



### III. JURISDICTION & CAUSES OF ACTION

**18A.** The City's and SJRA's intentional waste<sup>2</sup> of reservoir water from Lake Conroe is a public nuisance created by governmental functions for which governmental entities are not immune. The City's and SJRA's waste of Lake Conroe water unlawfully invades the rights of Petitioners in their use and enjoyment of state water. The proper relief of this public nuisance is abatement pursuant to the Petitioners' request for injunctive relief.

**18B.** The City and the SJRA's enactment and operation of the Lake Conroe Dam is inextricably intertwined. The City and SJRA knew that specific damage was substantially certain to result from its conduct in enacting and operating under the SLLP, and that their actions would necessarily cause physical damage to certain private and public properties and yet determined that the benefit to the public outweighed the harm caused to the public, Petitioners, and these properties. The City and SJRA intentionally performed affirmative acts that resulted in a physical taking of specific property for public use. For this reason, the public nuisance sought to be abated rises to the level of a constitutional taking under Tex. Const. art. I, § 17(a). Petitioners, and members of the LCA, have suffered diminutions in the use, enjoyment, and value of their private property and of the public property held in trust for the public by the state. Petitioners', and the members', private and public property rights have been taken by the City and SJRA for public use.

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<sup>2</sup> Water "waste" is defined as "[t]he diversion of water if the water is not used for a beneficial purpose; the use of that amount of water in excess of that which is economically reasonable for an authorized purpose when reasonable intelligence and reasonable diligence are used in applying the water to that purpose. Waste may include, but not be limited to, the unreasonable loss of water through faulty design or negligent operation of a water delivery, distribution or application system, or the diversion or use of water in any manner that causes or threatens to cause pollution of water. Waste does not include the beneficial use of water where the water may become polluted because of the nature of its use, such as domestic or residential use, but is subsequently treated in accordance with all applicable rules and standards prior to its discharge into or adjacent to water in the state so that it may be subsequently beneficially used." 30 TEX. ADMIN. CODE § 297.1(58) (emphasis added).

**18C.** In enacting and operating under the SLLP, the City and SJRA have performed a constitutional taking under Tex. Const. art. I, § 17(a), for which Petitioners’ requested declaratory and injunctive relief should be granted. Petitioners, and members of the LCA, have suffered diminutions in the use, enjoyment, and value of their private property and of the public property held in trust for the public by the state. Petitioners’, and the members’, private and public property rights have been taken by the City and SJRA for public use.

**18D.** The SLLP is of faulty design by wasting state water and is thus statutorily authorized to be abated, including a statutory waiver of immunity:

(a) A person<sup>3</sup> who permits an unreasonable loss of water through faulty design or negligent operation of any waterworks<sup>4</sup> using water for a purpose named in this chapter commits waste, and the commission may declare the works causing the waste to be a public nuisance. The commission may take the necessary action to abate the nuisance. Also, any person who may be injured by the waste may sue in the district court having jurisdiction over the works causing the waste to have the operation of the works abated as a public nuisance.

TEX. WATER CODE § 11.093(a) (emphasis added).

**18E.** The Water Code expressly acknowledges that prior common actions persist:

Policy Regarding Waters of the State. (a) The waters of the state are held in trust for the public, and the right to use state water may be appropriated only as expressly authorized by law.

TEX. WATER CODE § 11.0235.

Effect on Other Law. This chapter does not exempt a person from complying with or being subject to other law.

TEX. WATER CODE § 7.005.

Remedies Cumulative. The remedies under this chapter are cumulative of all other

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<sup>3</sup> “Person” is defined to “include[] corporation, organization, government or governmental subdivision or agency, business trust, estate, trust, partnership, association, and any other legal entity.” TEX. GOV’T CODE § 311.005(2).

<sup>4</sup> “Waterworks” is defined as “the system of reservoirs, channels, mains, and pumping and purifying equipment by which a water supply is obtained and distributed (as to a city).” “Waterworks,” Merriam-Webster.com at <https://www.merriam-webster.com/dictionary/waterworks> (accessed Apr. 5, 2021).

remedies. Nothing in this chapter affects the right of a private corporation or individual to pursue any available common law remedy to abate a condition of pollution or other nuisance, to recover damages to enforce a right, or to prevent or seek redress or compensation for the violation of a right or otherwise redress an injury.

