

**TCEQ AIR QUALITY PERMIT NUMBERS: 140763, PSDTX1500M1, and
GHGPSDTX46M1; 19871, PSDTX1236M1, and GHGPSDTX221; 91780, PSDTX1240M1,
and GHGPSDTX223; 19200, PSDTX1237M1, and GHGPSDTX218; 19168,
PSDTX1226M1, and GHGPSDTX224; 107518, PSDTX1383M2, and GHGPSDTX48M1;
20203, PSDTX1224M1, and GHGPSDTX222; 40157, PSDTX1222M1, and
GHGPSDTX225; 19201, PSDTX1232M1, and GHGPSDTX219
TCEQ DOCKET NUMBER 2025-1160-AIR**

APPLICATION BY	§	BEFORE THE
FORMOSA PLASTICS CORPORATION,	§	
TEXAS	§	
POINT COMFORT PLANT	§	TEXAS COMMISSION ON
POINT COMFORT, CALHOUN	§	
COUNTY	§	ENVIRONMENTAL QUALITY

EXECUTIVE DIRECTOR’S BRIEF REGARDING AFFECTED PARTY DETERMINATION

The Executive Director of the Texas Commission on Environmental Quality (Executive Director) continues to recommend denying the hearing request of San Antonio Bay Estuarine Waterkeeper (Waterkeeper). Although they submitted timely comments on the application, the group has no identified member who would otherwise have standing to request a hearing in their own right. The Executive Director recommends denying the hearing request.

I. INTRODUCTION

The Executive Director files this Brief to further elaborate on and support the *Executive Director’s Response to Hearing Requests* and *Agenda Backup* filed with the TCEQ Office of the Chief Clerk (OCC) on September 15, 2025 and September 16, 2025, respectively. The Executive Director incorporates those filings by reference.

The Texas Clean Air Act (TCAA), Texas Health & Safety Code (THSC) § 382.056(n), requires the commission to consider hearing requests in accordance with the procedures provided in Texas Water Code (TWC) § 5.556.¹ This statute is implemented through the rules in 30 Texas Administrative Code (TAC) Chapter 55, Subchapter F.

The Executive Director’s Response to Public Comment (RTC), which was mailed by the chief clerk to all persons on the mailing list, is on file with OCC for the commission’s consideration. Attached to this Brief is the Map, previously filed in this matter, which shows the location of the proposed plant and the location of the residence of Ms. Diane Wilson, the named member of Waterkeeper subject to the pending contested case hearing request.

II. FACILITY DESCRIPTION

Formosa Plastics Corporation, Texas (Applicant or Formosa) has applied to TCEQ for amendment of New Source Review Authorizations under Texas Clean Air Act (TCAA), Texas Health & Safety Code (THSC) § 382.0518.

¹ Statutes cited in this response may be viewed online at www.statutes.legis.state.tx.us. Relevant statutes are found primarily in the THSC and the TWC. The rules in the TAC may be viewed online at www.sos.state.tx.us/tac/index.shtml or follow the “Rules” link on the TCEQ website at www.tceq.texas.gov.

The permit application seeks to authorize the Applicant to modify the Formosa Point Comfort Plant. The facility is located at 201 Formosa Drive, Point Comfort, Calhoun County. Contaminants authorized under these permits include carbon monoxide, nitrogen oxides, organic compounds, hazardous air pollutants, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, sulfur dioxide, and sulfuric acid mist.

