

Jennifer Cox

From: PUBCOMMENT-OCC
Sent: Friday, August 30, 2024 11:25 AM
To: PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WQ0016351001
Attachments: Jonah's Rply to Rsps on Comments with Attachments.pdf

H

From: michael@carltonlawaustin.com <michael@carltonlawaustin.com>
Sent: Friday, August 30, 2024 10:19 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0016351001

REGULATED ENTY NAME EAST WILLIAMSON COUNTY MUNICIPAL UTILITY DISTRICT 1

RN NUMBER: RN111751244

PERMIT NUMBER: WQ0016351001

DOCKET NUMBER:

COUNTY: WILLIAMSON

PRINCIPAL NAME: EAST WILLIAMSON COUNTY MUNICIPAL UTILITY DISTRICT 1

CN NUMBER: CN605705201

NAME: Michael Parsons

EMAIL: michael@carltonlawaustin.com

COMPANY: The Carlton Law Firm PLLC

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

PHONE: 5126140901

FAX: 5129002855

COMMENTS: Please accept the attached Reply to the Executive Director's Responses to Public Comments on behalf of Jonah Water Special Utility District.

TPDES PERMIT NO. WQ0016351001

**APPLICATION BY EAST § BEFORE THE TEXAS COMMISSION
WILLIAMSON COUNTY MUNICIPAL §
UTILITY DISTRICT 1 FOR TPDES § ON ENVIRONMENTAL QUALITY
PERMIT NO. WQ0016351001**

**JONAH WATER SPECIAL UTILITY DISTRICT'S REPLY TO THE EXECUTIVE
DIRECTOR'S RESPONSE TO PUBLIC COMMENT**

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, 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 29, 2024. On July 26, 2024, the ED filed responses to the public comments and on August 2, 2024 the TCEQ issued its letter notifying of the ED's decision. A request for reconsideration of the ED's decision or a request for contested case hearing must be submitted within 30 days of the issuance of said letter. Therefore, this reply is timely submitted. 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. Negative Impacts on Water Quality

As stated in the comments made by the District, 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.

B. Proximity to Wells

Attached to this Reply are four maps:

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

Attachment B is the FEMA National Flood Hazard Layer FIRMette which depicts the approximate location of the proposed facility.

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.

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. 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 for scale. The location of the proposed facility under TPDES Permit No. WQ0016351001 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, discharged to a channel, thence to an unnamed tributary, thence to the San Gabriel/North Fork 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.

C. Impact to Lake Granger, a public water supply source

Please see the above section with regard to the effluent from the proposed facility flowing into Lake Granger. As stated above, the District disagrees with the ED that simply ensuring that surface water quality is protected means there will be no degradation to groundwater quality. Water from Lake Granger is the primary source of raw water for the District and all of the people it serves. Contamination of this source would have long lasting effects on the District and the people served by it.

D. Additional risk of contributing to flooding along discharge route

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 many wells 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. Failure to obtain Jonah's consent and failure to comply with regionalization requirements

As of the filing of this document, there is no signed agreement between the District and East Williamson County Municipal Utility District No. 1 ("Applicant"), the District has not consented to the request made in the Application, and the District has not withdrawn its comments.

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 District and Applicant are working toward reaching an agreement. 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. 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. This process ensures consistency in operations by qualified staff, maintenance of equipment, and continuous and adequate service to the area.

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.¹

F. 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, the San Gabriel River, and eventually Lake Granger.

¹ 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."

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.²

² 30 TAC § 55.203(d).

The proposed facility is within 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.*"³ 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, 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 above, are two of many issues in which Jonah has an interest that are relevant to the application.

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,

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

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

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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 30th day of August 2024, as follows:

FOR THE APPLICANT / PARA EL SOLICITANTE:

Michael Wilson, Vice President
East Williamson County MUD 1
% SKLaw
1980 Post Oak Boulevard, Suite 1380
Houston, Texas 77056

Steve Ihnen, P.E., District Engineer
Bleyl Engineering
7701 San Felip Boulevard, Suite 200
Austin, Texas 78729

Mark Adam, P.E., District Engineer
Bleyl Engineering
10515 Rodgers Road
Houston, Texas 77070

INTERESTED PERSONS / PERSONAS INTERESADAS:

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

Tiffany Malzahn
Brazos River Authority
P.O. Box 7555
Waco, Texas 76714

FOR THE EXECUTIVE DIRECTOR / PARA EL DIRECTOR EJECUTIVO via electronic mail / por correo electrónico:

Ryan Vise, Deputy Director
Texas Commission on Environmental Quality
External Relations Division
Public Education Program MC-108

P.O. Box 13087
Austin, Texas 78711-3087

Allie Soileau, Staff Attorney
Texas Commission on Environmental Quality
Environmental Law Division MC-173
P.O. Box 13087
Austin, Texas 78711-3087

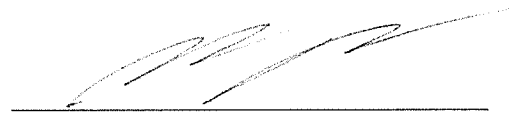
Sujata Sinha, Technical Staff
Texas Commission on Environmental Quality
Water Quality Division MC-148
P.O. Box 13087
Austin, Texas 78711-3087

FOR PUBLIC INTEREST COUNSEL / PARA ABOGADOS DE INTERÉS PÚBLICO via electronic mail / por correo electrónico:

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

FOR THE CHIEF CLERK / PARA EL SECRETARIO OFICIAL via electronic mail / por correo electrónico:

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



Michael Parsons

Attachment A

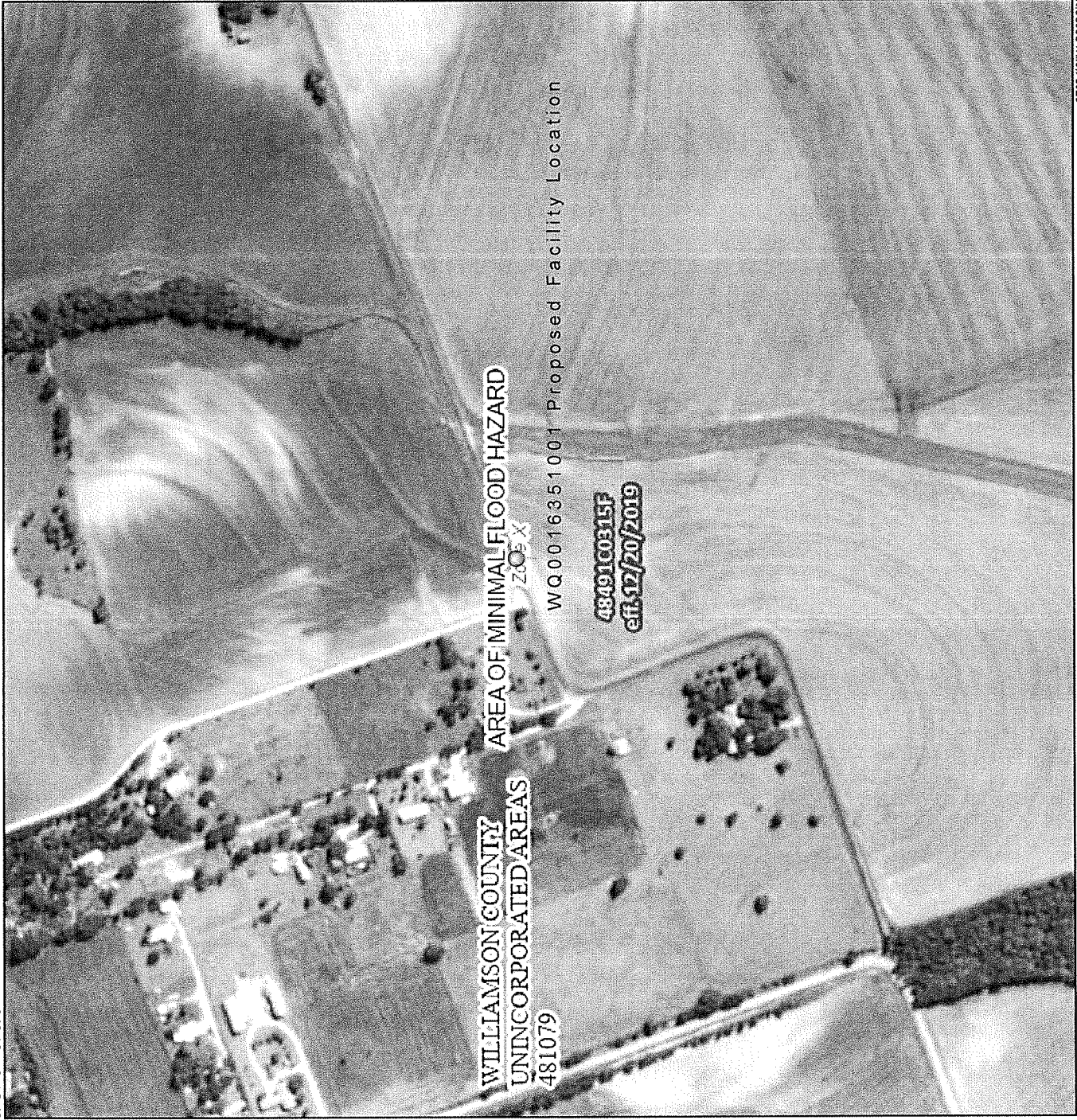
MAP NUMBER
48491C0315F
EFFECTIVE DATE
December 20, 2016

