contact chamber. The permittee shall dechlorinate the chlorinated effluent to less than 0.1 mg/L total chlorine residual and shall monitor total chlorine residual daily by grab sample after dichlorination process. An equivalent method of disinfection may be substituted only with prior approval of the Executive Director.

The pH shall not be less than 6.0 standard units (SU) nor greater than 9.0 SU and shall be monitored twice per month by grab sample. There shall be no discharge of floating solids or visible foam in other than trace amounts and no discharge of visible oil. The effluent shall contain a minimum dissolved oxygen of 4.0 mg/L and shall be monitored once per week by grab sample.

The plant site will be located at 10620 Farm-to-Market Road 1105, in Williamson County, Texas 76537. The treated effluent will be discharged to Willis Creek, thence to Granger Lake in Segment No. 1247 of the Brazos River Basin. The unclassified receiving water uses are limited aquatic life use for Willis Creek, and high aquatic life use for Willis Creek (about 0.36 miles downstream of County Road 319). The designated uses for Segment No. 1247 are primary contact recreation, public water supply, and high aquatic life use. In accordance with 30 Texas Administrative Code (TAC) Section (§) 307.5 and the TCEQ's Procedures to Implement the Texas Surface Water Quality Standards (June 2010), an antidegradation review of the receiving waters was performed. A Tier 1 antidegradation review preliminarily determined that existing water quality uses will not be impaired by this permit action. Numerical and narrative criteria to protect existing uses will be maintained. A Tier 2 review has preliminarily determined that no significant degradation of water quality is expected in Willis Creek, which has been identified as having high aquatic life uses. Existing uses will be

maintained and protected. The preliminary determination can be reexamined and may be modified if new information is received.

#### IV. PROCEDURAL HISTORY

TCEQ received the application on August 2, 2023, and declared it administratively complete on September 13, 2023. The Applicants published the Notice of Receipt and Intent to Obtain a Water Quality Permit (NORI) in English in the *Austin American-Statesman* on September 19, 2023, and in Spanish in *El Mundo* on September 21, 2023. The ED completed the technical review of the application on June 3, 2024, and prepared the proposed permit, which if approved, would establish the conditions under which the WWTP must operate. The Applicants published a Notice of Application and Preliminary Decision (NAPD) in English in the *Austin American-Statesman* on July 19, 2024, and in Spanish in *El Mundo* on July 18, 2024. The public comment period ended on August 19, 2024, the ED's Response to Public Comment (RTC) was mailed on October 16, 2024, and the time for filing Requests for a Hearing or a Request for Reconsideration (RFR) ended on November 15, 2024. Because this application was received after September 1, 2015, and because it was declared administratively complete after September 1, 1999, it is subject to both the procedural requirements adopted pursuant to House Bill 801, 76th Legislature, 1999, and the procedural requirements and rules implementing Senate Bill 709, 84<sup>th</sup> Legislature, 2015, which are implemented by the Commission in its rules in 30 TAC Chapters 39, 50, and 55.

#### V. ACCESS TO RULES, LAWS AND RECORDS

- All administrative rules: Secretary of State Website: [www.sos.state.tx.us](http://www.sos.state.tx.us)
- TCEQ rules: Title 30 of the Texas Administrative Code: [www.sos.state.tx.us/tac/](http://www.sos.state.tx.us/tac/) (select TAC Viewer on the right, then Title 30 Environmental Quality)
- Texas statutes: [www.statutes.capitol.texas.gov](http://www.statutes.capitol.texas.gov)
- TCEQ website: [www.tceq.texas.gov](http://www.tceq.texas.gov) (for downloadable rules in WordPerfect or Adobe PDF formats, select "Rules, Policy, & Legislation," then "Current TCEQ Rules," then "Download TCEQ Rules");
- Federal rules: Title 40 of the Code of Federal Regulations (C.F.R.) [http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl)
- Federal environmental laws: <http://www.epa.gov/lawsregs/>
- Environmental or citizen complaints may be filed electronically at: <https://www.tceq.texas.gov/assets/public/compliance/monops/complaints/complaints.html> (select "use our online form") or by sending an email to the following address: [complaint@TCEQ.texas.gov](mailto:complaint@TCEQ.texas.gov)

Commission records for the WWTP are available for viewing and copying at TCEQ's main office in Austin, 12100 Park 35 Circle, Building F, 1st Floor (Office of Chief Clerk, for the current application until final action is taken). Some documents located at the Office of the Chief Clerk may also be located in the TCEQ Commissioners' Integrated Database at [www.tceq.texas.gov/goto/cid](http://www.tceq.texas.gov/goto/cid). The permit application has been available for viewing and copying at Georgetown Public Library, 402 West 8<sup>th</sup> Street, Georgetown, Texas, since publication of the NORI. The final permit application, proposed permit, statement of basis/technical summary, and the ED's preliminary decision have been available for viewing and copying at the same location since publication of the NAPD.