TEX. WATER CODE § 7.004.

**18F.** The Legislature expressly waived governmental immunity for Petitioners' causes against the City for waterworks and dams and reservoirs in Tex. Civ. Prac. & Rem. Code § 101.0215.

**18G.** Petitioners seek to stop and prevent the City's waste of waters from the Lake Conroe reservoir which are obtained by means of opening the gates of the Lake Conroe Dam. The Lake Conroe reservoir is a part of the municipal system of waterworks, and the lake and dam are clearly a dam and reservoir, as contemplated by Tex. Civ. Prac. & Rem. Code § 101.0215(a)(11) & (19), respectively.

(a) A municipality is liable under this chapter for damages arising from its governmental functions, which are those functions that are enjoined on a municipality by law and are given it by the state as part of the state's sovereignty, to be exercised by the municipality in the interest of the general public, including but not limited to:

\* \* \*

(11) waterworks;

\* \* \*

(19) dams and reservoirs....

TEX. CIV. PRAC. & REM. CODE § 101.0215(a)(11)&(19) (emphasis added).

**18H.** The City's waste of water from the Lake Conroe reservoir is a result of the City's specific calls for water from its two-thirds of the water in Lake Conroe pursuant to the SLLP, which is then discharged through the waterworks and the Lake Conroe dam.<sup>5</sup>

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<sup>5</sup> See, e.g., Exhibit X, E-mail from Jace Houston, Gen. Mgr., SJRA, to Lloyd Tisdale, Bd. Member, SJRA (June 20, 2020, 1:45 p.m.) ("They [Houston] can call for their water anytime, and we would have to send it."); E-mail from Yvonne W. Forrest, Dir., Houston Water, to Chuck Gilman, Dir. of Water Resources, SJRA, & Greg Olinger,

## VI. REQUESTED DECLARATIONS

**86.d.** The Lake Conroe SLLP, as the term is referenced by the SJRA and the City, is a waste of state water and therefore a public nuisance.

**86A.** Pursuant to Tex. Civ. Prac. & Rem. Code § 37.009, for the relief of declarations and supplemental injunctive relief, Petitioners request an award of “costs and reasonable and necessary attorney’s fees as are equitable and just.”

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Coastal Water Auth. (May 29, 2020, 8:59 a.m.) (“Houston Water is requesting SJRA to lower Lake Conroe to 200' msl by June 2.”).

Respectfully submitted,

**WARD LAW FIRM**

By: /s/ David A. Ward, Jr.

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**ATTORNEYS FOR PETITIONERS  
LAKE CONROE ASSOCIATION,  
SUSANNE MITCHELL ALLEN, AND  
ROBERT FERRANTE**

**CERTIFICATE OF SERVICE**

I certify that pursuant to the Texas Rules of Civil Procedure, a true and correct copy of the foregoing document was delivered to the following counsel and promptly filed with the Clerk of this Court via TexFile ECF and email on this the **6th day of April, 2021**:

**Attorneys for Defendant**

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Suzanne R. Chauvin  
Chief, General Litigation Section  
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Via Email: [brian.amis@houstontx.gov](mailto:brian.amis@houstontx.gov)

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**Attorney for Defendant**

**San Jacinto River Authority**

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/s/ David A. Ward, Jr.  
David A. Ward, Jr.

**From:** [Forrest, Yvonne - HPW](#)  
**To:** [Chuck Gilman](#); [Greg Olinger \(CWA\)](#)  
**Cc:** [Osegueda, Veronica - HPW](#); [Jace Houston](#); [Andrew Molly](#); [Citino, Sharon - HPW](#); [Don Ripley](#); [Bret Raley](#)  
**Subject:** RE: Seasonal Lowering of Lake Conroe  
**Date:** Monday, June 1, 2020 8:29:17 AM  
**Attachments:** [image001.jpg](#)  
[image002.png](#)

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Good morning,

After a review of the SJRA website, the Lake Conroe drinking water reservoir level is currently at 200.0 ' msl and we can discontinue the seasonal release.

