

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Zak Covar, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 29, 2014

Bridget Bohac, Chief Clerk
Texas Commission on Environmental Quality
P.O. Box 13087, MC 105
Austin, Texas 78711-3087

Re: Backup Material for Executive Director's Response to Hearing Requests Brief for
Indeck Wharton, LLC, Air Quality Permit Nos. 111724 and PSDTX1374
TCEQ Docket No. 2014-0847-AIR

Dear Ms. Bohac:

Enclosed please find a copy of the Executive Director's Response to Hearing Requests brief for the above referenced item. If you have any questions, please do not hesitate to call me at extension 1439.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jennifer J. Furrow".

Jennifer J. Furrow
Staff Attorney
Environmental Law Division

Enclosure

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**TCEQ AIR QUALITY PERMIT REGISTRATION NOS. 111724 AND PSDTX1374
TCEQ DOCKET NUMBER 2014-0847-AIR**

APPLICATION BY	§	BEFORE THE
	§	
INDECK WHARTON, LLC	§	TEXAS COMMISSION ON
INDECK WHARTON ENERGY	§	
CENTER	§	
DANEVANG, WHARTON COUNTY	§	ENVIRONMENTAL QUALITY

EXECUTIVE DIRECTOR’S RESPONSE TO HEARING REQUESTS

The Executive Director (ED) of the Texas Commission on Environmental Quality (commission or TCEQ) files this response (Response) to the requests for a contested case hearing submitted by the persons listed herein. The Texas Clean Air Act (TCAA), Texas Health & Safety Code (THSC) § 382.056(n) requires the commission to consider hearing requests in accordance with the procedures provided in Tex. Water Code (TWC) § 5.556.¹ This statute is implemented through the rules in 30 Texas Administrative Code (TAC) Chapter 55, Subchapter F.

A map showing the location of the site for the proposed facility is included with this Response and has been provided to all persons on the attached mailing list. In addition, a current compliance history report, technical review summary, and draft permit prepared by the ED’s staff have been filed with the TCEQ’s Office of Chief Clerk for the commission’s consideration. Finally, the ED’s Response to Public Comments (RTC), which was mailed by the chief clerk to all persons on the mailing list, is on file with the Chief Clerk for the commission’s consideration.

I. Application Request and Background Information

Indeck Wharton, LLC (Indeck or Applicant) has applied to the TCEQ for a New Source Review Authorization under THSC § 382.0518. This permit will authorize the Applicant to construct and operate a natural gas fired electric generating facility. The facility is proposed to be located on the west side of State Route 71, 3,350 feet south of the center of Danevang, in Wharton County, Texas. Contaminants authorized under this permit include nitrogen oxides (NOx), carbon monoxide (CO), sulfur dioxide (SO₂), and particulate matter (PM), including particulate matter with aerodynamic diameters of 10 micrometers or less (PM₁₀) and 2.5 micrometers or less (PM_{2.5}). The Applicant is not delinquent on any administrative penalty payments to the TCEQ. The TCEQ Enforcement Database was searched and no enforcement activities were found that are inconsistent with the compliance history.

Before work is begun on the construction of a facility that may emit air contaminants, the person planning the construction must obtain authorization from the commission. This permit

¹ Statutes cited in this response may be viewed online at www.capitol.state.tx.us/statutes/statutes.html. Relevant statutes are found primarily in the Texas Health and Safety Code and the Texas Water Code. The rules in the Texas Administrative Code may be viewed online at www.sos.state.tx.us/tac/index.shtml, or follow the “Rules, Policy & Legislation” link on the TCEQ website at www.tceq.state.tx.us.

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application is for a new issuance of Air Quality Permit Numbers 111724 and PSDTX1374 to construct an electric generating facility.

The permit application was received on June 18, 2013, and it was declared administratively complete on July 11, 2013. The Notice of Receipt and Intent to Obtain an Air Quality Permit (public notice) for this permit application was published in English on August 7, 2013 in the *El Campo Leader-News*. The Notice of Application and Preliminary Decision for an Air Quality Permit was published on May 17, 2014 in English in the *El Campo Leader-News*. A public meeting was held on September 30, 2014 in El Campo. The notice of public meeting was mailed to interested persons on September 9, 2014, and it was also published on September 10, 2014, in English in the *El Campo Leader-News*. Although the public notices were required to be published in a Spanish language newspaper of general circulation, this requirement was waived pursuant to 30 TAC § 39.405(h)(8) because the Applicant certified that no Spanish language newspaper of general circulation exists in the municipality or county where the proposed facility would be located. The public comment period ended on September 30, 2014.