If you would like to file a complaint about the WWTP concerning its compliance with the provisions of its permit or with TCEQ rules, you may contact the TCEQ Regional Office (Region 11) in Austin, TX at (512) 339-2929 or the statewide toll-free number at 1-888-777-3186 to address potential permit violations. In addition, complaints may be filed electronically by using the methods described above in the seventh bullet point of section five (Access to Rules, Laws, and Records). If an inspection by the Regional Office finds that the Applicants are not complying with all the requirements of the permit, or that the WWTP is out of compliance with TCEQ rules, enforcement actions may arise.

## **VI. EVALUATION OF HEARING REQUESTS**

House Bill 801 established statutory procedures for public participation in certain environmental permitting proceedings, specifically regarding public notice and public comment and the Commission's consideration of hearing requests (Requests). The Commission implemented HB 801 by adopting procedural rules in 30 TAC chapters 39, 50, and 55. Senate Bill 709 revised the requirements for submitting public comment and the commission's consideration of Requests. This application was declared administratively complete on September 13, 2023; therefore, it is subject to the procedural requirements adopted pursuant to both HB 801 and SB 709

### **A. LEGAL AUTHORITY TO RESPOND TO HEARING REQUESTS**

"The executive director, the public interest counsel, and applicant may submit written responses to [hearing] requests . . . ."<sup>1</sup>

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

### **B. HEARING REQUEST REQUIREMENTS**

To consider a Request, the Commission must first conclude that the requirements in 30 TAC §§ 55.201 and 55.203, are met as follows.

A request for a contested case hearing by an affected person must be in writing, filed with the chief clerk within the time provided . . . , based only on the requester's timely comments, and not based on an issue that was raised solely in a public comment withdrawn by the commenter in writing by filing a withdrawal letter with the chief clerk prior to the filing of the ED's Response to Comment.<sup>3</sup>

---

<sup>1</sup> 30 TAC § 55.209(d).

<sup>2</sup> *Id.* at § 55.209(e).

<sup>3</sup> 30 TAC § 55.201(c).

A hearing request must substantially comply with the following:

- (1) give the name, address, telephone number, and where possible, fax number of the person who files the request. If the request is made by a group or association, the request must identify one person by name, address, daytime telephone number, and where possible, fax number, who is responsible for receiving all official communications and documents for the group;
- (2) identify the person's justiciable interest affected by the application, including a brief, but specific, written statement explaining in plain language the requestor's location and distance relative to the facility or activity that is the subject of the application and how and why the requestor believes he or she will be adversely affected by the facility or activity in a manner not common to members of the general public;
- (3) request a contested case hearing;
- (4) for applications filed;
  - (B) on or after September 1, 2015, list all relevant and material disputed issues of fact that were raised by the requestor during the public comment period and that are the basis of the hearing request. To facilitate the commission's determination of the number and scope of issues to be referred to hearing, the requestor should, to the extent possible, specify any of the ED's responses to the requestor's comments that the requestor disputes, the factual basis of the dispute, list any disputed issues of law; and
- (5) provide any other information specified in the public notice of application.<sup>4</sup>

**C. REQUIREMENT THAT REQUESTOR BE AN AFFECTED PERSON**

To grant a contested case hearing, the commission must determine, pursuant to 30 TAC § 55.203, that a requestor is an affected person.

- (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;

---

<sup>4</sup> *Id.* at § 55.201(d).



- (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.<sup>5</sup>
- (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.<sup>6</sup>

#### **D. REFERRAL TO THE STATE OFFICE OF ADMINISTRATIVE HEARINGS**

"When the commission grants a request for a contested case hearing, the commission shall issue an order specifying the number and scope of the issues to be referred to State Office of Administrative Hearing (SOAH) for a hearing."<sup>7</sup> "The commission may not refer an issue to SOAH for a contested case hearing unless the commission determines that the issue:

- (1) involves a disputed question of fact or a mixed question of law and fact;
- (2) was raised during the public comment period by an affected person; and
- (3) is relevant and material to the decision on the application."<sup>8</sup>

### **VII. ANALYSIS OF THE HEARING REQUESTS**

For this permit application the relevant public comment period ended on August 19, 2024, and the time for filing Requests for a Hearing or a Request for Reconsideration (RFR) ended on November 15, 2024. The ED's analyses determined whether the Requests followed TCEQ rules, if the requestors qualify as affected persons, what issues may be referred for a possible hearing, and the length of that hearing.

