

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 15, 2021 3:31 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

From: BISSELLS@swbell.net <BISSELLS@swbell.net>
Sent: Monday, March 15, 2021 2:49 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: DAWN BISSELL

E-MAIL: BISSELLS@SWBELL.NET

COMPANY:

ADDRESS: 253 CIRCLE DR
CORPUS CHRISTI TX 78411-1257

PHONE: 3618542635

FAX:

COMMENTS: I oppose the desal plant in the Inner Harbor, as there is not enough water circulation to properly dispense the brine discharge that will occur. This will result in an even more hypersaline bay, negatively affecting plant and sea life. I support desalination for Corpus Christi's water needs, but it MUST be placed in the right location.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 11:44 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: City of Corpus Christi WRPERM 13676

From: Brad Patterson <Brad.Patterson@tceq.texas.gov>
Sent: Thursday, March 18, 2021 8:33 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: City of Corpus Christi WRPERM 13676

From: David Bradsby <David.Bradsby@tpwd.texas.gov>
Sent: Thursday, March 18, 2021 8:32 PM
To: Brad Patterson <Brad.Patterson@tceq.texas.gov>
Cc: 'Steve Ramos' <estebanr2@cctexas.com>; Shannon Love <Shannon.Love@tpwd.texas.gov>
Subject: City of Corpus Christi WRPERM 13676

Mr. Patterson,

The Texas Parks and Wildlife Department (TPWD) has reviewed the water right permit application WRPERM 13676 submitted by the City of Corpus Christi for diversion of up to 93,148 a-ft/yr from Tule Lake Channel. TPWD recommends the permit include provisions to limit impingement and entrainment from the diversion of water. Specifically, TPWD recommends that:

- diversions of marine seawater should not exceed flow-through velocities of 0.5 feet per second (fps), nor be co-located such that combined impacts in the surrounding approach area exceeds 0.5 fps;
- intake structure design should adjust or adaptively manage with varying flows and water quality that may occur at the intake site;
- intake structures should be designed to reduce the flow velocity so that marine organisms may escape being drawn into the intake;
- screens or booms, or both, should be used to exclude organisms from the intake; and
- a site-specific study of conditions at proposed intake locations be conducted to identify marine organisms at risk from intake operations and to inform the design planning process.

In addition, if feasible, directional drilling to install piping below the seabed and draw water down through a sandy bottom would prevent impingement of marine organisms on intake screens exposed to open water and prevent entrainment of other organisms carried with the feedwater through the intake screen.

TPWD appreciates the opportunity to provide comments on the application.

Sincerely,

David Bradsby

David Bradsby, Leader
Water Quantity Program
Texas Parks and Wildlife Department

512.389.8048

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 11:32 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

From: kkcammarrata@outlook.com <kkcammarrata@outlook.com>
Sent: Thursday, March 18, 2021 10:21 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Kirk Cammarata

E-MAIL: kkcammarrata@outlook.com

COMPANY:

ADDRESS: 7602 IMPALA DR
CORPUS CHRISTI TX 78414-6423

PHONE: 3619062401

FAX:

COMMENTS: Thank you for the opportunity to comment. There should be more time, and more advanced advertising of this hearing as I only learned of it at the last minute. I am not opposed to desal per se, but it needs to be done right, and done at the right time. This proposal is neither. The science and common sense both indicate CLEARLY that the intake and discharge need to extended out in the Gulf. NOT in the bay, and definitely not from that cesspool of a ship channel.