The ED's RTC was filed with the Chief Clerk's Office on October 31, 2014, and mailed to all interested persons on November 6, 2014, including those who asked to be placed on the mailing list for this application and those who submitted comment or requests for a contested case hearing. The cover letter attached to the RTC included information about making requests for a contested case hearing or for reconsideration of the ED's decision.² The letter also explained hearing requesters should specify any of the ED's responses to comments they dispute and the factual basis of the dispute, in addition to listing any disputed issues of law or policy.

The time for requests for reconsideration and hearing requests ended on December 8, 2014. The TCEQ did not receive any requests for reconsideration. The TCEQ received timely requests for a contested case hearing from Farryl Holub. TCEQ also received timely hearing requests from two organizations, LISTEN! An Alliance to Protect the People and Property of Wharton County (LISTEN!), and the Danevang Lutheran Church.

II. Applicable Law for Hearing Requests

The commission must assess the timeliness and form of the hearing requests, as discussed in Section I above. The form requirements are set forth in 30 TAC § 55.201(d):

- (d) A hearing request must substantially comply with the following:
- (1) give the name, address, daytime telephone number, and, where possible, fax number of the person who files the request. If the request is made by a group or association, the request must identify one person by name, address, daytime telephone number, and, where possible, fax number, who

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

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- shall be responsible for receiving all official communications and documents for the group;
- (2) identify the person's personal justiciable interest affected by the application, including a brief, but specific, written statement explaining in plain language the requester's location and distance relative to the proposed facility or activity that is the subject of the application and how and why the requester believes he or she will be adversely affected by the proposed facility or activity in a manner not common to members of the general public;
 - (3) request a contested case hearing;
 - (4) list all relevant and material disputed issues of fact that were raised during the public comment period and that are the basis of the hearing request. To facilitate the commission's determination of the number and scope of issues to be referred to hearing, the requester should, to the extent possible, specify any of the executive director's responses to comments that the requester disputes and the factual basis of the dispute and list any disputed issues of law or policy; and
 - (5) provide any other information specified in the public notice of application.

The next necessary determination is whether the requests were filed by "affected persons" as defined by TWC § 5.115, implemented in commission rule 30 TAC § 55.203. Under 30 TAC § 55.203, an affected person is one who has a personal justiciable interest related to a legal right, duty, privilege, power or economic interest affected by the application. An interest common to members of the general public does not qualify as a personal justiciable interest. Local governments with authority under state law over issues raised by the application receive affected person status under 30 TAC § 55.203(b).

In determining whether a person is affected, 30 TAC § 55.203(c) requires all factors be considered, including, but not limited to, the following:

- (1) whether the interest claimed is one protected by the law under which the application will be considered;
- (2) distance restrictions or other limitations imposed by law on the affected interest;
- (3) whether a reasonable relationship exists between the interest claimed and the activity regulated;
- (4) likely impact of the regulated activity on the health and safety of the person, and on the use of property of the person;
- (5) likely impact of the regulated activity on use of the impacted natural resource by the person; and
- (6) for governmental entities, their statutory authority over or interest in the issues relevant to the application.

In addition to the requirements noted above regarding affected person status, in accordance with 30 TAC § 55.205(a), a group or association may request a contested case hearing only if the group or association meets all of the following requirements:

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- (1) one or more members of the group or association would otherwise have standing to request a hearing in their own right;
- (2) the interests the group or association seeks to protect are germane to the organization's purpose; and
- (3) neither the claim asserted nor the relief requested requires the participation of the individual members in the case.³

If the commission determines a hearing request is timely and fulfills the requirements for proper form and the hearing requester is an affected person, the commission must apply a three-part test to the issues raised in the request to determine if any of the issues should be referred to the State Office of Administrative Hearings (SOAH) for a contested case hearing. The three-part test in 30 TAC § 50.115(c) is as follows:

- (1) The issue must involve a disputed question of fact;
- (2) The issue must have been raised during the public comment period; and
- (3) The issue must be relevant and material to the decision on the application.