#### **A. WHETHER THE REQUEST COMPLIED WITH 30 TAC §§ 55.201(C) AND (D).**

1. **Jane Bessent and Roy Bessent Jr.** (the Bessents) filed a timely, written Request that provided the requisite contact information, raised issues that form the basis of their Request in timely comments not withdrawn before the RTC was filed, and requested a hearing.

<sup>5</sup> 30 TAC § 55.203(a)-(c).

<sup>6</sup> *Id.* at § 55.203(d).

<sup>7</sup> 30 TAC § 50.115(b).

<sup>8</sup> *Id.* at § 55.203(d).

The Bessents' Request complied with 30 TAC §§ 55.201(c) and (d) because the Request effectively identified personal justiciable interests in a written explanation plainly describing why the Bessents believe they will be affected by the application in a way not common to the public. The Bessents' Request states that they live close to the proposed facility, and the GIS Map prepared by the ED's staff shows that the Bessents' property is 0.79 miles away from the proposed facility. The Bessents raised issues related to the effect of the proposed discharge on wildlife, livestock, and vegetation.

The ED recommends finding that the Request of Jane Bessent and Roy Bessent Jr. substantially complied with 30 TAC §§ 55.201(c) and (d).

**B. WHETHER REQUESTOR IS AN AFFECTED PERSON UNDER 30 TAC § 55.203.**

1. **Jane Bessent and Roy Bessent Jr.** filed a Request that effectively identified personal, justiciable interests affected by the application.

The Bessents' Request stated that the discharge route crosses their property and that they are worried that the proposed discharge will negatively impact wildlife, livestock, and vegetation on their property. The protection of wildlife, livestock, and vegetation is regulated by the law under which TPDES permits are considered. Additionally, the Bessents' property is situated 0.79 miles away from the proposed facility. The Bessents' proximity to the proposed facility, in conjunction with the issues they raised, lead the ED to determine that the Bessents have a personal justiciable interest related to a legal right or duty affected by the application that is not common to the general public.

Therefore, the ED recommends the Commission find that Jane Bessent and Roy Bessent Jr. are affected persons under 30 TAC § 55.203 and grant their hearing request.

**VIII. ISSUES RAISED IN THE HEARING REQUEST:**

The Request raised the issues below.

1. **Whether the draft permit is adequately protective of wildlife, livestock, and vegetation as required by the Texas Surface Water Quality Standards.**

(RTC Response No. 1) This issue involves a disputed question of mixed fact and law. If it can be shown that the draft permit is not adequately protective of wildlife, livestock, and vegetation, then that information would be relevant and material to a decision on this application.

The ED concludes this issue is relevant and material, and if this case is referred to SOAH, the ED recommends the Commission refer this issue.

**IX. CONTESTED CASE HEARING DURATION**

If the Commission grants a hearing on this application, the ED recommends that the duration of the hearing be 180 days from the preliminary hearing to the presentation of a proposal for decision to the Commission.

X. REQUESTS FOR RECONSIDERATION

No Requests for Reconsideration were submitted.

XI. EXECUTIVE DIRECTOR'S RECOMMENDATION

The ED recommends the following actions by the Commission:

1. Find that Jane Bessent and Roy Bessent Jr. are affected persons under 30 TAC §§ 55.203.
2. Grant the Hearing Request of Jane Bessent and Roy Bessent Jr.
3. Should the Commission decide to refer this case to SOAH:
  - a. refer the case to Alternative Dispute Resolution for a reasonable time; and
  - b. refer issue 1 above in section VIII. to SOAH for a contested case hearing.
4. Should the Commission decide to deny the Requests, issue the Draft Permit as written.

Respectfully submitted,

Texas Commission on Environmental Quality

Kelly Keel, Executive Director

Philip Ledbetter, *Director*  
Office of Legal Services

Charmaine Backens, *Deputy Director*  
Environmental Law Division,



---

Bradford Eckhart, Staff Attorney  
Environmental Law Division  
State Bar No. 24137368  
P.O. Box 13087, MC 173  
Austin, Texas 78711 3087  
Telephone No. 512-239-1283  
Facsimile No. 512-239-0626

REPRESENTING THE EXECUTIVE DIRECTOR  
OF THE TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY

XII. CERTIFICATE OF SERVICE

I certify that on January 17, 2025, the Executive Director's Response to Hearing Requests for TPDES Permit No. WQ0016374001 was filed with the Texas Commission on Environmental Quality's Office of the Chief Clerk, and a copy was served to all persons listed on the attached mailing list via hand delivery, electronic delivery, inter-agency mail, or by deposit in the U.S. Mail.