III. PROCEDURAL BACKGROUND

This permit application is for a permit amendment of Air Quality Permit Numbers 140763, 19871, 91780, 19200, 19168, 107518, 20203, 40157, and 19201, modification to Prevention of Significant Deterioration (PSD) Air Quality Permit Numbers PSDTX1500M1, PSDTX1236M1, PSDTX1240M1, PSDTX1237M1, PSDTX1226M1, PSDTX1383M2, PSDTX1224M1, PSDTX1222M1, and PSDTX1232M1, modification to Greenhouse Gas (GHG) PSD Air Quality Permit Numbers GHGPSDTX46M1 and GHGPSDTX48M1 for emissions of GHGs, and issuance of GHG PSD Air Quality Permit Numbers GHGPSDTX221, GHGPSDTX223, GHGPSDTX218, GHGPSDTX224, GHGPSDTX222, GHGPSDTX225, and GHGPSDTX219 for emissions of GHGs. The permit application was received on June 7, 2024, and declared administratively complete on June 13, 2024. The Notice of Receipt and Intent to Obtain an Air Quality Permit (NORI, first public notice) for this permit application was published in English on June 29, 2024, in the *Orange Leader* and in Spanish on June 27, 2024, in *El Perico*. The Notice of Application and Preliminary Decision for an Air Quality Permit (NAPD, second public notice) was published on October 19, 2024, in English in the *Orange Leader* and on October 17, 2024, in Spanish in *El Perico*. Because this application was received after September 1, 2015, it is subject to the procedural requirements of and rules implementing Senate Bill 709 (84th Legislature, 2015).

The Executive Director's RTC was filed with the Chief Clerk's Office on April 24, 2025, and instructions to access the electronic RTC or request a hard copy were mailed to all interested persons on May 1, 2025, including those who asked to be placed on the mailing list for this application and those who submitted comments or requests for a contested case hearing. The cover letter attached to the RTC included information about making requests for a contested case hearing or for reconsideration of the Executive Director's decision.² The letter also explained that hearing requestors should specify any of the Executive Director's responses to comments they dispute and the factual basis of the dispute, in addition to listing any disputed issues of law or policy.

The time for requests for reconsideration and hearing requests ended on June 2, 2025. TCEQ received a timely hearing request from San Antonio Bay Estuarine Waterkeeper. TCEQ did not receive any requests for reconsideration.

IV. THE EVALUATION PROCESS FOR HEARING REQUESTS

House Bill 801 established statutory procedures for public participation in certain environmental permitting proceedings, specifically regarding public notice, public comment, and the commission's consideration of hearing requests. Senate Bill 709

² See TCEQ rules at Chapter 55, Subchapter F of Title 30 of the Texas Administrative Code. Procedural rules for public input to the permit process are found primarily in Chapters 39, 50, 55, and 80 of Title 30 of the Code.

revised the requirements for submitting public comment and the commission's consideration of hearing requests.

V. ANALYSIS OF THE HEARING REQUESTS

The Executive Director has analyzed the hearing requests to determine if the requestors qualify as affected persons, as laid out in detail below.

a. Requirement that Requestor be an Affected Person

In order to grant a contested case hearing, the commission must determine that a requestor is an "affected person." Section 55.203 sets out who may be considered an affected person.

- 1) 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 general public does not qualify as a personal justiciable interest.
- 2) Except as provided by 30 TAC § 55.103, governmental entities, including local governments and public agencies with authority under state law over issues raised by the application, may be considered affected persons.
- 3) In determining whether a person is an affected person, all factors shall be considered, including, but not limited to, the following:
 - i. whether the interest claimed is one protected by the law under which the application will be considered;
 - ii. distance restrictions or other limitations imposed by law on the affected interest;
 - iii. whether a reasonable relationship exists between the interest claimed and the activity regulated;
 - iv. likely impact of the regulated activity on the health and safety of the person, and on the use of property of the person;
 - v. impact of the regulated activity on use of the impacted natural resource by the person;
 - vi. for a hearing request on an application filed on or after September 1, 2015, whether the requestor timely submitted comments on the application which were not withdrawn; and
 - vii. for governmental entities, their statutory authority over or interest in the issues relevant to the application.

30 TAC § 55.203.

In regard specifically to air quality permits, the activity the commission regulates is the emissions of air contaminants into the atmosphere. Any person who plans to construct or modify a facility that may emit air contaminants must receive authorization from the commission. Commission rules also include a general prohibition against causing a nuisance. Further, for air quality permits, distance from the proposed facility is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person's interests. Because of air dispersion the concentrations of

individual air contaminants emitted from a facility and accordingly the likelihood of potential impact tend to decrease with distance. Moreover, TCEQ evaluates permit applications and issues permits that are designed to be compliant with air quality requirements for all ambient air, including air as close as the fence line of the facility.