Attachment B

National Flood Hazard Layer FIRMette



97°34'46"W 30°39'31"N



97°34'46"W 30°39'31"N

0 250 500 1,000 1,500 2,000 Feet 1:6,000

Basemap Imagery Source: USGS National Map 2023

Legend

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

SPECIAL FLOOD HAZARD AREAS	Without Base Flood Elevation (BFE) Zone A, V, A99
	With BFE or Depth Zone AE, AO, AH, VE, AR
OTHER AREAS OF FLOOD HAZARD	Regulatory Floodway
	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 Zone X
OTHER AREAS	Future Conditions 1% Annual Chance Flood Hazard Zone X
	Area with Reduced Flood Risk due to Levee. See Notes. Zone X
GENERAL STRUCTURES	Area with Flood Risk due to Levee Zone D
	NO SCREEN Area of Minimal Flood Hazard Zone X
OTHER FEATURES	Effective LOMRS
	Area of Undetermined Flood Hazard Zone D
MAP PANELS	Channel, Culvert, or Storm Sewer
	Levee, Dike, or Floodwall
OTHER FEATURES	20.2 Cross Sections with 1% Annual Chance
	17.5 Water Surface Elevation
MAP PANELS	Coastal Transect
	Base Flood Elevation Line (BFE)
MAP PANELS	Limit of Study
	Jurisdiction Boundary
MAP PANELS	Coastal Transect Baseline
	Profile Baseline
MAP PANELS	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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 4/24/2024 at 4:04 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.

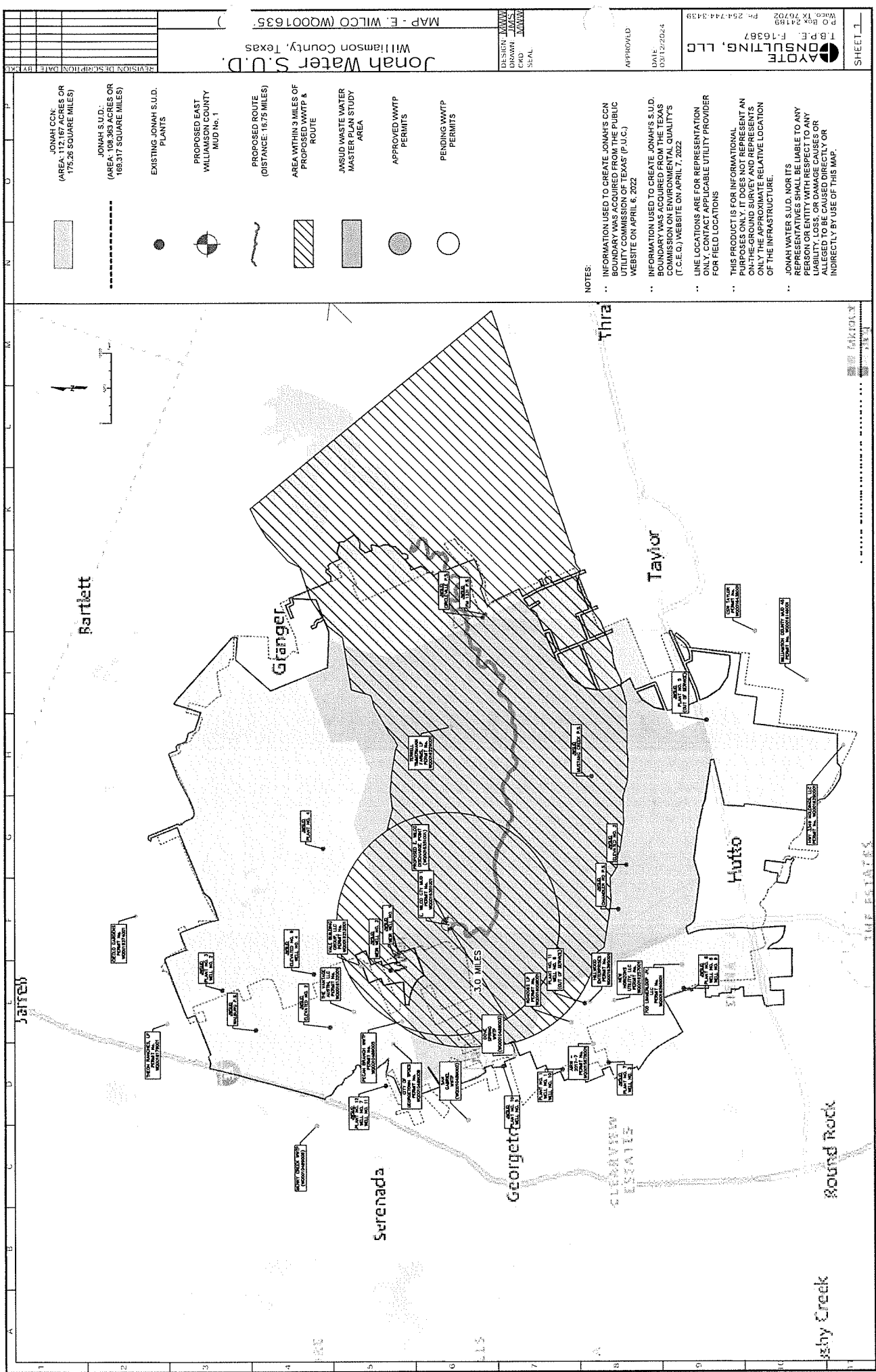
Attachment C

WQ0016351001 Proposed Facility Location

TEXAS WATER DEVELOPMENT BOARD

3° 24.2' N 97° 34' 36.3" W | D0: 30.640034 -97.576749

Attachment D



Jennifer Cox

From: PUBCOMMENT-OCC
Sent: Friday, August 30, 2024 4:00 PM
To: PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
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H

From: Yolanda Lara <yolanda@carltonlawaustin.com>
Sent: Friday, August 30, 2024 11:23 AM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Cc: Michael Parsons <michael@carltonlawaustin.com>; John Carlton <john@carltonlawaustin.com>
Subject: Jonah WSC - Jonah's Reply to Executive Directors Responses

Good Afternoon.