Q: Is there any requirement for a minimum quality of water for intake, and can we be ASSURED that there will be continuous testing of the intake water? This is a terrible idea and the WORST possible location. The sediments of the ship channel and adjacent Nueces Bay are known to be contaminated with heavy metals. Northeast winds will move water exiting Nueces Bay towards the ship channel intake at CC Bay. The myriad of chemicals, current and legacy, will runoff in normal rainfalls and catastrophes (hurricanes, fire extinguishing, leakages, etc) and be available at the intake. Will ships further dump bilge into our water source? While everyone makes the false assumption that hypersaline discharge will lay on the bottom and be safely flowed out into the gulf, in reality, the massive displacement caused by the large ships will thrust channel-bottom waters outward, and the prop-wash from the ships and tugs will mix it with surface waters and spread this into adjacent critical wildlife habitats. Has anybody even bothered to study the hydrology or at least model it taking ship-induced mixing into account? I'll bet not. This whole project is a sham to get the citizens to subsidize the profits of private industries, industries that bully the city with lawsuits to avoid paying their fair share of taxes! They know the water will be undrinkable and will eventually divert it all to industry, but the citizens are stuck footing the bill.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 11:46 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

From: elida.i.castillo@gmail.com <elida.i.castillo@gmail.com>
Sent: Thursday, March 18, 2021 8:02 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Elida Castillo

E-MAIL: elida.i.castillo@gmail.com

COMPANY:

ADDRESS: PO BOX 643
TAFT TX 78390-0643

PHONE: 2108578925

FAX:

COMMENTS: TCEQ, please deny The City of Corpus Christi; Water Use Permit Application No. 13676. We have not been provided with enough studies on how this will affect our bays and marine life in the area. There is currently not a need to expand our water supply to include the use of desalination plants. If these are being built to lure more industries to the area, while adversely affecting our environment. The permitting of a desalination plant will only create more issues

for all residents in the area. Also, our area is prone to natural disasters, so we do not yet know how this will react hold up in the event of a hurricane or an earthquake, as we've seen with fracking. Due to all the unknowns surrounding this issue, please deny the permit. It's bad enough with the boil notices we've been under, this desalination plant is too risky, expensive, and unnecessary.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Wednesday, March 17, 2021 10:46 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

From: melonychandler61@gmail.com <melonychandler61@gmail.com>
Sent: Tuesday, March 16, 2021 9:33 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: MS Melony Ann Chandler

E-MAIL: melonychandler61@gmail.com

COMPANY: Retired USDA NRCS

ADDRESS: PO BOX 152
CHRISTOVAL TX 76935-0152

PHONE: 3252343236

FAX:

COMMENTS: I am opposed to this DESAL plant and any others in the coastal bend. I am the third generation to enjoy fishing and birding in the Rockport to Aransas Pass to Port Aransas Area. My family eats the fish we catch both in the bays and offshore. I do not believe the DESAL plant is needed. I have studied the Region N water plan and the demand for additional water for the human population is not there. I am not in favor of recruiting additional petroleum based

facilities for this area. I have watched the whooping cranes come back from the brink of extinction in my lifetime. Too much work has gone into improving the wildlife and fisheries habitat in that region for a DESAL plant to come in and ruin the work that has been achieved. This is an important play ground for all socio economic groups of humans not just from Texas but from the across the United States. There is not enough research or baseline data available to prove there will not be damage to the ecosystem from the water that will be pumped back into the bay or other salt water body. I do not like the prospect of having solid waste/sludge to be disposed of in the area. There are other ways to provide water over the coming years. I have 35 years of Natural Resource Management Experience having retired with the USDA NRCS. I do not want the DESAL plants permitted or built in the Coastal Bend. There is no doubt in my mind these will destroy habitat, damage the aesthetic beauty we all enjoy and be detrimental to humans, wildlife and fisheries habitat. Please get experts in the area of wildlife and fisheries to complete studies before any permit is issued. Please make sure those experts are not hired or employed by the City of Corpus Christi, any of the petroleum industries or the Port o Corpus Christi. Please do not approve the permit for this DESAL plant. Respectfully submitted, Melony Chandler

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 11:50 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

From: kjdannenmaier@gmail.com <kjdannenmaier@gmail.com>
Sent: Thursday, March 18, 2021 7:26 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Katherine J Dannenmaier

E-MAIL: kjdannenmaier@gmail.com

COMPANY:

ADDRESS: 4519 AVENUE F
AUSTIN TX 78751-3108

PHONE: 4096925283

FAX:

