

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 requestor 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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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



FLOOD HAZARD INFORMATION
SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR DRAFT FIRM PANEL LAYOUT

- SPECIAL FLOOD HAZARD AREAS**
 - Without Base Flood Elevation (BFE) Zone A or B
 - With BFE or Depth Zone A or B or XA
 - Regulatory Floodway
 - 0.1% Annual Chance Flood Hazard, Areas of 1% Annual Chance Based with average depth less than one foot or with average areas of less than one square mile
 - Fishes Condition, 1% Annual Chance Flood Hazard
 - Areas with Reduced Flood Risk due to Levees See Notes
 - Area with Flood Risk due to Levees
- OTHER AREAS OF FLOOD HAZARD**
 - NO SCREEN
 - Area of Intermittent Flood Hazard
 - Etchick LOMs
 - Area of Undetermined Flood Hazard
- OTHER AREAS**
 - Channel, Culvert, or Storm Sewer
 - Levee, Dike, or Flood Wall
- GENERAL STRUCTURES**
 - 20.0' Cross Section with 1% Annual Chance
 - Water Surface Elevation
 - Crustal Trenches
 - Crustal Trench Baseline
 - Pre-Me Baseline
 - Hydrographic Feature
 - Base Flood Elevation Line (BFE)
- OTHER FEATURES**
 - Limit of Study
 - Jurisdiction Boundary

NOTES TO USERS

For information and questions about this Flood Insurance Rate Map (FIRM), available products associated with this FIRM, including historic versions, the current map user for use of FIRM products is the Federal Emergency Management Agency (FEMA) at the National Flood Insurance Program (NFIP). In general, please call the FEMA Map Information Center at 1-877-485-6247 or 1-877-252-8227 or visit the FEMA Flood Map Service Center website at www.fema.gov. Available products may include printed versions of the map, a digital version of the map, a Flood Insurance Study (FIS) report, or a digital version of the map. Many of these products can be viewed or downloaded from the website, or via digital versions of the map.

Communities seeking to purchase additional FIRM products must obtain a current copy of the subject panel as well as the current FIRM data. These may be obtained directly from the Flood Map Service Center at the number listed above.

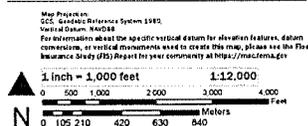
For community and county map data, refer to the Flood Insurance Study Report for this production. The information of flood insurance is available in this community, contact your insurance agent or call the National Flood Insurance Program at 1-800-368-5850.

Background information shown on this FIRM was provided in digital form by the USDA, Farm Service Agency (FSA). This information was derived from NRIS, dated April 1, 2014.

This map was prepared from FEMA's National Flood Hazard Layer (NFHL) on 5/13/2014 at 1:02 PM, and does not include changes or amendments subsequent to that date and time. The NFHL and effective information may change or become superseded by the data and time. For additional information, please see the Flood Hazard Mapping Update Overview Post Sheet at <http://www.fema.gov/media/pressroom/communications/18418>

This map complies with FEMA's standards for the use of digital data in the use of digital data. It is not used as a derivative product. The boundary shown complies with FEMA's boundary standards. This map may be used for one or more of the following map elements, but not appear as a separate map. Symbols, scale bars, map creation date, community number, and FISID are shown.