Attached please find a copy of Jonah's Reply to the Executive Director's Response to Public Comment that was filed today. If you have any questions, please let me know.

Sincerely,

Yolanda Lara

Paralegal



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

yolanda@carltonlawaustin.com

(512) 614-0901

CONFIDENTIALITY NOTICE: This e-mail transmission (and any attachments) may contain confidential information belonging to the sender that is protected by the attorney-client privilege. If you receive this in error please contact the sender.

TPDES PERMIT NO. WQ0016351001

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- (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.²

² 30 TAC § 55.203(d).

The proposed facility is within 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.*"³ 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, 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 above, are two of many issues in which Jonah has an interest that are relevant to the application.

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,

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

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
State Bar No. 24079109
michael@carltonlawaustin.com

Erin R. Selvera
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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 30th day of August 2024, as follows:

FOR THE APPLICANT / PARA EL SOLICITANTE:

Michael Wilson, Vice President
East Williamson County MUD 1
% SKLaw
1980 Post Oak Boulevard, Suite 1380
Houston, Texas 77056

Steve Ihnen, P.E., District Engineer
Bleyl Engineering
7701 San Felip Boulevard, Suite 200
Austin, Texas 78729

Mark Adam, P.E., District Engineer
Bleyl Engineering
10515 Rodgers Road
Houston, Texas 77070

INTERESTED PERSONS / PERSONAS INTERESADAS:

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

Tiffany Malzahn
Brazos River Authority
P.O. Box 7555
Waco, Texas 76714

FOR THE EXECUTIVE DIRECTOR / PARA EL DIRECTOR EJECUTIVO via electronic mail / por correo electrónico:

Ryan Vise, Deputy Director
Texas Commission on Environmental Quality
External Relations Division
Public Education Program MC-108

P.O. Box 13087
Austin, Texas 78711-3087

Allie Soileau, Staff Attorney
Texas Commission on Environmental Quality
Environmental Law Division MC-173
P.O. Box 13087
Austin, Texas 78711-3087

Sujata Sinha, Technical Staff
Texas Commission on Environmental Quality
Water Quality Division MC-148
P.O. Box 13087
Austin, Texas 78711-3087

FOR PUBLIC INTEREST COUNSEL / PARA ABOGADOS DE INTERÉS PÚBLICO via electronic mail / por correo electrónico:

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

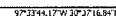
FOR THE CHIEF CLERK / PARA EL SECRETARIO OFICIAL via electronic mail / por correo electrónico:

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



Michael Parsons

Attachment A



SCALE


Map Projection
NAD 83 Geocentric Reference System Spheroid
Vertical Datum: NAVD83

For information about the specific vertical datum for elevation features, datum conversions, or vertical measurements, visit <https://www.fishbase.org/insurance/Slide%20GPS> Report for your connectivity at <https://mhc.mcmaster.ca>

1 inch = 1,000 feet **1:12,000**

0 500 1,000 2,000 3,000 4,000 Feet

0 105 210 420 630 840 Meters

 N

NATIONAL FLOOD INSURANCE PROGRAM
FLOOD INSURANCE RATE MAP
PANEL 315 OF 750

WILLIAMSON		
COUNTY	481079	0315
CITY OF WEAVER		
COMMUNITY	NUMBER	RANGE
CITY OF	1979	0315
GEORGETOWN	48066A	0315

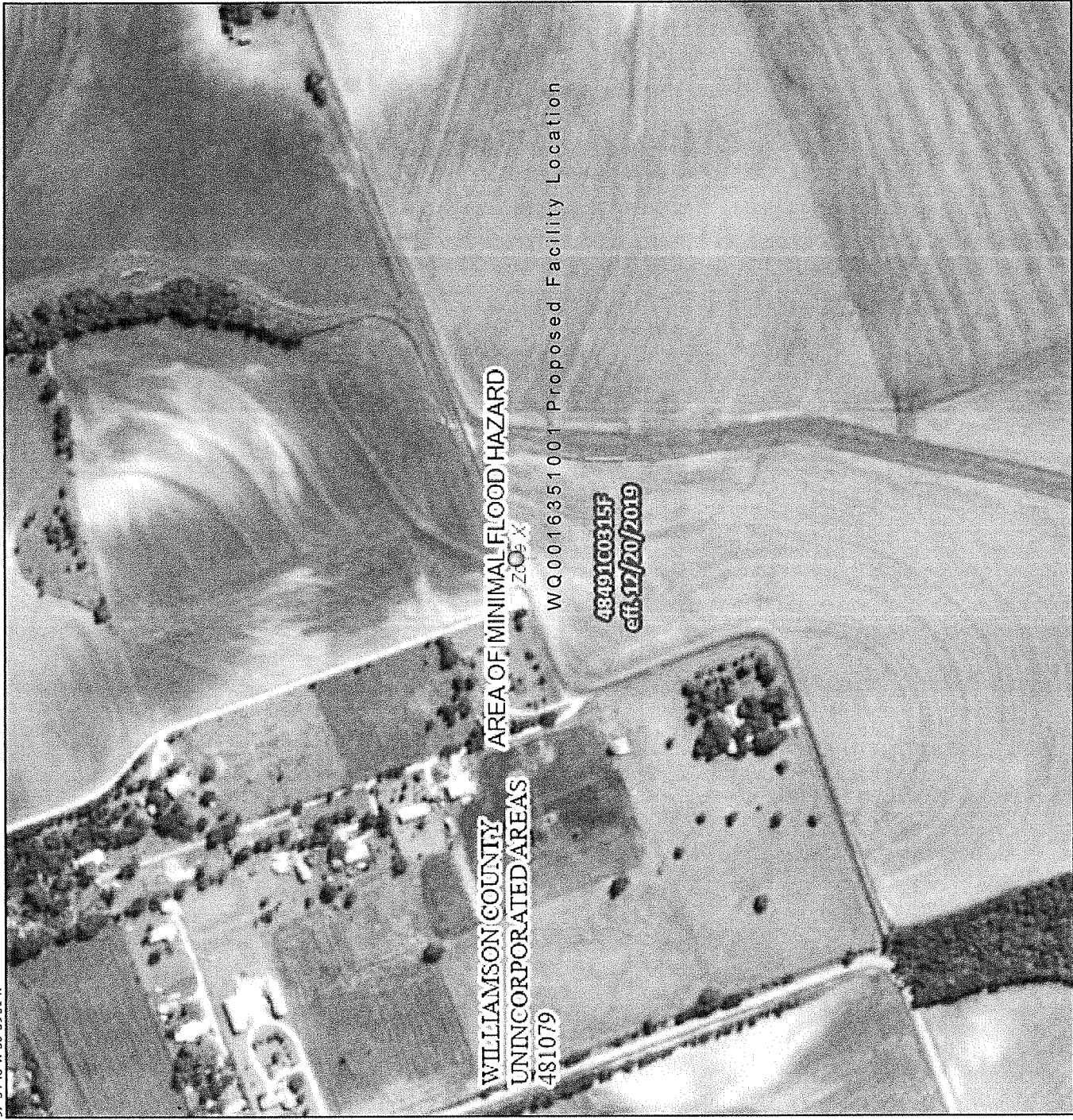
MAP NUMBER
48491C0315F
EFFECTIVE DATE
December 20, 2011