**Yvonne W. Forrest**  
Director, Houston Water  
832-395-2847

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**From:** Forrest, Yvonne - HPW  
**Sent:** Friday, May 29, 2020 8:59 AM  
**To:** Chuck Gilman <[cgilman@sjra.net](mailto:cgilman@sjra.net)>; Greg Olinger (CWA) <[golinger@Coastalwaterauthority.org](mailto:golinger@Coastalwaterauthority.org)>  
**Cc:** Osegueda, Veronica - HPW <[Veronica.Osegueda@houstontx.gov](mailto:Veronica.Osegueda@houstontx.gov)>; Jace Houston <[jhouston@sjra.net](mailto:jhouston@sjra.net)>; Molly, Andrew - HPW <[Andrew.Molly@houstontx.gov](mailto:Andrew.Molly@houstontx.gov)>; Citino, Sharon - HPW <[Sharon.Citino@houstontx.gov](mailto:Sharon.Citino@houstontx.gov)>; Don Ripley <[dripley@Coastalwaterauthority.org](mailto:dripley@Coastalwaterauthority.org)>; Bret Raley <[braley@sjra.net](mailto:braley@sjra.net)>  
**Subject:** RE: Seasonal Lowering of Lake Conroe

Thank you for your time to discuss this matter this morning.

Houston Water is requesting SJRA lower Lake Conroe to 200' msl by June 2. Please coordinate the releases to minimize impact to people and property along the river as well as with CWA given the ongoing construction on Lake Houston Dam.

Please don't hesitate to contact me if you have any questions.

**Yvonne W. Forrest**  
Director, Houston Water  
832-395-2847

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**From:** Chuck Gilman <[cgilman@sjra.net](mailto:cgilman@sjra.net)>  
**Sent:** Friday, May 29, 2020 8:18 AM  
**To:** Forrest, Yvonne - HPW <[Yvonne.Forrest@houstontx.gov](mailto:Yvonne.Forrest@houstontx.gov)>; Greg Olinger (CWA) <[golinger@Coastalwaterauthority.org](mailto:golinger@Coastalwaterauthority.org)>  
**Cc:** Osegueda, Veronica - HPW <[Veronica.Osegueda@houstontx.gov](mailto:Veronica.Osegueda@houstontx.gov)>; Jace Houston <[jhouston@sjra.net](mailto:jhouston@sjra.net)>; Molly, Andrew - HPW <[Andrew.Molly@houstontx.gov](mailto:Andrew.Molly@houstontx.gov)>; Citino, Sharon - HPW <[Sharon.Citino@houstontx.gov](mailto:Sharon.Citino@houstontx.gov)>; Don Ripley <[dripley@Coastalwaterauthority.org](mailto:dripley@Coastalwaterauthority.org)>; Bret Raley <[braley@sjra.net](mailto:braley@sjra.net)>  
**Subject:** RE: Seasonal Lowering of Lake Conroe



[Message Came from Outside the City of Houston Mail System]

Yes, we are available. I can send an appointment with a skype call-in number, if you'd like.

**Chuck Gilman, PE, PMP**  
**Director of Water Resources and Flood Management**



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**From:** Forrest, Yvonne - HPW <[Yvonne.Forrest@houstontx.gov](mailto:Yvonne.Forrest@houstontx.gov)>  
**Sent:** Friday, May 29, 2020 7:47 AM  
**To:** Chuck Gilman <[cgilman@sjra.net](mailto:cgilman@sjra.net)>; Greg Olinger (CWA) <[golinger@Coastalwaterauthority.org](mailto:golinger@Coastalwaterauthority.org)>  
**Cc:** Osegueda, Veronica - HPW <[Veronica.Osegueda@houstontx.gov](mailto:Veronica.Osegueda@houstontx.gov)>; Jace Houston <[jhouston@sjra.net](mailto:jhouston@sjra.net)>; Andrew Molly <[Andrew.Molly@houstontx.gov](mailto:Andrew.Molly@houstontx.gov)>; Citino, Sharon - HPW <[Sharon.Citino@houstontx.gov](mailto:Sharon.Citino@houstontx.gov)>; Don Ripley <[dripley@Coastalwaterauthority.org](mailto:dripley@Coastalwaterauthority.org)>  
**Subject:** RE: Seasonal Lowering of Lake Conroe

Good Morning,

Chuck and Greg are you available for an 8:30 call to discuss releases from reservoir operations this morning?

