

**TCEQ DOCKET NO. 2020-1559-WR**

<b>APPLICATION BY THE</b>	<b>§</b>	<b>BEFORE THE</b>
<b>CITY OF CORPUS CHRISTI FOR</b>	<b>§</b>	<b>TEXAS COMMISSION</b>
<b>WATER USE PERMIT NO.</b>	<b>§</b>	<b>ON</b>
<b>WRPERM 13676</b>	<b>§</b>	<b>ENVIRONMENTAL QUALITY</b>

**APPLICANT’S RESPONSE TO HEARING REQUESTS**

The City of Corpus Christi (the “*City*”) files these responses to hearing requests and, in support of its responses, would respectfully show the TCEQ Commissioners as follows:

**Background**

The City has requested a water use permit to authorize the diversion and use of not to exceed 93,148 acre-feet of water per year, at a maximum diversion rate of 129 cfs (57,708 gpm), from a diversion reach on Tule Lake Channel (Corpus Christi Ship Channel), tributary of Corpus Christi Bay, Nueces-Rio Grande Coastal Basin in Nueces County for municipal purposes within its service area in Nueces County, Kleberg County, San Patricio County, and Aransas County (the “*Application*”).

The City has also requested in the Application an exempt interbasin transfer of 93,148 acre-feet of water to the portions of Nueces County within the Nueces River Basin and the San Antonio-Nueces Coastal Basin and to the portions of Nueces and San Patricio Counties in the San Antonio-Nueces Coastal Basin within the City’s service area, and an exempt interbasin transfer of 2,999 acre-feet of water out of the authorized 93,148 acre-

feet to Aransas County within the San Antonio-Nueces Coastal Basin within the City's service area.

The proposed diversion reach is located along Tule Lake Channel—also known as the Corpus Christi Ship Channel Inner Harbor—in the Nueces-Rio Grande Coastal Basin, in Nueces County. The upper limit of the diversion reach is located at Latitude 27.812342° N, Longitude 97.414444° W, and the lower limit of the diversion reach is located at Latitude 27.811553° N, Longitude 97.412778° W.

The Executive Director has completed the technical review of the Application and prepared draft Water Use Permit No. 13676 (the “*Draft Permit*”). The Draft Permit, if issued, would authorize the requests contained in the Application subject to multiple special conditions.

Notice of the Application was mailed on October 26, 2020, and published on November 12, 2020. Pursuant to Title 30, section 55.251(d) of the Texas Administrative Code, all requests for a contested case hearing on the Application were due no later than December 14, 2020.

### Responses to Requests

The Executive Director's staff received multiple requests for a contested case hearing on the Application. However, only one requestor timely submitted a contested case hearing request. Regardless, none of the hearing requestors have shown that they possess a legal right, duty, privilege, power, or economic interest affected by the Application in a manner that is not common to members of the general public. Public use of the Corpus

Christi Ship Channel Inner Harbor for recreation, including all of the diversion reach, is prohibited. All of the requests should be denied for the reasons identified below.

I. Hearing requests received after December 14, 2020:

1. Yvette Arellano  
222 S 66th Street, Apt. 9108  
Houston, Texas 77011-4400  
fencelinewatch@gmail.com

Yvette Arellano submitted two requests that were each received on March 18, 2021. Each request was submitted on behalf of Fenceline Watch, a self-described environmental justice organization. Each request is untimely. In addition, the requestor does not claim ownership of any appropriative or riparian water right. The requestor specifies multiple concerns with the requests made in the Application from the standpoint of protecting the “public trust” in state water and “the public as a whole”—*i.e.*, interests common to members of the general public. The requestor has not identified any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application, nor does the requestor describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestor’s property. The requestor does not identify any member who has standing to request a hearing in his or her own right. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

2. Sylvia Campos  
4410 Fir St  
Corpus Christi, Texas 78411-3635  
campossylvia87@gmail.com

Sylvia Campos submitted a hearing request that was received on March 18, 2021.

The request is untimely. In addition, the requestor does not claim ownership of any appropriative or riparian water right. The requestor raises concerns with energy consumption and environmental impacts associated to desalination plants. None of the issues raised in the request are protected by the law under which the Application will be considered. The requestor has not identified any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application, nor does the requestor describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestor's property. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

3. Adrian Clark  
935 Waterview St  
Portland, Texas 78374-2222  
clark7as@aol.com

Adrian Clark submitted a hearing request that was received on March 28, 2021.