The law applicable to the proposed facility may generally be summarized as follows. A person who owns or operates a facility or facilities that will emit air contaminants is required to obtain authorization from the commission prior to the construction and operation of the facility or facilities.⁴ Thus, the location and operation of the proposed facility requires authorization under the TCAA. Permit conditions of general applicability must be in rules adopted by the commission.⁵ Those rules are found in 30 TAC Chapter 116. In addition, a person is prohibited from emitting air contaminants or performing any activity that violates the TCAA or any commission rule or order, or that causes or contributes to air pollution.⁶ The relevant rules regarding air emissions are found in 30 TAC Chapters 101 and 111-118. In addition, the commission has the authority to establish and enforce permit conditions consistent with this chapter.⁷ The materials accompanying this response list and reference permit conditions and operational requirements and limitations applicable to this proposed facility.

III. Analysis of Hearing Requests

A. Were the requests for a contested case hearing in this matter timely and in proper form?

The following person submitted a timely hearing request that was not withdrawn: Farryl Holub. Timely hearing requests were also submitted by two organizations: LISTEN! and the Danevang Lutheran Church.

1. Farryl Holub

Farryl Holub submitted a request for a contested case hearing on behalf of himself and his

³ 30 TAC § 55.205(a)

⁴ TEXAS HEALTH & SAFETY CODE § 382.0518

⁵ TEXAS HEALTH & SAFETY CODE § 382.0513

⁶ TEXAS HEALTH & SAFETY CODE § 382.085

⁷ TEXAS HEALTH & SAFETY CODE § 382.0513

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household family members, Martha Holub, Jillian Holub, and Jessica Holub Rumbaugh, on June 13, 2014. His request was made in a comment he timely submitted to the agency during the relevant public comment period. He provided his and his family members' names, a phone number, a mailing address, and a residential address in the request.

Farryl Holub did not give an approximate distance from his house to the proposed facility. Based on the address provided by Farryl Holub and the plot plan submitted by the Applicant, the ED's staff was able to confirm that the Holub residence is more than one mile from the facility (see attached map).

Farryl Holub requested a contested case hearing in the first sentence of his comment letter. He stated that he believes he and his family will be adversely affected by the application in the following ways:

- That the Holub family will be more directly affected by emissions and prevailing winds than the general public because they own more land and reside closer to the proposed facility.
- That agricultural chemicals used in the area may harmfully interact with emissions from the proposed facility and pose a danger to the people, animals, and plants of Danevang.
- That possible groundwater or surface water contamination from a ruptured pipeline on the property next to the tract of the land the facility will be located upon may somehow interact with Applicant's operation and emissions.
- That the combination of facility's emissions and chemicals already existing in the area may cause health problems among the general public, including children and adults suffering respiratory ailments.
- That residents and property owners need more time to learn about the project because the Applicant and Wharton County officials kept the project a secret from the public.

The comments submitted by Farryl Holub are generically stated or do not articulate an interest that is not common to the general public. Therefore, the ED finds that these issues do not qualify as personal justiciable interests. Based on the foregoing, the ED finds that Farryl Holub did not substantially comply with all of the requirements to request a contested case hearing required by 30 TAC § 55.201(d) because he failed to identify a personal justiciable interest in the matter.

2. LISTEN!

The hearing request filed on behalf of LISTEN! is identical to the request submitted by Farryl Holub on behalf of himself and his family members discussed above.⁸ It identified Farryl Holub as the President of the organization and named Farryl Holub, Martha Holub, Jillian Holub, and Jessica Holub Rumbaugh as members who will be adversely affected by the application in ways not common to the general public.

The request was timely made during the relevant public comment period. The request did not provide an approximate distance from the members' residence to the proposed facility, but it did

⁸ For clarity, the requests were contained in the same letter from Farryl Holub.

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provide the Holub family residential address as the address for the organization, a mailing address, and a telephone number. Based on the address provided by Farryl Holub and the plot plan submitted by the Applicant, the ED's staff was able to confirm that the Holub residence is more than one mile from the plant (see attached map). The analysis for the organization's request follows in subsection C below.

