



Lee Crews  
Chief Operations Officer

April 3, 2018

Mr. Matthew Udenenwu  
Texas Commission on Environmental Quality  
Office of the Chief Clerk, MC-124  
P.O. Box 13087  
Austin, Texas 78711-3087

VIA CMRRR #7017 1450 0000 4425 4114  
AND VIA EMAIL

**Re: Greenhouse Road Landfill ("Landfill"); Municipal Solid Waste Permit Major Amendment, Proposed Permit Number 1599B ("Permit"); Comments from Addicks Utility District in Response to Texas Commission on Environmental Quality ("TCEQ") Request for Comments**

Dear Mr. Udenenwu:

I am the Chief Operations Officer for Katy Independent School District. We have been recently notified that a major permit amendment has been requested for the above referenced Landfill. The Landfill is requesting a vertical and lateral expansion of its facility. I write you today to provide Katy ISD's comments, and to strongly oppose the approval of the amendment. Please note that our opposition to the amendment is congruent with the position taken by Harris County.

#### Non-Compliance with Settlement Agreement

Although Katy ISD was not a party to the settlement, we are aware of a settlement agreement entered into between Harris County and G.O. Weiss, Inc. regarding the Landfill in 2000. Our understanding is that on May 4, 2017, Harris County conducted an inspection of the Landfill to determine whether it was in compliance with the terms of this settlement agreement. We received information which indicates that several deficiencies were identified, including insufficient or missing berms, and improperly located drainage ditches. As such, Katy ISD believes that a Permit Amendment should not be granted while the Landfill and its owners remain in breach of any current obligation.

#### Property Values

Pursuant to state law, school districts in Texas rely upon property taxes to support their day-to-day operations, as well as the payments of interest and sinking accounts. The expansion of the Landfill may have a materially negative effect on the home values within the neighboring subdivision. Such an effect would negatively affect local Katy ISD homeowners and in turn could cause a decrease in the local taxable value. A Permit Amendment should not be granted unless the Landfill can provide convincing evidence that the expansion of the Landfill will have no materially negative effect on home values and quality of living in the neighboring subdivision.

Student and Campus Safety

Student and staff safety is a priority for KISD. We currently have several campuses in close proximity to the Greenhouse Road Landfill, including Cardiff Junior High, Mayde Creek Elementary, Mayde Creek Junior High, Mayde Creek High School and Schmalz Elementary. These campuses house nearly eight thousand students and hundreds of staff members. We currently account for safety concerns at these campuses from the Landfill which may produce methane gas, unpleasant odors and has the potential to contaminate water draining away from the site during heavy or prolonged rains. Without further assurance, an expansion of the Landfill could only exacerbate these concerns.

For the above reasons and others, Katy ISD respectfully requests that you deny the proposed Permit Amendment No. 1599B. Katy ISD will continue to monitor these proceedings, and reserves the right supplement or amend these comments when necessary. Should you have any questions, you may reach out to my office directly. Thank you for your consideration.

Sincerely,



Lee Crews  
CHIEF OPERATIONS OFFICER  
KATY INDEPENDENT SCHOOL DISTRICT



Dr. Lance Hindt  
SUPERINTENDENT  
KATY INDEPENDENT SCHOOL DISTRICT

Cc:

Ashley Vann  
KATY INDEPENDENT SCHOOL DISTRICT BOARD PRESIDENT

**Via Email**

Steve Radack  
HARRIS COUNTY COMMISSIONER, PRECINCT 3

**Via Email**

Sarah Utley  
ASSISTANT COUNTY ATTORNEY, HARRIS COUNTY

**Via Email**