For applications filed on or after September 1, 2015, 30 TAC § 55.201(d) allows the commission to 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 Executive Director; and
- 3) any other expert reports, affidavits, opinions, or data submitted by the Executive Director, the applicant, or a hearing requestor.

b. Groups and Associations

In addition to the requirements in 30 TAC § 55.201 and 30 TAC § 55.203, requests for a contested case hearing by a group or association, on an application filed on or after September 1, 2015, must meet the requirements in 30 TAC § 55.205(b). Specifically:

- 1) the group or association must have submitted timely comments on the application;
- 2) the request must identify, by name and physical address, one or more members of the group or association that would otherwise have standing to request a hearing in their own right;
- 3) the interests the group or association seeks to protect must be germane to the organization's purpose; and
- 4) the claim asserted or the relief requested may not require the participation of the individual members in the case.

c. Environmental Integrity Project on behalf of San Antonio Bay Estuarine Waterkeeper

1) Whether the group or association submitted timely comments on the application.

Colin Cox and Mariah Harrod, attorneys for Environmental Integrity Project, submitted separate hearing requests on behalf of Waterkeeper during the comment period. The issues raised in the hearing request were raised in the group's timely comments.

The Executive Director recommends that the commission find that Waterkeeper has met this requirement for associational standing.

2) Whether one or more members of the group or association would otherwise have standing to request a hearing in their own right.

Waterkeeper named a member of the group, Diane Wilson. Waterkeeper stated Ms. Wilson is concerned about the impact additional pollution from Formosa could have on her health when she is recreating in the waters and wetlands around Formosa's Plant, specifically raising concerns about increases in flaring. Waterkeeper stated Ms. Wilson spends time recreating in Lavaca Bay, including swimming, motorboating, and kayaking. Additionally, in connection with her work for Waterkeeper, Ms. Wilson visits Lavaca Bay to monitor pollution. Waterkeeper

additionally stated Ms. Wilson is concerned about the natural beauty resources of the area.

The Executive Director recommends that the commission determine that Ms. Wilson is not an affected person in her own right. In evaluating standing for an air permit application, the duration and location of the individual is key to the potential exposure of the individual to air contaminants. Intermittent time spent near the facility does not impact the presumption that the majority of Ms. Wilson's exposure would be associated with her personal residence. As shown on the map, Ms. Wilson resides almost 20 miles from the Formosa facility.³

Waterkeeper attempts to get around this by asserting that Ms. Wilson has recreational interests near the facility as well as a legal interest in enforcing a water quality-related Consent Decree⁴ for the site. Neither of these interests involve a frequency or duration to warrant granting affected party status. Ms. Wilson's recreational interests are intermittent, focused on water quality, common to those of the general public and unlikely to be impacted by the requested air permit application.⁵

Waterkeeper additionally argues that Ms. Wilson visits the areas around Formosa's property due to a Consent Decree against Formosa.⁶ The Consent Decree alleged violations that relate to water quality and not air quality, which is the subject of the permit at hand.⁷ The differing subject matter detracts from her personal justiciable interest. TCEQ is not a party to the Consent Decree; therefore, the Executive Director's response is based on the information provided by Waterkeeper regarding the Consent Decree. Waterkeeper's and Ms. Wilson's rights under the Consent Decree state "[p]laintiffs may request the opportunity to take the Remediation Consultant up Cox Creek or to Lavaca Bay to show areas of concern";⁸ however, the Consent Decree does not state that Ms. Wilson or Waterkeeper are exclusively allowed to visit these areas or monitor discharge – they just have to ability to work with Formosa to address the concerns subject to the Consent Decree.⁹ Additionally, although Ms. Wilson may visit¹⁰

³ 30 TAC § 55.203 provides a non-exhaustive list of factors to consider when determining affected party status. Included in these factors are "whether a reasonable relationship exists between the interest claimed and the activity regulated" and "likely impact of the regulated activity on the health and safety of the person, and on the use of property of the person." 30 TAC § 55.203. The location of the residence of a person requesting affected person status and the proposed activity is relevant in air applications due to the nature of ambient air. It is relevant to determine exposure risk, effect on property rights, and overall impact of activities authorized by an air permit authorization.