LISTEN! requested a contested case hearing in the first sentence of its comment letter. It stated that it believes its members, the Holub family, will be adversely affected by the application in the following ways:

- That the Holub family will be more directly affected by emissions and prevailing winds than the general public because they own more land and reside closer to the proposed facility.
- That agricultural chemicals used in the area may harmfully interact with emissions from the proposed facility and pose a danger to the people, animals, and plants of Danevang.
- That possible groundwater or surface water contamination from a ruptured pipeline on the property next to the tract of the land the facility will be located upon may somehow interact with Applicant's operation and emissions.
- That the combination of facility's emissions and chemicals already existing in the area may cause health problems among the general public, including children and adults suffering respiratory ailments.
- That residents and property owners need more time to learn about the project because the Applicant and Wharton County officials kept the project a secret from the public.

The comments submitted by LISTEN! are generically stated or do not articulate an interest that is not common to the general public. Therefore, the ED finds that these issues do not qualify as personal justiciable interests of members of the organization. Based on the foregoing, the ED finds that LISTEN! did not substantially comply with all of the requirements to request a contested case hearing required by 30 TAC § 55.201(d) because it failed to identify a personal justiciable interest in the matter.

3. The Danevang Lutheran Church

The hearing request filed by the Danevang Lutheran Church was submitted by Church Council President, Doyle Schaer, and Church Council Treasurer, Darleen Miksik. The request also had a petition attached, which was signed by the following persons: Maria Barnes, Marilyn Chappell, O.V. Christensen, Ashley Garza, Annabel Gonzales, Darleen Miksik, Juhl Miksik, Wesley Miksik, Judy Ocanas, Maria O. Navarro, Irene Ocampo, Ben Rivera, Erin Rivera, Esther Rivera, Meagan Rivera, Ann Schaer, Doyle Schaer, and Damion Taylor.

The church requested a hearing in the first sentence of its request. The request was made in a comment timely submitted to the commission during the relevant comment period. The hearing request submitted by the church provided the church's phone number, physical address, and mailing address. Although the church is within one mile of the proposed facility, the request does not claim that any person resides at the church or on the church grounds (see attached map). The petition was signed by eighteen members of the church, but only eight of those members provided residential addresses. The residential address provided by Erin and Meagan Rivera is within one mile of the proposed facility (see attached map). The analysis for the

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organization's request follows in subsection C below.

The church's request failed to identify which members the church believes will be adversely affected, and the request also failed to state how such members will be adversely affected in ways not common to the general public. Rather, the request details how the church and its grounds will be adversely affected:

- That, unlike the general public, the church attracts visitors from all over the country, and the church relies on donations from visitors to preserve the church, church hall, and museum. Such tourism, and thus, monetary support, may decrease if the Applicant's facility is built in such close proximity to the church grounds.
- The facility will negatively impact the beauty of the historical church and its property.

Comments regarding the effects upon aesthetics and tourism to the church property fail to show how any of the individual members or their own property will be adversely affected in ways not common to the general public. Additionally, the following church members simply listed the word "health" next to their names on the petition attached to the church's hearing request: Anabel Gonzales, Irene Ocampo, and Erin Rivera. The use of the word "health," without more, is too vague to demonstrate an interest that is not common to the general public. Therefore, the ED finds that these issues do not qualify as personal justiciable interests. Based on the foregoing, the ED finds that the request submitted by the Danevang Lutheran Church did not substantially comply with all of the requirements to request a contested case hearing required by 30 TAC § 55.201(d) because it failed to identify a personal justiciable interest.

B. Are those who requested a contested case hearing affected persons?

The law applicable to this permit application is outlined above in Section II. 30 TAC § 55.201(d)(2) requires hearing requesters to identify a personal justiciable interest and state why the requester believes he or she will be adversely affected by the proposed facility in a manner not common to members of the general public. If the requester raises a personal justiciable interest, the commission must consider whether the interest claimed is one protected by the law under which the application will be considered.