COMMENTS: I am a filmmaker from Galveston, currently living in Austin. I am working on a documentary about the Karankawa tribe and through them learned about this issue. Not only is desalination NOT the best option for the people living in Corpus Christi (San Patricio Aquifer has enough water for centuries), the creation of those plants would also destroy one of the only remaining historical Karankawa sacred sites where historic artifacts have been found. By

approving this permit you would be allowing the destruction of history, of marine life, of the water quality of the bay, and ultimately destroying future opportunities for tourism. Please consider looking into alternate options or at least approving fewer than four desalination plants, which is excessive.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Wednesday, March 17, 2021 11:23 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

From: goliadranger@gmail.com <goliadranger@gmail.com>
Sent: Tuesday, March 16, 2021 12:30 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Phillip Davis

E-MAIL: goliadranger@gmail.com

COMPANY:

ADDRESS: 622 SANTA MONICA PL
CORPUS CHRISTI TX 78411-2208

PHONE: 8327796372

FAX:

COMMENTS: Dear TCEQ Members: I oppose this permit on the grounds that: a) it is unneeded since alternative sources of water were not duly considered, b) it will cause sever degradation of our marine environment and c) public users should not subsidize private industrial users as will happen under this permit. Vote NO

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 5:48 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

From: hughesemailwendy@yahoo.com <hughesemailwendy@yahoo.com>
Sent: Thursday, March 18, 2021 3:44 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

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RN NUMBER: RN110941192

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DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Wendy Hughes

E-MAIL: hughesemailwendy@yahoo.com

COMPANY: Sierra Club, CAPE

ADDRESS: 2129 BAY BREEZE --
PORTLAND TX 78374-4156

PHONE: 3617040038

FAX:

COMMENTS: I am asking that you deny this permit. It threatens the bay and its wildlife. The intake would suck in and kill fish and other marine animals. The brine discharged would in turn kill other fish and wildlife. Desal is in now way needed for the people and is only being proposed for incoming corporations that don't know our area and how it would seriously affect our tourism and our environment. I believe you need to extend the comment period at least two weeks

to make up for the time Texas was under a freeze and without power which includes internet people were supposed to use to make their comments. All these companies have been allowed to just push through their permits and not allow the time needed to hear from the public. We all need to slow down and think of the cumulative affect of all this. Not just for each project. Thank you

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Wednesday, March 17, 2021 10:43 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

From: ejfb1029@gmail.com <ejfb1029@gmail.com>
Sent: Tuesday, March 16, 2021 11:05 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Edwin Jimenez

E-MAIL: ejfb1029@gmail.com

COMPANY:

ADDRESS: 757 MATTHEW DR
CORPUS CHRISTI TX 78418-4638

PHONE: 3615639756

FAX:

COMMENTS: I do not agree with the desalination plant in this permit, I think its unneeded and too expensive.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 5:38 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

From: jeklein20@gmail.com <jeklein20@gmail.com>
Sent: Thursday, March 18, 2021 6:16 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: DR. James Klein

E-MAIL: jeklein20@gmail.com

COMPANY: Coastal Bend Sierra Club group

ADDRESS: 3501 MONTERREY ST
CORPUS CHRISTI TX 78411-1709

PHONE: 3613343908

FAX:

COMMENTS: I urge the TCEQ to reject this permit. Locating this desalination facility's water intake in the inner harbor will be problematic because of its impingement and entrainment of organisms, particularly benthic organisms, in the ship channel. The threat to benthic organisms would consequently threaten the sporting fish in the ship channel and adjoining Corpus Christi Bay which feed on these organisms. Because port industries already discharge waste water

(including brine from one desalination facility already permitted) into the inner harbor, this intake will be terribly inefficient and may introduce dangerous chemicals into the Corpus Christi public water supply. This permit would contribute to completion of a desalination facility that would dump salty brine into the same inner harbor, further reducing the facility's efficiency. This inefficiency would further increase water rates for people living in Corpus Christi and the surrounding region, though the benefits of this facility will disproportionately go to area industries. For the sake of area water rate payers and for the sake of plant and animal life in Corpus Christi Bay, I urge the TCEQ to reject this permit.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 11:52 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