Attachment B

National Flood Hazard Layer FIRMette



97°34'46"W 30°39'31"N



0 250 500 1,000 1,500 2,000 Feet 1:6,000

Basemap Imagery Source: USGS National Map 2023

Legend

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

- SPECIAL FLOOD HAZARD AREAS**
- Without Base Flood Elevation (BFE) Zone A, V, A99
 - With BFE or Depth Zone AE, AO, AH, VE, AR
 - 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 Zone X
 - Future Conditions 1% Annual Chance Flood Hazard Zone X
 - Area with Reduced Flood Risk due to Levee. See Notes. Zone X
 - Area with Flood Risk due to Levee Zone D

- OTHER AREAS**
- NO SCREEN Area of Minimal Flood Hazard Zone X
 - Effective LOMRs
 - Area of Undetermined Flood Hazard Zone D
- GENERAL STRUCTURES**
- Channel, Culvert, or Storm Sewer
 - Levee, Dike, or Floodwall

- OTHER FEATURES**
- 20.2 Cross Sections with 1% Annual Chance
 - 17.5 Water Surface Elevation
 - Coastal Transect
 - Base Flood Elevation Line (BFE)
 - Limit of Study
 - Jurisdiction Boundary
 - Coastal Transect Baseline
 - Profile Baseline
 - Hydrographic Feature

- MAP PANELS**
- Digital Data Available
 - 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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 4/24/2024 at 4:04 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.

Attachment C

Measurement to 1 Miles

18 19 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209 210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 238 239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259 260 261 262 263 264 265 266 267 268 269 270 271 272 273 274 275 276 277 278 279 280 281 282 283 284 285 286 287 288 289 290 291 292 293 294 295 296 297 298 299 300 301 302 303 304 305 306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 321 322 323 324 325 326 327 328 329 330 331 332 333 334 335 336 337 338 339 340 341 342 343 344 345 346 347 348 349 350 351 352 353 354 355 356 357 358 359 360 361 362 363 364 365 366 367 368 369 370 371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524 525 526 527 528 529 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 588 589 590 591 592 593 594 595 596 597 598 599 600 601 602 603 604 605 606 607 608 609 610 611 612 613 614 615 616 617 618 619 620 621 622 623 624 625 626 627 628 629 630 631 632 633 634 635 636 637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656 657 658 659 660 661 662 663 664 665 666 667 668 669 670 671 672 673 674 675 676 677 678 679 680 681 682 683 684 685 686 687 688 689 690 691 692 693 694 695 696 697 698 699 700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 740 741 742 743 744 745 746 747 748 749 750 751 752 753 754 755 756 757 758 759 760 761 762 763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797 798 799 800 801 802 803 804 805 806 807 808 809 810 811 812 813 814 815 816 817 818 819 820 821 822 823 824 825 826 827 828 829 830 831 832 833 834 835 836 837 838 839 840 841 842 843 844 845 846 847 848 849 850 851 852 853 854 855 856 857 858 859 860 861 862 863 864 865 866 867 868 869 870 871 872 873 874 875 876 877 878 879 880 881 882 883 884 885 886 887 888 889 890 891 892 893 894 895 896 897 898 899 900 901 902 903 904 905 906 907 908 909 910 911 912 913 914 915 916 917 918 919 920 921 922 923 924 925 926 927 928 929 930 931 932 933 934 935 936 937 938 939 940 941 942 943 944 945 946 947 948 949 950 951 952 953 954 955 956 957 958 959 960 961 962 963 964 965 966 967 968 969 970 971 972 973 974 975 976 977 978 979 980 981 982 983 984 985 986 987 988 989 990 991 992 993 994 995 996 997 998 999 1000

WQ0016351001 Proposed Facility Location

Attachment D

REVISION	DESCRIPTION	DATE	BY	CHK

Jonah Water S.U.D.
Williamson County, Texas
MAP - E. WILCO (W0001635)

DESIGN
DRAWN
CHKD
SEAL

APPROVED

DATE
03/12/2024

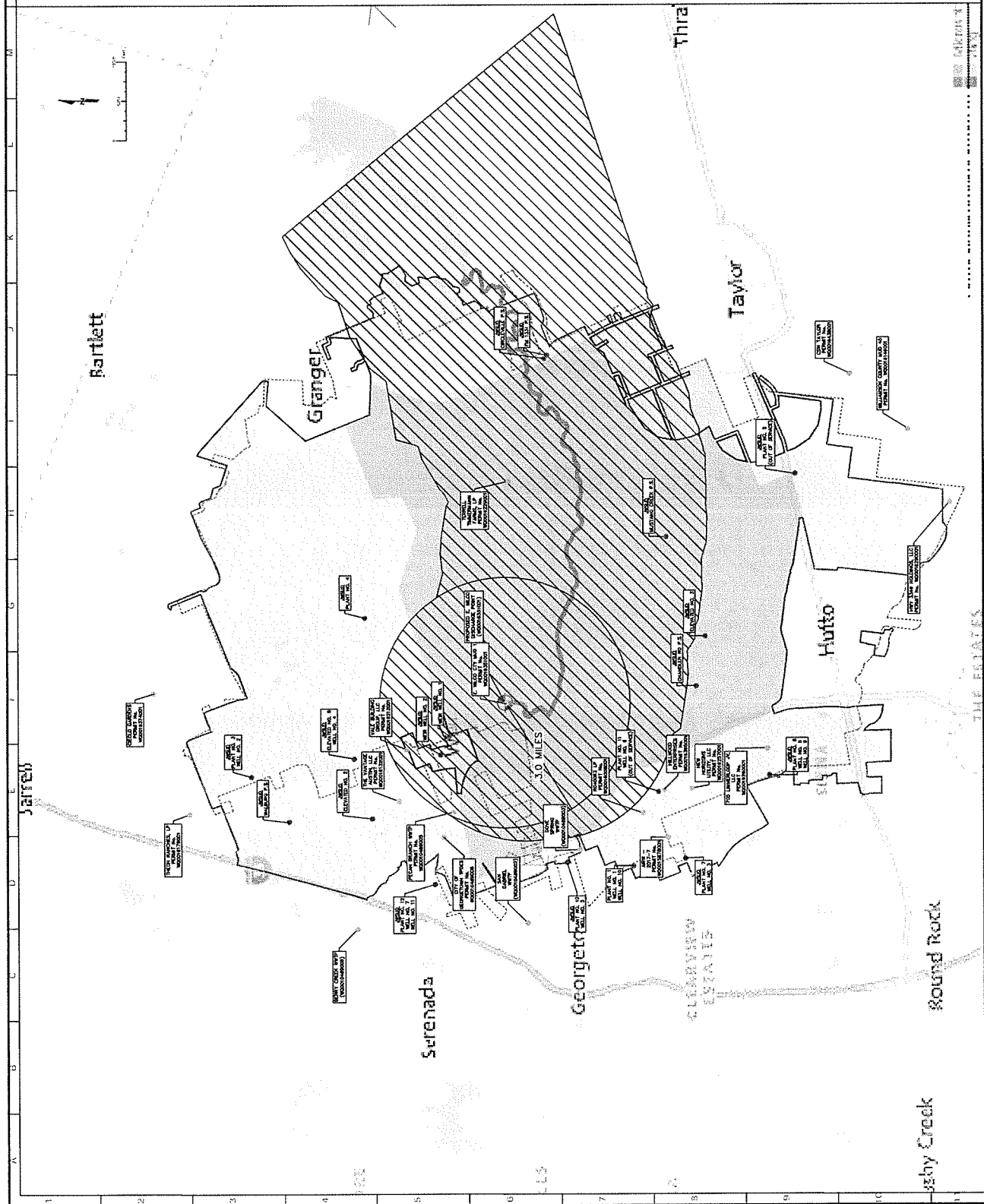
AYOTE
CONSULTING, LLC
18 P.E. F-16387
P.O. Box 24189
Waco, TX 76702
Ph: 254-744-3439

