

CONTRIBUTING ZONE APPLICATION
MODIFICATION OF PREVIOUSLY APPROVED CONTRIBUTING ZONE
PLAN

Submitted Per Agreed Order EAPP ID No. 11003420

Docket No. 2024-1217-MLM-E, Enforcement Case No. 66025

W.S. Campus Holdings LLC - RN 111359683

Prepared For:

*WS Campus Holdings LLC
1275 CR 233
Florence, TX 76527*

Prepared By:



Elizabeth Mack, Senior Project Consultant
18 Timberline Drive
Round Rock, TX 78665
512-656-7518 direct
512-774-5146 office
lizzie@featherandmane.com

Submitted: June 13, 2025
Revision Submitted: October 8, 2025

Texas Commission on Environmental Quality

Edwards Aquifer Application Cover Page

Our Review of Your Application

The Edwards Aquifer Program staff conduct an administrative and technical review of all applications. The turnaround time for administrative review can be up to 30 days as outlined in 30 TAC 213.4(e). Generally administrative completeness is determined during the intake meeting or within a few days of receipt. The turnaround time for technical review of an administratively complete Edwards Aquifer application is 90 days as outlined in 30 TAC 213.4(e). Please know that the review and approval time is directly impacted by the quality and completeness of the initial application that is received. In order to conduct a timely review, it is imperative that the information provided in an Edwards Aquifer application includes final plans, be accurate, complete, and in compliance with [30 TAC 213](#).

Administrative Review

1. [Edwards Aquifer applications](#) must be deemed administratively complete before a technical review can begin. To be considered administratively complete, the application must contain completed forms and attachments, provide the requested information, and meet all the site plan requirements. The submitted application and plan sheets should be final plans. Please submit one full-size set of plan sheets with the original application, and half-size sets with the additional copies.

To ensure that all applicable documents are included in the application, the program has developed tools to guide you and web pages to provide all forms, checklists, and guidance. Please visit the website below for assistance: <http://www.tceq.texas.gov/field/eapp>.

2. This Edwards Aquifer Application Cover Page form (certified by the applicant or agent) must be included in the application and brought to the administrative review meeting.
3. Administrative reviews are scheduled with program staff who will conduct the review. Applicants or their authorized agent should call the appropriate regional office, according to the county in which the project is located, to schedule a review. The average meeting time is one hour.
4. In the meeting, the application is examined for administrative completeness. Deficiencies will be noted by staff and emailed or faxed to the applicant and authorized agent at the end of the meeting, or shortly after. Administrative deficiencies will cause the application to be deemed incomplete and returned.

An appointment should be made to resubmit the application. The application is re-examined to ensure all deficiencies are resolved. The application will only be deemed administratively complete when all administrative deficiencies are addressed.

5. If an application is received by mail, courier service, or otherwise submitted without a review meeting, the administrative review will be conducted within 30 days. The applicant and agent will be contacted with the results of the administrative review. If the application is found to be administratively incomplete, it can be retrieved from the regional office or returned by regular mail. If returned by mail, the regional office may require arrangements for return shipping.
6. If the geologic assessment was completed before October 1, 2004 and the site contains “possibly sensitive” features, the assessment must be updated in accordance with the *Instructions to Geologists* (TCEQ-0585 Instructions).

Technical Review

1. When an application is deemed administratively complete, the technical review period begins. The regional office will distribute copies of the application to the identified affected city, county, and groundwater conservation district whose jurisdiction includes the subject site. These entities and the public have 30 days to provide comments on the application to the regional office. All comments received are reviewed by TCEQ.
2. A site assessment is usually conducted as part of the technical review, to evaluate the geologic assessment and observe existing site conditions. The site must be accessible to our staff. The site boundaries should be

clearly marked, features identified in the geologic assessment should be flagged, roadways marked and the alignment of the Sewage Collection System and manholes should be staked at the time the application is submitted. If the site is not marked the application may be returned.

3. We evaluate the application for technical completeness and contact the applicant and agent via Notice of Deficiency (NOD) to request additional information and identify technical deficiencies. There are two deficiency response periods available to the applicant. There are 14 days to resolve deficiencies noted in the first NOD. If a second NOD is issued, there is an additional 14 days to resolve deficiencies. If the response to the second notice is not received, is incomplete or inadequate, or provides new information that is incomplete or inadequate, the application must be withdrawn or will be denied. Please note that because the technical review is underway, whether the application is withdrawn or denied **the application fee will be forfeited**.
4. The program has 90 calendar days to complete the technical review of the application. If the application is technically adequate, such that it complies with the Edwards Aquifer rules, and is protective of the Edwards Aquifer during and after construction, an approval letter will be issued. Construction or other regulated activity may not begin until an approval is issued.

Mid-Review Modifications

It is important to have final site plans prior to beginning the permitting process with TCEQ to avoid delays.

Occasionally, circumstances arise where you may have significant design and/or site plan changes after your Edwards Aquifer application has been deemed administratively complete by TCEQ. This is considered a “Mid-Review Modification”. Mid-Review Modifications may require redistribution of an application that includes the proposed modifications for public comment.

If you are proposing a Mid-Review Modification, two options are available:

- If the technical review has begun your application can be denied/withdrawn, your fees will be forfeited, and the plan will have to be resubmitted.
- TCEQ can continue the technical review of the application as it was submitted, and a modification application can be submitted at a later time.

If the application is denied/withdrawn, the resubmitted application will be subject to the administrative and technical review processes and will be treated as a new application. The application will be redistributed to the affected jurisdictions.

Please contact the regional office if you have questions. If your project is located in Williamson, Travis, or Hays County, contact TCEQ’s Austin Regional Office at 512-339-2929. If your project is in Comal, Bexar, Medina, Uvalde, or Kinney County, contact TCEQ’s San Antonio Regional Office at 210-490-3096

Please fill out all required fields below and submit with your application.

1. Regulated Entity Name: WS Campus - Staccato					2. Regulated Entity No.: RN111359683				
3. Customer Name: WS Campus Holdings					4. Customer No.: CN605947324				
5. Project Type: (Please circle/check one)	New	Modification			Extension	Exception			
6. Plan Type: (Please circle/check one)	WPAP	CZP	SCS	UST	AST	EXP	EXT	Technical Clarification	Optional Enhanced Measures
7. Land Use: (Please circle/check one)	Residential	Non-residential				8. Site (acres):		55.53	
9. Application Fee:	\$8,000	10. Permanent BMP(s):				Vegetative Filter Strips, Grassy Swales			
11. SCS (Linear Ft.):	N/A	12. AST/UST (No. Tanks):				N/A			
13. County:	Williamson	14. Watershed:				South Salado Creek			

Application Distribution

Instructions: Use the table below to determine the number of applications required. One original and one copy of the application, plus additional copies (as needed) for each affected incorporated city, county, and groundwater conservation district are required. Linear projects or large projects, which cross into multiple jurisdictions, can require additional copies. Refer to the “Texas Groundwater Conservation Districts within the EAPP Boundaries” map found at:

http://www.tceq.texas.gov/assets/public/compliance/field_ops/eapp/EAPP%20GWCD%20map.pdf

For more detailed boundaries, please contact the conservation district directly.

Austin Region			
County:	Hays	Travis	Williamson
Original (1 req.)	—	—	<u> X </u>
Region (1 req.)	—	—	<u> X </u>
County(ies)	—	—	<u> X </u>
Groundwater Conservation District(s)	<u> </u> Edwards Aquifer Authority <u> </u> Barton Springs/ Edwards Aquifer <u> </u> Hays Trinity <u> </u> Plum Creek	<u> </u> Barton Springs/ Edwards Aquifer	NA
City(ies) Jurisdiction	<u> </u> Austin <u> </u> Buda <u> </u> Dripping Springs <u> </u> Kyle <u> </u> Mountain City <u> </u> San Marcos <u> </u> Wimberley <u> </u> Woodcreek	<u> </u> Austin <u> </u> Bee Cave <u> </u> Pflugerville <u> </u> Rollingwood <u> </u> Round Rock <u> </u> Sunset Valley <u> </u> West Lake Hills	<u> </u> Austin <u> </u> Cedar Park <u> </u> Florence <u> </u> Georgetown <u> </u> Jerrell <u> </u> Leander <u> </u> Liberty Hill <u> </u> Pflugerville <u> </u> Round Rock

San Antonio Region					
County:	Bexar	Comal	Kinney	Medina	Uvalde
Original (1 req.)	—	—	—	—	—
Region (1 req.)	—	—	—	—	—
County(ies)	—	—	—	—	—
Groundwater Conservation District(s)	<u> </u> Edwards Aquifer Authority <u> </u> Trinity-Glen Rose	<u> </u> Edwards Aquifer Authority	<u> </u> Kinney	<u> </u> EAA <u> </u> Medina	<u> </u> EAA <u> </u> Uvalde
City(ies) Jurisdiction	<u> </u> Castle Hills <u> </u> Fair Oaks Ranch <u> </u> Helotes <u> </u> Hill Country Village <u> </u> Hollywood Park <u> </u> San Antonio (SAWS) <u> </u> Shavano Park	<u> </u> Bulverde <u> </u> Fair Oaks Ranch <u> </u> Garden Ridge <u> </u> New Braunfels <u> </u> Schertz	NA	<u> </u> San Antonio ETJ (SAWS)	NA

I certify that to the best of my knowledge, that the application is complete and accurate. This application is hereby submitted to TCEQ for administrative review and technical review.

JOHN MESSER

Print Name of Customer

Signature of Customer

Date: June 13, 2025

****FOR TCEQ INTERNAL USE ONLY****

Date(s) Reviewed:		Date Administratively Complete:	
Received From:		Correct Number of Copies:	
Received By:		Distribution Date:	
EAPP File Number:		Complex:	
Admin. Review(s) (No.):		No. AR Rounds:	
Delinquent Fees (Y/N):		Review Time Spent:	
Lat./Long. Verified:		SOS Customer Verification:	
Agent Authorization Complete/Notarized (Y/N):		Fee Check:	Payable to TCEQ (Y/N):
Core Data Form Complete (Y/N):			Signed (Y/N):
Core Data Form Incomplete Nos.:			Less than 90 days old (Y/N):

TABLE OF CONTENTS

Modification of a Previously Approved Plan

- I. Modification of a Previously Approved Contributing Zone Plan form with Attachments (TCEQ-10259)**
- II. Contributing Zone Plan Application (TCEQ-10257)**
- III. SWPPP or Temporary Stormwater Section (TCEQ-0602)**
- IV. Copy of Notice of Intent (NOI)**
- V. Agent Authorization Forms (TCEQ-0599)**
- VI. Application Fee Form (TCEQ-0574)**
- VII. Core Data Form (TCEQ-10400)**

Section I

Modification of a Previously Approved Contributing Zone Plan Form with Attachments A-C (TCEQ-10259)

Modification of a Previously Approved Plan

Texas Commission on Environmental Quality

for Regulated Activities on the Edwards Aquifer Recharge Zone and Transition Zone and Relating to 30 TAC 213.4(j), Effective June 1, 1999

To ensure that the application is administratively complete, confirm that all fields in the form are complete, verify that all requested information is provided, consistently reference the same site and contact person in all forms in the application, and ensure forms are signed by the appropriate party.

Note: Including all the information requested in the form and attachments contributes to more streamlined technical reviews.

Signature

To the best of my knowledge, the responses to this form accurately reflect all information requested concerning the proposed regulated activities and methods to protect the Edwards Aquifer. This request for a **Modification of a Previously Approved Plan** is hereby submitted for TCEQ review and executive director approval. The request was prepared by:

Print Name of Customer/John Messer

Date: June 13, 2025

Signature of Customer:



Project Information

1. Current Regulated Entity Name: WS Holdings Campus LLC
Original Regulated Entity Name: Staccato
Regulated Entity Number(s) (RN): RN111359683
Edwards Aquifer Protection Program ID Number(s): 11003420/11002735/11003376
☒ The applicant has not changed and the Customer Number (CN) is: CN605947324
☐ The applicant or Regulated Entity has changed. A new Core Data Form has been provided.
2. ☒ **Attachment A: Original Approval Letter and Approved Modification Letters.** A copy of the original approval letter and copies of any modification approval letters are attached.

3. A modification of a previously approved plan is requested for (check all that apply):

- ☐ Physical or operational modification of any water pollution abatement structure(s) including but not limited to ponds, dams, berms, sewage treatment plants, and diversionary structures;
- ☐ Change in the nature or character of the regulated activity from that which was originally approved or a change which would significantly impact the ability of the plan to prevent pollution of the Edwards Aquifer;

XX Development of land previously identified as undeveloped in the original water pollution abatement plan

- ☐ Physical modification of the approved organized sewage collection system;
- ☐ Physical modification of the approved underground storage tank system;
- ☐ Physical modification of the approved aboveground storage tank system.

4. ☒ Summary of Proposed Modifications (select plan type being modified). If the approved plan has been modified more than once, copy the appropriate table below, as necessary, and complete the information for each additional modification.

TABLE 1: PLAN MODIFICATION No. 1 (APPROVED 04/21/2023 - #11003420)

<i>WPAP Modification</i>	<i>Approved Project</i>	<i>Proposed Modification</i>
<i>Summary</i>		
Acres	<u>41.22</u>	<u>50.6002</u>
Type of Development	<u>Manufacturing</u>	<u>Manuf./ Shooting Range</u>
Number of Residential Lots	<u>0</u>	<u>0</u>
Impervious Cover (acres)	<u>6.584</u>	<u>8.464</u>
Impervious Cover (%)	<u>15.97</u>	<u>16.73</u>
Permanent BMPs	<u>VFS, GS</u>	<u>VFS, GS</u>
Other	<u> </u>	<u> </u>
<i>SCS Modification</i>	<i>Approved Project</i>	<i>Proposed Modification</i>
<i>Summary</i>		
Linear Feet	<u>n/a</u>	<u>n/a</u>
Pipe Diameter	<u>n/a</u>	<u>n/a</u>
Other	<u>n/a</u>	<u>n/a</u>

TABLE 2: PROPOSED PLAN MODIFICATION NO. 2 (REQUESTED APPROVAL)

<i>WPAP Modification Summary</i>	<i>Approved Project</i>	<i>Proposed Modification</i>
Acres	<u>50.60</u>	<u>55.53</u>
Type of Development	<u>Manuf/Shooting Range</u>	<u>Manuf./Shooting Range</u>
Number of Residential Lots	<u>0</u>	<u>0</u>
Impervious Cover (acres)	<u>8.464</u>	<u>13.39 (new 4.93)</u>
Impervious Cover (%)	<u>16.73</u>	<u>25.35</u>
Permanent BMPs	<u>VFS, GS</u>	<u>VFS, GS</u>
Other	_____	_____
<i>SCS Modification Summary</i>	<i>Approved Project</i>	<i>Proposed Modification</i>
Linear Feet	<u>n/a</u>	<u>n/a</u>
Pipe Diameter	<u>n/a</u>	<u>n/a</u>
Other	<u>n/a</u>	<u>n/a</u>
<i>AST Modification</i>	<i>Approved Project</i>	<i>Proposed Modification</i>
Number of ASTs	<u>0</u>	<u>0</u>
Volume of ASTs	<u>0</u>	<u>0</u>
Other	_____	_____
<i>UST Modification</i>	<i>Approved Project</i>	<i>Proposed Modification</i>
Number of USTs	0	0
Volume of USTs	0	0
Other	0	0

5. ☒ **Attachment B: Narrative of Proposed Modification.** A detailed narrative description of the nature of the proposed modification is attached. It discusses what was approved, including any previous modifications, and how this proposed modification will change the approved plan.
6. ☒ **Attachment C: Current Site Plan of the Approved Project.** A current site plan showing the existing site development (i.e., current site layout) at the time this application for modification is attached. A site plan detailing the changes proposed in the submitted modification is required elsewhere.
- ☐ The approved construction has not commenced. The original approval letter and any subsequent modification approval letters are included as Attachment A to document that the approval has not expired.
- ☐ The approved construction has commenced and has been completed. Attachment C illustrates that the site was constructed as approved.
- ☒ **The approved construction has commenced and has been completed. Attachment C illustrates that the site was constructed with additional ranges not approved by TCEQ.**
- ☐ The approved construction has commenced and has **not** been completed.
Attachment C illustrates that, thus far, the site was constructed as approved.
- ☐ The approved construction has commenced and has **not** been completed.
Attachment C illustrates that, thus far, the site was **not** constructed as approved.
7. ☐ The acreage of the approved plan has increased. A Geologic Assessment has been provided for the new acreage.
- ☒ Acreage has not been added to or removed from the approved plan.
8. ☒ Submit one (1) original and one (1) copy of the application, plus additional copies as needed for each affected incorporated city, groundwater conservation district, and county in which the project will be located. The TCEQ will distribute the additional copies to these jurisdictions. The copies must be submitted to the appropriate regional office.

ATTACHMENT A

Original Approval Letter and Approved Modification Letters

1. EA application #1 submitted 10/21/21
 - a. Project Name – Staccato
 - b. Program ID# 11002735
 - c. RN111359683
 - d. Regulated Entity Name: WS CAMPUS STACCATO
 - e. Issue Date – 2/4/22

2. EA application #2 submitted 12/5/22
 - a. Project Name – WS Campus Private Roads
 - b. Program ID# 11003376
 - c. RN111359683
 - d. Regulated Entity Name: WS CAMPUS HOLDINGS LLC
 - e. Issue Date - 3/3/23

3. EA application #3 submitted 12/21/22
 - a. Project Name – WS Campus Staccato
 - b. Program ID #11003420
 - c. RN111359683
 - d. Regulated Entity Name: WS CAMPUS HOLDINGS LLC
 - e. Issue Date – 4/21/23
 - f. This application was submitted to *increase the project area of CZP #11002735*.
New EA # to the project.

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 4, 2022

Mr. Sal Siino

WS Campus Holdings LLC
1999 Bryan Street, Suite 900

Dallas, Texas 75201

Re: Edwards Aquifer, Williamson County

NAME OF PROJECT: Staccato; Located south side of CR233, approximately 3.9 miles east of CR233 and Highway 195 intersection; Williamson County, Texas

TYPE OF PLAN: Request for Approval of a Contributing Zone Plan (CZP); 30 Texas Administrative Code (TAC) Chapter 213 Subchapter B Edwards Aquifer, Regulated Entity No. RN111359683; Additional Program ID No. 11002735

Dear Mr. Siino:

The Texas Commission on Environmental Quality (TCEQ) has completed its review of the CZP application for the above-referenced project submitted to the Austin Regional Office by JAB Engineering, LLC on behalf of WS Campus Holdings, LLC on October 21, 2021. Final review of the CZP was completed after additional material was received on January 18, 2022, and February 2, 2022. As presented to the TCEQ, the Temporary and Permanent Best Management Practices (BMPs) were selected, and construction plans were prepared by a Texas Licensed Professional Engineer to be in general compliance with the requirements of 30 TAC Chapter

213. These planning materials were sealed, signed and dated by a Texas Licensed Professional Engineer. Therefore, based on the engineer's concurrence of compliance, the planning materials for construction of the proposed project and pollution abatement measures are hereby approved subject to applicable state rules and the conditions in this letter. The applicant or a person affected may file with the chief clerk a motion for reconsideration of the executive director's final action on this Edwards Aquifer Protection Plan. A motion for reconsideration must be filed no later than 23 days after the date of this approval letter. *This approval expires two (2) years from the date of this letter unless, prior to the expiration date, more than 10 percent of the construction has commenced on the project or an extension of time has been requested.*

PROJECT DESCRIPTION

The proposed commercial project will have an area of approximately 41.22 acres. It will include construction of one manufacturing/assembly building, one office building, two storage buildings, associated parking, utility extensions, and ancillary improvements. The impervious cover will be 6.602 acres (16.02 percent). According to a letter dated September 22, 2021, signed by Chad Winkler, OS, with Williamson County, the site in the development is acceptable for the use of on-site sewage facilities.

TCEQ Region 11 • P.O. Box 13087 • Austin, Texas 78711-3087 • 512-339-2929 • Fax 512-339-3795

Austin Headquarters: 512-239-1000 • tceq.texas.gov • How is our customer service? tceq.texas.gov/customersurvey

February 4, 2022

PERMANENT POLLUTION ABATEMENT MEASURES

To prevent the pollution of stormwater runoff originating on-site or upgradient of the site and potentially flowing across and off the site after construction, engineered vegetated filter strips (VFS) in series with grassy swales, and grassy swales (GS), designed using the TCEQ technical guidance document, Complying with the Edwards Aquifer Rules: Technical Guidance on Best Management Practices (2005), will be constructed to treat stormwater runoff. The required total suspended solids (TSS) treatment for this project is 5,746 pounds of TSS generated from the 6.602 acres of impervious cover. The approved measures meet the required 80 percent removal of the increased load in TSS caused by the project.