From: dloeb@landlord-resources.com <dloeb@landlord-resources.com>
Sent: Thursday, March 18, 2021 6:49 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

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DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: David Loeb

E-MAIL: dloeb@landlord-resources.com

COMPANY:

ADDRESS: 3833 S STAPLES ST STE S116
CORPUS CHRISTI TX 78411-5226

PHONE: 3618770474

FAX:

COMMENTS: I am commenting in favor of the permit. I served on the City Council here during our last water project, Mary Rhodes Pipeline Phase 2. Long experience has taught us that each time we execute a water project we must immediately start the process of the next one. That has allowed us as a community to have the water we need when we need it. One of the projects we started planning then was this desal plant. At that point we did not know if it would be

viable or feasible. Successive City Council's after I left have continued to develop the project to the point where it is before you today. It has strong backing from the community both from private citizens and business. We actually began the process due to strong citizen interest in desal. While I know there are environmental concerns I have a high regard for the staff working on the project and trust them. One of the benefits of a city water utility holding this type of permit is that should such an issue arise the community has several other current sources of water to use while any modifications are made to a desal plant. It will also be accountable to the public on a local level through the normal electoral process. Over ten years of direct planning and public discussion have gone into this project in particular. While I do not know for sure whether the City will build this plant in the near term I do know that having the permit and knowing it's conditions will greatly aid the City Council and community in accurately weighing the costs and benefits of building and operating the facility. Thank you for the opportunity to comment. Sincerely, David Loeb

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 11:48 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIG; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

From: thirdcoastphoto@gmail.com <thirdcoastphoto@gmail.com>
Sent: Thursday, March 18, 2021 7:45 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

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DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Carrie R Meyer

E-MAIL: thirdcoastphoto@gmail.com

COMPANY:

ADDRESS: 4401 GULFBREEZE BLVD
CORPUS CHRISTI TX 78402-1517

PHONE: 3614420628

FAX:

COMMENTS: Desal threatens the bays, wildlife and ways of life in the Coastal Bend. My husband and I kitesurf, kayak and swim in the water of Corpus Christi Bay near the USS Lexington. We live on North Beach and bought our house and decided to settle here because of the recreational opportunities that we enjoy. We believe that the City of Corpus Christi's Inner Harbor proposed Desal plant would pose a threat to water quality where we recreate because it is directly

downstream of the intake, which would suck in and kill fish and other marine animals and organisms. That could change the delicate balance of life in the bay and cause fish kills, due to the Desal intake killing the food sources of the larger fish that could die of starvation and cause a big die off of marine life in the bay. I am starting a kayak touring business and am concerned that reduced water quality from the Desal plant will negatively impact that business, which will be based on North Beach, and negatively impact the city's #2 industry, tourism. Thank you.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 5:42 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676
Attachments: Public Comments - Inner Harbor Intake Permit #13676.pdf

From: emily@nyexp.us <emily@nyexp.us>
Sent: Thursday, March 18, 2021 5:18 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Emily Christina Nye

E-MAIL: emily@nyexp.us

COMPANY:

ADDRESS: 1018 BAYSHORE DR
INGLESIDE TX 78362-4647

PHONE: 3615620171

FAX:

COMMENTS: The permit application and draft permit #13676 are deceitful in their intended use of the waters of Corpus Christi Bay and should be rejected. Please see attached document for full comments.

Dear members of the TCEQ,

My name is Emily Nye. I live at 1022 Bayshore Drive in Ingleside on the Bay, Texas. I am the Manager of Public Relations, Research, and Environmental Justice for the Ingleside on the Bay Coastal Watch Association. As a resident of the Coastal Bend, I *strongly oppose* desalination anywhere in Corpus Christi Bay, including the City of Corpus Christi's water rights permit application #13676.