SHEET 1

- JONAH CCN
(AREA: 112,167 ACRES OR
175,286 SQUARE MILES)
- JONAH S.U.D.
(AREA: 108,393 ACRES OR
169,317 SQUARE MILES)
- EXISTING JONAH S.U.D.
PLANTS
- PROPOSED EAST
WILLIAMSON COUNTY
MUD No. 1
- PROPOSED ROUTE
(DISTANCE: 16.79 MILES)
- AREA WITHIN 3 MILES OF
PROPOSED WWTP &
ROUTE
- JMSUD WASTE WATER
MASTER PLAN STUDY
AREA
- APPROVED WWTP
PERMITS
- PENDING WWTP
PERMITS

NOTES:

- .. INFORMATION USED TO CREATE JONAH'S CCN
BOUNDARY WAS ACQUIRED FROM THE PUBLIC
UTILITY COMMISSION OF TEXAS (P.U.C.)
WEBSITE ON APRIL 6, 2022
- .. INFORMATION USED TO CREATE JONAH'S S.U.D.
BOUNDARY WAS ACQUIRED FROM THE TEXAS
COMMISSION ON ENVIRONMENTAL QUALITY
(T.C.E.Q.) WEBSITE ON APRIL 7, 2022
- .. LINE LOCATIONS ARE FOR REPRESENTATION
ONLY. CONTACT APPLICABLE UTILITY PROVIDER
FOR FIELD LOCATIONS
- .. THIS PRODUCT IS FOR INFORMATIONAL
PURPOSES ONLY. IT DOES NOT REPRESENT AN
OFFER OF ENGINEERING SERVICES OR
ONLY THE APPROXIMATE RELATIVE LOCATION
OF THE INFRASTRUCTURE.
- .. JONAH WATER S.U.D. NOR ITS
REPRESENTATIVES SHALL BE LIABLE TO ANY
PERSON OR ENTITY WITH RESPECT TO ANY
INJURY, LOSS, DAMAGE, OR
ALLEGED TO BE CAUSED DIRECTLY OR
INDIRECTLY BY USE OF THIS MAP.



Kimberly Muth

From: PUBCOMMENT-OCC
Sent: Monday, April 29, 2024 3:12 PM
To: PUBCOMMENT-WQ; PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WQ0016351001
Attachments: 2024.04.29 Comment Letter and Hearing Request with Attachments - compressed.pdf

H

From: michael@carltonlawaustin.com <michael@carltonlawaustin.com>
Sent: Monday, April 29, 2024 2:09 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0016351001

REGULATED ENTY NAME EAST WILLIAMSON COUNTY MUNICIPAL UTILITY DISTRICT 1

RN NUMBER: RN111751244

PERMIT NUMBER: WQ0016351001

DOCKET NUMBER:

COUNTY: WILLIAMSON

PRINCIPAL NAME: EAST WILLIAMSON COUNTY MUNICIPAL UTILITY DISTRICT 1

CN NUMBER: CN605705201

NAME: Michael Parsons

EMAIL: michael@carltonlawaustin.com

COMPANY: The Carlton Law Firm

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

PHONE: 5126140901

FAX: 5129002855

COMMENTS: Please see attached Comments and Hearing Request submitted on behalf of Jonah Water Special Utility District.

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

Michael Parsons
michael@carltonlawaustin.com

April 29, 2024

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 on East Williamson County Municipal Utility District 1's Application for a Proposed Texas Pollutant Discharge Elimination System, Permit No. WQ0016351001, 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 request for a contested case hearing and comments in opposition to the above-referenced permit application submitted by East Williamson County Municipal Utility District 1 ("Application"). Jonah further requests to be placed on the permanent mailing list to receive all future public notices on this Application. This Application's Notice of Preliminary Decision (the "Notice") was issued on March 28, 2024. The deadline to submit comments and request a hearing is 30 days from the date the Notice was published in the newspaper.¹ According to the Commissioner's Integrated Database (CID), the Notice was published in the newspaper on April 10, 2024. This hearing request with comments is timely filed.

Jonah is a special utility district, a political subdivision of the State of Texas operating under Texas Water Code Chapter 65 and the holder of water Certificate of Convenience and Necessity ("CCN") No. 10970, in Williamson County, Texas. Jonah provides service for approximately 13,500 customers and 35,000 people in its service area. Jonah has concerns about the negative impacts on water quality and raw water sources; the additional flooding and contamination risk posed by the proposed facility; the Applicant's failure to demonstrate need for the permit; and the Applicant's failure to secure consent to provide wastewater service within Jonah's district boundary; and that the application fails to comply with TCEQ's regionalization requirements.

Negative Impacts on Water Quality and Raw Water Sources:

The Notice indicates that Applicant intends to discharge its wastewater to a channel, thence to an unnamed tributary, thence to the San Gabriel/North Fork San Gabriel River in

¹ 30 TAC § 39.551

segment No. 1248 of the Brazos River Basin. Jonah provides to its customers water obtained from surface water and wells, including water from Lake Granger, which is fed by the San Gabriel River. Jonah is concerned about increases in algal growth and blooms, and other unsanitary or unsafe water quality conditions in these creek beds, tributaries, and the San Gabriel River.

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 thousands of 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 continue to have reliable water service in this high growth area.

The proposed facility is located entirely within Jonah's district boundary and water CCN territory as reflected in the enclosed map (Attachment A), and will have a negative impact on the local community within Jonah. The location of the proposed facility (according to the Notice) is shown in Attachment A (labeled according to the key), depicting its relative location to Jonah's district boundary, CCN territory, and Jonah's wastewater master plan study area. The map in Attachment A also illustrates the discharge route will bisect Jonah's district boundary, CCN territory, and Jonah's wastewater master plan study area. This can be seen by starting at the proposed facility location and following the discharge route stated in the Notice, depicted with a pink line, until it eventually flows into Lake Granger just east of the boundaries, territory, and study area stated above. Jonah has a substantial interest in maintaining its service areas and protecting the investments that Jonah has made in its infrastructure, and the quality of water sources used to serve its customers, all of which may be adversely affected by the outcome of this Application.

Attachment B includes a series of four maps generated from the Texas Water Development Board's Groundwater Data Viewer Interactive mapping tool. The maps depict the wells in the vicinity of the proposed facility and along the discharge route of the proposed facility. The maps were prepared using the TWDB's Groundwater Data Interactive mapping tool, adding the location of the proposed facility (according to the Notice). The map on Attachment B shows the approximate location of the facility (according to the Notice), marked with a green arrow and labeled with black text, in relation to the closest residence which is approximately 618 feet away. This attachment also shows the unnamed tributary that feeds into the San Gabriel River, passing within feet of other existing residences, some of which likely source water from wells on their respective properties.

The maps on Attachments B-1, B-2, and B-3 depict a distance of approximately one mile, with a blue line, for scale. The location of the proposed facility under TPDES Permit No. WQ0016351001 has been marked with a green arrow (according to the Notice) and labeled with black text. As reflected on Attachment B-1, there are eight wells to the north of the proposed facility within one mile. First, Lamar Zrubch's Public Domestic Well, State Well No. 5820501 is located approximately 0.91 miles from the proposed facility. Second, Domestic Well No. 634422 owned by Charles R. Kelley is located approximately 0.89

miles from the proposed facility. Third, Domestic Well No. 164579 owned by Jerry Richie is located approximately 0.81 miles from the proposed facility. Fourth, Domestic Well No. 439799 owned by Grant Kessler is located approximately 0.97 miles from the proposed facility. Fifth, Domestic Well No. 335095 owned by Jerry Richie is located approximately 0.91 miles from the proposed facility. Sixth, Domestic Well No. 483022 owned by Doug Perry is located approximately 0.82 miles from the proposed facility. Seventh, Domestic Well No. 610213 owned by Jay Kobelin is located approximately 0.69 miles from the proposed facility. Eighth, Domestic Well No. 663599 owned by Husky Trucking is located approximately 0.62 miles from the proposed facility.