The individual treatment measures will consist of VFS along drives and parking lots for initial treatment with runoff from VFS draining to one of two GS. Areas in four drainage areas not initially treated by VFS all drain to and are treated by flow through the GS.

SPECIAL CONDITIONS

- I. All permanent pollution abatement measures shall be operational prior to occupancy of the facility.
- II. Regulated activities identified during the site assessment investigation constitute construction without the prior approval of the Contributing Zone Plan as required by Commission rules (30 TAC Chapter 213). Therefore, the applicant is hereby advised that the after-the-fact approval of the development, as provided by this letter, shall not absolve the applicant of any prior violations of Commission rules related to this project, and shall not necessarily preclude the Commission from pursuing appropriate enforcement actions and administrative penalties associated with such violations, as provided in 30 TAC §213.10 of Commission rules.

STANDARD CONDITIONS

1. Pursuant to Chapter 7 Subchapter C of the Texas Water Code, any violations of the requirements in 30 TAC Chapter 213 may result in administrative penalties.
2. The holder of the approved Edwards Aquifer protection plan must comply with all provisions of 30 TAC Chapter 213 and all best management practices and measures contained in the approved plan. Additional and separate approvals, permits, registrations and/or authorizations from other TCEQ Programs (i.e., Stormwater, Water Rights, UIC) can be required depending on the specifics of the plan.
3. In addition to the rules of the Commission, the applicant may also be required to comply with state and local ordinances and regulations providing for the protection of water quality.

Prior to Commencement of Construction:

4. All contractors conducting regulated activities at the referenced project location shall be provided a copy of this notice of approval. At least one complete copy of the approved Contributing Zone Plan and this notice of approval shall be maintained at the project location until all regulated activities are completed.
5. Any modification to the activities described in the referenced CZP application following the date of approval may require the submittal of a plan to modify this approval, including the payment of appropriate fees and all information necessary for its review and approval prior to initiating construction of the modifications.
6. The applicant must provide written notification of intent to commence construction, replacement, or rehabilitation of the referenced project. Notification must be submitted to the Austin Regional Office no later than 48 hours prior to commencement of the regulated activity. Written notification must include the name of the approved plan and file number for the regulated activity, the date on which the regulated activity will commence, and the name of the prime contractor with the name and telephone number of the contact person.

7. Temporary erosion and sedimentation (E&S) controls, i.e., silt fences, rock berms, stabilized construction entrances, or other controls described in the approved Storm Water Pollution Prevention Plan (SWPPP) must be installed prior to construction and maintained during construction. Temporary E&S controls may be removed when vegetation is established and the construction area is stabilized. If a water quality pond is proposed, it shall be used as a sedimentation basin during construction. The TCEQ may monitor stormwater discharges from the site to evaluate the adequacy of temporary E&S control measures. Additional controls may be necessary if excessive solids are being discharged from the site.

During Construction:

8. During the course of regulated activities related to this project, the applicant or his agent shall comply with all applicable provisions of 30 TAC Chapter 213, Edwards Aquifer. The applicant shall remain responsible for the provisions and conditions of this approval until such responsibility is legally transferred to another person or entity.
9. If sediment escapes the construction site, the sediment must be removed at a frequency sufficient to minimize offsite impacts to water quality (e.g., fugitive sediment in street being washed into surface streams or sensitive features by the next rain). Sediment must be removed from sediment traps or sedimentation ponds not later than when design capacity has been significantly reduced. Litter, construction debris, and construction chemicals exposed to stormwater shall be prevented from becoming a pollutant source for stormwater discharges (e.g., screening outfalls, picked up daily).
10. Intentional discharges of sediment laden water are not allowed. If dewatering becomes necessary, the discharge will be filtered through appropriately selected best management practices. These may include vegetated filter strips, sediment traps, rock berms, silt fence rings, etc.
11. The following records shall be maintained and made available to the executive director upon request: the dates when major grading activities occur, the dates when construction activities temporarily or permanently cease on a portion of the site, and the dates when stabilization measures are initiated.
12. Stabilization measures shall be initiated as soon as practicable in portions of the site where construction activities have temporarily or permanently ceased, and construction activities will not resume within 21 days. When the initiation of stabilization measures by the 14th day is precluded by weather conditions, stabilization measures shall be initiated as soon as practicable.
13. This approval does not authorize the installation of temporary aboveground storage tanks on this project. If the contractor desires to install a temporary aboveground storage tank for use during construction, an application to modify this approval must be submitted and approved prior to installation. The application must include information related to tank location and spill containment. Refer to Standard Condition No. 5, above.

After Completion of Construction:

14. Owners of permanent BMPs and measures must insure that the BMPs and measures are constructed and function as designed. A Texas Licensed Professional Engineer must certify in writing that the permanent BMPs or measures were constructed as designed. The certification letter must be submitted to the Austin Regional Office within 30 days of site completion.
15. The applicant shall be responsible for maintaining the permanent BMPs after construction until such time as the maintenance obligation is either assumed in writing by another entity having ownership or control of the property (such as without limitation, an owner's association, a new property owner or lessee, a district, or municipality) or the ownership of the property is transferred to the entity. Such entity shall then be responsible for maintenance until another entity assumes such obligations in writing or ownership is transferred. A copy of the transfer of responsibility must be filed with the executive director through the Austin Regional Office within 30 days of the transfer. A copy of the transfer form (TCEQ-10263) is enclosed.

Mr. Sal Siino
Page 4
February 4, 2022

16. Upon legal transfer of this property, the new owner(s) is required to comply with all terms of the approved Contributing Zone Plan. If the new owner intends to commence any new regulated activity on the site, a new Contributing Zone Plan that specifically addresses the new activity must be submitted to the executive director. Approval of the plan for the new regulated activity by the executive director is required prior to commencement of the new regulated activity.
17. A Contributing Zone Plan approval or extension will expire and no extension will be granted if more than 50 percent of the total construction has not been completed within ten years from the initial approval of a plan. A new Contributing Zone Plan must be submitted to the Austin Regional Office with the appropriate fees for review and approval by the executive director prior to commencing any additional regulated activities.
18. At project locations where construction is initiated and abandoned, or not completed, the site shall be returned to a condition such that the aquifer is protected from potential contamination.

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality. If you have any questions or require additional information, please contact the Edwards Aquifer Protection Program Austin Regional Office at 512-339-2929.

Sincerely,



Lillian Butler, Section Manager
Edwards Aquifer Protection Program
Texas Commission on Environmental Quality

LIB/dv

Enclosures: Change in Responsibility for Maintenance of Permanent BMPs, Form TCEQ-
10263 cc: Mr. Joshua Baran, PE, JAB Engineering

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Erin E. Chancellor, *Interim Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 3, 2023

Mr. Sal Sino
WS Campus Holdings, LLC
110 Woodland Ave., Ste. 1
Reno, NV 89523

Re: Edwards Aquifer, Williamson County
NAME OF PROJECT: WS Campus Private Roads; Located 1.15 mi west of CR 233 and FM 487;
Florence, Texas
TYPE OF PLAN: Request for Approval of a Contributing Zone Plan (CZP); 30 Texas
Administrative Code (TAC) Chapter 213 Subchapter B Edwards Aquifer
Edwards Aquifer Protection Program ID No. 11003376; Regulated Entity No. RN111359683

Dear Mr. Sino:

The Texas Commission on Environmental Quality (TCEQ) has completed its review of the CZP application for the above-referenced project submitted to the Austin Regional Office by JAB Engineering, LLC on behalf of WS Campus Holdings, LLC on December 5, 2022. Final review of the CZP was completed after additional material was received on February 27, 2023, and March 2, 2023. As presented to the TCEQ, the Temporary and Permanent Best Management Practices (BMPs) were selected, and construction plans were prepared by a Texas Licensed Professional Engineer to be in general compliance with the requirements of 30 TAC Chapter 213. These planning materials were sealed, signed, and dated by a Texas Licensed Professional Engineer. Therefore, based on the engineer's concurrence of compliance, the planning materials for construction of the proposed project and pollution abatement measures are hereby approved subject to applicable state rules and the conditions in this letter. The applicant or a person affected may file with the chief clerk a motion for reconsideration of the executive director's final action on this Edwards Aquifer Protection Plan. A motion for reconsideration must be filed no later than 23 days after the date of this approval letter. *This approval expires two (2) years from the date of this letter unless, prior to the expiration date, more than 10 percent of the construction has commenced on the project or an extension of time has been requested.*

PROJECT DESCRIPTION

The proposed non-residential project will have an area of approximately 480.644 acres. It will include the construction of private roads, multiple earthen shooting ranges, four covered shooting galleries, and placement of multiple Conex storage units. The impervious cover will be 9.03 acres (1.88 percent). No wastewater will be generated by this project.

PERMANENT POLLUTION ABATEMENT MEASURES

This small business/school/etc. will not have more than 20 percent impervious cover.

SPECIAL CONDITIONS

- I. Since this project will not have more than 20 percent impervious cover, an exemption from additional permanent BMPs is approved. If the percent impervious cover ever increases above 20 percent or the land use changes, the exemption for the whole site as described in the property boundaries required by §213.4(g), may no longer apply and the property owner must notify the appropriate regional office of these changes.

STANDARD CONDITIONS

1. Pursuant to Chapter 7 Subchapter C of the Texas Water Code, any violations of the requirements in 30 TAC Chapter 213 may result in administrative penalties.
2. The holder of the approved Edwards Aquifer protection plan must comply with all provisions of 30 TAC Chapter 213 and all best management practices and measures contained in the approved plan. Additional and separate approvals, permits, registrations and/or authorizations from other TCEQ Programs (i.e., Stormwater, Water Rights, UIC) can be required depending on the specifics of the plan.
3. In addition to the rules of the Commission, the applicant may also be required to comply with state and local ordinances and regulations providing for the protection of water quality.

Prior to Commencement of Construction:

4. All contractors conducting regulated activities at the referenced project location shall be provided a copy of this notice of approval. At least one complete copy of the approved Contributing Zone Plan and this notice of approval shall be maintained at the project location until all regulated activities are completed.
5. Any modification to the activities described in the referenced CZP application following the date of approval may require the submittal of a plan to modify this approval, including the payment of appropriate fees and all information necessary for its review and approval prior to initiating construction of the modifications.
6. The applicant must provide written notification of intent to commence construction, replacement, or rehabilitation of the referenced project. Notification must be submitted to the Austin Regional Office no later than 48 hours prior to commencement of the regulated activity. Written notification must include the name of the approved plan and file number for the regulated activity, the date on which the regulated activity will commence, and the name of the prime contractor with the name and telephone number of the contact person.
7. Temporary erosion and sedimentation (E&S) controls, i.e., silt fences, rock berms, stabilized construction entrances, or other controls described in the approved Storm Water Pollution Prevention Plan (SWPPP) must be installed prior to construction and maintained during construction. Temporary E&S controls may be removed when vegetation is established and the construction area is stabilized. If a water quality pond is proposed, it shall be used as a sedimentation basin during construction. The TCEQ may monitor stormwater discharges from the site to evaluate the adequacy of temporary E&S control measures. Additional controls may be necessary if excessive solids are being discharged from the site.

During Construction:

8. During the course of regulated activities related to this project, the applicant or his agent shall comply with all applicable provisions of 30 TAC Chapter 213, Edwards Aquifer. The applicant shall remain responsible for the provisions and conditions of this approval until such responsibility is legally transferred to another person or entity.
9. If sediment escapes the construction site, the sediment must be removed at a frequency sufficient to minimize offsite impacts to water quality (e.g., fugitive sediment in street being washed into surface streams or sensitive features by the next rain). Sediment must be removed from sediment traps or sedimentation ponds not later than when design capacity has been significantly reduced. Litter, construction debris, and construction chemicals exposed to stormwater shall be prevented from becoming a pollutant source for stormwater discharges (e.g., screening outfalls, picked up daily).
10. Intentional discharges of sediment laden water are not allowed. If dewatering becomes necessary, the discharge will be filtered through appropriately selected best management practices. These may include vegetated filter strips, sediment traps, rock berms, silt fence rings, etc.
11. The following records shall be maintained and made available to the executive director upon request: the dates when major grading activities occur, the dates when construction activities temporarily or permanently cease on a portion of the site, and the dates when stabilization measures are initiated.
12. Stabilization measures shall be initiated as soon as practicable in portions of the site where construction activities have temporarily or permanently ceased, and construction activities will not resume within 21 days. When the initiation of stabilization measures by the 14th day is precluded by weather conditions, stabilization measures shall be initiated as soon as practicable.
13. This approval does not authorize the installation of temporary aboveground storage tanks on this project. If the contractor desires to install a temporary aboveground storage tank for use during construction, an application to modify this approval must be submitted and approved prior to installation. The application must include information related to tank location and spill containment. Refer to Standard Condition No. 5, above.

After Completion of Construction:

14. Upon legal transfer of this property, the new owner(s) is required to comply with all terms of the approved Contributing Zone Plan. If the new owner intends to commence any new regulated activity on the site, a new Contributing Zone Plan that specifically addresses the new activity must be submitted to the executive director. Approval of the plan for the new regulated activity by the executive director is required prior to commencement of the new regulated activity.
15. A Contributing Zone Plan approval or extension will expire and no extension will be granted if more than 50 percent of the total construction has not been completed within ten years from the initial approval of a plan. A new Contributing Zone Plan must be submitted to the Austin Regional Office with the appropriate fees for review and approval by the executive director prior to commencing any additional regulated activities.
16. At project locations where construction is initiated and abandoned, or not completed, the site shall be returned to a condition such that the aquifer is protected from potential contamination.

Mr. Sal Sino
Page 4
March 3, 2023

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality. If you have any questions or require additional information, please contact James "Bo" Slone, P.G. of the Edwards Aquifer Protection Program of the Austin Regional Office at (512) 339-2929.

Sincerely,



Lillian Butler, Section Manager
Edwards Aquifer Protection Program
Texas Commission on Environmental Quality

LIB/jcs

Enclosure: Deed Recordation Affidavit, Form TCEQ-0625A

Cc: Mr. Joshua A. Baran, P.E., JAB Engineering, LLC

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Erin E. Chancellor, *Interim Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 21, 2023

Mr. Sal Sino
WS Campus Holdings, LLC
110 Woodland Ave., Ste. 1
Reno, NV 89523

Re: Edwards Aquifer, Williamson County
NAME OF PROJECT: WS Campus Staccato; Located 1.15 mi W of CR 233 and FM 487; Florence, Texas
TYPE OF PLAN: Request for Modification of an Approved Contributing Zone Plan (CZP-MOD); 30 Texas Administrative Code (TAC) Chapter 213 Subchapter B Edwards Aquifer
Edwards Aquifer Protection Program ID No. 11003420; Regulated Entity No. RN111359683

Dear Mr. Sino:

The Texas Commission on Environmental Quality (TCEQ) has completed its review of the CZP-MOD for the above-referenced project submitted to the Austin Regional Office by JAB Engineering, LLC on behalf of WS Campus Holdings, LLC on December 21, 2022. Final review of the CZP-MOD was completed after additional material was received on April 18, 2023. As presented to the TCEQ, the Temporary and Permanent Best Management Practices (BMPs) were selected, and construction plans were prepared by a Texas Licensed Professional Engineer to be in general compliance with the requirements of 30 TAC Chapter 213. These planning materials were sealed, signed and dated by a Texas Licensed Professional Engineer. Therefore, based on the engineer's concurrence of compliance, the planning materials for construction of the proposed project and pollution abatement measures are hereby approved subject to applicable state rules and the conditions in this letter. The applicant or a person affected may file with the chief clerk a motion for reconsideration of the executive director's final action on this Edwards Aquifer Protection Plan. A motion for reconsideration must be filed no later than 23 days after the date of this approval letter. *This approval expires two (2) years from the date of this letter unless, prior to the expiration date, more than 10 percent of the construction has commenced on the project or an extension of time has been requested.*

BACKGROUND

A Contributing Zone Plan was approved by letter dated February 4, 2022 (EAPP ID No. 11002735).

PROJECT DESCRIPTION

The proposed non-residential project will increase the project area to approximately 50.6 acres. The project will include the addition of an indoor shooting range, four rainwater harvesting tanks (not used for impervious cover reduction), one waste tank, and associated appurtenances. The impervious cover will increase to 8.46 acres (16.73 percent). According to a letter dated,

September 22, 2021, signed by Mr. Chad Winkler, with Williamson County, the site in the development is acceptable for the use of on-site sewage facilities.

PERMANENT POLLUTION ABATEMENT MEASURES

To prevent the pollution of stormwater runoff originating on-site or upgradient of the site and potentially flowing across and off the site after construction, engineered vegetative filter strips, and vegetative filters strips in series with grassy swales, designed using the TCEQ technical guidance document, Complying with the Edwards Aquifer Rules: Technical Guidance on Best Management Practices (2005), will be constructed to treat stormwater runoff. The required total suspended solids (TSS) treatment for this project is 7,367 pounds of TSS generated from the 8.46 acres of impervious cover. The approved measures meet the required 80 percent removal of the increased load in TSS caused by the project.

SPECIAL CONDITIONS

- I. This modification is subject to all Special and Standard Conditions listed in the CZP approval letter dated February 4, 2022.
- II. All permanent pollution abatement measures shall be operational prior to occupancy of the facility.

STANDARD CONDITIONS

1. Pursuant to Chapter 7 Subchapter C of the Texas Water Code, any violations of the requirements in 30 TAC Chapter 213 may result in administrative penalties.
2. The holder of the approved Edwards Aquifer protection plan must comply with all provisions of 30 TAC Chapter 213 and all best management practices and measures contained in the approved plan. Additional and separate approvals, permits, registrations and/or authorizations from other TCEQ Programs (i.e., Stormwater, Water Rights, UIC) can be required depending on the specifics of the plan.
3. In addition to the rules of the Commission, the applicant may also be required to comply with state and local ordinances and regulations providing for the protection of water quality.

Prior to Commencement of Construction:

4. All contractors conducting regulated activities at the referenced project location shall be provided a copy of this notice of approval. At least one complete copy of the approved Contributing Zone Plan and this notice of approval shall be maintained at the project location until all regulated activities are completed.
5. Any modification to the activities described in the referenced CZP application following the date of approval may require the submittal of a plan to modify this approval, including the payment of appropriate fees and all information necessary for its review and approval prior to initiating construction of the modifications.
6. The applicant must provide written notification of intent to commence construction, replacement, or rehabilitation of the referenced project. Notification must be submitted to the Austin Regional Office no later than 48 hours prior to commencement of the regulated activity. Written notification must include the name of the approved plan and file number for the regulated activity, the date on which the regulated activity will commence, and the name of the prime contractor with the name and telephone number of the contact person.
7. Temporary erosion and sedimentation (E&S) controls, i.e., silt fences, rock berms, stabilized construction entrances, or other controls described in the approved Storm Water Pollution Prevention Plan (SWPPP) must be installed prior to construction and maintained during

construction. Temporary E&S controls may be removed when vegetation is established and the construction area is stabilized. If a water quality pond is proposed, it shall be used as a sedimentation basin during construction. The TCEQ may monitor stormwater discharges from the site to evaluate the adequacy of temporary E&S control measures. Additional controls may be necessary if excessive solids are being discharged from the site.

During Construction:

8. During the course of regulated activities related to this project, the applicant or his agent shall comply with all applicable provisions of 30 TAC Chapter 213, Edwards Aquifer. The applicant shall remain responsible for the provisions and conditions of this approval until such responsibility is legally transferred to another person or entity.
9. If sediment escapes the construction site, the sediment must be removed at a frequency sufficient to minimize offsite impacts to water quality (e.g., fugitive sediment in street being washed into surface streams or sensitive features by the next rain). Sediment must be removed from sediment traps or sedimentation ponds not later than when design capacity has been significantly reduced. Litter, construction debris, and construction chemicals exposed to stormwater shall be prevented from becoming a pollutant source for stormwater discharges (e.g., screening outfalls, picked up daily).
10. Intentional discharges of sediment laden water are not allowed. If dewatering becomes necessary, the discharge will be filtered through appropriately selected best management practices. These may include vegetated filter strips, sediment traps, rock berms, silt fence rings, etc.
11. The following records shall be maintained and made available to the executive director upon request: the dates when major grading activities occur, the dates when construction activities temporarily or permanently cease on a portion of the site, and the dates when stabilization measures are initiated.
12. Stabilization measures shall be initiated as soon as practicable in portions of the site where construction activities have temporarily or permanently ceased, and construction activities will not resume within 21 days. When the initiation of stabilization measures by the 14th day is precluded by weather conditions, stabilization measures shall be initiated as soon as practicable.
13. This approval does not authorize the installation of temporary aboveground storage tanks on this project. If the contractor desires to install a temporary aboveground storage tank for use during construction, an application to modify this approval must be submitted and approved prior to installation. The application must include information related to tank location and spill containment. Refer to Standard Condition No. 5, above.