The commission must also consider whether a reasonable relationship exists between the interest claimed and the activity regulated. The activity the commission regulates is the authorized emissions into the air of contaminants by a person who owns or operates a facility or facilities. Those persons who own or operate a facility or facilities are prohibited from emitting air contaminants or performing any activities that contravene the TCAA or any other commission rule or order, or that causes or contributes to air pollution.

In this matter, the request submitted by Farryl Holub on behalf of himself and his household family members listed ways in which the family believes it will adversely affected by the facility. However, the reasons provided are generic and common to the general public. Thus, Farryl Holub did not state a personal justiciable interest of himself or his family members, as required by 30 TAC § 55.201(d)(2). Accordingly, the analyses of whether the interests claimed are ones protected by the law under which the application will be considered and whether a reasonable relationship exists between the interests claimed and the activity the commission regulates are moot.

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The commission must also consider distance restrictions or other limitations imposed by law on the affected interest, the likely impact of the regulated activity on the health and safety of the person, and on the use of the property of the person, and the likely impact of the regulated activity on the use of the impacted natural resource by the person. For air authorizations, distance from the proposed facility is particularly relevant to the issue of whether there is a likely impact of the regulated activity on a person's interests because of the dispersion and effects of individual air contaminants emitted from a facility. Because Farryl Holub, Martha Holub, Jillian Holub, and Jessica Holub Rumbaugh reside more than one mile from the facility that is the subject of this permit application, the ED finds that it is not likely to impact the health and safety of these requesters or the use of their property in a manner different from the general public. Therefore, they are not affected persons under 30 TAC § 55.203.

C. Do the organizations LISTEN! and the Danevang Lutheran Church meet the group or associational standing requirements?

1. LISTEN!

Farryl Holub filed the hearing request on behalf of LISTEN! The members of LISTEN! are identified as Farryl Holub, Martha Holub, Jillian Holub, and Jessica Holub Rumbaugh.⁹ The purpose of the organization is not explicitly stated in the request. However, the full name of the organization, LISTEN! An Alliance to Protect the People and Property of Wharton County, reveals a general purpose to protect people and property within Wharton County, Texas. The request gave the names and address of Farryl Holub and his household family members. The hearing request met the requirements for form, but did not meet the requirements for affected person status since, as previously discussed, no members live within a mile of the proposed facility and the requester failed to identify any members' personal justiciable interests. Therefore, since it has not identified one or more members that would have standing to request a hearing in their own right, LISTEN! did not meet the requirements for associational standing found in 30 TAC § 55.205(a).

2. The Danevang Lutheran Church

The hearing request filed by the Danevang Lutheran Church was signed by Church Council President, Doyle Schaer, and Treasurer, Darleen Miksik. The request had a petition attached, entitled, "Petition to Protest Building of Electric Plant in Our Community," which was signed by the following persons: Maria Barnes, Marilyn Chappell, O.V. Christensen, Ashley Garza, Annabel Gonzales, Darleen Miksik, Juhl Miksik, Wesley Miksik, Judy Ocanas, Maria O. Navarro, Irene Ocampo, Ben Rivera, Erin Rivera, Esther Rivera, Meagan Rivera, Ann Schaer, Doyle Schaer, and Damion Taylor.

Although the church building is within one mile of the proposed facility, the request does not claim that any person resides at the church or on the church grounds. Although the petition lists eighteen church members who are against the construction of the facility, the request did not identify which people are representative members of the group. Of the eighteen people who

⁹ Although not specifically identified, because all of the individuals are members of the same family, reside at the same address, and are all named members of the organization, the ED treated them all as representative members.

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signed the petition, only eight people provided their residential addresses. Based on the residential addresses listed on the petition attached to the request and the plot plan submitted by the Applicant, the ED's staff was able to confirm that the residential address provided by Erin and Meagan Rivera is within one mile from the proposed facility (see attached map).

The request did not identify how any of its members will be adversely affected in ways not common to the general public. Rather, as discussed in Section III above, the request details how the church and its grounds will be adversely affected with regard to aesthetics and tourism. Additionally, the following church members simply listed the word "health" next to their names on the petition attached to the church's hearing request: Anabel Gonzales, Irene Ocampo, and Erin Rivera. No other details were provided. The comments submitted by the Danevang Lutheran Church and use of the word "health" on the petition are generically stated and fail to demonstrate that any of the people who signed the petition has an interest that is not common to the general public. Therefore, the ED finds that these issues do not qualify as personal justiciable interests pursuant to 30 TAC § 55.201(d).