⁴ Consent Decree Between Formosa Plastics, San Antonio Bay Estuarine Waterkeeper, and Diane Wilson, No. 6:17-Cv-47, (Dec. 6, 2019) (hereinafter "Consent Decree"), Exhibit A of *San Antonio Bay Estuarine Waterkeeper's Reply to Responses to Hearing Request*, filed September 29, 2025 (hereinafter "Waterkeeper's Reply"), available at https://www14.tceq.texas.gov/epic/eCID/index.cfm?fuseaction=main.detail&item_id=166352492021351&detail=filing&StartRow=1&EndRow=1&Step=5.

⁵ The Executive Director does not dispute that Ms. Wilson spends time recreating in and around Lavaca Bay. However, the Executive Director is not aware of an *exclusive* personal right by Ms. Wilson to recreate in the area that her neighbors, members of the surrounding community, or even visitors do not have to recreate in Lavaca Bay and surrounding area.

⁶ Waterkeeper's Reply, 8-10.

⁷ See *generally*, Consent Decree.

⁸ Consent Decree at 41(e).

⁹ *Id.*

¹⁰ Waterkeeper states on page 10 of Waterkeeper's Reply: "Since 2016, Ms. Wilson has visited these waters to look for plastic pellets at Formosa's wastewater and stormwater outfalls—each around 0.15 miles from the Plant's boundaries—by kayak, motorboat, or on foot at least once every few weeks, often more

these areas under the Consent Decree, she is not required to spend any specified amount of time visiting areas that may be near Formosa.¹¹ Ms. Wilson resides over 20 miles¹² from Formosa's property, therefore, Ms. Wilson's health and use of natural resources are not likely to be impacted if these permit amendments are authorized. In the absence of sustained and consistent time spent by Ms. Wilson near the plant that may be analogized to a regular job or living in the area, Waterkeeper has failed to establish that Ms. Wilson would be affected differently than the general public. Although Ms. Wilson may choose to put herself in close proximity to the Formosa property on average once every few weeks, that still does not rise to the level of sustained regular contact that would give her a personable justiciable interest different than that of the general public.

Additionally, Waterkeeper argues that Ms. Wilson and Waterkeeper have the right to meet with Formosa officials and discuss issues subject to the Consent Decree on Formosa's property.¹³ These visits appear to be intermittent and irregular and, again, do not rise to a level that would support a claim of a sustained and consistent exposure different than that of the general public.¹⁴ Generally, Ms. Wilson's ability to be present on Formosa's property for an unspecified number of visits does not support a contention that she would be an affected person entitled to request a contested case hearing on this permit application.

Therefore, based on the arguments stated above, Ms. Wilson should not be considered an affected person. Accordingly, the Executive Director recommends that the commission find that San Antonio Bay Estuarine Waterkeeper has not met this requirement for associational standing.

3) Whether the interests the group or association seeks to protect are germane to the organization's purpose.

San Antonio Bay Estuarine Waterkeeper is a volunteer-run community organization that is a local affiliate of the national Waterkeeper Alliance. San Antonio Bay Estuarine Waterkeeper's mission is to protect Lavaca Bay, Cox Bay, Keller Bay, Chocolate Bay, Matagorda Bay, San Antonio Bay, and Espiritu Santo Bay and to educate the public about these ecologically important estuarine systems to ensure clean, healthy natural resources for public health and wildlife. San Antonio Bay Estuarine Waterkeeper also promotes the preservation of local wetlands and waterways for recreational uses and promotes appreciation and restoration of these areas.

Accordingly, the Executive Director recommends that the Commission find that San Antonio Bay Estuarine Waterkeeper has met this requirement for associational standing.

frequently, and for approximately four to six hours per visit." Waterkeeper then states on page 17 of Waterkeeper's Reply: "Since 2016, Ms. Wilson has thus been within 0.15 miles of Formosa approximately 450 times." Based off this information, Ms. Wilson appears to visit the area, on average, once a week to once every few weeks.