After Completion of Construction:

14. Owners of permanent BMPs and measures must ensure that the BMPs and measures are constructed and function as designed. A Texas Licensed Professional Engineer must certify in writing that the permanent BMPs or measures were constructed as designed. The certification letter must be submitted to the Austin Regional Office within 30 days of site completion.
15. The applicant shall be responsible for maintaining the permanent BMPs after construction until such time as the maintenance obligation is either assumed in writing by another entity having ownership or control of the property (such as without limitation, an owner's association, a new property owner or lessee, a district, or municipality) or the ownership of the property is transferred to the entity. Such entity shall then be responsible for maintenance until another entity assumes such obligations in writing or ownership is transferred. A copy of the transfer of responsibility must be filed with the executive director through the Austin Regional Office within 30 days of the transfer. A copy of the transfer form (TCEQ-10263) is enclosed.

Mr. Sal Siino
Page 4
April 21, 2023

16. Upon legal transfer of this property, the new owner(s) is required to comply with all terms of the approved Contributing Zone Plan. If the new owner intends to commence any new regulated activity on the site, a new Contributing Zone Plan that specifically addresses the new activity must be submitted to the executive director. Approval of the plan for the new regulated activity by the executive director is required prior to commencement of the new regulated activity.
17. A Contributing Zone Plan approval or extension will expire and no extension will be granted if more than 50 percent of the total construction has not been completed within ten years from the initial approval of a plan. A new Contributing Zone Plan must be submitted to the Austin Regional Office with the appropriate fees for review and approval by the executive director prior to commencing any additional regulated activities.
18. At project locations where construction is initiated and abandoned, or not completed, the site shall be returned to a condition such that the aquifer is protected from potential contamination.

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality. If you have any questions or require additional information, please contact James "Bo" Slone, P.G. of the Edwards Aquifer Protection Program of the Austin Regional Office at (512) 339-2929.

Sincerely,



Lillian Butler, Section Manager
Edwards Aquifer Protection Program
Texas Commission on Environmental Quality

LIB/jcs

Enclosure: Change in Responsibility for Maintenance of Permanent BMPs, Form TCEQ-10263

Cc: Mr. Josh Baran, P.E., JAB Engineering, LLC

ATTACHMENT B PROJECT NARRATIVES

ORIGINAL PROJECT NARRATIVE APPROVED

The original CZPA was approved on February 4, 2022 with the following project narrative:

The Staccato project is a 41.224 acre tract of land (lot 1, Staccato Ranch Subdivision) located along the south side of CR 233 approximately 6,000 feet from the intersection of CR 487 and CR 233 in Williamson County, Texas. Refer to the vicinity map located in Attachment A. The subject project is located within the Edward's Aquifer Contributing Zone. A portion of the site lies within the FEMA 100-year floodplain per map number 48491C0125F, dated December 20, 2019. No development is proposed within the floodplain. The scope of the project includes the construction/ development of one new 80,063 sf manufacturing and assembly building, one new 9,934 sf office building, two new 528 sf storage buildings, associated parking, utility extensions, and ancillary improvements to support the development. The proposed development will include 287,595 square feet or 16.02% impervious cover across the site. The development includes multiple vegetative filter strips and a grassy swale to treat flows from the proposed development and remove 80% of the increase in total suspended solids (see attached plans under separate cover). The existing drainage that currently sheet flows across the site from the northwest is proposed to be rerouted around the proposed buildings and bypass the proposed BMP's. Based upon an overall drainage analysis performed for the site and the upstream drainage basin, peak flows from the proposed development will be routed through the designed stormwater channel and peak discharge reduced to match or lower below the existing peak discharge.

PROJECT NARRATIVE MODIFICATION NO. 1 APPROVED ADDING GUN RANGES IN/OUT

The modified CZPA was approved on April 21, 2023 with the following project narrative:

The Staccato project is a 50.600 acre tract of land (Lot 2, Staccato Ranch Subdivision) located along the south side of CR 233 approximately 6,000 feet from the intersection of CR 487 and CR 233 in Williamson County, Texas. Refer to the vicinity map located in Attachment A. The subject project is located within the Edward's Aquifer Contributing Zone. A portion of the site lies within the FEMA 100-year floodplain per map number 48491C0125F, dated December 20, 2019. No development is proposed within the floodplain.

The scope of the project included the construction/ development of one new 80,063 sf manufacturing and assembly building, one new 9,934 sf office building, two new 528 sf storage buildings, one new 29,826 sf indoor shooting range building, associated parking, utility extensions, and ancillary improvements to support the development.

- Ancillary improvements include four rainwater harvesting tanks, one fire suppression tank, and a processed waste tank.
- The processed waste has been evaluated and does not meet the requirements for documenting as an AST in the CZPA.
- The modification No. 1 approved proposed development and includes 368,693 square feet or 16.73% impervious cover across the site.

- The development includes multiple vegetative filter strips and a grassy swale to treat flows from the proposed development and remove 80% of the increase in total suspended solids (see attached plans under separate cover).
- The existing drainage that currently sheet flows across the site from the northwest is proposed to be rerouted around the proposed buildings and bypass the proposed
- BMP's. Based upon an overall drainage analysis performed for the site and the upstream drainage basin, peak flows from the proposed development will be routed through the designed stormwater channel and peak discharge reduced to match or lower below the existing peak discharge.

NEW PROJECT NARRATIVE MODIFICATION NO. 2 ENFORCEMENT ORDER UPDATE

The WS Campus Holdings LLC site is a commercial development housing multiple entities. A portion of the site lies within the FEMA 100-year floodplain per map number 48491C0125F, dated December 20, 2019. No development is proposed within the floodplain.

The scope of the project that was built without TCEQ approval included 4.93 AC increasing the developed area from 50.60 sf (approved in Modification No. 1) to 55.53 sf (ranges built without authorization). The original development that was approved in Modification No. 1 is shown in Attachment C along with new unauthorized development is as built and of which WS Campus Holdings LLC is seeking approval now.

With this CZP Modification No. 2, as mandated per the enforcement order, the proposed non-residential project will increase the project area to approximately 55.53 acres. The project will include:

- 140,000 sf (3.21 AC) of new shooting ranges made of compacted berms and gravel. This included the addition of eight ranges behind the 29,826 sf indoor shooting range building that were not authorized and are now built.
- One compacted gravel 22,500 SF (0.52 AC) range was also added to the northwest of the original ranges that was not authorized and is now built.
- A concrete driveway at 17,500 sf (0.40 AC) was added at the front of the 22,500 SF range to allow vehicles and parking, was not authorized, and is now built.
- A recessed below grade compacted gravel structure for close contact military/police practice clearing building exercises at 20,000 sf (0.46 AC) was added across the creek south of the existing approved skeet shooting.
- A wood structure for long range shooting was added at 300 sf (0.01 AC) to the southeast of the existing 29,826 sf indoor shoot range that was not authorized, and is now built.
- A compacted gravel road at 14,400 sf (0.33 AC) was laid out, and is not yet completed, was planned to the proposed new underwater creek crossing being reviewed by the TCEQ Dam Permit program and Williamson County Floodplain Program for approval.

The changes listed above include an additional 214,700 sf (4.93 AC) of impervious cover not approved in any other CZP modifications or original submittals. The new impervious cover areas were constructed following the approved Construction Stormwater Pollution Prevention Plan managed by Headwaters Inc. and in compliance with Edwards Aquifer controls and permits already approved by TCEQ.

As these areas only increase impervious cover over previous submissions, and were still a very small increase in impervious cover to 24.12% versus 16.73% approved by TCEQ in Modification No. 1, no changes to existing stormwater controls or Edward's Aquifer controls or required permanent engineering controls for these changes was required. Therefore, no P.E. Stamp has been provided nor is required on this submittal.

This project narrative addresses changes made to the site that were not approved in Modification No. 1 and need to be incorporated and approved through this submittal in order to comply with Enforcement Case No. 63568.

ATTACHMENT C

**Current Site Plan of the Approved Project
(Modification No. 1) Plus Unauthorized Impervious
Cover (Modification No. 2)**



5 Image D
SCALE: 1/8"=1'-0"



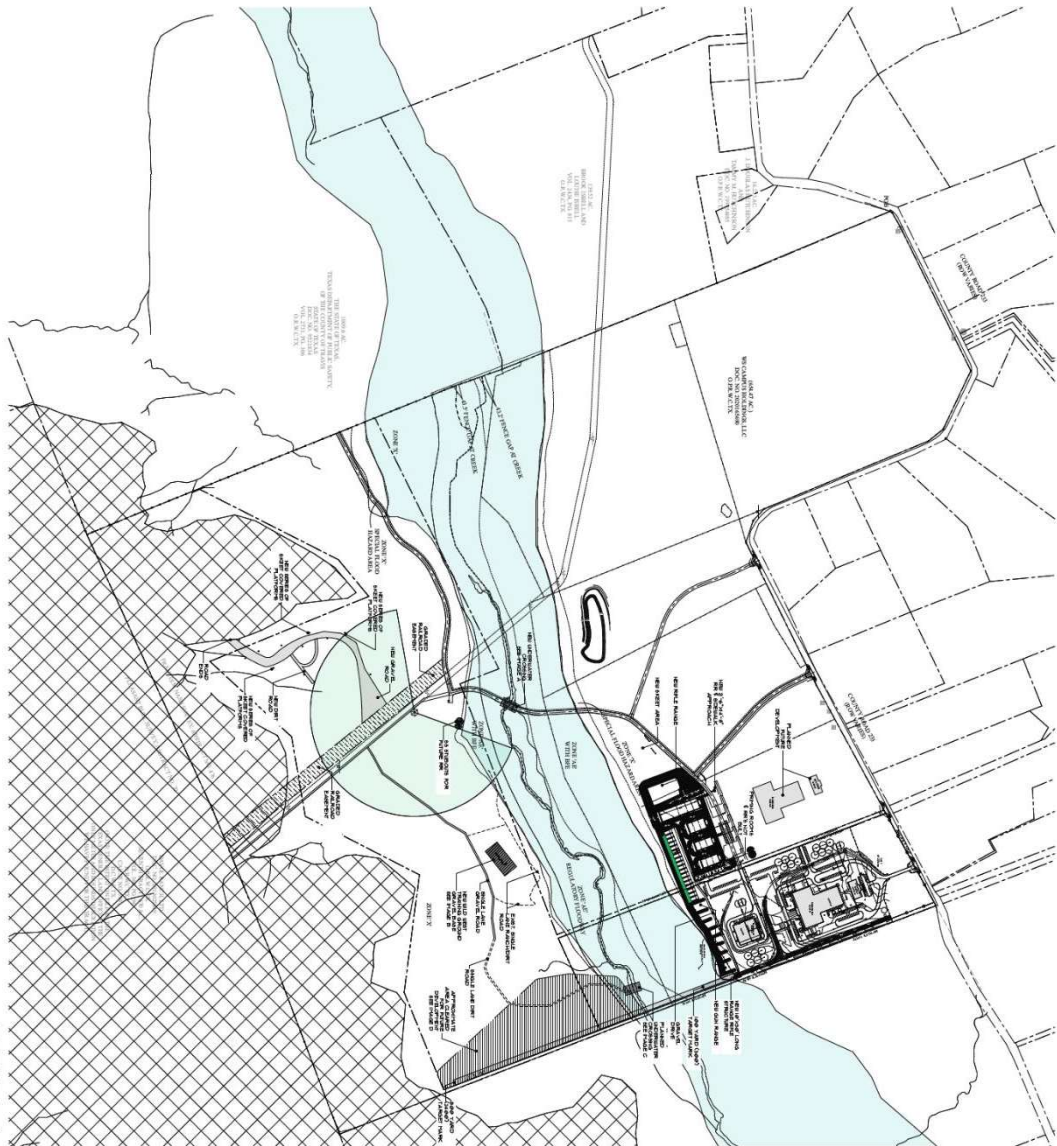
4 Image C
SCALE: 1/8"=1'-0"



3 Image B
SCALE: 1/8"=1'-0"

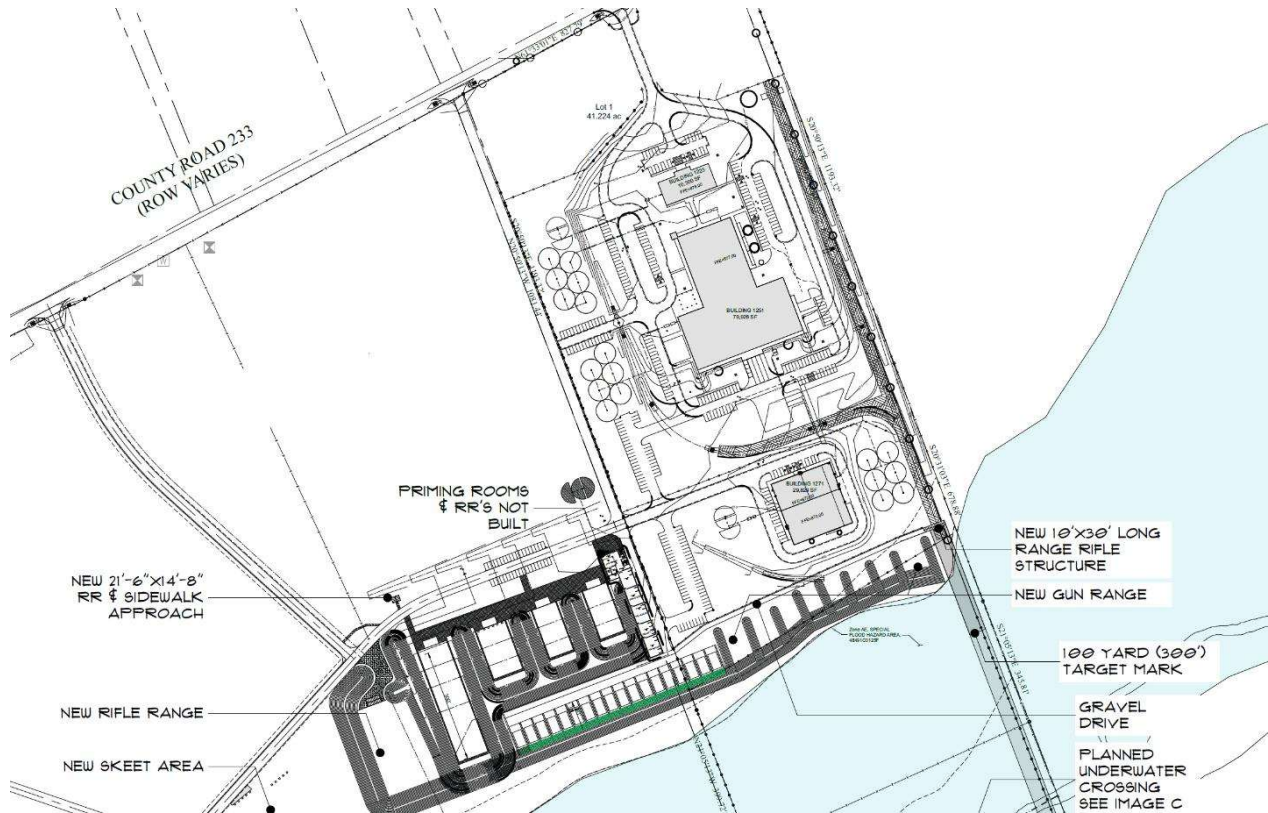


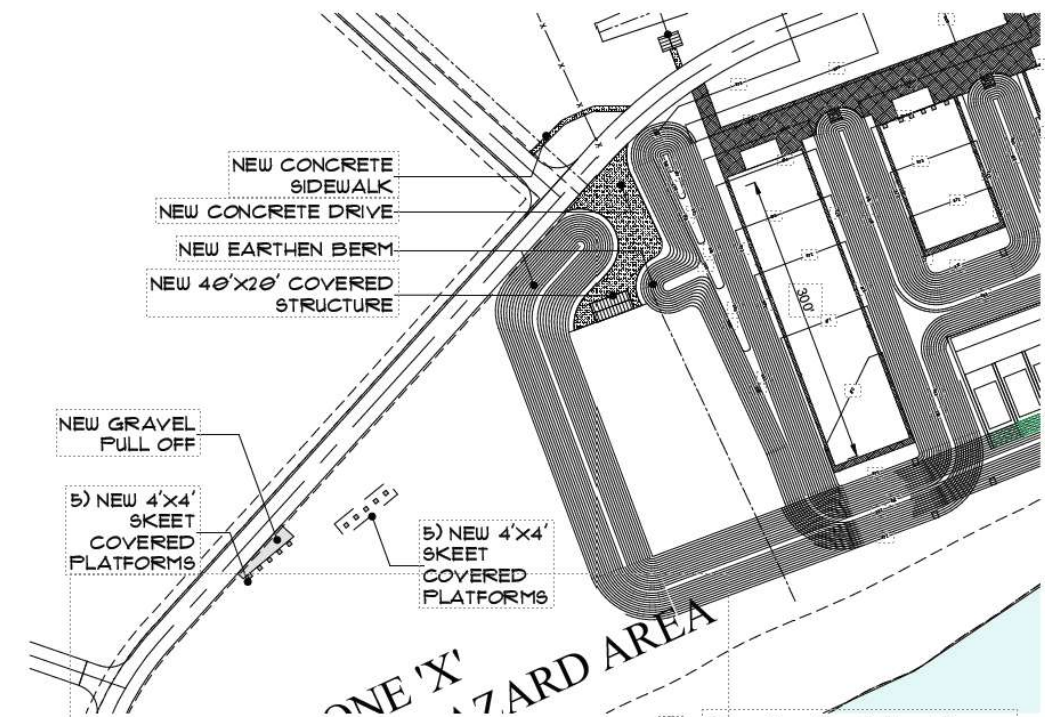
2 Image A
SCALE: 1/8"=1'-0"



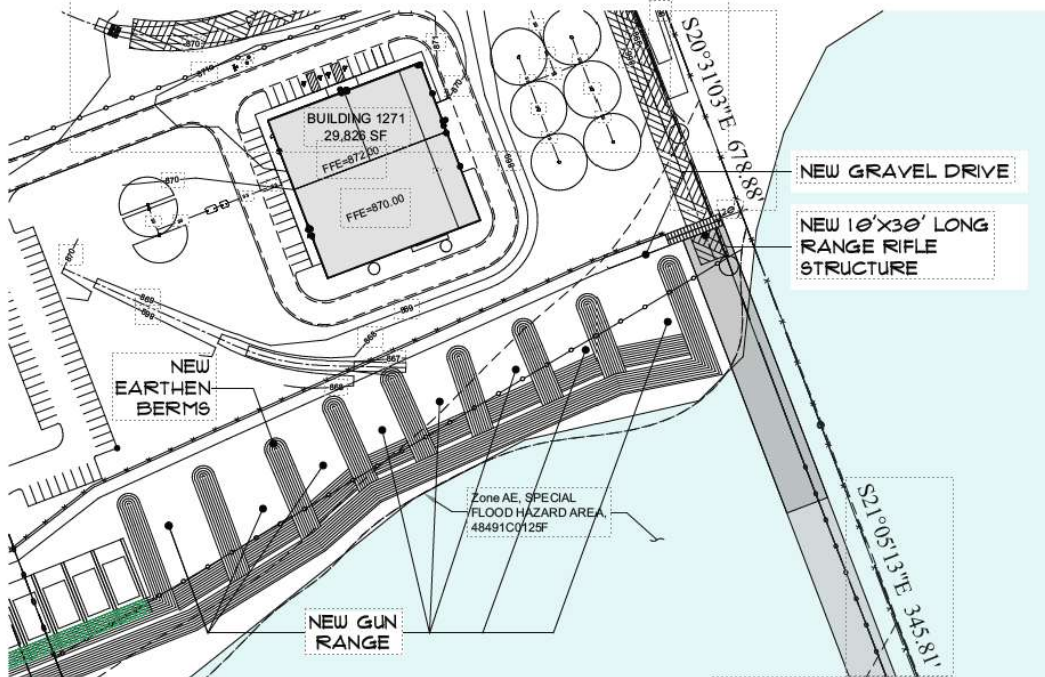
1 Site - Comprehensive

ENLARGED IMAGE OF NEW RANGES





2 Plan - New Gun & Skeet Ranges
SCALE: 1/320'



1 Plan - New Gun Ranges
SCALE: 1/800'

GGO ARCHITECTS

ISSUE

Site Updates

03/14/2025

REVISIONS

ID TITLE

ISSUE DATE

Disclaimer:

These drawings are for

pricing and project

development only. Not to

be used for permit or

construction.