According to page 16 of the water rights application, all 93,148 acre-feet of bay water requested is for the purpose of *municipal* use. However, according to the 2021 Region N Water Plan, *municipal* demand over the next fifty years will only grow marginally. The projected growth rate for the Coastal Bend from 2010-2070 is .46%. This is down from .68% from 1990-2010 and is about 1/3rd the projected growth rate for the State of Texas from 2010-2070. The low projections for population growth in the Coastal Bend by no means demand desalination. This is supported by the supplemental letter attached to the City's application written by the Region N Planning Group's co-chairs. Their joint-letter states: "Preliminary information from the 2021 Region N Plan currently under development shows *manufacturing* needs within the 2020-2070 planning period which the project can be shown to address, but does not identify *municipal* needs for the City of Corpus Christi or their customers" (emphasis my own). In other words, for the stated purpose of the proposed project according to the application itself, this water rights permit is *entirely unnecessary* and is, therefore, fiscally and environmental irresponsible.

Besides proposing a facility for an unnecessary purpose, the City's application is both deficient and misleading. For instance, pages 47-48 of the City's application address whether or not conservation can meet the area's needs and whether or not alternative forms of water development exist. With regards to the former, simply because a particular water management

strategy is included in the Region N Water Plan does not mean that conservation cannot resolve the demand this strategy proposes to address. In fact, the City's own 2020 Water Conservation Plan on page 13 clearly states: "A more aggressive conservation program could help municipal demand level off or decrease, even with an increase in population. A goal of 1% annual reduction in municipal consumption...would defer the need for additional supplies." In other words, a 1% increase in water conservation would serve the municipal needs of our region. Once again, the proposed desalination facility is, according to the City's own plan, unnecessary. Yet, the applicant intentionally and, I would argue, deceitfully, conceals this reality. Furthermore, the applicant goes on to state that "Desalination is the only recommended strategy that has sufficient quality to meet the projected needs in [Nueces and San Patricio] counties." Again, if we are in fact talking about *municipal* water needs, this is simply **NOT** true according to the 2021 Region N Water Plan and the 2020 Water Conservation Plan by the City of Corpus Christi.

In conclusion, I request that the TCEQ deny the City's water rights permit application for this extremely expensive, energy-demanding, environmentally destructive, and unnecessary project. And lest the TCEQ argue that "municipal" means "industrial," let me remind you of the words of George Orwell, "...the great enemy of clear language is insincerity."

Let us be sincere.

Thank you.

Emily C. Nye
Manager of Public Relations, Research
And Environmental Justice

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 5:12 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676
Attachments: INNER HARBOR DESAL CC BAY 20210318.pdf

From: patrick@nyexp.us <patrick@nyexp.us>
Sent: Thursday, March 18, 2021 6:39 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

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COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Patrick Arnold Nye

E-MAIL: patrick@nyexp.us

COMPANY: Ingleside on the Bay Coastal Watch Association

ADDRESS: 1018 BAYSHORE DR
INGLESIDE TX 78362-4647

PHONE: 3616581089

FAX:

COMMENTS: SLIDES FOR COMMENTS BY PATRICK NYE

IOB Coastal Watch Association, Inc.