The hearing request submitted by the church was timely. However, the request failed to designate a representative member with a personal justiciable interest. Of the eighteen people who signed the church's petition, only one person, Erin Rivera, provided a residential address within a mile of the proposed facility and a comment that could be construed as an interest in the matter. However, the ED's staff finds that Erin Rivera's use of the word "health," without more information, is too vague to demonstrate a personal justiciable interest. As such, Erin Rivera would not qualify as an affected person. Therefore, since it has not identified one or more members that would have standing to request a hearing in their own right, the Danevang Lutheran Church did not meet the requirements for associational standing found in 30 TAC § 55.205(a).

D. Which issues in this matter should be referred to SOAH for hearing?

If the commission determines any of the hearing requests in this matter are timely and in proper form, and some or all of the hearing requesters are affected persons, the commission must apply the three-part test discussed in Section II to the issues raised in this matter to determine if any of the issues should be referred to SOAH for a contested case hearing. The three-part test asks whether the issues involve disputed questions of fact, whether the issues were raised during the public comment period, and whether the issues are relevant and material to the decision on the permit application, in order to refer them to SOAH. However, because none of the individuals identified in this Response meet requirements for an affected person, including potential representatives of the organizations, their interests are not likely to be impacted in a manner different from the general public. Thus, these hearing requests should not be referred to SOAH for a contested case hearing. However, if the commission determines that one or more of the hearing requesters are affected parties, then those hearing requests should be referred to SOAH.

IV. Executive Director's Recommendation

The Executive Director respectfully recommends that the commission deny all requests for a contested case hearing in this matter.

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Respectfully submitted,
Texas Commission on Environmental Quality
Richard Hyde, P.E., Executive Director
Caroline Sweeney, Deputy Director
Office of Legal Services
Robert Martinez, Division Director
Environmental Law Division



Jennifer J. Furrow, Staff Attorney
Environmental Law Division
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(512) 239-1439
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Austin, Texas 78711-3087

REPRESENTING THE
EXECUTIVE DIRECTOR OF THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

CERTIFICATE OF SERVICE

On the 29th of December, 2014, a true and correct copy of the foregoing instrument was served on all persons on the mailing list by the undersigned via deposit into the U.S. Mail, inter-agency mail, facsimile, electronic mail, or hand delivery.