WS Holdings
Site Updates

ARCHITECTS

GGO ARCHITECTS

18815 Crest Laurel Blvd

Dallas, TX 75226

214.326.9591



GGOA PROJECT

412.00

Enlarged Site

Plans

A1.2

Section II
Contributing Zone Plan Application
(TCEQ-10257)

Contributing Zone Plan Application

Texas Commission on Environmental Quality

for Regulated Activities on the Contributing Zone to the Edwards Aquifer and Relating to 30 TAC

§213.24(1), Effective June 1, 1999

To ensure that the application is administratively complete, confirm that all fields in the form are complete, verify that all requested information is provided, consistently reference the same site and contact person in all forms in the application, and ensure forms are signed by the appropriate party.

Note: Including all the information requested in the form and attachments contributes to more streamlined technical reviews.

Signature

To the best of my knowledge, the responses to this form accurately reflect all information requested concerning the proposed regulated activities and methods to protect the Edwards Aquifer. This **Contributing Zone Plan Application** is hereby submitted for TCEQ review and Executive Director approval. The application was prepared by:

Print Name of Customer/**John Messer**

Date: 6/13/2025

Signature of Customer



Regulated Entity Name: WS Campus Holdings LLC

Project Information

- ☒ County: Williamson
- ☒ Stream Basin: South Salado Creek
- ☒ Groundwater Conservation District (if applicable): N/A
- ☒ Customer (Applicant): Contact Person: John Messer

Entity: WS Campus Holdings LLC

Mailing Address: 1223 CR 233

City, State: Florence, TX Zip: 76527

Telephone: 254-624-9031

Fax: N/A

Email Address: john.messer@staccatoammo.com

☒ **Agent/Representative (If any):**

Contact Person: Elizabeth Mack Entity: Feather and Mane LLC

Mailing Address: 18 Timberline Drive

City, State: Round Rock, TX

Zip: 78665

Telephone: (512) 656-7518

Fax: _____

Email Address: lizzie@featherandmane.com

☒ **Project Location:**

☐ The project site is located inside the city limits of _____.

☐ The project site is located outside the city limits but inside the ETJ (extra-territorial jurisdiction) of _____.

☒ The project site is not located within any city's limits or ETJ.

☒ The location of the project site is described below. Sufficient detail and clarity has been provided so that the TCEQ's Regional staff can easily locate the project and site boundaries for a field investigation.

This site is located on the south side of CR 233, approximately 3.9 miles east of its intersection with Hwy 195.

☒ **Attachment A - Road Map.** A road map showing directions to and the location of the project site is attached. The map clearly shows the boundary of the project site.

☒ **Attachment B - USGS Quadrangle Map.** A copy of the official 7 ½ minute USGS Quadrangle Map (Scale: 1" = 2000') is attached. The map(s) clearly show:

☒ Project site boundaries. USGS

☒ Quadrangle Name(s).

☒ **Attachment C - Project Narrative.** A detailed narrative description of the proposed project is attached. The project description is consistent throughout the application and contains, at a minimum, the following details:

☒ Area of the site

☒ Offsite areas

☒ Impervious cover

☒ Permanent BMP(s)

☒ Proposed site use

☒ Site history

☒ Previous development Area(s)
to be demolished

☒ Existing project site conditions are noted below:

☐ Existing commercial site

☒ Existing industrial site

- ☐ Existing residential site
- ☐ Existing paved and/or unpaved roads Undeveloped (Cleared)
- ☐ Undeveloped (Undisturbed/Not cleared) ☐
- Other: _____

☒ The type of project is:

- ☐ Residential: # of Lots: _____
- ☐ Residential: # of Living Unit Equivalents: _____
- ☐ Commercial
- ☒ Industrial
- ☐ Other: _____

☒ Total project area (size of site): 55.53 Acres

Total disturbed area: 13.39 Acres

☒ Estimated projected population: 200 people

☒ The amount and type of impervious cover expected after construction is complete is shown below:

Table 1 - Impervious Cover

<i>Impervious Cover of Proposed Project</i>	<i>Sq. Ft.</i>	<i>Sq. Ft./Acre</i>	<i>Acres</i>
Structures/Rooftops	124,965	÷ 43,560 =	2.868
Parking	220,975	÷ 43,560 =	5.073
Other paved/compacted gravel surfaces	237,453	÷ 43,560 =	6.139
Total Impervious Cover	583,393	÷ 43,560 =	13.39

Total Impervious Cover 13.39 ÷ Total Acreage 55.53 X 100 = 24.12% Impervious Cover

☒ **Attachment D - Factors Affecting Surface Water Quality.** A detailed description of all factors that could affect surface water quality is attached. If applicable, this includes the location and description of any discharge associated with industrial activity other than construction.

☒ Only inert materials as defined by 30 TAC 330.2 will be used as fill material.

For Road Projects Only

Complete questions 18 - 23 if this application is exclusively for a road project.

☒ N/A

Type of project:

☐ TXDOT road project.

☐ County road or roads built to county specifications.

☐ City thoroughfare or roads to be dedicated to a municipality. ☐
Street or road providing access to private driveways.

Type of pavement or road surface to be used:

☐ Concrete

☐ Asphaltic concrete pavement ☐

Other: _____

Right of Way (R.O.W.):

Length of R.O.W.: _____ feet.

Width of R.O.W.: _____ feet.

$L \times W = \text{_____ Ft}^2 \div 43,560 \text{ Ft}^2/\text{Acre} = \text{_____ acres.}$

Pavement Area:

Length of pavement area: _____ feet.

Width of pavement area: _____ feet.

$L \times W = \text{_____ Ft}^2 \div 43,560 \text{ Ft}^2/\text{Acre} = \text{_____ acres.}$

Pavement area _____ acres $\div$ R.O.W. area _____ acres $\times 100 = \text{_____ \%}$ impervious cover.

☐ A rest stop will be included in this project.

☐ A rest stop will not be included in this project.

☐ Maintenance and repair of existing roadways that do not require approval from the TCEQ Executive Director. Modifications to existing roadways such as widening roads/adding shoulders totaling more than one-half (1/2) the width of one (1) existing lane require prior approval from the TCEQ.

Stormwater to be generated by the Proposed Project

- ☒ **Attachment E - Volume and Character of Stormwater.** A detailed description of the volume (quantity) and character (quality) of the stormwater runoff which is expected to occur from the proposed project is attached. The estimates of stormwater runoff quality and quantity are based on area and type of impervious cover. Include the runoff coefficient of the site for both pre-construction and post-construction conditions.

Wastewater to be generated by the Proposed Project

Wastewater is to be discharged in the contributing zone. Requirements under 30 TAC §213.6(c) relating to Wastewater Treatment and Disposal Systems have been satisfied.

☒ N/A

Wastewater will be disposed of by:

On-Site Sewage Facility (OSSF/Septic Tank):

Attachment F - Suitability Letter from Authorized Agent. An on-site sewage facility is already in place to treat and dispose of the wastewater from this site. The appropriate licensing authority's (authorized agent) written approval is attached. It states that the land is suitable for the use of private sewage facilities and will meet or exceed the requirements for on-site sewage facilities as specified under 30 TAC Chapter 285 relating to On-site Sewage Facilities.

Each lot in this project/development is at least one (1) acre (43,560 square feet) in size. The system was designed by a licensed professional engineer or registered sanitarian and installed by a licensed installer in compliance with 30 TAC Chapter 285.

☐ Sewage Collection System (Sewer Lines):

The sewage collection system will convey the wastewater to the _____(name) Treatment Plant. The treatment facility is:

☐ Existing.
☐ Proposed.

☒ N/A

Permanent Aboveground Storage Tanks(ASTs) ≥ 500 Gallons

Complete questions 27 - 33 if this project includes the installation of AST(s) with volume(s) greater than or equal to 500 gallons.

☒ N/A

Tanks and substance stored:

Table 2 - Tanks and Substance Storage

<i>AST Number</i>	<i>Size (Gallons)</i>	<i>Substance to be Stored</i>	<i>Tank Material</i>
1			
2			
3			
4			
5			

Total x 1.5 = _____ Gallons

The AST will be placed within a containment structure that is sized to capture one and one-half (1 1/2) times the storage capacity of the system. For facilities with more than

one tank system, the containment structure is sized to capture one and one-half (1 1/2) times the cumulative storage capacity of all systems.

- ☐ **Attachment G - Alternative Secondary Containment Methods.** Alternative methods for providing secondary containment are proposed. Specifications showing equivalent protection for the Edwards Aquifer are attached.

Inside dimensions and capacity of containment structure(s):

Table 3 - Secondary Containment

<i>Length (L)(Ft.)</i>	<i>Width(W)(Ft.)</i>	<i>Height (H)(Ft.)</i>	<i>L x W x H = (Ft3)</i>	<i>Gallons</i>

Total: _____ Gallons

Piping:

- ☐ All piping, hoses, and dispensers will be located inside the containment structure.
- ☐ Some of the piping to dispensers or equipment will extend outside the containment structure.
- ☐ The piping will be aboveground ☐ The piping will be underground

The containment area must be constructed of and in a material impervious to the substance(s) being stored. The proposed containment structure will be constructed of: _____.

Attachment H - AST Containment Structure Drawings. A scaled drawing of the containment structure is attached that shows the following:

- ☐ Interior dimensions (length, width, depth and wall and floor thickness). ☐ Internal drainage to a point convenient for the collection of any spillage. ☐ Tanks clearly labeled
- ☐ Piping clearly labeled
- ☐ Dispenser clearly labeled

Any spills must be directed to a point convenient for collection and recovery. Spills from storage tank facilities must be removed from the controlled drainage area for disposal within 24 hours of the spill.

- ☐ In the event of a spill, any spillage will be removed from the containment structure within 24 hours of the spill and disposed of properly.
- ☐ In the event of a spill, any spillage will be drained from the containment structure through a drain and valve within 24 hours of the spill and disposed of properly. The drain and valve system are shown in detail on the scaled drawing.

Site Plan Requirements - Items 34 - 46 must be included on the Site Plan.

- ☒ The Site Plan must have a minimum scale of 1" = 400'.

Site Plan Scale: 1" = 800'. Enlarged site plans included as Attachment C.

- ☒ 100-year floodplain boundaries:

☒ Some part(s) of the project site is located within the 100-year floodplain. The floodplain is shown and labeled.

☐ No part of the project site is located within the 100-year floodplain.

The 100-year floodplain boundaries are based on the following specific (including date of material) sources(s): FEMA FIRM Map No. 48491C0125F eff. 12/20/2019.

☒ The layout of the development is shown with existing and finished contours at appropriate, but not greater than ten-foot contour intervals. Lots, recreation centers, buildings, roads, etc. are shown on the site plan.

☐ The layout of the development is shown with existing contours at appropriate, but not greater than ten-foot contour intervals. Finished topographic contours will not differ from the existing topographic configuration and are not shown. Lots, recreation centers, buildings, roads, etc. are shown on the site plan.

☒ A drainage plan showing all paths of drainage from the site to surface streams.

PREVIOUSLY SUBMITTED – no changes proposed.

☒ The drainage patterns and approximate slopes anticipated after major grading activities.

PREVIOUSLY SUBMITTED – no changes proposed.

☒ Areas of soil disturbance and areas which will not be disturbed. PREVIOUSLY SUBMITTED – no changes proposed.

☒ Locations of major structural and nonstructural controls. These are the temporary and permanent best management practices. PREVIOUSLY SUBMITTED – no changes proposed.

☒ Locations where soil stabilization practices are expected to occur. PREVIOUSLY SUBMITTED – no changes proposed.

☐ Surface waters (including wetlands).

☒ N/A

☐ Locations where stormwater discharges to surface water.

☒ There will be no discharges to surface water.

☐ Temporary aboveground storage tank facilities.

☒ Temporary aboveground storage tank facilities will not be located on this site.

☐ Permanent aboveground storage tank facilities.

☒ Permanent aboveground storage tank facilities will not be located on this site.

- ☒ Legal boundaries of the site are shown.

Permanent Best Management Practices (BMPs)

Practices and measures that will be used during and after construction is completed.

- ☐ Permanent BMPs and measures must be implemented to control the discharge of pollution from regulated activities after the completion of construction.

XX N/A ALREADY COMPLETED PRIOR TO THESE RANGES BEING BUILT. NO CHANGES NEEDED.

☒ These practices and measures have been designed, and will be constructed, operated, and maintained to insure that 80% of the incremental increase in the annual mass loading of total suspended solids (TSS) from the site caused by the regulated activity is removed. These quantities have been calculated in accordance with technical guidance prepared or accepted by the executive director.

☒ The TCEQ Technical Guidance Manual (TGM) was used to design permanent BMPs and measures for this site.

☐ A technical guidance other than the TCEQ TGM was used to design permanent BMPs and measures for this site. The complete citation for the technical guidance that was used is: _____.

XX N/A ALREADY COMPLETED PRIOR TO THESE RANGES BEING BUILT. NO CHANGES NEEDED.

- ☐ Owners must insure that permanent BMPs and measures are constructed and function as designed. A Texas Licensed Professional Engineer must certify in writing that the permanent BMPs or measures were constructed as designed. The certification letter must be submitted to the appropriate regional office within 30 days of site completion.

XX N/A ALREADY COMPLETED PRIOR TO THESE RANGES BEING BUILT. NO CHANGES NEEDED.

☒ Where a site is used for low density single-family residential development and has 20 % or less impervious cover, other permanent BMPs are not required. This exemption from permanent BMPs must be recorded in the county deed records, with a notice that if the percent impervious cover increases above 20% or land use changes, the exemption for the whole site as described in the property boundaries required by 30 TAC §213.4(g) (relating to Application Processing and Approval), may no longer apply and the property owner must notify the appropriate regional office of these changes.

☐ The site will be used for low density single-family residential development and has 20% or less impervious cover.

☐ The site will be used for low density single-family residential development but has more than 20% impervious cover.

☒ The site will not be used for low density single-family residential development.

☒ The executive director may waive the requirement for other permanent BMPs for multi-family residential developments, schools, or small business sites where 20% or less impervious cover is used at the site. This exemption from permanent BMPs must be recorded in the county deed records, with a notice that if the percent impervious cover increases above 20% or land use changes, the exemption for the whole site as described in the property boundaries required by 30 TAC §213.4(g) (relating to Application Processing and Approval), may no longer apply and the property owner must notify the appropriate regional office of these changes.

☐ **Attachment I - 20% or Less Impervious Cover Waiver.** The site will be used for multi-family residential developments, schools, or small business sites and has 20% or less impervious cover. A request to waive the requirements for other permanent BMPs and measures is attached.

☐ The site will be used for multi-family residential developments, schools, or small business sites but has more than 20% impervious cover.

☒ The site will not be used for multi-family residential developments, schools, or small business sites.

☒ **Attachment J - BMPs for Upgradient Stormwater.**

☐ A description of the BMPs and measures that will be used to prevent pollution of surface water, groundwater, or stormwater that originates upgradient from the site and flows across the site is attached.

☐ No surface water, groundwater or stormwater originates upgradient from the site and flows across the site, and an explanation is attached.

☒ Permanent BMPs or measures are not required to prevent pollution of surface water, groundwater, or stormwater that originates upgradient from the site and flows across the site, and an explanation is attached.

☒ **Attachment K - BMPs for On-site Stormwater.**

☒ A description of the BMPs and measures that will be used to prevent pollution of surface water or groundwater that originates on-site or flows off the site, including pollution caused by contaminated stormwater runoff from the site is attached.

☐ Permanent BMPs or measures are not required to prevent pollution of surface water or groundwater that originates on-site or flows off the site, including pollution caused by contaminated stormwater runoff, and an explanation is attached.

☐ **Attachment L - BMPs for Surface Streams.** A description of the BMPs and measures that prevent pollutants from entering surface streams is attached.

☒ N/A

☐ **Attachment M - Construction Plans.** Construction plans and design calculations for the proposed permanent BMPs and measures have been prepared by or under the direct supervision of a Texas Licensed Professional Engineer, and are signed, sealed, and dated. Construction plans for the proposed permanent BMPs and measures are attached and include: Design calculations, TCEQ Construction Notes, all proposed structural plans and specifications, and appropriate details.

☒ **N/A ALREADY SUBMITTED. NO NEW CONTROLS PROPOSED.**

☒ **Attachment N - Inspection, Maintenance, Repair and Retrofit Plan.** A site and BMP specific plan for the inspection, maintenance, repair, and, if necessary, retrofit of the permanent BMPs and measures is attached. The plan fulfills all of the following:

Prepared and certified by the engineer designing the permanent BMPs and measures

Signed by the owner or responsible party

Outlines specific procedures for documenting inspections, maintenance, repairs, and, if necessary, retrofit.

Contains a discussion of record keeping procedures

☒ **N/A ALREADY SUBMITTED. NO NEW CONTROLS PROPOSED.**

- ☒ **Attachment O - Pilot-Scale Field Testing Plan.** Pilot studies for BMPs that are not recognized by the Executive Director require prior approval from the TCEQ. A plan for pilot-scale field testing is attached.

☒ N/A for ATTACMENT O

- ☒ **Attachment P - Measures for Minimizing Surface Stream Contamination.** A description of the measures that will be used to avoid or minimize surface stream contamination and changes in the way in which water enters a stream as a result of the construction and development is attached. The measures address increased stream flashing, the creation of stronger flows and in-stream velocities, and other in-stream effects caused by the regulated activity, which increase erosion that result in water quality degradation.

☐ N/A

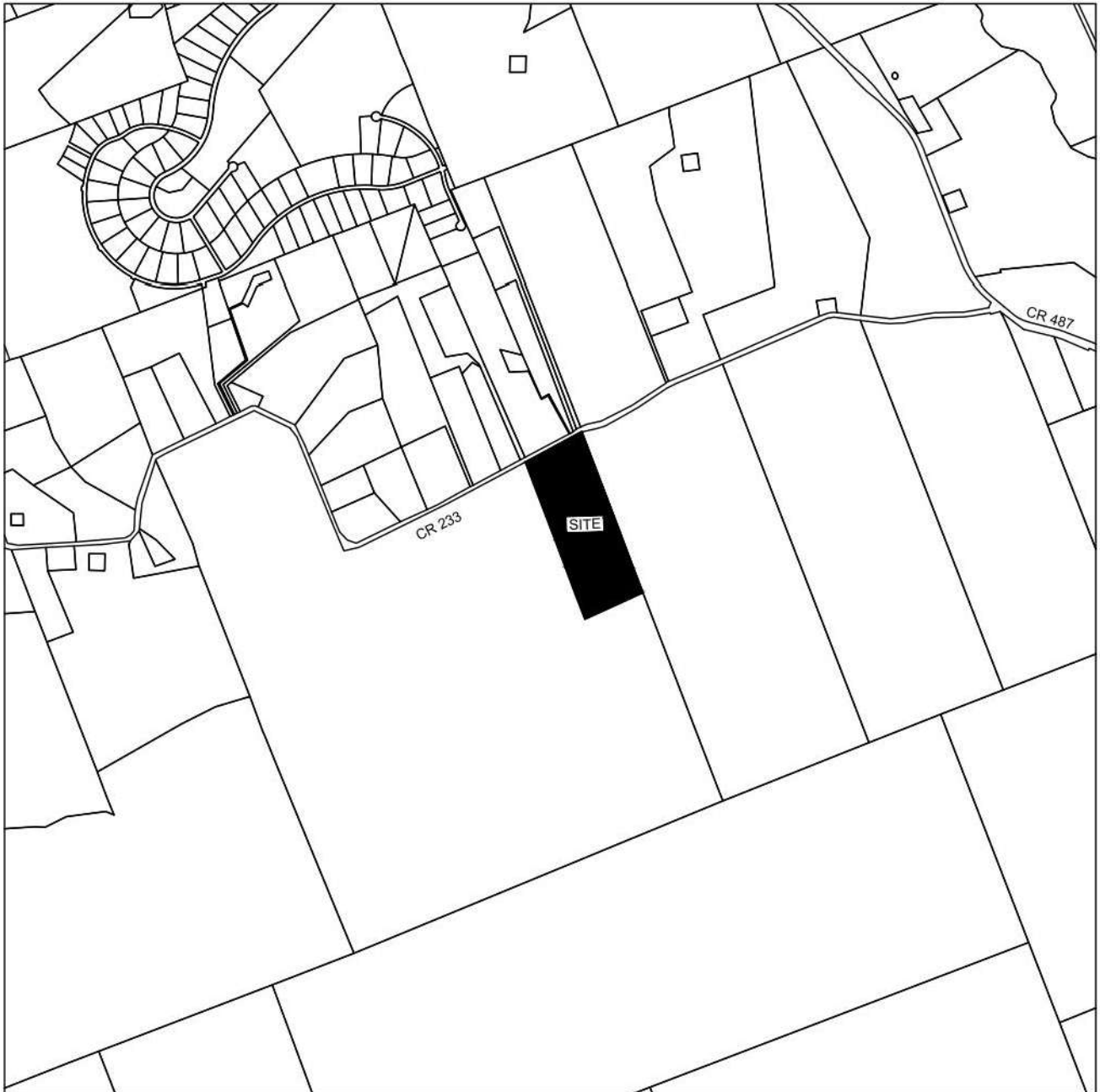
Responsibility for Maintenance of Permanent BMPs and Measures after Construction is Complete.