SCALE



FEMA
National Flood Insurance Program

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

WILLIAMSON COUNTY
GEORGETOWN

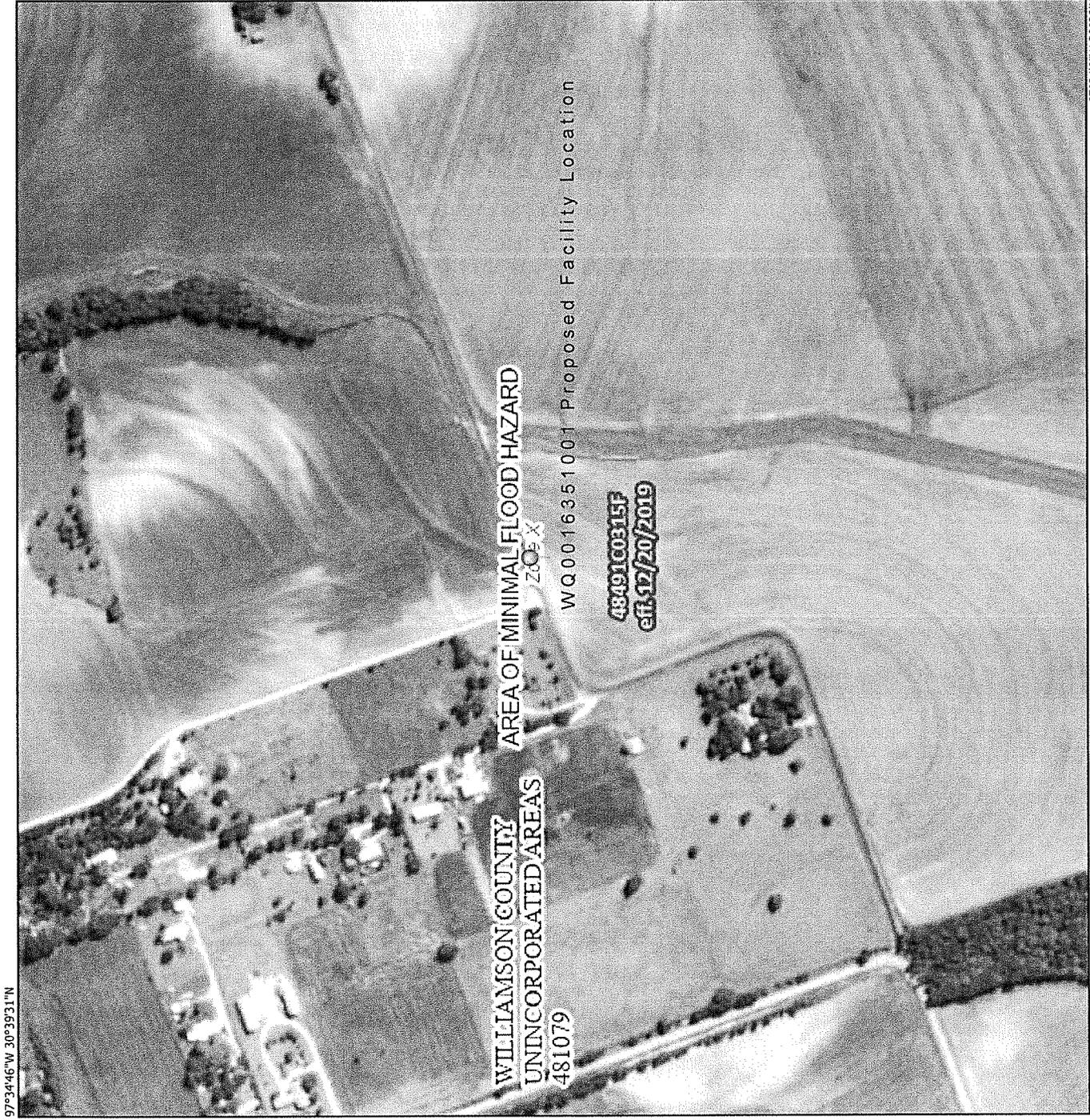
484915 0315
NUMBER PANEL
484915 0315

Attachment B

National Flood Hazard Layer FIRMette



97°34'46"W 30°39'31"N



97°34'19"W 30°39'31"N

1:6,000

Feet

0 250 500 1,000 1,500 2,000

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 Water Surface Elevation
- 17.5 Coastal Transect
- 8 Base Flood Elevation Line (BFE)
- 503 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, FIRN panel number, and FIRN effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

Attachment C

[Groundwater](#)
[Layers](#)
[Base Maps](#)
[Help](#)
[Disclaimer](#)

Measurement Tool
 Measurement
 1 Miles



Attachment D

Jennifer Cox

From: PUBCOMMENT-OCC
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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.