To the west, as reflected on Attachment B-2, the proposed facility is approximately .77 miles from Domestic Well No. 249037 owned by Antone Schwertner.

As reflected on Attachment B-3, the proposed facility is located less than a mile from two wells to the south. State Well No. 5820806 (well labeled by TWDB as Unused), owned by Ray Mobile Home Park #1, is approximately 0.78 miles from the proposed facility location. State Well No. 5820805 (well labeled by TWDB as Unused), owned by Riverside Mobile Home Park, is approximately 0.59 miles from the proposed facility location.

The wells described above as part of Attachments B-1, B-2, and B-3 are only the wells within approximately one mile of the proposed facility location. The maps that make up Attachments B-1, B-2, and B-3 show many more wells located in the area, some just over a mile from the proposed facility location.

Additional Flood and Contamination Risk:

The proposed facility also poses an additional risk of contributing to flooding along the discharge route. FEMA's evaluation of flood risk and flood zones are depicted in map form in its National Flood Hazard Layer. Attachment C, the National Flood Hazard Layer FIRMette map from FEMA's website, depicts the location of the proposed facility (according to the Notice) with a red pin, added by the user and not FEMA. The permit number was added in black text after downloading the map from FEMA's website.

Attachment C-1 is the National Flood Hazard Layer FIRM map from FEMA's website. The proposed facility location (according to the Notice) is marked with a black "X" and labeled with black text and the discharge route (according to the Notice), shown with red lines was added after downloading the map from FEMA's website. As reflected in Attachment C-1, a portion of the discharge route is denoted as Zone A. This is a Special Flood Hazard Area, a high-risk area where flood insurance is mandated for home and business owners with structures and where floodplain management regulations apply. This Zone A, which is less than a mile downstream from the proposed facility (according to the Notice), is partially a residential area. In the event of a flood, this residential area is at risk of additional inundation due to the flows from the proposed facility and contamination by the effluent from the proposed facility. Because the discharge from the proposed facility increases the flood potential and contaminants in the effluent may negatively impact the residential area downstream within one mile, potential adverse impacts should be further evaluated or the permit denied.

Failure to Demonstrate Need for the Permit:

The Applicant has also failed to provide sufficient justification for the need for the permit. The application requests a permit to authorize the discharge of treated domestic wastewater at an annual average flow not to exceed 600,000 gallons per day. The Notice states 600,000,00 gallons per day, but that is assumed to be a typo considering the original Notice of Receipt and Intent stated 600,000 gallons per day prior to being amended for an unrelated reason. Although the area is undoubtedly growing, there are no documented requests for service from this applicant that would substantiate the need for a facility that would discharge such a volume. A review of the Public Utility Commission's Water and Sewer CCN Viewer indicates that the proposed facility would be located entirely within Jonah's certificated service area. Based on this, the Applicant has failed to demonstrate justification for permit need, a required analysis in the Domestic Wastewater Permit Application Technical Report 1.1. Failure to provide sufficient justification of the need for the permit and each proposed phase should result in a recommendation for denial of the application.

Failure to Secure Consent to Serve within A Special District:

Jonah has not consented to East Williamson County Municipal Utility District 1's ("Applicant's") provision of sewer service within Jonah's district boundary. TWC § 13.044(c) requires the Applicant to obtain consent from Jonah and provide evidence of Jonah's consent as part of the Application. TCEQ's Domestic Wastewater Permit Application requests information regarding consent from the types of entities from which consent may be required before service can be provided in a particular area. 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." Jonah is the "other public authority" under this statute. Jonah is a special utility district, a political subdivision of the State of Texas operating under Texas Water Code Chapter 65 and thus has all of the rights, powers, privileges, authority and functions conferred by, and shall be subject to all duties imposed by, the rules and regulations of the Texas Commission on Environmental Quality and the general laws of the State of Texas relating to special utility districts. This includes the power to provide wastewater service. Jonah Water SUD was created via Texas Water Commission Order in the matter of the petition of Jonah Water Supply Corporation for creation of and conversion to Jonah Water Special Utility District, Ordering Provision No. 6, May 15, 1992. Without Jonah's consent, the Applicant will be legally barred from providing service.

Failure to Comply with Regionalization Requirements:

Finally, 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.”² 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”³

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 Notice indicates that Applicant requested wastewater service from Jonah, nor that Jonah is unable or unwilling to provide such service. Jonah believes the permit application is insufficient for that reason.

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

Sincerely,

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



Michael Parsons
Attorney for Jonah Water Special Utility
District

Enclosures: Map of Jonah’s CCN and District boundaries, and approximate location of proposed facility and discharge route as identified in Notice (Attachment A)

Four maps from Texas Water Development Board Groundwater Data
Interactive mapping tool showing wells in the vicinity of the proposed facility

1. A zoomed in map showing the immediate surrounding area of the proposed facility (Attachment B)
2. A map showing wells in the vicinity to the north of the proposed facility (Attachment B-1)
3. A map showing wells in the vicinity to the west of the proposed facility (Attachment B-2)
4. A map showing wells in the vicinity to the south of the proposed facility (Attachment B-3)

Two maps from Federal Emergency Management Agency (FEMA) National
Flood Hazard Layer Viewer

² TWC § 26.081.

³ TWC § 26.0282.