- ☒ The applicant is responsible for maintaining the permanent BMPs after construction until such time as the maintenance obligation is either assumed in writing by another entity having ownership or control of the property (such as without limitation, an owner's association, a new property owner or lessee, a district, or municipality) or the ownership of the property is transferred to the entity. Such entity shall then be responsible for maintenance until another entity assumes such obligations in writing or ownership is transferred.
- ☒ A copy of the transfer of responsibility must be filed with the executive director at the appropriate regional office within 30 days of the transfer if the site is for use as a multiple single-family residential development, a multi-family residential development, or a non-residential development such as commercial, industrial, institutional, schools, and other sites where regulated activities occur.

Administrative Information

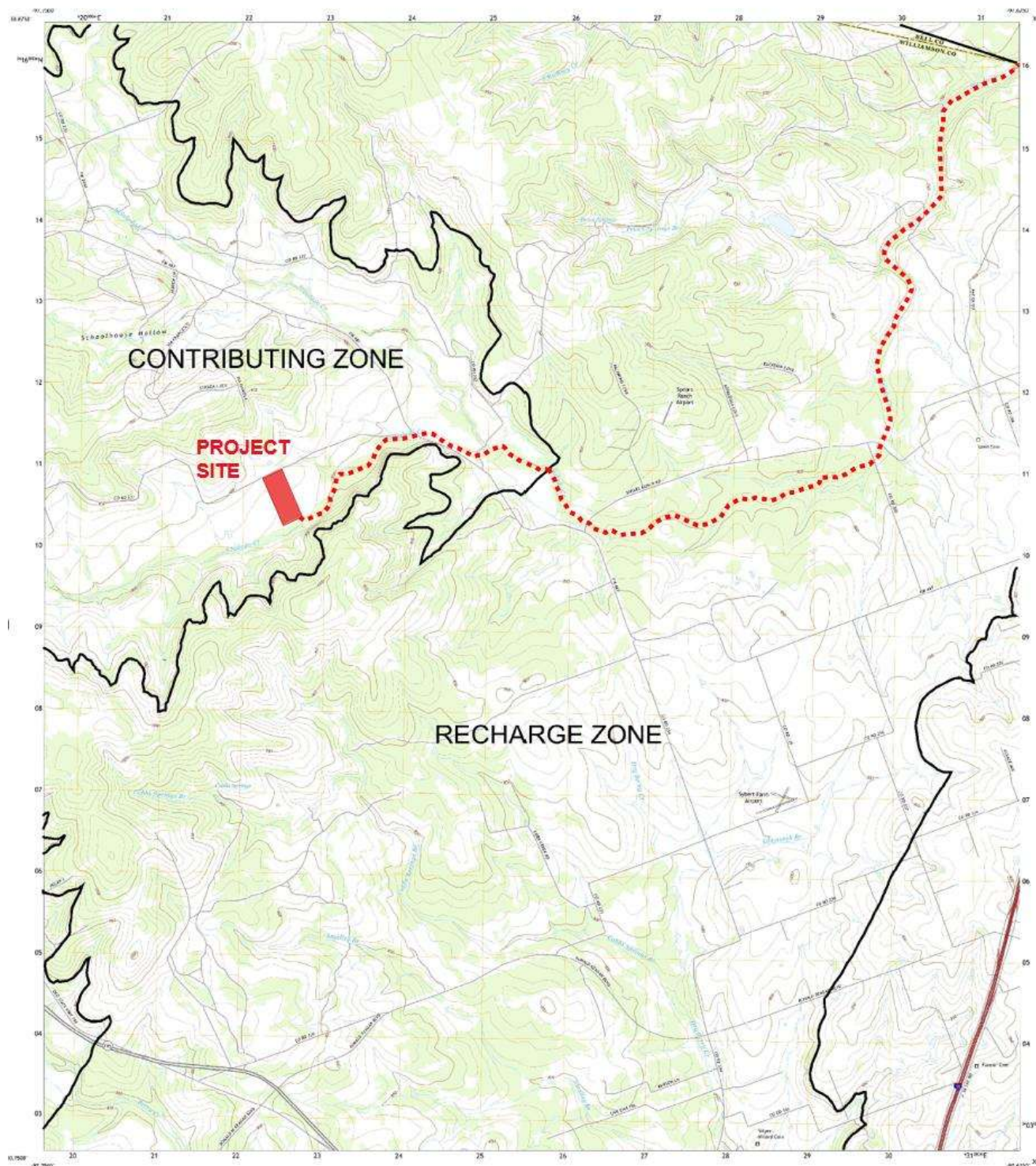
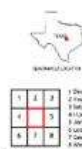
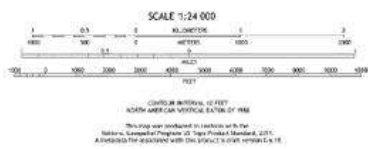
- ☒ Submit one (1) original and one (1) copy of the application, plus additional copies as needed for each affected incorporated city, groundwater conservation district, and county in which the project will be located. The TCEQ will distribute the additional copies to these jurisdictions.
- ☒ Any modification of this Contributing Zone Plan may require TCEQ review and Executive Director approval prior to construction, and may require submission of a revised application, with appropriate fees.
- ☒ The site description, controls, maintenance, and inspection requirements for the storm water pollution prevention plan (SWPPP) developed under the EPA NPDES general permits for stormwater discharges have been submitted to fulfill paragraphs 30 TAC §213.24(1-5) of the technical report. All requirements of 30 TAC §213.24(1-5) have been met by the SWPPP document.
- ☒ The Temporary Stormwater Section (TCEQ-o602) is included with the application.

ATTACHMENT A ROAD MAP



SCALE: 1" = 2,000'

ATTACHMENT B
USGS MAP

[illegible]

ROAD CLASSIFICATION

Expressway	Local Collector
Trunkway	Local Road
Arterial	RD

 Vancouver Island BC RD

COBBS CAVERN, TX

ATTACHMENT C: PROJECT NARRATIVES

ORIGINAL PROJECT NARRATIVE APPROVED

The original CZPA was approved on February 4, 2022 with the following project narrative:

The Staccato project is a 41.224 acre tract of land (lot 1, Staccato Ranch Subdivision) located along the south side of CR 233 approximately 6,000 feet from the intersection of CR 487 and CR 233 in Williamson County, Texas. Refer to the vicinity map located in Attachment A. The subject project is located within the Edward's Aquifer Contributing Zone. A portion of the site lies within the FEMA 100-year floodplain per map number 48491C0125F, dated December 20, 2019. No development is proposed within the floodplain. The scope of the project includes the construction/ development of one new 80,063 sf manufacturing and assembly building, one new 9,934 sf office building, two new 528 sf storage buildings, associated parking, utility extensions, and ancillary improvements to support the development. The proposed development will include 287,595 square feet or 16.02% impervious cover across the site. The development includes multiple vegetative filter strips and a grassy swale to treat flows from the proposed development and remove 80% of the increase in total suspended solids (see attached plans under separate cover). The existing drainage that currently sheet flows across the site from the northwest is proposed to be rerouted around the proposed buildings and bypass the proposed BMP's. Based upon an overall drainage analysis performed for the site and the upstream drainage basin, peak flows from the proposed development will be routed through the designed stormwater channel and peak discharge reduced to match or lower below the existing peak discharge.

PROJECT NARRATIVE MODIFICATION NO. 1 APPROVED ADD GUN RANGES

The modified CZPA was approved on April 21, 2023 with the following project narrative:

The Staccato project is a 50.600 acre tract of land (Lot 2, Staccato Ranch Subdivision) located along the south side of CR 233 approximately 6,000 feet from the intersection of CR 487 and CR 233 in Williamson County, Texas. Refer to the vicinity map located in Attachment A. The subject project is located within the Edward's Aquifer Contributing Zone. A portion of the site lies within the FEMA 100-year floodplain per map number 48491C0125F, dated December 20, 2019. No development is proposed within the floodplain.

The scope of the project included the construction/ development of one new 80,063 sf manufacturing and assembly building, one new 9,934 sf office building, two new 528 sf storage buildings, one new 29,826 sf indoor shooting range building, associated parking, utility extensions, and ancillary improvements to support the development.

- Ancillary improvements include four rainwater harvesting tanks, one fire suppression tank, and a processed waste tank.
- The processed waste has been evaluated and does not meet the requirements for documenting as an AST in the CZPA.
- The modification No. 1 approved proposed development and includes 368,693 square feet or 16.73% impervious cover across the site.

- The development includes multiple vegetative filter strips and a grassy swale to treat flows from the proposed development and remove 80% of the increase in total suspended solids.
- The existing drainage that currently sheet flows across the site from the northwest is proposed to be rerouted around the proposed buildings and bypass the proposed
- BMP's. Based upon an overall drainage analysis performed for the site and the upstream drainage basin, peak flows from the proposed development will be routed through the designed stormwater channel and peak discharge reduced to match or lower below the existing peak discharge.

NEW PROJECT NARRATIVE MODIFICATION NO. 2 ENFORCEMENT ORDER UPDATE

The WS Campus Holdings LLC site is a commercial development housing multiple legal entities. A portion of the site lies within the FEMA 100-year floodplain per map number 48491C0125F, dated December 20, 2019. No development is proposed within the floodplain.

The scope of the project that was built without TCEQ approval included 4.93 AC increasing the developed area from 50.60 sf (approved in Modification No. 1) to 55.53 sf (built without authorization). The original development that was approved in Modification No. 1 is shown in Attachment C along with new unauthorized development is as built and of which WS Campus Holdings LLC is seeking approval now.

With this CZP Modification No. 2, as mandated per the enforcement order, the proposed non-residential project will increase the project area to approximately 55.53 acres. The project will include:

- 140,000 sf (3.21 AC) of new shooting ranges made of compacted berms and gravel. This included the addition of eight ranges behind the 29,826 sf indoor shooting range building that were not authorized and are now built.
- One compacted gravel 22,500 SF (0.52 AC) range was also added to the northwest of the original ranges (approved in Modification No. 1 by TCEQ in 2023) that was not authorized and is now built.
- A concrete driveway at 17,500 sf (0.40 AC) was added at the front of the 22,500 SF range to allow vehicles and parking and was not authorized, and is now built.
- A recessed below grade compacted gravel structure for close contact military/police practice clearing structures at 20,000 sf (0.46 AC) was added across the creek south of the existing approved skeet shooting.
- A wood structure for long range shooting was added at 300 sf (0.01 AC) to the southeast of the existing 29,826 sf indoor shoot range that was not authorized and is now built.
- A compacted gravel road at 14,400 sf (0.33 AC) was laid out, and is not finished construction, was planned to the proposed new underwater creek crossing being reviewed by the TCEQ Dam Permit program and Williamson County Floodplain Program for approval.

The changes listed above include an additional 214,700 sf (4.93 AC) of impervious cover not approved in any other CZP modifications or original submittals. The new impervious cover areas were constructed following the approved Construction Stormwater Pollution Prevention Plan managed by Headwaters Inc. and in compliance with Edwards Aquifer controls and permits already approved by TCEQ.

As these areas only increase impervious cover over previous submissions, and were still a small increase in impervious cover (24.12%) versus 16.73% approved by TCEQ in Modification No. 1, no changes to existing stormwater controls or Edward's Aquifer controls or required permanent engineering controls for these changes was required. Therefore, no P.E. Stamp has been provided nor is required on this submittal.

This project narrative addresses changes made to the site that were not approved in Modification No. 1 and need to be incorporated and approved through this submittal in order to comply with Enforcement Case No. 63568.

ATTACHMENT D

FACTORS AFFECTING SURFACE WATER QUALITY

Potential Sources of Contamination associated with this project may include:

1. Compacted gravel
2. Disrupted soil
3. Concrete waste

ATTACHMENT E

VOLUME AND CHARACTER OF STORMWATER

The original CZPA was approved on February 4, 2022 with the following project narrative:

The Staccato project is a 41.224 acre tract of land (lot 1, Staccato Ranch Subdivision) located along the south side of CR 233 approximately 6,000 feet from the intersection of CR 487 and CR 233 in Williamson County, Texas. Refer to the vicinity map located in Attachment A. The subject project is located within the Edward's Aquifer Contributing Zone. A portion of the site lies within the FEMA 100-year floodplain per map number 48491C0125F, dated December 20, 2019. No development is proposed within the floodplain. The scope of the project includes the construction/ development of one new 80,063 sf manufacturing and assembly building, one new 9,934 sf office building, two new 528 sf storage buildings, associated parking, utility extensions, and ancillary improvements to support the development.

The proposed development will include 287,595 square feet or 16.02% impervious cover across the site.

- ☐ The development includes multiple vegetative filter strips and a grassy swale to treat flows from the proposed development and remove 80% of the increase in total suspended solids (see attached plans under separate cover).
- ☐ The existing drainage that currently sheet flows across the site from the northwest is proposed to be rerouted around the proposed buildings and bypass the proposed BMP's.
- ☐ Based upon an overall drainage analysis performed for the site and the upstream drainage basin, peak flows from the proposed development will be routed through the designed stormwater channel and peak discharge reduced to match or lower below the existing peak discharge.

TCEQ approved Modification No. 1 proposed the following changes to the CZPA and narrative:

The Staccato project is a 50.600 acre tract of land (Lot 2, Staccato Ranch Subdivision) located along the south side of CR 233 approximately 6,000 feet from the intersection of CR 487 and CR 233 in Williamson County, Texas. Refer to the vicinity map located in Attachment A. The subject project is located within the Edward's Aquifer Contributing Zone. A portion of the site lies within the FEMA 100-year floodplain per map number 48491C0125F, dated December 20, 2019. No development is proposed within the floodplain.

The scope of the project includes the construction/ development of one new 80,063 sf manufacturing and assembly building, one new 9,934 sf office building, two new 528 sf storage buildings, one new 29,826 sf indoor shooting range building, associated parking, utility extensions, and ancillary improvements to support the development. Ancillary improvements include four rainwater harvesting tanks, one fire suppression tank, and a processed waste tank. The processed waste has been evaluated and does not meet the requirements for documenting as an AST in the CZPA.

The proposed development will include 368,693 square feet or 16.73% impervious cover across the site. The development includes multiple vegetative filter strips and a grassy swale to treat flows from the proposed development and remove 80% of the increase in total suspended solids (see attached plans under

separate cover). The existing drainage that currently sheet flows across the site from the northwest is proposed to be rerouted around the proposed buildings and bypass the proposed BMP's. Based upon an overall drainage analysis performed for the site and the upstream drainage basin, peak flows from the proposed development will be routed through the designed stormwater channel and peak discharge reduced to match or lower below the existing peak discharge.

Modification No. 2 proposed the following modifications to the CZPA and narrative:

The WS Campus Holdings LLC site is a commercial development housing multiple legal business entities. A portion of the site lies within the FEMA 100-year floodplain per map number 48491C0125F, dated December 20, 2019. No development is proposed within the floodplain.

The scope of the project that was built without TCEQ approval included 4.93 AC increasing the developed area from 50.60 AC (approved in Modification No. 1) to 55.53 AC. The original development that was approved in Modification No. 1 is shown in Attachment C along with new unauthorized development of additional outdoor ranges built, and of which WS Campus Holdings LLC is seeking approval now per its agreed enforcement order with TCEQ.

With this CZP Modification No. 2, the scope of the project is 55.53 AC which includes 4.93 AC of impervious cover (compacted gravel) which was not approved in any previous CZP modification or original submittal. The new range areas were constructed following the Construction Stormwater Pollution Prevention Plan (C-SWPPP) managed by Headwaters Inc. and following existing Edwards Aquifer controls and requirements already approved by TCEQ.

As these areas only increase impervious cover over previous submissions, no new permanent or temporary controls above and beyond those already mandated, are being requested. The increase in impervious cover is 24.12% versus 16.73% approved by TCEQ in Modification No. 1. No changes to existing permanent stormwater controls or Edwards Aquifer controls were needed. Therefore, no P.E. Stamp has been provided nor is required on this submittal.

This project narrative addresses changes adding additional outdoor ranges at the site that were not approved in Modification No. 1 and need to be incorporated and approved through this submittal in order to comply with Enforcement Case No. 63568.

ATTACHMENT F
SUITABILITY LETTER FROM AUTHORIZED AGENT

Department of Infrastructure
County Engineer's Office
3151 SE Inner Loop, Ste B
Georgetown, TX 78626
T: 512.943.3330
F: 512.943.3335

J. Terron Everton, PE, DR, CFM



September 22, 2021

WS Campus Holdings, LLC
110 Woodland Ave, Ste 1
Reno, NV 89523

RE: 1223 CR 233, Florence, TX 76527
AW0476 ~~AW0476~~ - Nash, F.m. Sur., ACRES 41.22

The above referenced property is located within the Edwards Aquifer Contributing Zone.

Based on the surrounding subdivisions and the soil survey for Williamson County and planning material received, this office is able to determine that the soil and site conditions of this lot is suitable to allow the use of on-site sewage facilities (OSSF). It should be noted that this office has not actually studied the physical properties of this site. Site specific conditions such as OSSF setbacks, recharge features, drainage, soil conditions, etc... , will need taken into account in planning any OSSF.

These OSSF's will have to be designed by a professional engineer or a registered sanitarian. An Edwards Aquifer protection plan shall be approved by the appropriate TCEQ regional office before an authorization to construct an OSSF may be issued. The owner will be required to inform each prospective buyer, lessee or renter of the following in writing:

- That an authorization to construct shall be required before an OSSF can be constructed in the subdivision;
- That a notice of approval shall be required for the operation of an OSSF;
- Whether an application for a water pollution abatement plan as defined in Chapter 213 has been made, whether it has been approved and if any restrictions or conditions have been placed on the approval.

If this office can be of further assistance, please do not hesitate to call.

s **NmA**

Chad Winkler, OS 31826
Williamson County - OSSF

ATTACHMENT J

BMPs FOR UPGRADIENT STORMWATER

Upgradient properties are currently developed as large-lot single family and consist of approximately 10% impervious cover. The drainage from the upgradient area will be routed around the site and will bypass the proposed on-site BMP's. No BMP's are proposed for upgradient stormwater due to the limited area.

ATTACHMENT K

BMPs FOR ON-SITE STORMWATER (SUBMITTED PREVIOUSLY)

Temporary erosion and sedimentation controls will consist of silt fences, rock berms, and a stabilized construction entrance/ exit. A combination of vegetative filter strips and grassy swales was installed for this project to prevent pollution of stormwater that originates on-site. The vegetative filter strips and grassy swales are located adjacent to the extents of paving. The efficiency of the vegetative filter strip to remove TSS is 85% per the TCEQ, grassy swale efficiency is 70% complying with Edwards Aquifer Rules Manual.

There are two overall drainage areas, each of which contains a Vegetative Filter Strip sub-area and a grassy swale overall area. The areas of vegetative filter strip drainage receive the benefit of BMP's installed in a series. For purposes of TSS removal, the vegetative filter strip drainage areas are calculated at 91.83% removal efficiency to account for the compounding net efficiency as outlined in RG-348. The removal of the remaining areas only draining to the grassy swale are calculated at the typical 70% removal efficiency.

For purposes of grassy swale sizing, the areas of the grassy swales are included back into the sizing calculations. This is done to ensure that the grassy swale is sized to accept the entire drainage basin and account for the correct velocity range.

The required Total TSS already approved for removal for this project is 7,367 pounds and the proposes total TSS removal is 7,587 pounds. Refer to the previously submitted construction documents (Attachment M Modification No. 1).

**ATTACHMENT M
(SUBMITTED SEPARATELY)**

***BMPs FOR ON-SITE STORMWATER SUBMITTED
AND
APPROVED UNDER MODIFICATION NO. 1 BY TCEQ.
NO NEW CONTROLS PROPOSED.***

ATTACHMENT N
INSPECTION, MAINTENANCE, REPAIR AND RETROFIT PLAN
(NO CHANGES PROPOSED FROM MODIFICATION NO. 1 SUBMISSION)

Project Name: W.S. Campus Holdings LLC Additional Gun Ranges

Address: 1201 County Rd 233, Florence, TX 76527

GRASSY SWALES

Maintenance for grassy swales is minimal and is largely aimed at keeping the grass cover dense and vigorous. Maintenance practices and schedules should be developed and included as part of the original plans to alleviate maintenance problems in the future. Recommended practices include (modified from Young et al., 1996):

- ☐ **Pest Management.** An Integrated Pest Management (IPM) Plan should be developed for vegetated areas. This plan should specify how problem insects and weeds will be controlled with minimal or no use of insecticides and herbicides.
- ☐ **Seasonal Mowing and Lawn Care.** Lawn mowing should be performed routinely, as needed, throughout the growing season.