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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
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Austin, Texas 78711-3087

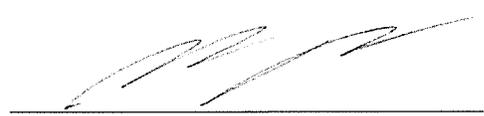
Sujata Sinha, Technical Staff
Texas Commission on Environmental Quality
Water Quality Division MC-148
P.O. Box 13087
Austin, Texas 78711-3087

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

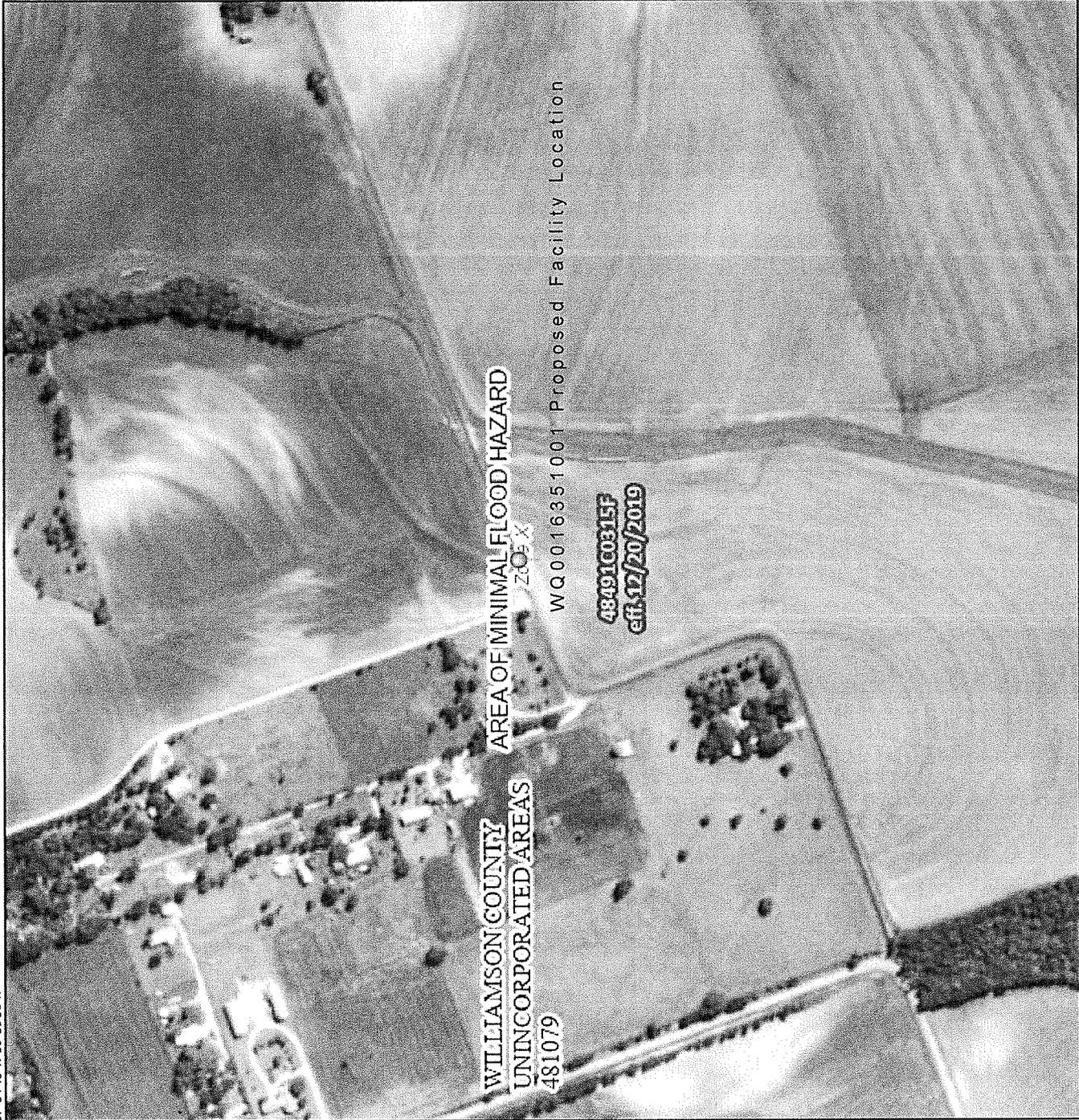
Attachment A

Attachment B

National Flood Hazard Layer FIRMette



97°34'46"W 30°39'31"N



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 8 Coastal Transect Base Flood Elevation Line (BFE) 53 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.