Yvonne W. Forrest  
Director, Houston Water  
832-395-2847

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**From:** Forrest, Yvonne - HPW  
**Sent:** Thursday, May 28, 2020 7:12 AM  
**To:** Chuck Gilman <[cgilman@sjra.net](mailto:cgilman@sjra.net)>  
**Cc:** Osegueda, Veronica - HPW <[Veronica.Osegueda@houstontx.gov](mailto:Veronica.Osegueda@houstontx.gov)>; Jace Houston <[jhouston@sjra.net](mailto:jhouston@sjra.net)>; Molly, Andrew <[Andrew.Molly@houstontx.gov](mailto:Andrew.Molly@houstontx.gov)>; Citino, Sharon - HPW <[Sharon.Citino@houstontx.gov](mailto:Sharon.Citino@houstontx.gov)>  
**Subject:** RE: Seasonal Lowering of Lake Conroe

Good Morning,

Lake Houston had to increase the discharge over night to release water from the rains. The level as of 5:30 am was 41.41 ' msl. Houston Water is requesting that SJRA not begin releasing water from Lake Conroe until we can fully evaluate the inflows and level of Lake Houston tomorrow morning.

I will send an email once we determine it is safe to release water.

Thank you for your partnership in this effort.

**Yvonne W. Forrest**  
Director, Houston Water  
832-395-2847

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**From:** Forrest, Yvonne - HPW  
**Sent:** Wednesday, May 27, 2020 10:49 AM  
**To:** Chuck Gilman <[cgilman@sjra.net](mailto:cgilman@sjra.net)>  
**Cc:** Osegueda, Veronica - HPW <[Veronica.Osegueda@houstontx.gov](mailto:Veronica.Osegueda@houstontx.gov)>; Jace Houston <[jhouston@sjra.net](mailto:jhouston@sjra.net)>; Molly, Andrew <[Andrew.Molly@houstontx.gov](mailto:Andrew.Molly@houstontx.gov)>; Citino, Sharon - HPW <[Sharon.Citino@houstontx.gov](mailto:Sharon.Citino@houstontx.gov)>  
**Subject:** RE: Seasonal Lowering of Lake Conroe

Chuck,

I am aware we have a meeting scheduled this afternoon but I wanted to clarify Houston Water's position on the current elevation of Lake Conroe with respect to seasonal lowering and the weather forecast. Houston Water is requesting that SJRA lower Lake Conroe to 200' msl beginning on Friday, May 29, 2020 if the predicted rain events over the next two days do not cause Lake Houston to be at 42' msl on Friday morning.

In accordance with our agreement, SJRA can begin to recapture in Lake Conroe on Monday June 1, 2020.

**Yvonne W. Forrest**  
Director, Houston Water  
832-395-2847

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**From:** Citino, Sharon - HPW <[Sharon.Citino@houstontx.gov](mailto:Sharon.Citino@houstontx.gov)>  
**Sent:** Monday, April 13, 2020 9:31 AM  
**To:** Chuck Gilman <[cgilman@sjra.net](mailto:cgilman@sjra.net)>  
**Cc:** Forrest, Yvonne - HPW <[Yvonne.Forrest@houstontx.gov](mailto:Yvonne.Forrest@houstontx.gov)>; Osegueda, Veronica - HPW <[Veronica.Osegueda@houstontx.gov](mailto:Veronica.Osegueda@houstontx.gov)>; Jace Houston <[jhouston@sjra.net](mailto:jhouston@sjra.net)>  
**Subject:** RE: Seasonal Lowering of Lake Conroe

Thanks for the update, Chuck. Hope you and [REDACTED] are well.