Grass height should not exceed 18 inches.

Grass cuttings should be collected and disposed of offsite, or a mulching mower can be used.

Regular mowing should also include weed control practices; however, herbicide use should be kept to a minimum (Urbonas et al., 1992).

Healthy grass can be maintained without using fertilizers because runoff usually contains sufficient nutrients.

- ☐ **Inspection.** Inspect swales at least twice annually for erosion or damage to vegetation; however, additional inspection after periods of heavy runoff is most desirable.

The swale should be checked for uniformity of grass cover, debris and litter, and areas of sediment accumulation.

More frequent inspections of the grass cover during the first few years after establishment will help to determine if any problems are developing, and to plan for long-term restorative maintenance needs.

Bare spots and areas of erosion identified during semi-annual inspections should be replanted and restored to meet specifications.

Construction of a level spreader device may be necessary to reestablish shallow overland flow.

- ☐ **Debris and Litter Removal.** Trash tends to accumulate in swale areas, particularly along highways.

Any swale structures (i.e. check dams) should be kept free of obstructions to reduce floatables being flushed downstream, and for aesthetic reasons.

The need for this practice is determined through periodic inspection, but should be performed no less than two times per year (Urbonas et al., 1992).

- ☐ **Sediment Removal.** Sediment accumulating near culverts and in channels needs to be removed when they build up to 3 inches at any spot, or cover vegetation.

Excess sediment should be removed by hand or with flat-bottomed shovels.

If areas are eroded, they should be filled, compacted, and reseeded so that the final grade is level with the bottom of the swale.

Sediment removal should be performed periodically, as determined through inspection.

- ☐ **Grass Reseeding.** Grass damaged during the sediment removal process should be promptly replaced using the same seed mix used during swale establishment.

If possible, flow should be diverted from the damaged areas until the grass is firmly established.

- ☐ **Public Education.** Private homeowners are often responsible for roadside swale maintenance. Unfortunately, overzealous lawn care on the part of homeowners can present some problems.

For example, mowing the swale too close to the ground, or excessive application of fertilizer and pesticides will all be detrimental to the performance of the swale.

Pet waste can also be a problem in swales, and should be removed to avoid contamination from fecal coliform and other waste-associated bacteria.

The delegation of maintenance responsibilities to individual landowners is a cost benefit to the locality.

However, localities should provide an active educational program to encourage the recommended practices.

VEGETATIVE FILTER STRIPS

- ☐ Once a vegetated area is well established, little additional maintenance is generally necessary. The key to establishing a viable vegetated feature is the care and maintenance it receives in the first few months after it is planted. Once established, all vegetated BMPs require some basic maintenance to insure the health of the plants including:
 - **Pest Management.** An Integrated Pest Management (IPM) Plan should be developed for vegetated areas. This plan should specify how problem insects and weeds will be controlled with minimal or no use of insecticides and herbicides.
 - **Seasonal Mowing and Lawn Care.** If the filter strip is made up of turf grass, it should be mowed as needed to limit vegetation height to 18 inches, using a mulching mower (or removal of clippings). If native grasses are used, the filter may require less frequent mowing, but a

minimum of twice annually.

Grass clippings and brush debris should not be deposited on vegetated filter strip areas.

Regular mowing should also include weed control practices, however herbicide use should be kept to a minimum (Urbonas et al., 1992).

Healthy grass can be maintained without using fertilizers because runoff usually contains sufficient nutrients. Irrigation of the site can help assure a dense and healthy vegetative cover.

- ☐ Inspection. Inspect filter strips at least twice annually for erosion or damage to vegetation; however, additional inspection after periods of heavy runoff is most desirable.

The strip should be checked for uniformity of grass cover, debris and litter, and areas of sediment accumulation.

More frequent inspections of the grass cover during the first few years after establishment will help to determine if any problems are developing, and to plan for long-term restorative maintenance needs.

Bare spots and areas of erosion identified during semi-annual inspections must be replanted and restored to meet specifications.

Construction of a level spreader device may be necessary to reestablish shallow overland flow.

- ☐ Debris and Litter Removal. Trash tends to accumulate in vegetated areas, particularly along highways. Any filter strip structures (i.e. level spreaders) should be kept free of obstructions to reduce floatables being flushed downstream, and for aesthetic reasons.

The need for this practice is determined through periodic inspection, but should be performed no less than 4 times per year.

- ☐ Sediment Removal. Sediment removal is not normally required in filter strips, since the vegetation normally grows through it and binds it to the soil. However, sediment may accumulate along the upstream boundary of the strip preventing uniform overland flow. Excess sediment should be removed by hand or with flat-bottomed shovels.

- ☐ Grass Reseeding and Mulching. A healthy dense grass should be maintained on the filter strip. If areas are eroded, they should be filled, compacted, and reseeded so that the final grade is level.

Grass damaged during the sediment removal process should be promptly replaced using the same seed mix used during filter strip establishment.

If possible, flow should be diverted from the damaged areas until the grass is firmly established.

Bare spots and areas of erosion identified during semi-annual inspections must be replanted and restored to meet specifications.

Corrective maintenance, such as weeding or replanting should be done more frequently in the first two

to three years after installation to ensure stabilization.

Dense vegetation may require irrigation immediately after planting, and during particularly dry periods, particularly as the vegetation is initially established.

- ☐ An amended copy of this document will be provided to the Texas Commission on Environmental Quality within thirty (30) days of any changes in the information.

RESPONSIBLE PARTY: John Messer, Staccato Ammunition/Longhorn Ammunition

MAILING ADDRESS: W.S. Campus Holdings LLC, 1201 County Rd 233, Florence, TX 76527

TELEPHONE: 254-624-9031

SIGNATURE OF RESPONSIBLE PARTY

DATE

Engineer: Joshua A. Baran, P.E.
Firm: JAB Engineering, LLC
TBPE Firm No.: E-14076
Mailing Address: 4500 Williams Drive, Ste. 212-121
City, State: Georgetown, TX 78633
Telephone: (512) 779-7414



ATTACHMENT P
MEASURES FOR MINIMIZING SURFACE STREAM CONTAMINATION

All flow generated from development on the subject site is treated by the proposed on-site vegetative filter strips and grassy swales prior to discharging the stormwater into the downstream channel. Therefore, any contamination of surrounding surface streams is greatly reduced. The on-site vegetative filter strips and grassy swales satisfy the TCEQ Criteria, thus providing adequate pollutant removal.

SECTION III
Temporary Stormwater Section (TCEQ-0602)

Temporary Stormwater Section

Texas Commission on Environmental Quality

for Regulated Activities on the Edwards Aquifer Recharge Zone and Relating to 30 TAC

§213.5(b)(4)(A), (B), (D)(I) and (G); Effective June 1, 1999

To ensure that the application is administratively complete, confirm that all fields in the form are complete, verify that all requested information is provided, consistently reference the same site and contact person in all forms in the application, and ensure forms are signed by the appropriate party.

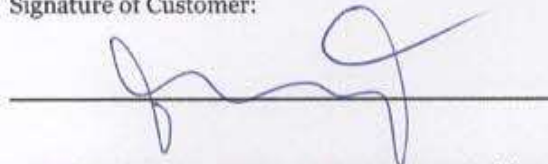
Note: Including all the information requested in the form and attachments contributes to more streamlined technical reviews.

Signature

To the best of my knowledge, the responses to this form accurately reflect all information requested concerning the proposed regulated activities and methods to protect the Edwards Aquifer. This **Temporary Stormwater Section** is hereby submitted for TCEQ review and executive director approval. The application was prepared by:

Print Name of Customer/JOHN MESSER Date: 06/13/25

Signature of Customer:



Regulated Entity Name: W.S. Campus Holdings LLC

Project Information

Potential Sources of Contamination

Examples: Fuel storage and use, chemical storage and use, use of asphaltic products, construction vehicles tracking onto public roads, and existing solid waste.

☒ Fuels for construction equipment and hazardous substances which will be used during construction:

☐ The following fuels and/or hazardous substances will be stored on the site: _____

These fuels and/or hazardous substances will be stored in:

☐ Aboveground storage tanks with a cumulative storage capacity of less than 250 gallons will be stored on the site for less than one (1) year.

☐ Aboveground storage tanks with a cumulative storage capacity between 250 gallons and 499 gallons will be stored on the site for less than one (1) year.

☐ Aboveground storage tanks with a cumulative storage capacity of 500 gallons or more will be stored on the site. An Aboveground Storage Tank Facility Plan application must be submitted to the appropriate regional office of the TCEQ prior to moving the tanks onto the project.

☒ Fuels and hazardous substances will not be stored on the site.

☒ **Attachment A - Spill Response Actions.** A site specific description of the measures to be taken to contain any spill of hydrocarbons or hazardous substances is attached.

☒ **N/A -** Temporary aboveground storage tank systems of 250 gallons or more cumulative storage capacity must be located a minimum horizontal distance of 150 feet from any domestic, industrial, irrigation, or public water supply well, or other sensitive feature.

☒ **Attachment B - Potential Sources of Contamination.** A description of any activities or processes which may be a potential source of contamination affecting surface water quality is attached.

Sequence of Construction

☒ **Attachment C - Sequence of Major Activities.** A description of the sequence of major activities which will disturb soils for major portions of the site (grubbing, excavation, grading, utilities, and infrastructure installation) is attached.

☒ For each activity described, an estimate (in acres) of the total area of the site to be disturbed by each activity is given.

☒ For each activity described, include a description of appropriate temporary control measures and the general timing (or sequence) during the construction process that the measures will be implemented.

☒ Name the receiving water(s) at or near the site which will be disturbed or which will receive discharges from disturbed areas of the project: South Salado Creek

Temporary Best Management Practices (TBMPs)

Erosion control examples: tree protection, interceptor swales, level spreaders, outlet stabilization, blankets or matting, mulch, and sod. Sediment control examples: stabilized construction exit, silt fence, filter dikes, rock berms, buffer strips, sediment traps, and sediment basins. Please refer to the Technical Guidance Manual for guidelines and specifications. All structural BMPs must be shown on the site plan.

☒ **Attachment D – Temporary Best Management Practices and Measures.** TBMPs and measures will prevent pollution of surface water, groundwater, and stormwater. The construction-phase BMPs for erosion and sediment controls have been designed to retain sediment on site to the extent practicable. The following information is attached:

- ☒ A description of how BMPs and measures will prevent pollution of surface water, groundwater or stormwater that originates upgradient from the site and flows across the site.
- ☒ A description of how BMPs and measures will prevent pollution of surface water or groundwater that originates on-site or flows off site, including pollution caused by contaminated stormwater runoff from the site.
- ☒ A description of how BMPs and measures will prevent pollutants from entering surface streams, sensitive features, or the aquifer.
- ☒ A description of how, to the maximum extent practicable, BMPs and measures will maintain flow to naturally-occurring sensitive features identified in either the geologic assessment, TCEQ inspections, or during excavation, blasting, or construction.

☐ The temporary sealing of a naturally-occurring sensitive feature which accepts recharge to the Edwards Aquifer as a temporary pollution abatement measure during active construction should be avoided.

☐ **Attachment E - Request to Temporarily Seal a Feature.** A request to temporarily seal a feature is attached. The request includes justification as to why no reasonable and practicable alternative exists for each feature.

☒ There will be no temporary sealing of naturally-occurring sensitive features on the site.

☒ **Attachment F - Structural Practices.** A description of the structural practices that will be used to divert flows away from exposed soils, to store flows, or to otherwise limit runoff discharge of pollutants from exposed areas of the site is attached. Placement of structural practices in floodplains has been avoided.

☒ **Attachment G - Drainage Area Map.** A drainage area map supporting the following requirements is attached:

For areas that will have more than 10 acres within a common drainage area disturbed at one time, a sediment basin will be provided.

☐ For areas that will have more than 10 acres within a common drainage area disturbed at one time, a smaller sediment basin and/or sediment trap(s) will be used.

☐ For areas that will have more than 10 acres within a common drainage area disturbed at one time, a sediment basin or other equivalent controls are not attainable, but other TBMPs and measures will be used in combination to protect down slope and side slope boundaries of the construction area.

☐ There are no areas greater than 10 acres within a common drainage area that will be disturbed at one time. A smaller sediment basin and/or sediment trap(s) will be used in combination with other erosion and sediment controls within each disturbed drainage area.

☒ **There are no areas greater than 10 acres within a common drainage area that will be disturbed at one time. Erosion and sediment controls other than sediment basins or sediment traps within each disturbed drainage area will be used.**

☐ **Attachment H - Temporary Sediment Pond(s) Plans and Calculations.** Temporary sediment pond or basin construction plans and design calculations for a proposed temporary BMP or measure have been prepared by or under the direct supervision of a Texas Licensed Professional Engineer. All construction plans and design information must be signed, sealed, and dated by the Texas Licensed Professional Engineer. Construction plans for the proposed temporary BMPs and measures are attached.

☒ N/A

☒ **Attachment I - Inspection and Maintenance for BMPs.** A plan for the inspection of each temporary BMP(s) and measure(s) and for their timely maintenance, repairs, and, if necessary, retrofit is attached. A description of the documentation procedures, recordkeeping practices, and inspection frequency are included in the plan and are specific to the site and/or BMP.

☒ All control measures must be properly selected, installed, and maintained in accordance with the manufacturer's specifications and good engineering practices. If periodic inspections by the applicant or the executive director, or other information indicate a control has been used inappropriately, or incorrectly, the applicant must replace or modify the control for site situations.

☒ If sediment escapes the construction site, off-site accumulations of sediment must be removed at a frequency sufficient to minimize offsite impacts to water quality (e.g., fugitive sediment in street being washed into surface streams or sensitive features by the next rain).

☒ Sediment must be removed from sediment traps or sedimentation ponds not later than when design capacity has been reduced by 50%. A permanent stake will be provided that can indicate when the sediment occupies 50% of the basin volume.

☒ Litter, construction debris, and construction chemicals exposed to stormwater shall be prevented from becoming a pollutant source for stormwater discharges (e.g., screening outfalls, picked up daily).

Soil Stabilization Practices

Examples: establishment of temporary vegetation, establishment of permanent vegetation, mulching, geotextiles, sod stabilization, vegetative buffer strips, protection of trees, or preservation of mature vegetation.

☒ **Attachment J - Schedule of Interim and Permanent Soil Stabilization Practices.** A schedule of the interim and permanent soil stabilization practices for the site is attached.

☒ Records must be kept at the site of the dates when major grading activities occur, the dates when construction activities temporarily or permanently cease on a portion of the site, and the dates when stabilization measures are initiated.

☒ Stabilization practices must be initiated as soon as practicable where construction activities have temporarily or permanently ceased.

Administrative Information

- ☒ All structural controls will be inspected and maintained according to the submitted and approved operation and maintenance plan for the project.
- ☒ If any geologic or manmade features, such as caves, faults, sinkholes, etc., are discovered, all regulated activities near the feature will be immediately suspended. The appropriate TCEQ Regional Office shall be immediately notified. Regulated activities must cease and not continue until the TCEQ has reviewed and approved the methods proposed to protect the aquifer from any adverse impacts.
- ☒ Silt fences, diversion berms, and other temporary erosion and sediment controls will be constructed and maintained as appropriate to prevent pollutants from entering sensitive features discovered during construction.

ATTACHMENT A

SPILL RESPONSE ACTIONS

Spills will be prevented utilizing Best Management Practices previously described such as proper material storage, handling, and disposal practices. However, despite such efforts, a spill may occur on site. If a spill occurs, the following procedures will be utilized.

- ***Stop the spill, if possible.*** This can include shutting off power to a pump, righting an overturned container, or plugging a hole in a damaged container.
- ***Contain the spill, safely.*** Spill containment can be accomplished using a variety of materials and methods such as the use of absorbents (i.e. sawdust, Oil Dri, rags, soil, polypropylene pads or booms, etc.) to dike the area around the spill, or placing a leaking container inside one which is not leaking. Spill containment should only be attempted if it is safe to do so. Proper safety equipment such as gloves and eye protection should be used as directed on the Material Safety Data Sheet for the spilled material.
- ***Report the spill, if necessary.*** Certain quantities of hazardous or toxic materials such as pesticides, paint thinners, gasoline, etc. are required by Federal Law to be reported to the National Response Center (NRC) at 1-800-424-8802 as soon as you have knowledge of the spill. Since most of the quantities which require reporting to the NRC are larger than that found on a typical construction site, spill reporting to the State or Local authorities is more likely. When in doubt, report the spill.

The reporting requirements which may apply to the sites covered in this SW3P are:

Texas Commission on Environmental Quality (TCEQ) 1-800-832-8224

TCEQ requires reporting of spills of 25 gallons or greater, especially which might impact a waterway.

- ***Clean the spill up, properly.*** Spill clean up should be performed in accordance with applicable regulations or according to the manufacturer's recommendations on the Material Safety Data Sheet. In most cases, proper spill clean up is to use a dry method such as absorbing the spill and containerize for disposal via a licensed disposal company. For non-hazardous and non-toxic materials this may be through your solid waste disposal service with prior approval.
- ***Fill in table on next page.***

The SW3P must be modified within 14 days of a release to provide a description of the spill, the circumstances leading to the spill, and the date of the spill. Spill clean-up materials, methods, and additional Best Management Practices addressing spill prevention should also be included.

[illegible]

ATTACHMENT B

Potential Sources of Contamination

*Potential Sources of Contamination associated with this project:

1. Dirt, rocks, silt from building berms and compacting gravel.
2. Trash and debris: from construction workers.
3. Construction Phase Pollutants: hydraulic fluid, machine oil, concrete and sediment from equipment .

ATTACHMENT C

Sequence of Major Activities

1. Install construction fencing, stabilized construction entrance, erosion controls, and tree protection fencing per approved erosion and sedimentation control/tree protection plan.
2. The contractor shall arrange and coordinate acceptable meeting times for an on-site preconstruction meeting with the Owner, Project Engineer, relevant contractors, and the City Environmental Inspector. The Environmental Inspector shall be contacted 72 hours prior to the required on-site preconstruction meeting.
3. Begin site clearing/demolition. Silt Fence, SCE, and temporary sediment pond must be installed prior and maintained during operations.
4. Rough grade the site in accordance with plans.
5. Install utility improvements.
6. Construct all-weather driving surface. Silt Fence must be maintained during operations.
7. Complete final grading, drainage, and ranges. Silt Fence must be maintained during operations.
8. Hydromulch or sod all disturbed areas per landscape plan and general site cleanup. Silt Fence, must be maintained during operations.
9. Final clearing of temporary erosion and sedimentation controls and storm drain structures.

Total Disturbed Area = 5.61 acres

*Note: Areas identified above in the sequence of construction may overlap and should not be totaled.

ATTACHMENT D

Temporary Best Management Practices and Measures

- Silt Fence – Silt fence will be installed along the property line prior to the start of berm construction activities. The silt fence will prevent total suspended solids from leaving the site via sheet flow.
- Rock Berm – Approximately 30 lf of rock berm will be installed along the roadside ditch of Williams Drive during construction. This BMP will be removed upon stabilization of the permanent BMPs.
- Concrete Washout – Washout area to be located near SCE. This BMP will be removed upon completion of concrete work.

ATTACHMENT F

Structural Practices

Upgradient flows will be routed through the proposed stormwater detention facility and outfall along the southeast corner of the property. All on-site drainage during construction will flow through the proposed temporary BMP's.

ATTACHMENT G

DRAINAGE AREA MAPS

**REFER TO CONSTRUCTION PLANS SUBMITTED UNDER MODIFICATION 1 APPROVED BY TCEQ.
NO CHANGES PROPOSED.**

ATTACHMENT I
INSPECTION AND MAINTENANCE FOR BMPs
(NO CHANGES PROPOSED FROM MODIFICATION NO. 1 SUBMISSION)

Project Name: W.S. Campus Holdings LLC Additional Gun Ranges

Address: 1201 County Rd 233, Florence, TX 76527

SILT FENCE

- Inspections: Inspections shall be made weekly or after each rainfall event and repair or replacement shall be made promptly as needed.
- Sediment Removal: Accumulated silt shall be removed when it reaches a depth of 150mm (6 inches). The silt shall be disposed of on an approved site and in such a manner that will not contribute to additional siltation.
- Silt fence shall be removed when the site is completely stabilized so as not to block or impede storm flow or drainage.