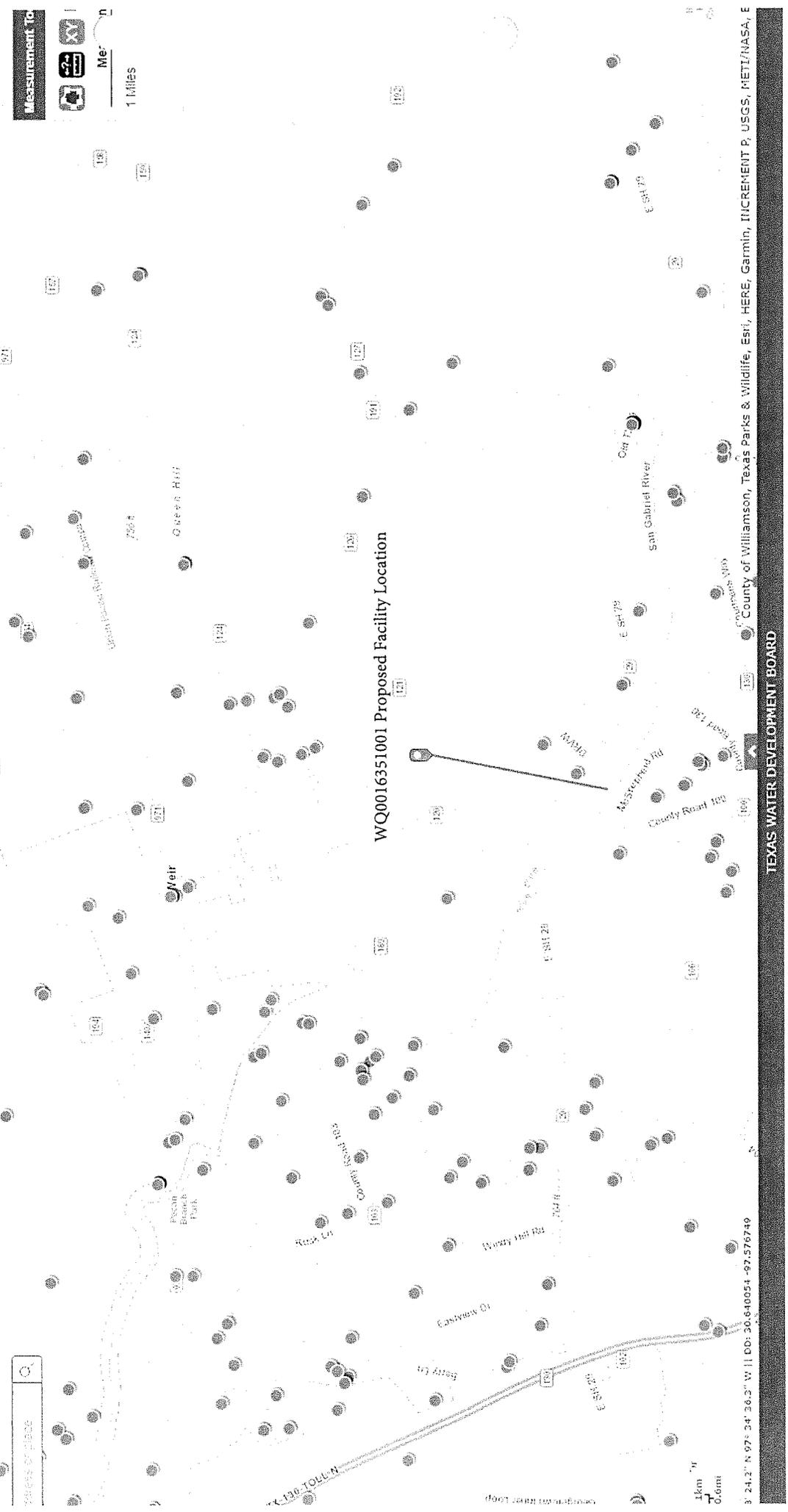
The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 4/24/2024 at 4:04 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if 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.