The request is untimely. In addition, the requestor does not claim ownership of any appropriative or riparian water right. The residence address provided is around 10 miles away from the proposed diversion reach, according to the requestor. The requestor raises a series of concerns regarding desalination in general, impacts of seawater desalination on

electric energy availability, and water quality issues associated with discharges. None of these issues are protected by the law under which the Application will be considered. The requestor raises general concerns regarding the diversion volume and rate, and the associated intake, as well as potential impacts to recreation. The requestor does not describe any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application, nor does the requestor describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestor's property. Requestor's concerns instead describe interests that are common to members of the general public. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

4. Patt & Yves Coeckelenbergh  
410 Mercer St  
Port Aransas, Texas 78373-5160  
pattcoeck@aol.com

Patt & Yves Coeckelenbergh submitted a hearing request that was received on March 25, 2021. Their request is untimely. In addition, the requestors do not identify ownership of any appropriative or riparian water right. The requestors raise concerns regarding impacts of seawater desalination on electric energy availability and general impacts to unidentified nearby neighborhoods. None of these issues are protected by the law under which the Application will be considered. The requestors raise general concerns regarding the diversion volume and the associated intake, as well as potential impacts to recreation. The requestors do not describe any personal justiciable interests related to a

legal right, duty, privilege, power, or economic interest affected by the Application, nor do they describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestors' property. Requestors' concerns instead describe interests that are common to members of the general public. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

5. Erin Denny  
269 Madison St  
San Francisco, California 94134-1347  
agenthandy@gmail.com

Erin Denny submitted a hearing request that was received on March 26, 2021. The request is untimely. In addition, the requestor does not claim ownership of any appropriative or riparian water right. The requestor provides a California address and indicates that she does not live in the Corpus Christi area. The requestor raises a series of concerns regarding desalination in general, impacts of seawater desalination, water quality issues associated with discharges, and general impacts to unidentified nearby neighborhoods. None of these issues are protected by the law under which the Application will be considered. The requestor also raises general concerns regarding the diversion volume and associated intake, and potential impacts to recreation. The requestor has not identified any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application. Additionally, the requestor does not describe any likely impacts of the activities authorized in the Draft Permit on the health,

safety, and use of the requestor's property. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

6. James & Paige Dinn  
214 Ohio Ave.  
Corpus Christi, Texas 78404-1723

James & Paige Dinn submitted a hearing request that was received on March 22, 2021. Their request is untimely. In addition, the requestors do not claim ownership of any appropriative or riparian water right. The requestors also raise general concerns regarding the location and impacts of the diversion intake as well as potential impacts to recreation. In addition, the requestors raise a series of general concerns regarding desalination and water quality issues associated with discharges. None of these issues are protected by the law under which the Application will be considered. The requestors have not identified any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application. Additionally, the requestors do not describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestors' property. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

7. Margaret A. and Jose M. Duran  
4022 Congressional Dr  
Corpus Christi, TX 78413-2523  
pegduran@stx.rr.com  
pegduran1@gmail.com

Margaret and Jose Duran submitted a hearing request that was received on March 18, 2021. Their request is untimely. In addition, the requestors do not claim ownership of any appropriative or riparian water right. The requestors raise a series of general concerns regarding desalination, water quality issues associated with discharges, and drinking water treatment. None of these issues are protected by the law under which the Application will be considered. The requestors also raise general concerns regarding the location and impacts of the diversion intake as well as potential impacts to recreation. The requestors have not identified any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application. Additionally, the requestors do not describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestors' property. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

8. Sally Clark Farris  
13043 Hunters Breeze St  
San Antonio, Texas 78230-2822  
s.farris@att.net

Sally Clark Farris submitted two hearing requests that were each received on March 18, 2021. The requests are untimely. The requestor provides a San Antonio address and does not claim ownership of any appropriative or riparian water right. The requestor raises



a series of general concerns regarding desalination, water quality issues associated with discharges, and permitting processes that do not apply to the Application. None of these issues are protected by the law under which the Application will be considered. The requestor also raises general concerns regarding the location of the diversion intake. The requestor has not identified any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application. Additionally, the requestor does not describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestor's property. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