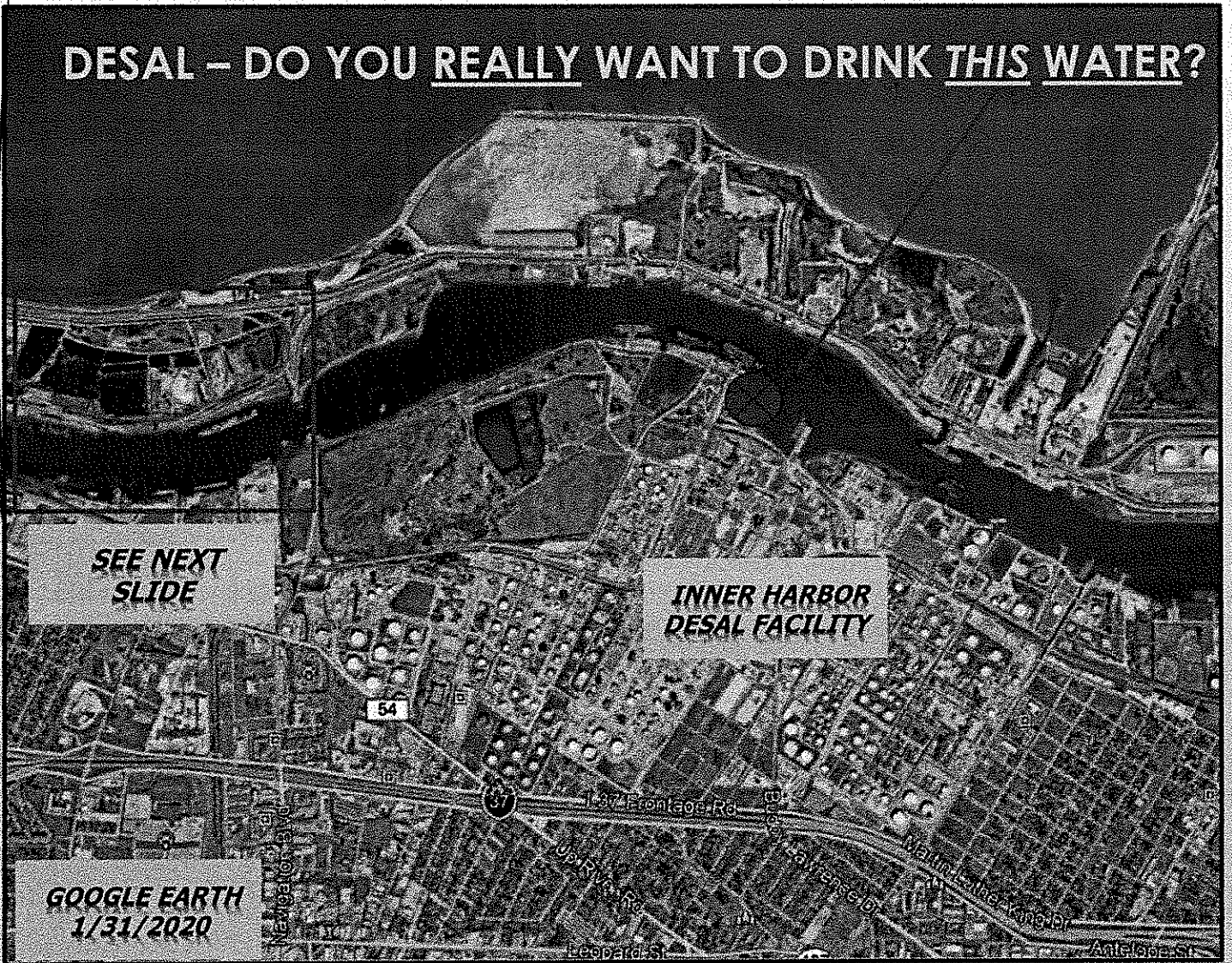
SLIDES COMMENTS BY PATRICK NYE, PRESIDENT

INNER HARBOR DESAL PERMIT 13676

MARCH 18, 2021

SLIDE 1

DESAL – DO YOU REALLY WANT TO DRINK THIS WATER?