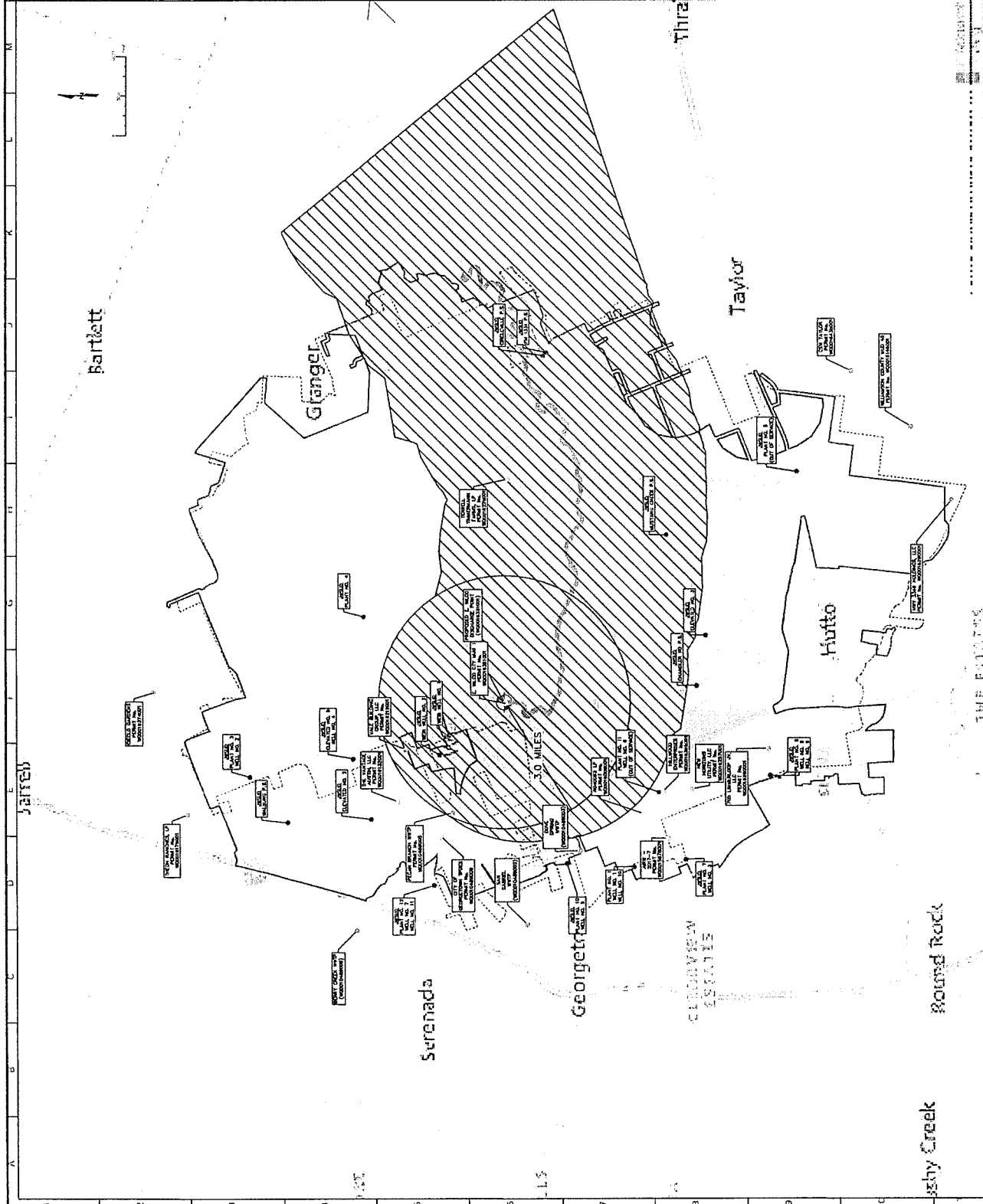
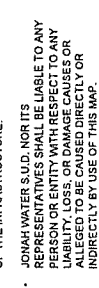
The Carlton Law Firm, P.L.L.C.

Page 6

1. A zoomed in map showing the immediate surrounding area of the proposed facility (Attachment C)
2. A map showing the discharge route of effluent from the proposed facility (Attachment C-1)

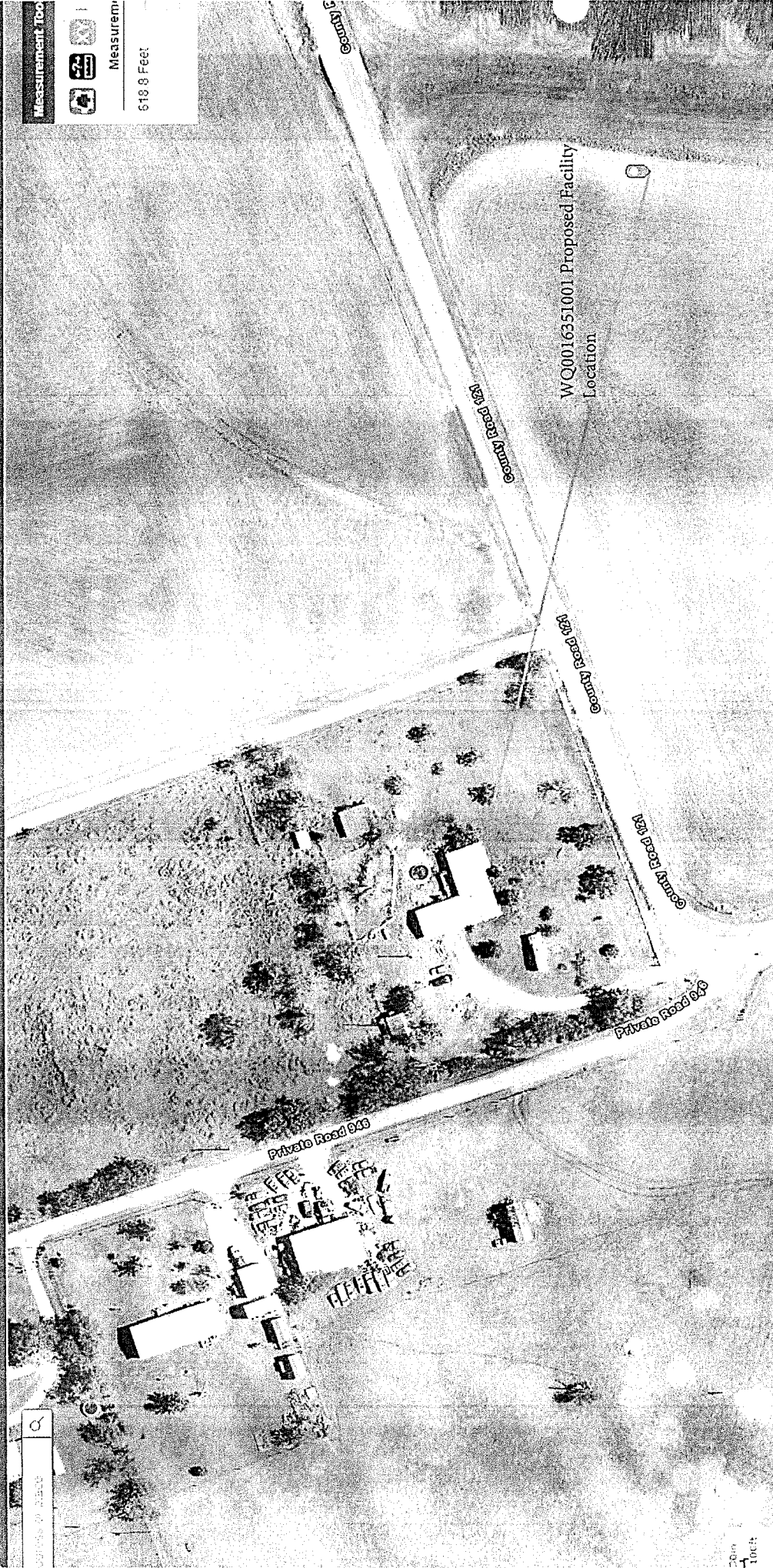
cc: Bill Brown, General Manager, Jonah Water Special Utility District.