**Sharon Citino**  
Planning Director, Houston Water  
832.395.2712 | Cell 713.205.5342



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**From:** Chuck Gilman <[cgilman@sjra.net](mailto:cgilman@sjra.net)>  
**Sent:** Monday, April 13, 2020 9:23 AM  
**To:** Citino, Sharon - HPW <[Sharon.Citino@houstontx.gov](mailto:Sharon.Citino@houstontx.gov)>; Jace Houston <[jhouston@sjra.net](mailto:jhouston@sjra.net)>  
**Cc:** Forrest, Yvonne - HPW <[Yvonne.Forrest@houstontx.gov](mailto:Yvonne.Forrest@houstontx.gov)>; Osegueda, Veronica - HPW <[Veronica.Osegueda@houstontx.gov](mailto:Veronica.Osegueda@houstontx.gov)>  
**Subject:** RE: Seasonal Lowering of Lake Conroe

[Message Came from Outside the City of Houston Mail System]

Good morning Sharon, I hope all is well. I want to let you know that we intend to begin diverting the city's water from Lake Conroe this morning. Lake Conroe is currently at Elevation 200.80' (approximately 2.5" below Conservation Pool). Based on the model we've developed, we should be able to reach elevation 200' on or before May 1<sup>st</sup>. We plan to begin releasing water from one tainter gate at a rate of approximately 529 cfs.

Please let me know if you have any questions or need additional information. I will give you an update if there is a need to deviate significantly from our plan.

Thanks,  
Chuck

**Chuck Gilman, PE, PMP**  
**Director of Water Resources and Flood Management**



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**From:** Citino, Sharon - HPW <[Sharon.Citino@houstontx.gov](mailto:Sharon.Citino@houstontx.gov)>  
**Sent:** Wednesday, April 1, 2020 4:00 PM  
**To:** Jace Houston <[jhouston@sjra.net](mailto:jhouston@sjra.net)>  
**Cc:** Chuck Gilman <[cgilman@sjra.net](mailto:cgilman@sjra.net)>; Forrest, Yvonne - HPW <[Yvonne.Forrest@houstontx.gov](mailto:Yvonne.Forrest@houstontx.gov)>; Osegueda, Veronica - HPW <[Veronica.Osegueda@houstontx.gov](mailto:Veronica.Osegueda@houstontx.gov)>  
**Subject:** Seasonal Lowering of Lake Conroe

Hi Jace,

Consistent with the SJRA Board recommendation adopted February 20, 2020, Houston requests that SJRA begin lowering the level of Lake Conroe

to reach 200' msl by May 1, 2020 with recapture of the lake level beginning June 1.

Thank you,

Sharon

**Sharon Citino**

Planning Director, Houston Water  
832.395.2712 | Cell 713.205.5342



**From:** [lloydtisdale](#)  
**To:** [Jace Houston](#)  
**Subject:** Re[7]: Board update re seasonal lowering  
**Attachments:** [image001.jpg](#)  
[image002.png](#)  
[image003.jpg](#)  
[image004.png](#)

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Yes it would. It would also be a major betrayal of the people on the lake.

----- Original Message -----

From: "Jace Houston" <[jhouston@sjra.net](mailto:jhouston@sjra.net)>  
To: "lloydtisdale" <[home@tisdaleusa.com](mailto:home@tisdaleusa.com)>  
Sent: 6/2/2020 2:48:06 PM  
Subject: RE: Re[5]: Board update re seasonal lowering

Agreed. We've been wondering if they will prerelease. It would be incredibly irresponsible.

**Jace A. Houston**  
General Manager



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**From:** lloydtisdale <[home@tisdaleusa.com](mailto:home@tisdaleusa.com)>  
**Sent:** Tuesday, June 2, 2020 2:45 PM  
**To:** Jace Houston <[jhouston@sjra.net](mailto:jhouston@sjra.net)>  
**Subject:** Re[5]: Board update re seasonal lowering

Just concerned since we have an early Gulf weather event happening outside of the Fall window for an event that triggers COH's ability to call for 199' level. I guess they could call for it now, but the timing heading in to what could be a dry Summer would not be good.