9. Erin Gaines  
Attorney  
Earthjustice  
3205 McCurdy St  
Austin, Texas 78723-2905  
egaines@earthjustice.org

Erin Gaines co-signed a hearing request and supplement submitted by Marisa Perales on behalf of the Hillcrest Residents Association. The request was received on March 18, 2021, and the supplement was received on April 1, 2021. The request is untimely. Additional bases for denying the association's request are addressed in the City's responses to Marisa Perales' correspondence below. Erin Gaines submitted no additional requests for hearing on this Application. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

10. Guillermo Gallegos  
7621 Cedar Brook Dr  
Corpus Christi, Texas 78413-5622  
ggtherobot@yahoo.com

Guillermo Gallegos submitted a hearing request that was received on March 16, 2021. The request is untimely. In addition, the requestor does not identify ownership of any appropriative or riparian water right. The requestor raises a series of concerns regarding desalination and water quality issues associated with discharges and general impacts to unidentified nearby neighborhoods. None of these issues are protected by the law under which the Application will be considered. The requestor raises general concerns regarding the diversion volume and rate and the associated intake without specifying any individualized impacts. The requestor does not describe any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application. Additionally, the requestor does not describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestor's property. Requestor's concerns instead describe interests that are common to members of the general public. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

11. Donna L. Hoffman  
1500 Gregory St  
Austin, Texas 78702-2732  
donna.leehoffman@gmail.com

Donna Hoffman submitted a hearing request that was received on March 18, 2021. The request is untimely. In addition, the requestor does not claim ownership of any appropriative or riparian water right. The requestor indicates that she resides in Austin, Texas. The requestor raises a series of concerns regarding desalination in general, impacts of seawater desalination and water quality issues associated with discharges. None of these issues are protected by the law under which the Application will be considered. The requestor also raises general concerns regarding the diversion volume and associated intake, and potential impacts to recreation. The requestor has not identified any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application. The requestor does not describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestor's property. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

12. Uneeda E. Laitinen  
102 Markham Pl  
Portland, Texas 78374-1418  
uneedalaitinen@gmail.com

Uneeda Laitinen submitted a hearing request that was received on March 18, 2021. The request is untimely. In addition, the requestor does not claim ownership of any appropriative or riparian water right. The requestor raises a series of concerns regarding

desalination in general, its costs, its impacts of seawater desalination on electric energy availability, and water quality issues associated with discharges. None of these issues are protected by the law under which the Application will be considered. The requestor raises general concerns regarding the diversion volume and rate, and the associated intake, as well as potential impacts to recreation. The requestor does not describe any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application. Additionally, the requestor does not describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestor's property. Requestor's concerns instead describe interests that are common to members of the general public. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

13. Mary C. Lee  
7046 Hathor Dr  
Corpus Christi, Texas 78412-4110  
mclare.lee@gmail.com

Mary Lee submitted a hearing request that was received on March 18, 2021. The request is untimely. In addition, the requestor does not claim ownership of any appropriative or riparian water right. The requestor raises general concerns regarding the proposed location of the diversion reach. The requestor does not describe any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application. Additionally, the requestor does not describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the

requestor's property. Requestor's concerns instead describe interests that are common to members of the general public. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

14. Deborah Manning  
3634 Shore Dr.  
Corpus Christi, Texas 78418-3064  
debmanning01@gmail.com

Deborah Manning submitted a hearing request that was received on March 25, 2021. The request is untimely. In addition, the requestor does not claim ownership of any appropriative or riparian water right. The requestor also raises general concerns regarding energy consumption attributable to desalination. This issue is not one that is protected by the law under which the Application will be considered. The requestor also raises general concerns regarding the environmental impacts attributable to the diversion volume, rate, and the associated intake. The requestor does not describe any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application. Additionally, the requestor does not describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestor's property. Requestor's concerns instead describe interests that are common to members of the general public. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

15. Dr. Kathryn A. Masten  
1006 Sandpiper  
Ingleside, Texas 78362-4689

P.O. Box 25  
Vienna, Maryland 21869-0025  
kathrynmasten@yahoo.com

Kathryn Masten submitted a hearing request that was received on March 18, 2021.