¹¹ See generally, Consent Decree.

¹² See attached map.

¹³ Waterkeeper Reply, at 9-10.

¹⁴ See Waterkeeper Reply, at 9-10 (explaining Ms. Wilson had a visit on Formosa property "a few months ago" and had another visit scheduled "in two weeks." Waterkeeper Reply, at 9-10.)

4) Whether the claim asserted or the relief requested requires the participation of the individual members in the case.

The relief requested by Waterkeeper does not require the participation of any individual member of Waterkeeper. Thus, the Executive Director has determined that San Antonio Bay Estuarine Waterkeeper has met this requirement for associational standing.

Because San Antonio Bay Estuarine Waterkeeper has not met all four requirements for associational standing, the Executive Director recommends the commission find that San Antonio Bay Estuarine Waterkeeper is not an affected person.

VI. CONCLUSION

The Executive Director respectfully recommends the commission:

- 1) Find all hearing requests in this matter were timely filed; and
- 2) Find that San Antonio Bay Estuarine Waterkeeper is not an affected person as a matter of law and deny their hearing request.
- 3) If referred to SOAH, first refer the matter to Alternative Dispute Resolution for a reasonable period.
- 4) If referred to SOAH, the Executive Director recommends 180 days be the duration of the hearing.

Respectfully submitted,

Kelly Keel, Executive Director

Phillip Ledbetter, Director
Office of Legal Services

Charmaine K. Backens, Deputy Director
Environmental Law Division

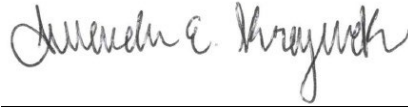


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REPRESENTING THE
EXECUTIVE DIRECTOR OF THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

CERTIFICATE OF SERVICE

I certify that on this 17th day of October, 2025, a true and correct copy of the “Executive Director’s Brief Regarding Affected Party Determination” was served on all persons on the mailing list by the undersigned via electronic filing, electronic mail, facsimile transmission, inter-agency mail, electronic submittal, or by deposit in the U.S. Mail.

A handwritten signature in black ink, appearing to read "Amanda E. Kraynok". The signature is fluid and cursive, with the first name "Amanda" being more prominent.

Amanda Kraynok, Staff Attorney
Environmental Law Division

Formosa Plastics Corporation - 140763, et al.

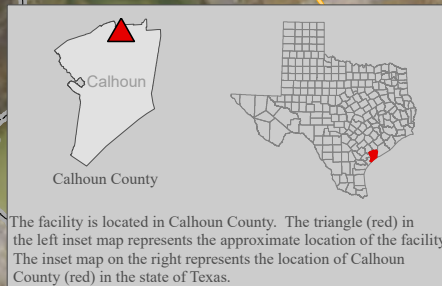
Map Requested by TCEQ Office of Legal Services
for Commissioners' Agenda



*Protecting Texas by
Reducing and
Preventing Pollution*

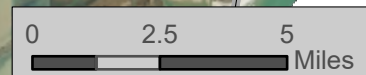
Texas Commission on Environmental Quality
GIS Team (Mail Code 197)
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Date: 6/4/2025
CRF 0123781
Cartographer: RKukushk

- Emission Points (EPNs)
- Requestor: Diane Wilson
- 1.5 miles from EPNs
- 1 mile from EPNs
- 0.5 miles from EPNs
- Highway
- Intermediate Roads
- County Boundary



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

Diane Wilson



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

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

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TCEQ Docket No. 2025-1160-AIR;

Air Permit Nos. 140763, PSDTX1500M1, and GHGPSDTX46M1; 19871, PSDTX1236M1, and GHGPSDTX221; 91780, PSDTX1240M1, and GHGPSDTX223; 19200, PSDTX1237M1, and GHGPSDTX218; 19168, PSDTX1226M1, and GHGPSDTX224; 107518, PSDTX1383M2, and GHGPSDTX48M1; 20203, PSDTX1224M1, and GHGPSDTX222; 40157, PSDTX1222M1, and GHGPSDTX225; 19201, PSDTX1232M1, and GHGPSDTX219

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