---

Bradford Eckhart, *Staff Attorney*  
State Bar No. 24137368

MAILING LIST  
Cielo Gardens LP  
TCEQ Docket No./TCEQ Expediente N.º 2024-1982-MWD  
TPDES Permit No./TPDES Permiso N.º WQ0016374001

FOR THE APPLICANT/PARA EL SOLICITANTE

Andrew Bilger  
Cielo Gardens LP  
3939 Bee Caves Road, Suite C100  
West Lake Hills, Texas 78746

Michael Bevilacqua, P.E.  
Green Civil Design, LLC  
301 Denali Pass, Suite 3  
Cedar Park, Texas 78613

REQUESTER(S)/SOLICITANTE(S)

Mr. Roy S. & Mrs. Jane T. Bessent  
PO Box 162  
Walburg, Texas 78673

INTERESTED PERSON(S)/PERSONA(S) INTERESADA(S)

Tiffany Malzahn  
Brazos River Authority  
4600 Cobbs Drive  
Waco, Texas 76710

Tiffany Malzahn  
Brazos River Authority  
PO Box 7555  
Waco, Texas 76714

Michael L. Parsons  
The Carlton Law Firm PLLC  
4301 Westbank Drive, Suite B130  
Austin, Texas 78746

FOR THE EXECUTIVE DIRECTOR/PARA EL DIRECTOR EJECUTIVO

via electronic mail/vía correo electrónico:

Bradford Eckhart, Staff Attorney  
Texas Commission on  
Environmental Quality  
Environmental Law Division, MC-173  
P.O. Box 13087  
Austin, Texas 78711

Shaun Speck, Technical Staff  
Texas Commission on  
Environmental Quality  
Water Quality Division, MC-148  
P.O. Box 13087  
Austin, Texas 78711

Ryan Vise, Deputy Director  
Texas Commission on  
Environmental Quality  
External Relations Division  
Public Education Program, MC-108  
P.O. Box 13087  
Austin, Texas 78711

FOR PUBLIC INTEREST COUNSEL/PARA ABOGADOS DE INTERÉS PÚBLICO

via electronic mail/vía correo electrónico:

Garrett T. Arthur, Attorney  
Texas Commission on  
Environmental Quality  
Public Interest Counsel, MC-103  
P.O. Box 13087  
Austin, Texas 78711

FOR ALTERNATIVE DISPUTE RESOLUTION/PARA LA RESOLUCIÓN ALTERNATIVA DE DISPUTAS

via electronic mail/vía correo electrónico:

Kyle Lucas  
Texas Commission on  
Environmental Quality  
Alternative Dispute Resolution, MC-222  
P.O. Box 13087  
Austin, Texas 78711

FOR THE CHIEF CLERK/PARA EL SECRETARIO OFICIAL

via eFilings:

Docket Clerk  
Texas Commission on Environmental  
Quality Office of Chief Clerk, MC-105  
P.O. Box 13087  
Austin, Texas 78711

<https://www.tceq.texas.gov/goto/efilings>

# Attachment A



# Cielo Gardens LP

## Cielo Gardens Water Reclamation WWTF

Map Requested by TCEQ Office of Legal Services  
for Commissioners' Agenda



*Protecting Texas by  
Reducing and  
Preventing Pollution*

Texas Commission on Environmental Quality  
GIS Team (Mail Code 197)  
P.O. Box 13087  
Austin, Texas 78711-3087  
Date: 12/19/2024  
CRF 0115593  
Cartographer: AProvenc



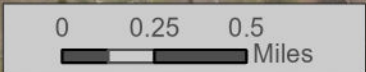
### Legend

- Outfall
- Requestor
- Discharge Route
- 0.5 Mile Radius
- 1 Mile Radius
- 1.5 Mile Radius

Requestor Distance  
from Outfall  
0.79 Miles



The facility is located in Williamson County. The Circle (green) in the left inset map represents the approximate location of the facility. The inset map on the right represents the location of Williamson County (red) in the state of Texas.



Source: The location of the facility was provided by the TCEQ Office of Legal Services (OLS). OLS obtained the site location information from the applicant and the requestor information from the requestor.

This map was generated by the Information Resources Division of the Texas Commission on Environmental Quality. This product is for informational purposes and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries. For more information concerning this map, contact the Information Resource Division at (512) 239-0800.