The request is untimely. In addition, the requestor does not claim ownership of any appropriative or riparian water right. The requestor lists an address in Ingleside, Texas and in Maryland. The Ingleside address is separated from the diversion reach by several miles. The requestor raises concerns regarding general impacts of desalination to nearby neighborhoods, the ability of the City to operate desalination facilities, impacts from other regulated activities not associated with the Application, and impacts of weather on intake structures and diversion metering and monitoring. None of these issues are protected by the law under which the Application will be considered. The requestor also expresses concerns regarding the proposed use of water diverted under the terms of the Draft Permit. The requestor also expresses concerns with projected water demands and costs associated with desalination. The requestor does not describe any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application. Additionally, the requestor does not describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestor's property. Requestor's concerns instead describe interests that are common to members of the general public. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

16. Robert Muir  
6230 Bourbonais Dr.  
Corpus Christi, Texas 78414-6015  
rmmuircc@gmail.com

Robert Muir submitted a hearing request that was received on March 18, 2021. The request is untimely. In addition, the requestor does not claim ownership of any appropriative or riparian water right. The requestor raises general concerns regarding the associated intake and its impact on water quality. In addition, the requestor expresses concerns regarding the electric energy required for desalination. None of these issues are protected by the law under which the Application will be considered. The requestor does not describe any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application. Additionally, the requestor does not describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestor's property. Requestor's concerns instead describe interests that are common to members of the general public. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

17. Marisa Perales  
Attorney  
Perales Allmon & Ice PC  
1206 San Antonio St.  
Austin, Texas 78701-1834

Marisa Perales submitted a hearing request on behalf of the Hillcrest Residents Association that was received on March 18, 2021, and later supplemented on April 1, 2021. The request and supplement were also signed by Erin Gaines, as discussed above. The

request is untimely. The request identifies six members—Reverend Henry Williams, Lamont Taylor, Daniel Pena, Jistine Knox, David Garza, and Carrie Meyer—as the basis for the association’s request. None of the identified members submitted their own hearing requests.

The requestor describes Reverend Williams as residing at 2422 Summers Street in Corpus Christi. Mr. Garza is described as living at 2813 Hulbirt Street in Corpus Christi. Ms. Meyer is described as living at 4401 Gulfbreeze Boulevard in Corpus Christi. None of these addresses have coastal frontage, and none are adjacent to the diversion reach identified in the Draft Permit. The requestor describes Reverend Williams and Mr. Garza as having recreational interests in the Inner Harbor and North Beach. The requestor describes Ms. Meyer as having recreational and pecuniary interests in Corpus Christi Bay. As stated above, however, public use of the Corpus Christi Ship Channel Inner Harbor for recreation, including all of the diversion reach, is prohibited. The request does not provide any address for, nor additional information regarding, Mr. Taylor, Mr. Pena, or Ms. Knox. The requestor does not identify any appropriative or riparian water rights held by any of its six identified members. Additionally, the requestor does not describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the referenced properties. None of the interests described are related to a legal right, duty, privilege, power, or economic interest affected by the Application personal to any of the six identified members. Instead, the requestor describes interests that are common to members of the general public. The requestor does not specify how any of the identified members would otherwise have standing to request a contested case hearing in their own right.



The request references multiple concerns with the Application, including concerns regarding the City's reliance on agency definitions in lieu of more descriptive terminology and lack of references to surplus water. The requestor also describes concerns regarding speculative uses of water diverted and transported as described in the Draft Permit. In addition, the requestor describes its concerns regarding the consistency of the City's requests with State and Regional Water Plans, the City's proposed uses of diversions and the needs of the City's customers. The requestor also expresses concerns regarding impacts from the diversions on recreational activities. Finally, the requestor expresses concerns regarding agency rulemaking. None of the requestor's concerns are distinguishable from issues that are common to members of the general public. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

18. Julie Travis Rogers  
710 Furman Ave.  
Corpus Christi, Texas 78404-3222  
rogersjuliet@gmail.com

Julie Travis Rogers submitted a hearing request that was received on March 25, 2021. The request is untimely. In addition, the requestor does not claim ownership of any appropriative or riparian water right. The requestor expresses concerns about water quality issues associated with desalination and related environmental impacts. None of these issues are protected by the law under which the Application will be considered. The requestor does not describe any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application. Additionally, the

requestor does not describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestor's property. Requestor's concerns instead describe interests that are common to members of the general public. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