----- Original Message -----

From: "Jace Houston" <[jhouston@sjra.net](mailto:jhouston@sjra.net)>  
To: "lloydtisdale" <[home@tisdaleusa.com](mailto:home@tisdaleusa.com)>  
Sent: 6/2/2020 1:45:25 PM  
Subject: RE: Re[3]: Board update re seasonal lowering

They can call for their water anytime, and we would have to send it. If they exceed their annual permitted amount of 67k acre feet, then there may be some ability for folks to challenge it, but right now TCEQ is still exercising enforcement discretion.

**Jace A. Houston**  
General Manager



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**From:** lloydtsdale <[home@tisdaleusa.com](mailto:home@tisdaleusa.com)>  
**Sent:** Tuesday, June 2, 2020 1:30 PM  
**To:** Jace Houston <[jhouston@sjra.net](mailto:jhouston@sjra.net)>  
**Subject:** Re[3]: Board update re seasonal lowering

Does the COH have the ability to ask for additional lowering beyond 200' before Aug. 1 or even Sept 1?

Do we have any obligation to do it?

----- Original Message -----

From: "lloydtsdale" <[home@tisdaleusa.com](mailto:home@tisdaleusa.com)>  
To: "Jace Houston" <[jhouston@sjra.net](mailto:jhouston@sjra.net)>  
Sent: 6/2/2020 12:04:47 PM  
Subject: Re[2]: Board update re seasonal lowering

Thanks

----- Original Message -----

From: "Jace Houston" <[jhouston@sjra.net](mailto:jhouston@sjra.net)>  
To: "lloydtsdale" <[home@tisdaleusa.com](mailto:home@tisdaleusa.com)>  
Sent: 6/2/2020 11:57:04 AM  
Subject: RE: Board update re seasonal lowering

Yes. We will now be recapturing any inflows and maintain 201 until August when the fall seasonal lowering occurs.

**Jace A. Houston**  
General Manager



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**From:** lloydtsdale <[home@tisdaleusa.com](mailto:home@tisdaleusa.com)>  
**Sent:** Tuesday, June 2, 2020 11:50 AM  
**To:** Jace Houston <[jhouston@sjra.net](mailto:jhouston@sjra.net)>  
**Subject:** Re: Board update re seasonal lowering

I read some public comments on FB about levels and dates that didn't sound correct.

Isn't level supposed to be allowed to return to 201' between June 1 and Aug 1?

----- Original Message -----

From: "Jace Houston" <[jhouston@sjra.net](mailto:jhouston@sjra.net)>

To: "Jace Houston" <[jhouston@sjra.net](mailto:jhouston@sjra.net)>

Cc: "Cynthia Bowman" <[cbowman@sjra.net](mailto:cbowman@sjra.net)>; "Bret Raley" <[braley@sjra.net](mailto:braley@sjra.net)>;  
"Mitch Page - PMIS Forward" <[mepage@sphllp.com](mailto:mepage@sphllp.com)>; "Kate Henderson - PMIS  
Forward" <[khenderson@sphllp.com](mailto:khenderson@sphllp.com)>; "Chuck Gilman" <[cgilman@sjra.net](mailto:cgilman@sjra.net)>;  
"Heather Ramsey Cook" <[hcook@sjra.net](mailto:hcook@sjra.net)>; "Ron Kelling" <[rkelling@sjra.net](mailto:rkelling@sjra.net)>;  
"Tom Michel" <[tmichel@sjra.net](mailto:tmichel@sjra.net)>

Sent: 6/1/2020 2:11:34 PM

Subject: Board update re seasonal lowering

Board members,

Just a quick update. The City of Houston contacted us this morning and directed us to stop releasing. The lake is at 200.01.

We are monitoring the tropical system over Central America and will keep you informed if anything develops.

**Jace A. Houston**  
**General Manager**



**P.O. Box 329, Conroe, TX 77305**  
**1577 Dam Site Rd, Conroe, TX 77304**  
**Main: (936) 588-3111**  
**[jhouston@sjra.net](mailto:jhouston@sjra.net)**  
**[www.sjra.net](http://www.sjra.net)**

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