Basemap Imagery Source: USGS National Map 2023

Attachment C



Attachment D

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

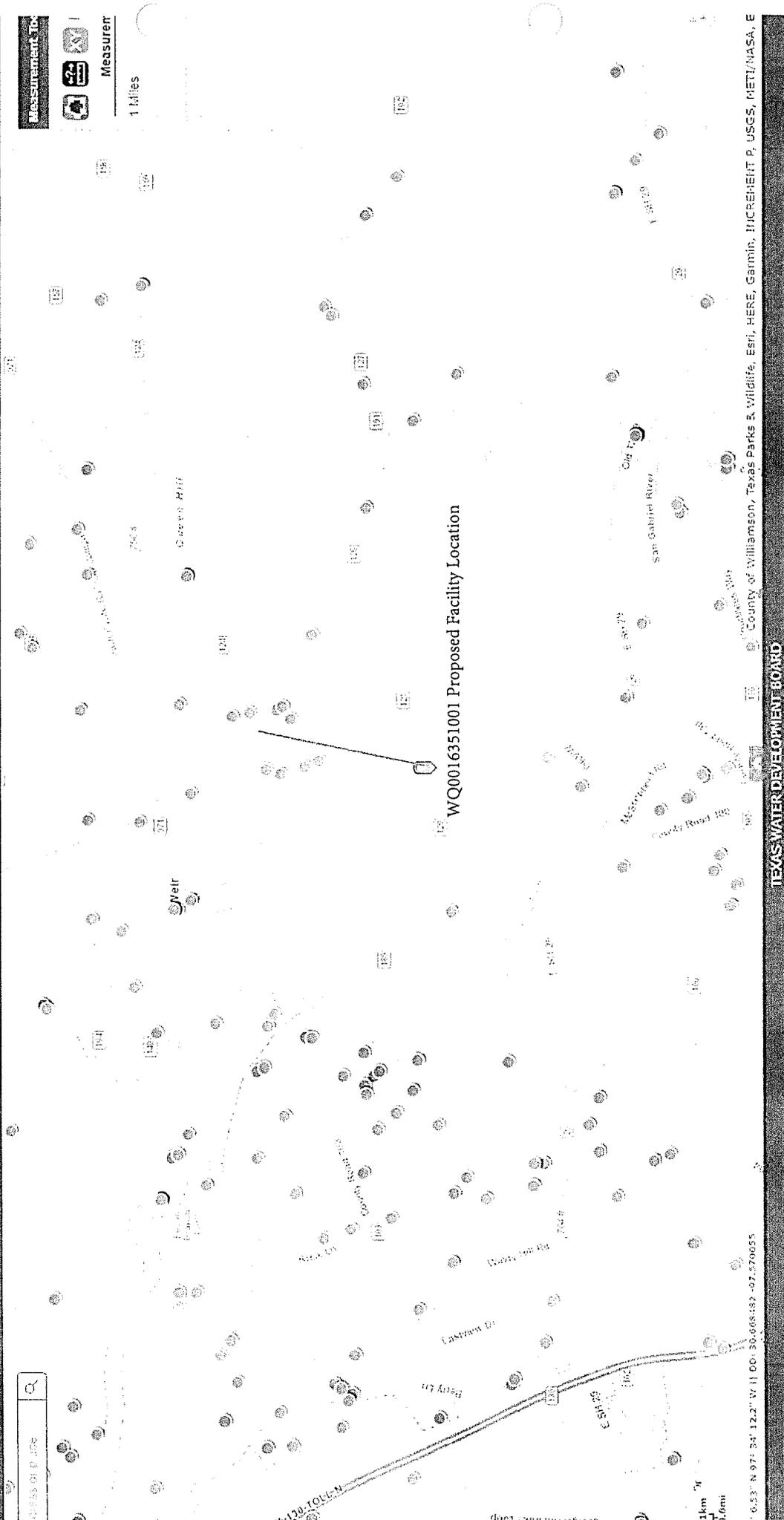
Measurement Tool

Measurement: 618.8 Feet



Attachment B-1

Measurement Tool
Measurer
1 Miles

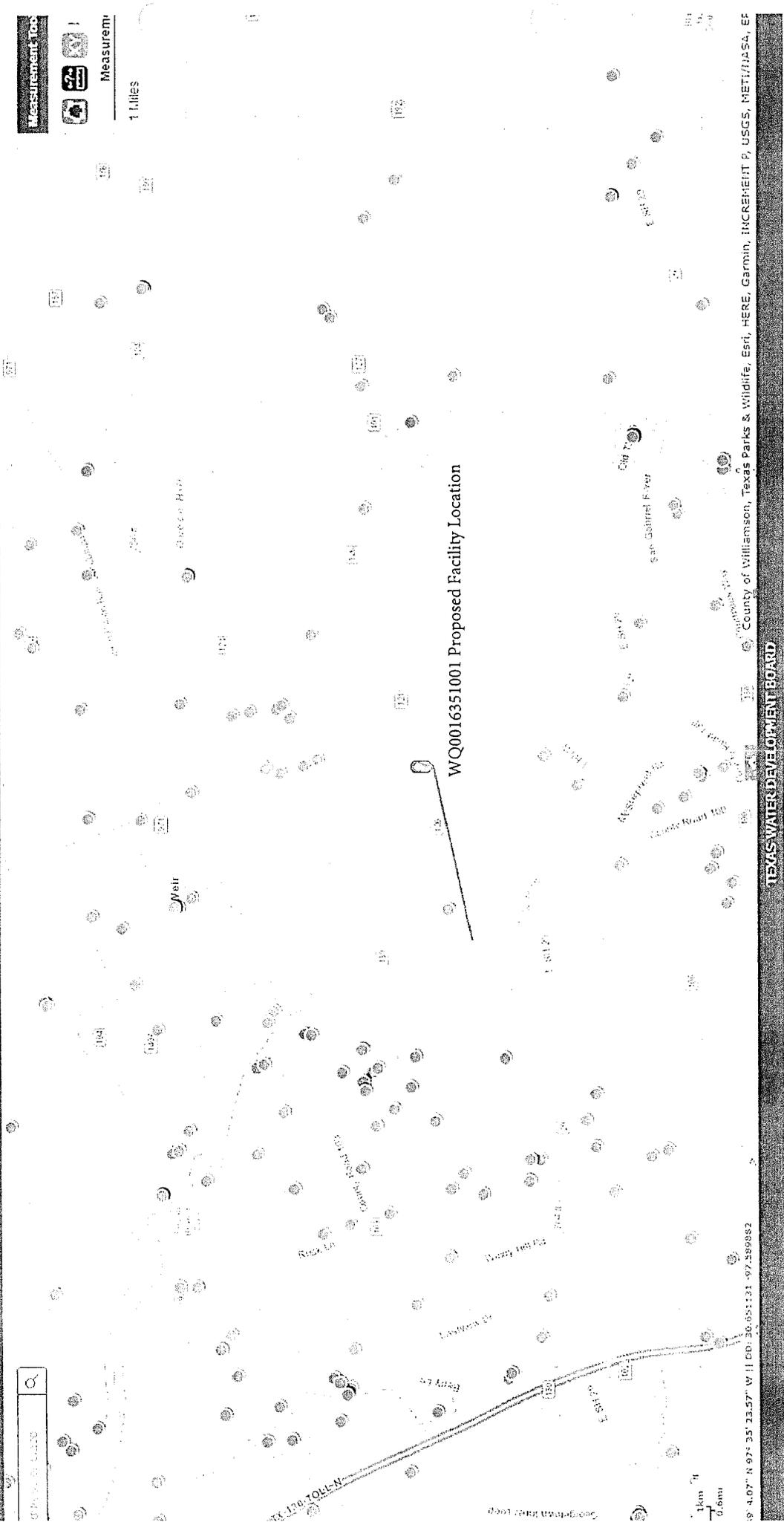


Attachment B-2

Measurement Tools

Measurement Tools

1 Miles



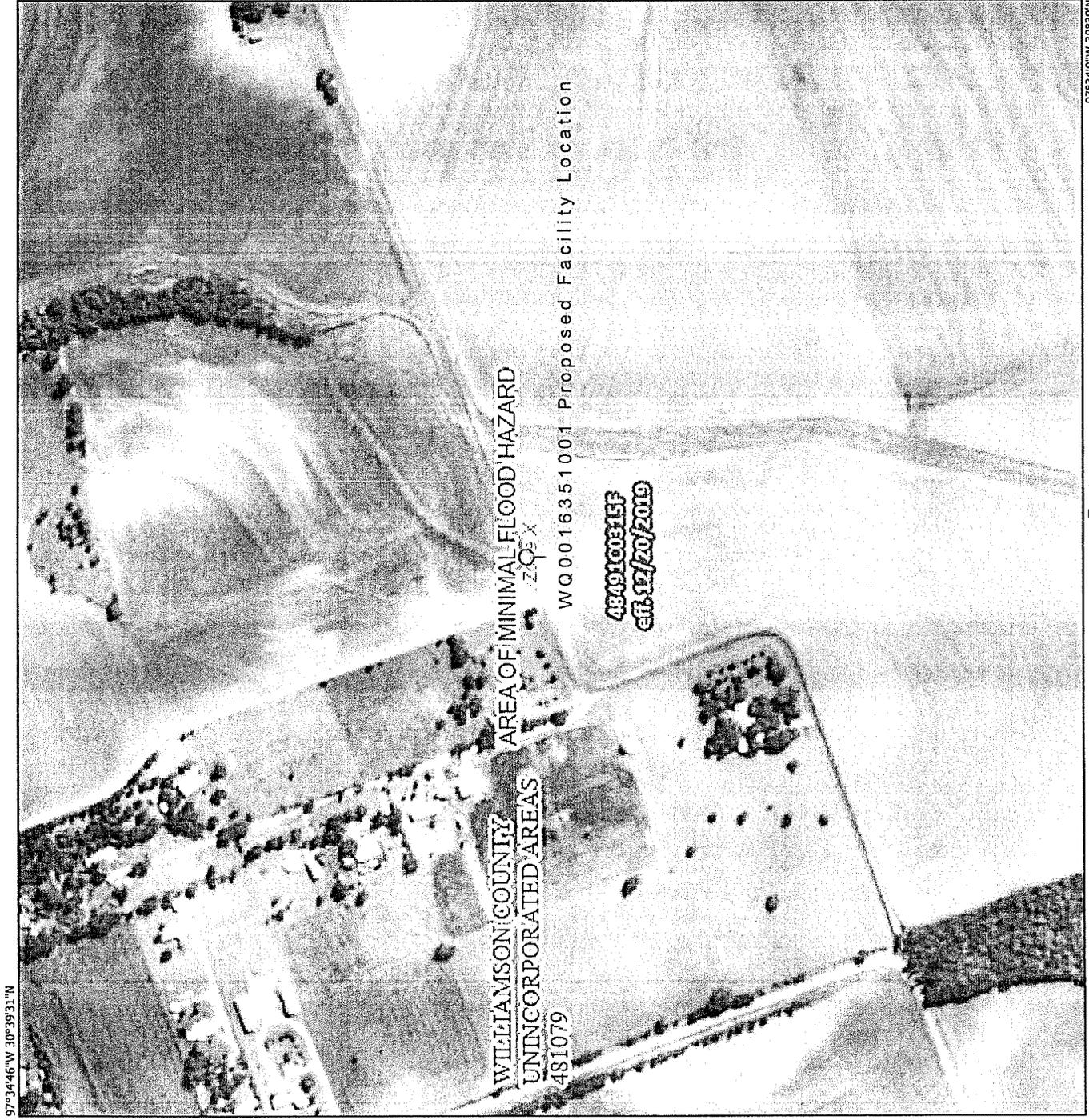
Attachment B-3

Attachment C

National Flood Hazard Layer FIRMette



97°34'46"W 30°39'31"N



97°34'9"W 30°39'N

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) <i>Zone A, V, A99</i>
	With BFE or Depth <i>Zone AE, AC, AH, VE, AR</i> Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD	0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile <i>Zone X</i> Future Conditions 1% Annual Chance Flood Hazard <i>Zone X</i>
	Area with Reduced Flood Risk due to Levee, See Notes, <i>Zone X</i> Area with Flood Risk due to Levee <i>Zone D</i>
OTHER AREAS	NO SCREEN Area of Minimal Flood Hazard <i>Zone X</i> Effective LOMRs
	Area of Undetermined Flood Hazard <i>Zone D</i>