19. Donna Rosson  
11464 Highway 188  
Sinton, Texas 78387-5539  
Drossonjr@yahoo.com

Donna Rosson submitted a hearing request that was received on March 18, 2021. The request is untimely. In addition, the requestor does not claim ownership of any appropriative or riparian water right. The requestor expresses general concerns regarding water quality impacts from desalination activities, including discharges. The requestor also expresses concerns regarding electric energy consumption attributable to desalination. None of these issues are protected by the law under which the Application will be considered. In addition, the requestor expresses concerns regarding the proposed diversion rate and associated intake. The requestor does not describe any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application. Additionally, the requestor does not describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestor's property. Requestor's concerns instead describe interests that are common to members of

the general public. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

20. Clara Villarreal Varner  
2413 Gavin Trail  
Pflugerville, Texas 78660-6528  
Teksun1@aol.com

Clara Villarreal Varner submitted a hearing request that was received on March 18, 2021. The request is untimely. In addition, the requestor does not claim ownership of any appropriative or riparian water right. The requestor expresses general concerns regarding desalination and its impacts on the environment. These concerns are not issues that are protected by the law under which the Application will be considered. The requestor does not describe any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application. Additionally, the requestor does not describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestor's property. Requestor's concerns instead describe interests that are common to members of the general public. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

21. Daniel Patrick Wilkerson  
Rockport Family Fishing Charters  
3196 Rebecca St.  
Ingleside, Texas 78362-4649  
captaindpw@gmail.com

Daniel Wilkerson submitted a hearing request that was received on March 18, 2021. The request is untimely. In addition, the requestor does not claim ownership of any appropriative or riparian water right. The requestor expresses concerns regarding marine life impingement and the quality of treated water from desalination. The requestor explains that he is a fishing guide and area resident, but he does not describe how his concerns impact any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application. Additionally, the requestor does not describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestor's property. Requestor's concerns instead describe interests that are common to members of the general public. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

22. Melissa Zamora  
3917 Brawner Pkwy  
Corpus Christi, Texas 78411-3254  
zmelissa898@gmail.com

Melissa Zamora submitted a hearing request that was received on March 29, 2021. The request is untimely. In addition, the requestor does not claim ownership of any appropriative or riparian water right. The requestor expresses general concerns regarding costs associated with desalination and impacts from other facilities in the area. These

concerns are not issues that are protected by the law under which the Application will be considered. The requestor expresses concerns that the diversions proposed in the Application will impact water quality. The requestor also expresses concerns with the intake design. The requestor does not describe any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application. Additionally, the requestor does not describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestor's property. Requestor's concerns instead describe interests that are common to members of the general public. The request should be denied on the basis that it was untimely submitted and based on the other reasons described above.

II. Hearing request received by December 14, 2020:

23. Encarnacion Serna, Jr.  
105 Lost Creek Drive  
Portland, Texas 78374-1449  
cacheton1@twc.com

Encarnacion Serna, Jr., submitted a public hearing request that was received on June 30, 2020, and a public hearing request that was received on July 16, 2020. The requestor does not claim ownership of any appropriative or riparian water right. The requestor expresses concerns regarding water quality impacts from desalination projects in La Quinta Channel and Corpus Christi Bay. The requestor also expresses concerns regarding impacts of raw water quality on the desalination process and the quality of treated water. These concerns are not issues that are protected by the law under which the

Application will be considered. The requestor does not describe any personal justiciable interests related to a legal right, duty, privilege, power, or economic interest affected by the Application. Additionally, the requestor does not describe any likely impacts of the activities authorized in the Draft Permit on the health, safety, and use of the requestor's property. Requestor's concerns instead describe interests that are common to members of the general public. The request should be denied on these bases.

Conclusion and Prayer for Relief

The City respectfully requests that the Commission deny the hearing requests made by each of the requestors identified herein, direct the Executive Director to grant the Application and issue Water Use Permit No. 13676 as proposed in the Draft Permit, and award the City all other relief to which it is lawfully entitled.

Respectfully Submitted,

J.T. Hill. PLLC.  
3800 North Lamar Blvd., Suite 200  
Austin, Texas 78756  
(512) 806-1060 (phone)  
(512) 957-1405 (fax)  
jason@jthill.com

By: /s/ Jason Hill  
Jason T. Hill  
State Bar No. 24046075

**ATTORNEY FOR APPLICANT CITY OF  
CORPUS CHRISTI**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of September 2022, the foregoing response was filed electronically with the Office of the Chief Clerk of the Texas Commission on Environmental Quality and was delivered as indicated to the persons on the attached Service List.