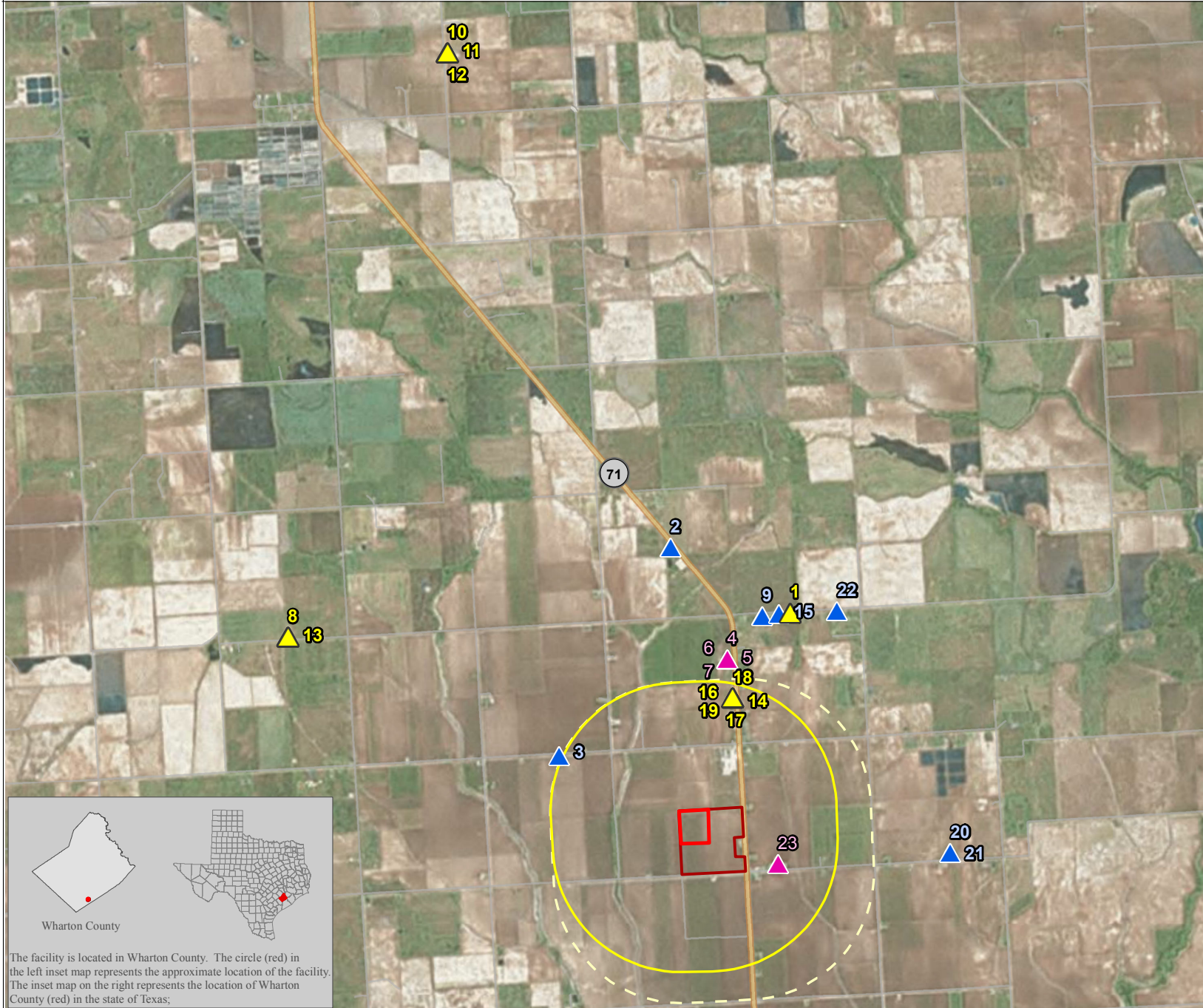










Jennifer J. Furrow

Contested Case Hearing Requests

Indeck Wharton, LLC, Permit Nos. 111724 and PSDTX1374

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

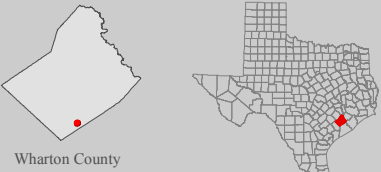


-  Hearing Requestors
-  Church members who provided a residential address
-  Church members who did not provide a residential address
-  Facility Boundary
-  Property Boundary
-  1 Radial Mile from Facility Boundary
-  1 Radial Mile from Property Boundary
-  Major Highways

0 0.5 1
Miles

Source: The location of the facility was provided by the TCEQ Office of Legal Services (OLS). OLS obtained the site location information from the applicant and the requestor information from the requestor. The background imagery of this map is from the current Environmental Systems Research Institute (ESRI) map service, as of the date of this map.

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



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

Map Key for Contested Case Hearing Requests
Indeck Wharton, LLC, Permit Nos. 111724 and PSDTX1374

ID	<u>Name</u>
1	Barnes, Maria
2	Chappell, Marilyn*
3	Christensen, OV*
4	Holub, Farryl
5	Holub, Jillian
6	Holub, Martha
7	Holub Rumbaugh, Jessica
8	Garza, Ashley
9	Gonzales, Annabel*
10	Miksik, Darlene
11	Miksik, Juhl
12	Miksik, Wesley
13	Navarro, Maria
14	Ocampo, Irene*
15	Ocanas, Judy*
16	Rivera, Ben*
17	Rivera, Erin
18	Rivera, Esther*
19	Rivera, Meagan
20	Schaer, Ann*
21	Schaer, Doyle*
22	Taylor, Damian*
23	Danevang Lutheran Church

*Denotes an individual who did not provide a residential address in a comment, in a hearing request, or on the Chief Clerk's mailing list.