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
MAP PANELS	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 FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR DRAFT PANEL LAYOUT

- SPECIAL FLOOD HAZARD AREAS**
- Without Base Flood Elevation (BFE) (21.4, 1.5)
 - With BFE or Depth (21.4, 1.5) (42, 20, 18, 20)
 - Regulatory Floodway
 - 0.2% Annual Chance Flood Hazard, Area of 1% Annual Chance Flood with average depth less than one foot with average or at least than one foot (19)
 - Future Conditions 1% Annual Chance Flood Hazard (19)
 - Area with Reduced Flood Risk due to Levee Site (19)
 - Area with Flood Risk due to Levee (19)
- OTHER AREAS OF FLOOD HAZARD**
- NO SCREEN Area of Minimal Flood Hazard (19)
 - Effective Levee
- OTHER AREAS**
- Area of Undetermined Flood Hazard (19)
- GENERAL STRUCTURES**
- Channel, Culvert, or Storm Sewer
 - Levee, Dike, or Floodwall
 - 25.1 Water Surface Elevation
 - 17.1 Water Surface Elevation
 - Coastal Flooding
 - Coastal Flooding
 - Public Sandbag
 - Hydrologic Feature
 - Base Flood Elevation Line (BFE)
- OTHER FEATURES**
- Limit of Study