*/s/ Jason Hill*  
\_\_\_\_\_  
Jason T. Hill

**Service List**  
**City of Corpus Christi**  
**Application for Water Use Permit No. WRPERM 13676**  
**TCEQ Docket No. 2020-1559-WR**

**OFFICE OF THE CHIEF CLERK**

Docket Clerk  
TCEQ Office of Chief Clerk, MC-105  
P.O. Box 13087  
Austin, Texas 78711-3087  
(512) 239-3300 telephone  
(512) 239-3311 fax  
*via agency filing service*

**EXECUTIVE DIRECTOR:**

Ruth Ann Takeda  
TCEQ Environmental Law Division  
MC-173  
P.O. Box 13087  
Austin, Texas 78711-3087  
(512) 239-0600 telephone  
(512) 239-0606 fax  
ruth.takeda@tceq.texas.gov  
*via email*

**EXECUTIVE DIRECTOR**

**EXTERNAL RELATIONS**

Ryan Vise, Director  
TCEQ External Relations Division  
Public Education Program MC-108  
P.O. Box 13087  
Austin, Texas 78711-3087  
(512) 239-4000 telephone  
(512) 239-5678 fax  
ryan.vise@tceq.texas.gov  
*via email*

**OFFICE OF PUBLIC INTEREST**

**COUNSEL:**

Vic McWherter, Public Interest Counsel  
Texas Commission on Environmental  
Quality  
Office of Public Interest Counsel  
MC-103  
P.O. Box 13087  
Austin, Texas 78711-3087  
(512) 239-6363 telephone  
(512) 239-6377 fax  
vic.mcwherter@tceq.texas.gov  
*via email*

**ALTERNATIVE DISPUTE  
RESOLUTION**

Kyle Lucas  
TCEQ Alternative Dispute Resolution  
MC-222  
P.O. Box 13087  
Austin, Texas 78711-3087  
(512) 239-0687 telephone  
(512) 239-4015 fax  
kyle.lucas@tceq.texas.gov  
*via email*

**REQUESTORS**

*via U.S. First Class Mail delivery*

Yvette Arellano  
222 S 66Th Street, Apt 9108  
Houston, Texas 77011-4400



Sylvia Campos  
4410 Fir Street  
Corpus Christi, Texas 78411-3635

Adrian Clark  
935 Waterview Street  
Portland, Texas 78374-2222

Patt & Yves Coeckelenbergh  
410 Mercer Street  
Port Aransas, Texas 78373-5160

Erin Denny  
269 Madison Street  
San Francisco, California 94134-1347

James & Paige Dinn  
214 Ohio Ave  
Corpus Christi, Texas 78404-1723

Margaret A. and Jose M. Duran  
4022 Congressional Dr  
Corpus Christi, TX 78413-2523

Sally Clark Farris  
13043 Hunters Breeze Street  
San Antonio, Texas 78230-2822

Erin Gaines  
Earthjustice  
3205 McCurdy Street  
Austin, Texas 78723-2905

Guillermo Gallegos  
7621 Cedar Brook Dr  
Corpus Christi, Texas 78413-5622

Donna L. Hoffman  
1500 Gregory Street  
Austin, Texas 78702-2732

Uneeda E. Laitinen  
102 Markham Place  
Portland, Texas 78374-1418

Mary C. Lee  
7046 Hathor Dr  
Corpus Christi, Texas 78412-4110

Deborah Manning  
3634 Shore Dr  
Corpus Christi, Texas 78418-3064

Dr. Kathryn A. Masten  
1006 Sandpiper  
Ingleside, Texas 78362-4689

Dr. Kathryn A. Masten  
P.O. Box 25  
Vienna, Maryland 21869-0025

Robert Muir  
6230 Bourbonais Dr  
Corpus Christi, Texas 78414-6015

Marisa Perales  
Attorney  
Perales Allmon & Ice PC  
1206 San Antonio Street  
Austin, Texas 78701-1834

Julie Travis Rogers  
710 Furman Ave  
Corpus Christi, Texas 78404-3222

Donna Rosson  
11464 Highway 188  
Sinton, Texas 78387-5539

Encarnacion Serna, Jr.  
105 Lost Creek Drive  
Portland, Texas 78374-1449

Clara Villarreal Varner  
2413 Gavin Trail  
Pflugerville, Texas 78660-6528

Daniel Patrick Wilkerson  
Rockport Family Fishing Charters  
3196 Rebecca Street  
Ingleside, Texas 78362-4649

Melissa Zamora  
3917 Brawner Pkwy  
Corpus Christi, Texas 78411-3254