ROCK BERM

- Inspections: Inspections shall be made weekly or after each rainfall event and the stone and/or fabric core-woven sheathing shall be replaced when the structure ceases to function as intended, due to silt accumulation among the rocks, washout, construction traffic damage, etc.
- Daily inspections shall be made on severe-service rock berms; silt shall be removed when accumulation reaches 150mm (6 inches).
- Sediment Removal: Accumulated silt shall be removed when it reaches a depth of 150mm (6 inches). The silt shall be disposed of on an approved site and in such a manner that will not contribute to additional siltation.
- Rock berms shall be removed when the site is completely stabilized so as not to block or impede storm flow or drainage.

STABILIZED CONSTRUCTION ENTRANCE

- Maintenance: The entrance shall be maintained in a condition that will prevent tracking or flowing of sediment onto public roadway. This may require periodic top dressing with additional stone as conditions demand, as well as repair and clean out of any measure devices used to trap sediment.
- All sediment that is spilled, dropped, washed or tracked onto public roadway must be removed immediately. The stabilized construction entrance will be removed once the driveway to the proposed site is complete.

CONCRETE WASHOUT AREAS

- When temporary concrete washout facilities are no longer required for the work, the hardened concrete should be removed and disposed of.
- Materials used to construct temporary concrete washout facilities should be removed from the site of the work and disposed of.
- Holes, depressions or other ground disturbance caused by the removal of the temporary concrete washout facilities should be backfilled and repaired.
- Disposal of accumulated silt shall be accomplished following Texas Commission on Environmental Quality guidelines and specifications.

An amended copy of this document will be provided to the Texas Commission on Environmental Quality within thirty (30) days of any changes in the following information.

Responsible Party: JOHN MESSER, W.S. Campus Holdings LLC

Mailing Address: 1201 County Rd 233, Florence, TX 76527

Telephone: 254-624-9031


SIGNATURE OF RESPONSIBLE PARTY

DATE

ATTACHMENT J

Schedule of Interim and Permanent Soil Stabilization Practices

Interim stabilization shall be achieved through the temporary erosion controls. All disturbed pervious space shall receive permanent hydromulch or sod after final grading.

SECTION IV

Notice of Intent (NOI)

NO NEW NOI IS REQUIRED

NOI was previously submitted under Modification No.1 via STEERS

SECTION V
Agent Authorization Forms

Agent Authorization Form

For Required Signature Edwards Aquifer Protection Program

Relating to 30 TAC Chapter 213

Effective June 1, 1999

I JOHN MESSER
PRINT NAME

CEO
TITLE

OF W.S. CAMPUS HOLDINGS INC.
Corporation/Partnership/Entity Name

HAVE AUTHORIZED ELIZABETH MACK
PRINT NAME AGENT

OF FEATHER AND MANE LLC
PRINT NAME OF FIRM

to represent and act on the behalf of the above named Corporation, Partnership, or Entity for the purpose of preparing and submitting this plan application to the Texas Commission on Environmental Quality (TCEQ) for the review and approval consideration of regulated activities.

I also understand that:

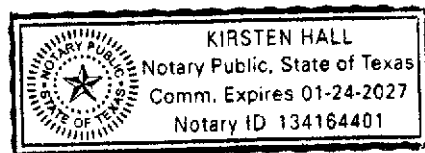
1. The applicant is responsible for compliance with 30 Texas Administrative Code Chapter 213 and any condition of the TCEQ's approval letter. The TCEQ is authorized to assess administrative penalties of up to \$10,000 per day per violation.
2. For those submitting an application who are not the property owner, but who have the right to control and possess the property, additional authorization is required from the owner.
3. Application fees are due and payable at the time the application is submitted. The application fee must be sent to the TCEQ cashier or to the appropriate regional office. The application will not be considered until the correct fee is received by the commission.
4. A notarized copy of the Agent Authorization Form must be provided for the person preparing the application, and this form must accompany the completed application.
5. No person shall commence any regulated activity on the Edwards Aquifer Recharge Zone, Contributing Zone or Transition Zone until the appropriate application for the activity has been filed with and approved by the Executive Director.

SIGNATURE PAGE:

[Signature]
Applicant's Signature

10/8/25
Date

THE STATE OF TEXAS
COUNTY OF WILLIAMSON



BEFORE ME, the undersigned authority, on this day personally appeared known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that (s)he executed same for the purpose and consideration therein expressed.

GIVEN under my hand and seal of office on this 8th DAY OF OCTOBER 2025

NOTARY PUBLIC

KIRSTEN HALL
TYPED OR PRINTED NAME

1/24/2027
MY COMMISSION EXPIRES

SECTION VI
Application Fee Form

Texas Commission on Environmental QualityName of Proposed Regulated Entity: W.S. CAMPUS HOLDINGS LLCRegulated Entity Location: 1223 CR 233 | Name of Customer: WS Campus Holdings LLC

Contact Person: John Messer

Phone: 254-624-9031

Customer Reference Number (if issued):

CN 605947324

Regulated Entity Reference Number (if issued):

RN 1161359683

Austin Regional Office (3373)☐ Hays☐ Travis☒ Williamson**San Antonio Regional Office (3362)**☐ Bexar☐ Medina☐ Uvalde☐ Comal☐ Kinney

Application fees must be paid by check, certified check, or money order, payable to the **Texas Commission on Environmental Quality**. Your canceled check will serve as your receipt. **This form must be submitted with your fee payment.** This payment is being submitted to:

☒ Austin Regional Office☐ San Antonio Regional Office☐ Mailed to: TCEQ - Cashier Revenues
Section☐ Overnight Delivery to: TCEQ - Cashier 12100 Park 35
Circle

Mail Code 214

P.O. Box 13088

Austin, TX 78711-3088

Building A, 3rd Floor

Austin, TX 78753

(512)239-0357

Site Location (Check All That Apply):☐ Recharge Zone☒ Contributing Zone☐ Transition Zone

Type of Plan	Size	Fee Due
Water Pollution Abatement Plan, Contributing Zone Plan: One Single Family Residential Dwelling	Acres	\$
Water Pollution Abatement Plan, Contributing Zone Plan: Multiple Single Family Residential and Parks	Acres	\$
Water Pollution Abatement Plan, Contributing Zone Plan: Non-residential	55.53 Acres	\$8,000
Sewage Collection System	L.F.	\$
Lift Stations without sewer lines	Acres	\$
Underground or Aboveground Storage Tank Facility	Tanks	\$
Piping System(s)(only)	Each	\$
Exception	Each	\$
Extension of Time	Each	\$

Signature:

Date: 10/08/2025

Application Fee Schedule

Texas Commission on Environmental Quality

Edwards Aquifer Protection Program 30 TAC Chapter 213 (effective 05/01/2008)

Water Pollution Abatement Plans and Modifications

Contributing Zone Plans and Modifications

<i>Project</i>	<i>Project Area in Acres</i>	<i>Fee</i>
One Single Family Residential Dwelling	< 5	\$650
Multiple Single Family Residential and Parks	< 5	\$1,500
	5 < 10	\$3,000
	10 < 40	\$4,000
	40 < 100	\$6,500
	100 < 500	\$8,000
	≥ 500	\$10,000
Non-residential (Commercial, industrial, institutional, multi-family residential, schools, and other sites where regulated activities will occur)	< 1	\$3,000
	1 < 5	\$4,000
	5 < 10	\$5,000
	10 < 40	\$6,500
	40 < 100	\$8,000
	≥ 100	\$10,000

Organized Sewage Collection Systems and Modifications

<i>Project</i>	<i>Cost per Linear Foot</i>	<i>Minimum Fee- Maximum Fee</i>
Sewage Collection Systems	\$0.50	\$650 - \$6,500

Underground and Aboveground Storage Tank System Facility Plans and Modifications

<i>Project</i>	<i>Cost per Tank or Piping System</i>	<i>Minimum Fee- Maximum Fee</i>
Underground and Aboveground Storage Tank Facility	\$650	\$650 - \$6,500

Exception Requests

<i>Project</i>	<i>Fee</i>
Exception Request	\$500

Extension of Time Requests

<i>Project</i>	<i>Fee</i>
Extension of Time Request	\$150

SECTION VI
Core Data Form



TCEQ Use Only

TCEQ Core Data Form

SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
☐ New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
☐ Renewal (Core Data Form should be submitted with the renewal form)		☒ Other Modification
2. Customer Reference Number (if issued)		3. Regulated Entity Reference Number (if issued)
CN 605947324		RN 111359683

[Follow this link to search for CN or RN numbers in Central Registry**](#)

SECTION II: Customer Information

4. General Customer Information		5. Effective Date for Customer Information Updates (mm/dd/yyyy)			
☐ New Customer		☒ Update to Customer Information		☐ Change in Regulated Entity Ownership	
☐ Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)					
The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).					
6. Customer Legal Name (If an individual, print last name first: eg: Doe, John)				If new Customer, enter previous Customer below:	
WS Campus Holdings LLC					
7. TX SOS/CPA Filing Number		8. TX State Tax ID (11 digits)		9. Federal Tax ID (9 digits)	
0803931911		32077753401			
11. Type of Customer:		☐ Corporation		☐ Individual	
Government: ☐ City ☐ County ☐ Federal ☐ State ☐ Other		☐ Sole Proprietorship		Partnership: ☐ General ☒ Limited	
12. Number of Employees		13. Independently Owned and Operated?			
☐ 0-20 ☐ 21-100 ☐ 101-250 ☐ 251-500 ☐ 501 and higher		☒ Yes ☐ No			
14. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following					
☒ Owner ☐ Operator ☐ Owner & Operator					
☐ Occupational Licensee ☐ Responsible Party ☐ Voluntary Cleanup Applicant ☐ Other:					
15. Mailing Address:					
John Messer					
1275 Co Rd 233					
City		Florence		State	TX
ZIP		76527		ZIP + 4	
16. Country Mailing Information (if outside USA)				17. E-Mail Address (if applicable)	
				john.messer@staccatoammo.com	
18. Telephone Number		19. Extension or Code		20. Fax Number (if applicable)	
254-624-9031				() -	

SECTION III: Regulated Entity Information

21. General Regulated Entity Information (If 'New Regulated Entity' is selected below this form should be accompanied by a permit application)	
☐ New Regulated Entity ☐ Update to Regulated Entity Name ☐ Update to Regulated Entity Information	
The Regulated Entity Name submitted may be updated in order to meet TCEQ Agency Data Standards (removal of organizational endings such as Inc, LP, or LLC).	
22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)	
WS Campus Holdings LLC	

23. Street Address of the Regulated Entity: (No PO Boxes)	1223 CR 233						
	City	Florence	State	TX	ZIP	76527	ZIP + 4
24. County	Williamson						
25. Description to Physical Location:	On the south side of CR 233, approximately 3.9 miles east of its intersection with Hwy 195						
26. Nearest City	Florence				State	TX	Nearest ZIP Code
							76527
27. Latitude (N) In Decimal:	30.823488°			28. Longitude (W) In Decimal:	-97.720194°		
Degrees	Minutes	Seconds		Degrees	Minutes	Seconds	
30	49	23.87		97	43	14.13	
29. Primary SIC Code (4 digits)	30. Secondary SIC Code (4 digits)		31. Primary NAICS Code (5 or 6 digits)		32. Secondary NAICS Code (5 or 6 digits)		
3484	3482		332994		332992		
33. What is the Primary Business of this entity? (Do not repeat the SIC or NAICS description.)							
Manufacturing facility AND gun range/sports club for firearms and ammunition							
34. Mailing Address:	SAME AS ABOVE						
	SAME AS ABOVE						
	City		State		ZIP		ZIP + 4
35. E-Mail Address:							
36. Telephone Number		37. Extension or Code		38. Fax Number (if applicable)			
				() -			

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

SECTION IV: Preparer Information

☐ Dam Safety	☐ Districts	☒ Edwards Aquifer	☐ Emissions Inventory Air	☐ Industrial Hazardous Waste
☐ Municipal Solid Waste	☐ New Source Review Air	☐ OSSF	☐ Petroleum Storage Tank	☐ PWS
☐ Sludge	☐ Storm Water	☐ Title V Air	☐ Tires	☐ Used Oil
☐ Voluntary Cleanup	☐ Waste Water	☐ Wastewater Agriculture	☐ Water Rights	☐ Other:
40. Name:	ELIZABETH MACK		41. Title:	SENIOR PROJECT CONSULTANT
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address	
512-656-7518		() -	LIZZIE@FEATHERANDMANE.COM	

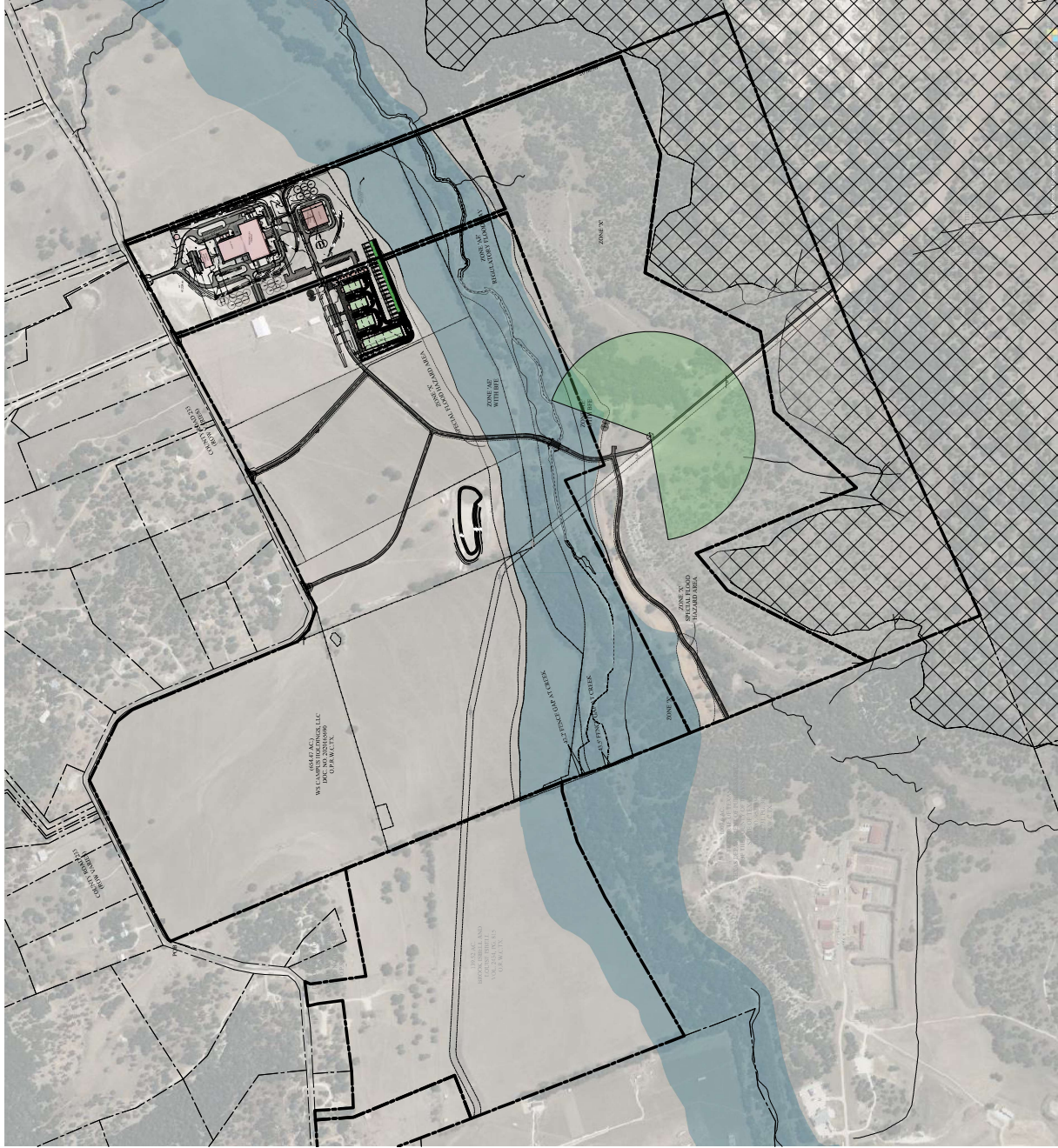
SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates identified in field 39.

Company:	STACCATO AMMUNITION/WS CAMPUS HOLDINGS	Job Title:	CEO
Name (In Print):	JOHN MESSER	Phone:	254-624-9031
Signature:		Date:	JUNE 13, 2025

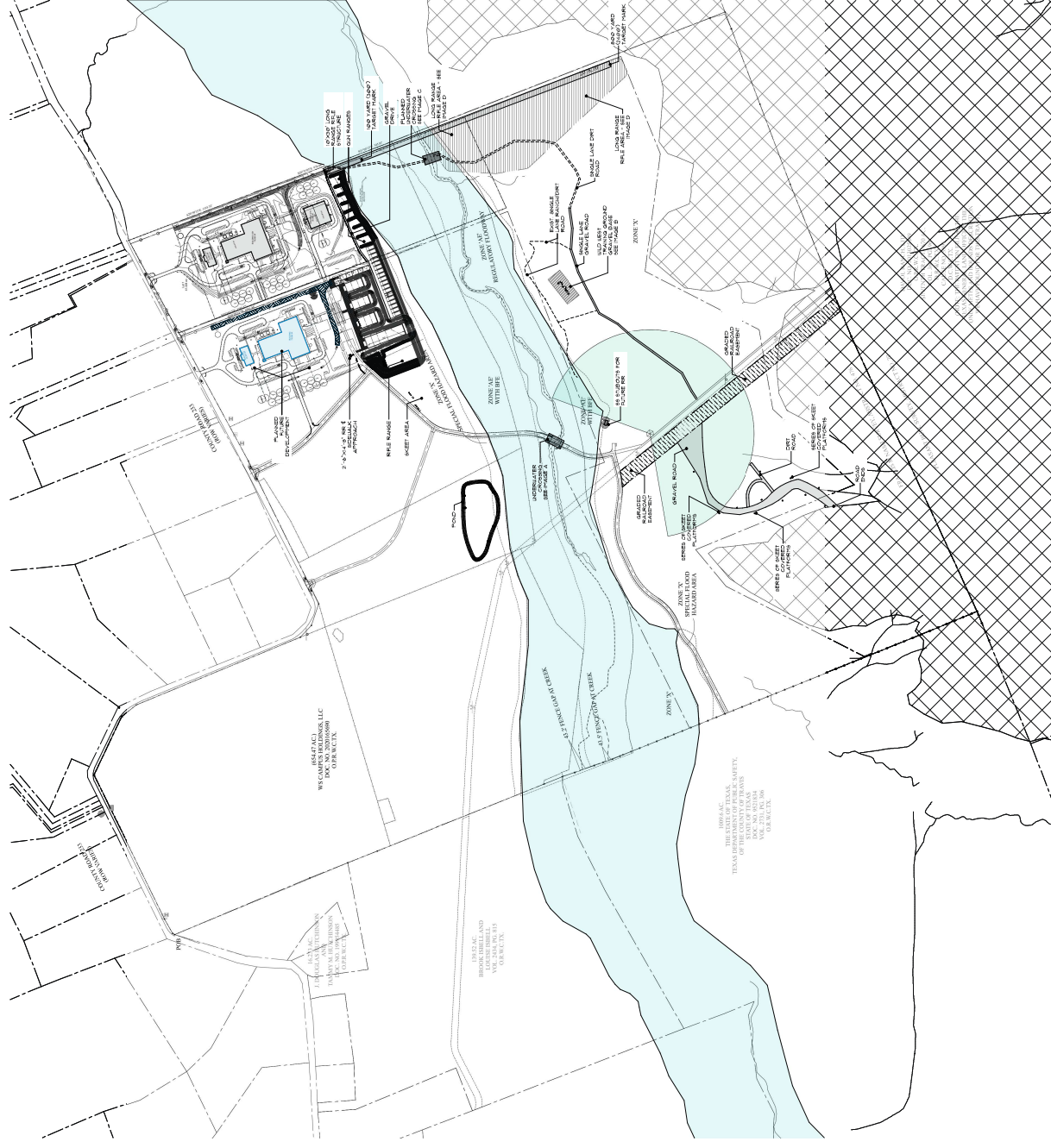
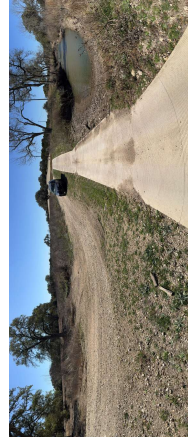
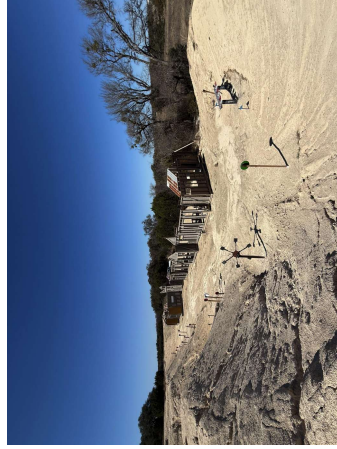
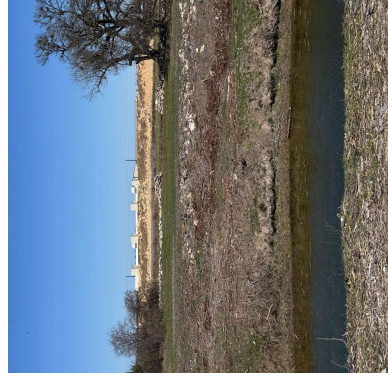
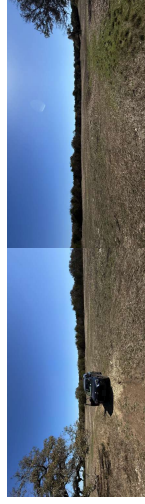
**PLEASE NOTE THAT NO NEW ENGINEERING, STORMWATER OR EDWARDS AQUIFER
BMP OR CONTROLS REQUIRING ENGINEERING REVIEW HAVE BEEN SUBMITTED AS
ONLY ADDITIONAL RANGES WERE BUILT AND EXISTING CONTROLS AND
PROCEDURES ARE SUFFICIENT FOR THOSE AREAS.**