 - Jurisdiction Boundary

NOTES TO USERS

For information and questions about this Flood Insurance Rate Map (FIRM), available products associated with the FIRM, available hazard warnings, the report map data file, or the FIRM panel layout, please contact the National Flood Insurance Program (NFIP) or general offices of the FEMA Map Information Center at 1-877-FEMA-MAP (3747) or visit the FEMA Map Information Center website at www.fema.gov. Available products may include previously issued Letters of Map Change, if Flood Insurance Study Reports are available for the area. Many of the products can be accessed or ordered directly from the website. Comments on mapping and adjacent FIRM panels must be submitted to the nearest panel of the subject panel or to the nearest FIRM office. This may be accessed directly from the Flood Map Service Center at the nearest flood office.

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

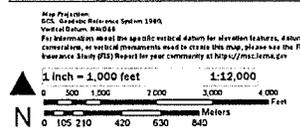
To determine if flood insurance is available in this community, contact your insurance agent or call the National Flood Insurance Program at 1-800-425-6842.

General information about the FIRM was provided in digital format by USDA, Farm Service Agency (FSA). This information was derived from FIRM, dated April 11, 2018.

This map was prepared from FEMA's National Flood Insurance Program (NFIP) on 12/29/2018. It is a digital map and does not include any other information, such as the NFIP, and a digital elevation map (DEM) or other data. For additional information, please see the Flood Insurance Study Report for this panel.

This map complies with FEMA's standards for the use of digital flood maps. It is not valid as described below. The National Flood Insurance Program (NFIP) is a federal program. This map may be used for the purpose of a flood insurance policy and other flood insurance purposes. Some panels may be updated to the most current data. Community information, FIRM panel number, and FIRM version date.

SCALE



FEMA
National Flood Insurance Program

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

WILLIAMSON COUNTY, TENNESSEE
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