Attachment A



Attachment B

Measurement Tool
Measurement
618.8 Feet



Attachment B-1

Measurement Tool

Measure

1 Miles



Attachment B-2



Attachment B-3

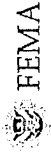
WQ0016351001 Proposed Facility Location

TEXAS WATER DEVELOPMENT BOARD

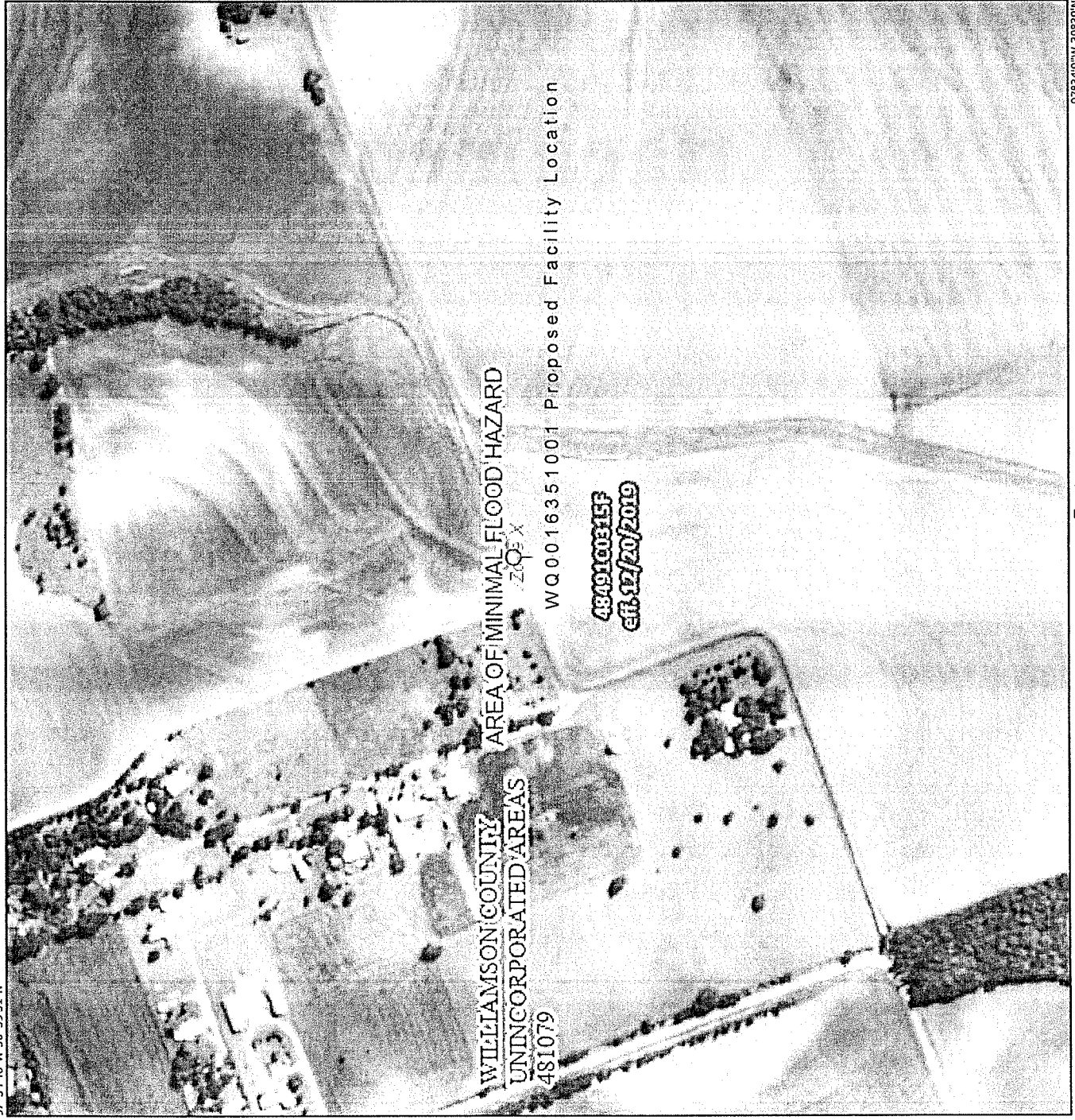
94.2" N 97° 34' 36.2" W 110D: 30,64035 ÷ 97.576749

Attachment C

National Flood Hazard Layer FIRMette



97°34'46"W 30°39'31"N



0 250 500 1,000 1,500 2,000 Feet 1:6,000

Basemap Imagery Source: USGS National Map 2023

Legend

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

SPECIAL FLOOD HAZARD AREAS	Without Base Flood Elevation (BFE) Zone A, V, A99
	With BFE or Depth Zone AE, AO, AH, VE, AR 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 Zone X
	Future Conditions 1% Annual Chance Flood Hazard Zone X Area with Reduced Flood Risk due to Levee, See Notes, Zone X Area with Flood Risk due to Levee Zone D
OTHER AREAS	NO SCREEN Area of Minimal Flood Hazard Zone X
	Effective LOMRs
GENERAL STRUCTURES	Area of Undetermined Flood Hazard Zone D
	Channel, Culvert, or Storm Sewer Levee, Dike, or Floodwall
OTHER FEATURES	20.2 Cross Sections with 1% Annual Chance
	17.5 Water Surface Elevation
MAP PANELS	Coastal Transect
	Base Flood Elevation Line (BFE)
	Limit of Study
	Jurisdiction Boundary
	Coastal Transect Baseline
	Profile Baseline
	Hydrographic Feature
	Digital Data Available
	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.

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 4/24/2024 at 4:04 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.

Attachment C-1



FLOOD HAZARD INFORMATION

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

- SPECIAL FLOOD HAZARD AREAS**
- Without Base Flood Elevation (BFE) (21 CFR 1.103)
 - With BFE or Depth (21 CFR 1.103)
 - Regulatory Floodway
 - 0.2% Annual Chance Flood Hazard, Area of 1% Annual Chance Flood with average depth less than one foot and no damage or as little as one square foot (21 CFR 1.103)
 - Future Conditions 1% Annual Chance Flood Hazard (21 CFR 1.103)
 - Area with Reduced Flood Risk due to Levee or Barrier (21 CFR 1.103)
 - Area with Flood Risk due to Levee (21 CFR 1.103)
- OTHER AREAS OF FLOOD HAZARD**
- NO SCREEN: Area of Minimal Flood Hazard (21 CFR 1.103)
 - Effective LDBRs
 - Area of Undetermined Flood Hazard (21 CFR 1.103)
- OTHER AREAS**
- Channel, Culvert, or Storm Sewer
 - Levee, Dike, or Floodwall
 - 80% Cross Sections with 1% Annual Chance
 - Water Surface Elevation
 - Coastal Barrier
 - Coastal Transport Barrier
 - Profile Sandline
 - Hydrographic Feature
 - Base Flood Elevation Line (BFE)
 - Unlabeled Study
 - Jurisdiction Boundary
- GENERAL STRUCTURES**
- OTHER FEATURES**

NOTES TO USERS

For information and questions about this Flood Insurance Rate Map (FIRM), available products associated with the FIRM, including the Flood Insurance Study (FIS), or general questions about the FIRM, please contact the FEMA Map Information Center at 1-877-FEMA-6473 (1-877-366-2642) or visit the FEMA Map Information Center website at www.fema.gov. Available products may include previously issued Letters of Map Change, a Flood Insurance Study Report, or other digital versions of the map. Many of these products can be accessed or ordered directly from the website.

Comments on missing data and/or errors in the FIRM should be sent to the FEMA Map Information Center at the address listed below. These may be received directly from the Flood Map Information Center or the nearest FEMA office.

For community and countywide map data, refer to the Flood Insurance Study Report for this jurisdiction.

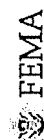
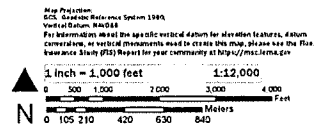
To determine if flood insurance is available in this community, contact your insurance agent or call the National Flood Insurance Program at 1-800-442-4642.

Base map information shown on this FIRM was provided in digital format by USDA, Farm Service Agency (FSA). This information was derived from a map dated April 11, 2013.

This map was prepared by FEMA's National Flood Insurance Program (NFIP) on 02/20/2014 at 1:12 PM and does not include changes or amendments subsequent to the date indicated. The NFIP and a digital elevation map change or update subsequent to the date and time shown. For additional information, please see the Flood Insurance Study Report's Community Profile or the NFIP's National Flood Insurance Program website at www.fema.gov.

This map complies with FEMA's standards for the use of digital flood maps and is not valid as described below. The map is shown as a draft and is not for use in any other manner. The map is shown as a draft and is not for use in any other manner. The map is shown as a draft and is not for use in any other manner.

SCALE



National Flood Insurance Program

NATIONAL FLOOD INSURANCE PROGRAM
FLOOD INSURANCE MAP
PANEL 315 of 750

WILLIAMSON COUNTY
GEORGETOWN
48076 0315
NUMBER PANEL
48066 0315