**THE DRAWING SET ATTACHED SHOWS NO CHANGES IN ENGINEERING CONTROLS.
ONLY NEW RANGES HAVE BEEN ADDED.**



LEGEND: PROPERTY LINE LOT LINE BASEMENT LINE EXISTING EDGE OF PAVEMENT EXISTING OVERHEAD ELECTRIC LINE PROPOSED FIRE LINE PROPOSED SCREEN FENCE LIMITS OF CONSTRUCTION ACCESSIBLE ROUTE EXISTING TREE DRIP LINE		IMPERVIOUS COVER CALCULATIONS TOTAL AREA 20,306.85 SF (480.844 AC) BUILDING IMPERVIOUS COVER 13,200 SF (0.303 AC) SIDEWALK IMPERVIOUS COVER 6,000 SF (0.136 AC) PAVEMENT IMPERVIOUS COVER 374,130 SF (8.589 AC) TOTAL IMPERVIOUS AREA PROPOSED (1.48%) 389,373 SF (8.930 AC)	
NOTES: 1. FIRE DEMAND INFORMATION IS BASED ON THE ASSUMPTION OF A MINIMUM 14'-0" VERTICAL CLEARANCE AND MAXIMUM SLOPE OF 10% IN ANY DIRECTION. 2. FIRE LINES SHALL BE MARKED BY LANES OF TRAFFIC PAINT A MINIMUM OF 6 FEET WIDE. FIRE LINES SHALL BE MARKED BY WHITE LETTERS NO GREATER THAN 3" IN HEIGHT. FIRE LINES SHALL BE MARKED BY WHITE LETTERS NO GREATER THAN 3" IN HEIGHT. FIRE LINES SHALL BE MARKED BY WHITE LETTERS NO GREATER THAN 3" IN HEIGHT. FIRE LINES SHALL BE MARKED BY WHITE LETTERS NO GREATER THAN 3" IN HEIGHT. 3. DOWN STRIPPING SHALL BE USED. ENTRANCES AND EXITS SHALL BE MARKED BY WHITE LETTERS NO GREATER THAN 3" IN HEIGHT. FIRE LINES SHALL BE MARKED BY WHITE LETTERS NO GREATER THAN 3" IN HEIGHT. FIRE LINES SHALL BE MARKED BY WHITE LETTERS NO GREATER THAN 3" IN HEIGHT.		BUILDING / FIRE DEMAND INFORMATION STRUCTURES CONSIST OF 4x COVERED FRING PLATFORMS (NO WALLS) (6,600 SF TOTAL) MULTIPLE CONEX STORAGE CONTAINERS (NO POWDER STORAGE) (EST. 6,600 SF TOTAL) NO WALLED BUILDINGS ARE PROPOSED	

WS CAMPUS - LOTS 3 & 4 PRIVATE ROADS FLORENCE, TX 76527		DIMENSIONAL SITE PLAN	
WS Holdings Site Updates ARCHITECTS SALT STUDIO & ARCHITECTURE Dallas, TX 75225 214.320.5601		WS CAMPUS - LOTS 3 & 4 PRIVATE ROADS FLORENCE, TX 76527	



ISSUE:	ISSUE DATE:
Site Updates	
06/23/2025	
REVISIONS:	
ID	TITLE

Disclaimer:
These drawings are for pricing and project development only. Not to be used for permit or construction.

WS Holdings Site Updates

ARCHITECTS
SALT STUDIO & ARCHITECTURE
1808 S. Good Latimer Express
Dallas, TX 75226
214.328.9081



SALT PROJEC-
412-00

Comprehensive
Site

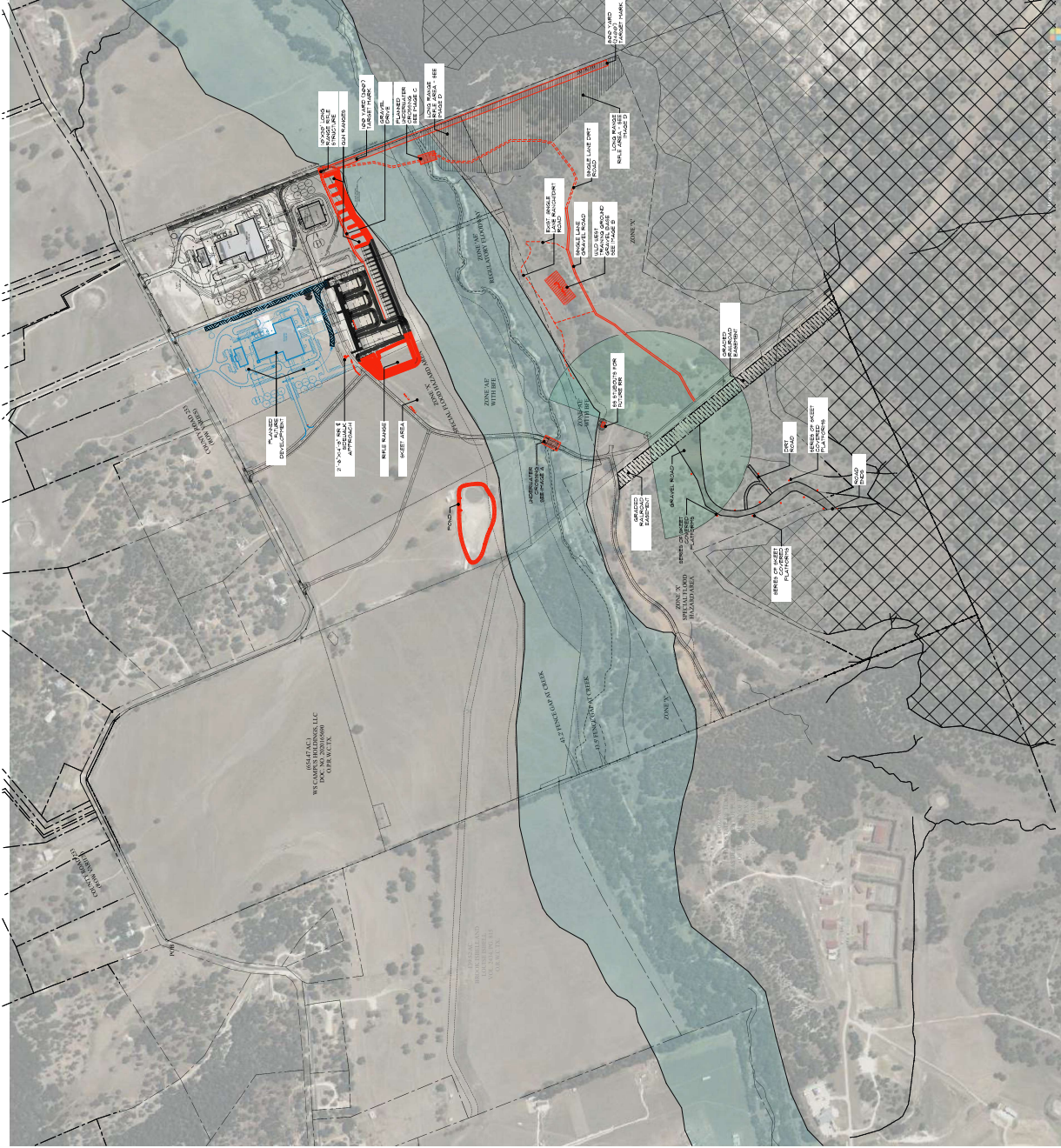
A1.0

LEGEND

- EXISTING
- ELEMENTS ADDED TO SITE
- PLANNED ELEMENTS - NOT YET BUILT

GENERAL NOTES

- PLANNED ELEMENTS DESIGNED IN ARE IDENTICAL TO THE EXISTING
- PLANNED ELEMENTS ARE SHOWN FOR INFORMATIONAL PURPOSES ONLY NOT TO BE USED FOR CONSTRUCTION.



SALT STUDIO
ARCHITECTS

ISSUE

01/10/2023

02/22/2023

REVISIONS

ISSUE DATE

ID

TITLE

DATE

DESCRIPTION

REVISIONS

DATE

DESCRIPTION

REVISIONS

DATE

DESCRIPTION

REVISIONS

DATE

DESCRIPTION

REVISIONS

DATE

DESCRIPTION

REVISIONS

DATE

DESCRIPTION

REVISIONS

DATE

DESCRIPTION

REVISIONS

DATE

DESCRIPTION

REVISIONS

DATE

DESCRIPTION

REVISIONS

DATE

DESCRIPTION

REVISIONS

DATE

DESCRIPTION

REVISIONS

DATE

DESCRIPTION

REVISIONS

DATE

DESCRIPTION

REVISIONS

DATE

DESCRIPTION

REVISIONS

DATE

DESCRIPTION

REVISIONS

DATE

DESCRIPTION

REVISIONS

DATE

DESCRIPTION

REVISIONS

DATE

DESCRIPTION

REVISIONS

DATE

DESCRIPTION

WS Holdings
Site Updates

ARCHITECT

SALT STUDIO & ARCHITECTURE
1000 N. 10th St., Suite 100
Duluth, GA 30090
214.320.5001



SALT PROJECT
412.80

Comprehensive

Site - Compared

A1.1

1 Site Comparison

SCALE: 1"=80'

ISSUE	DATE	REVISIONS	ISSUE DATE
1	09/27/2025		
2	09/27/2025		
3	09/27/2025		
4	09/27/2025		
5	09/27/2025		
6	09/27/2025		
7	09/27/2025		
8	09/27/2025		
9	09/27/2025		
10	09/27/2025		
11	09/27/2025		
12	09/27/2025		
13	09/27/2025		
14	09/27/2025		
15	09/27/2025		
16	09/27/2025		
17	09/27/2025		
18	09/27/2025		
19	09/27/2025		
20	09/27/2025		
21	09/27/2025		
22	09/27/2025		
23	09/27/2025		
24	09/27/2025		
25	09/27/2025		
26	09/27/2025		
27	09/27/2025		
28	09/27/2025		
29	09/27/2025		
30	09/27/2025		
31	09/27/2025		
32	09/27/2025		
33	09/27/2025		
34	09/27/2025		
35	09/27/2025		
36	09/27/2025		
37	09/27/2025		
38	09/27/2025		
39	09/27/2025		
40	09/27/2025		
41	09/27/2025		
42	09/27/2025		
43	09/27/2025		
44	09/27/2025		
45	09/27/2025		
46	09/27/2025		
47	09/27/2025		
48	09/27/2025		
49	09/27/2025		
50	09/27/2025		
51	09/27/2025		
52	09/27/2025		
53	09/27/2025		
54	09/27/2025		
55	09/27/2025		
56	09/27/2025		
57	09/27/2025		
58	09/27/2025		
59	09/27/2025		
60	09/27/2025		
61	09/27/2025		
62	09/27/2025		
63	09/27/2025		
64	09/27/2025		
65	09/27/2025		
66	09/27/2025		
67	09/27/2025		
68	09/27/2025		
69	09/27/2025		
70	09/27/2025		
71	09/27/2025		
72	09/27/2025		
73	09/27/2025		
74	09/27/2025		
75	09/27/2025		
76	09/27/2025		
77	09/27/2025		
78	09/27/2025		
79	09/27/2025		
80	09/27/2025		
81	09/27/2025		
82	09/27/2025		
83	09/27/2025		
84	09/27/2025		
85	09/27/2025		
86	09/27/2025		
87	09/27/2025		
88	09/27/2025		
89	09/27/2025		
90	09/27/2025		
91	09/27/2025		
92	09/27/2025		
93	09/27/2025		
94	09/27/2025		
95	09/27/2025		
96	09/27/2025		
97	09/27/2025		
98	09/27/2025		
99	09/27/2025		
100	09/27/2025		

Disclaimer: We are not responsible for printing and project details. We are not responsible for printing and project details.

WS Holdings
Site Updates

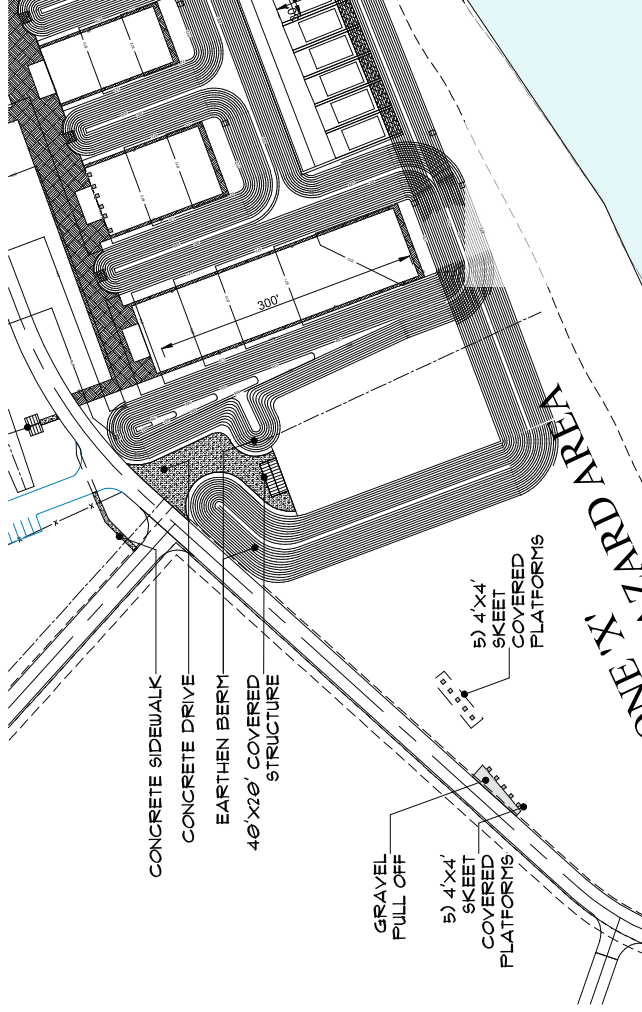
ARCHITECT
SALT STUDIO & ARCHITECTURE
214.325.0001



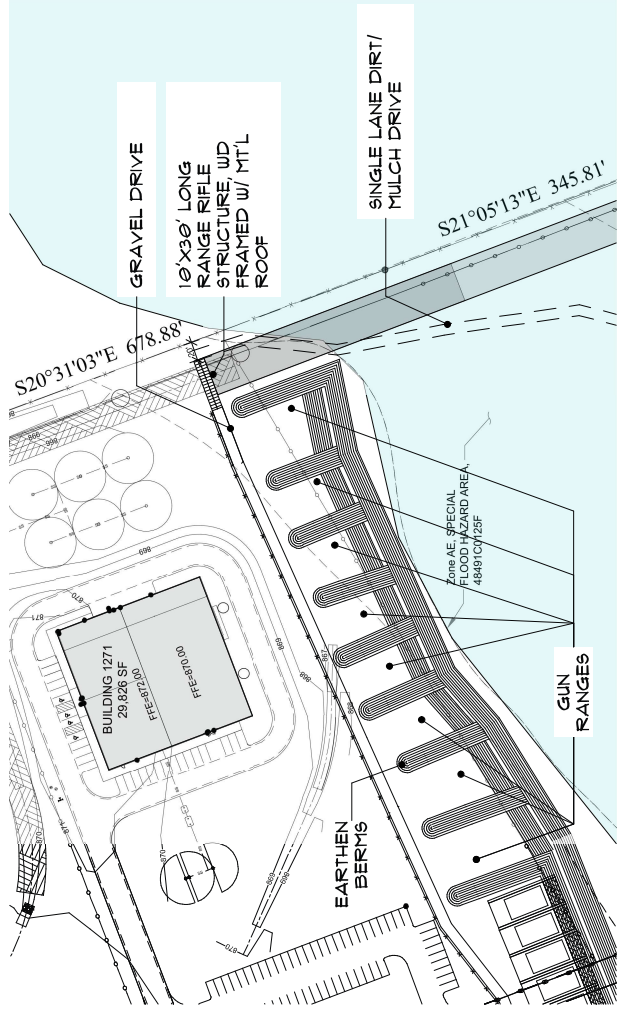
SALT PROJECT
412.88

Enlarged Site
Plans

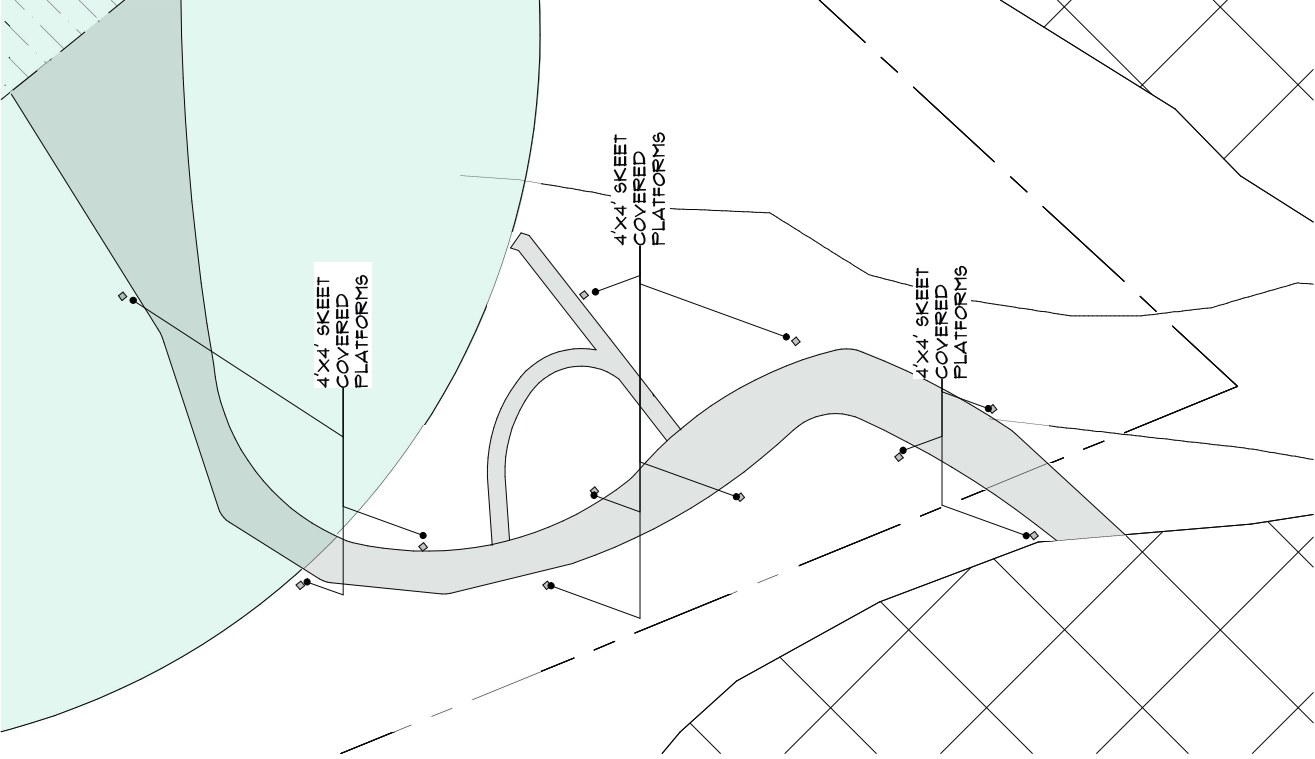
A1.2



2 Plan - Gun & Skeet Ranges
SCALE: 1/8"=1'-0"



1 Plan - Gun Ranges
SCALE: 1/8"=1'-0"



3 Plan - Gun & Skeet Ranges
SCALE: 1/8"=1'-0"