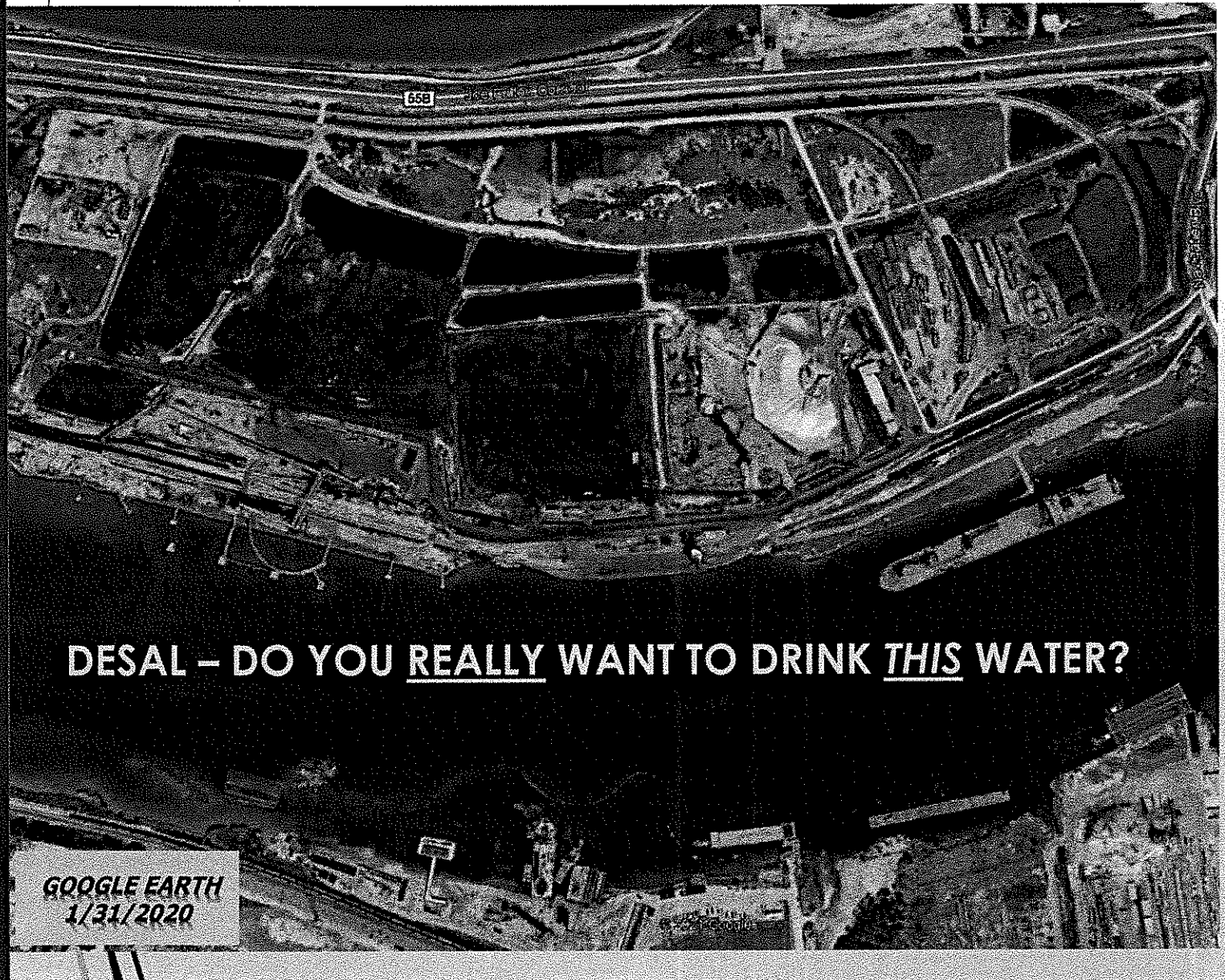
SEE NEXT
SLIDE

INNER HARBOR
DESAL FACILITY

GOOGLE EARTH
1/31/2020

CORPUS CHRISTI INNER HARBOR DESAL

SLIDE 2



DESAL – DO YOU REALLY WANT TO DRINK THIS WATER?

GOOGLE EARTH
1/31/2020

DRINKING HARBOR DESAL WATER?

SLIDE 3

1. DESAL DRINKING WATER?? - Heavy metals from 95 years of use & ongoing pollutants in Harbor (See Slides #1 & #2)
2. COKE & SULFUR MOUNDS – JUST A FEW OF THE CONTAMINATES GOING INTO THE INNER HARBOR (See Slides #1 & #2)
3. Soil Remediation under refinery row tank farms contain petroleum products measured in **feet** of thickness PLUS runoff & refinery discharges

DESALINATION FACILITIES THAT FAILED

Estimated cost to build a 2.5 MGD seawater desal plant in the ship channel:
channel: \$67 million (2008)

Brownsville did a government-funded pilot bay water desal plant 2004, within the local ship channel

SLIDE 4

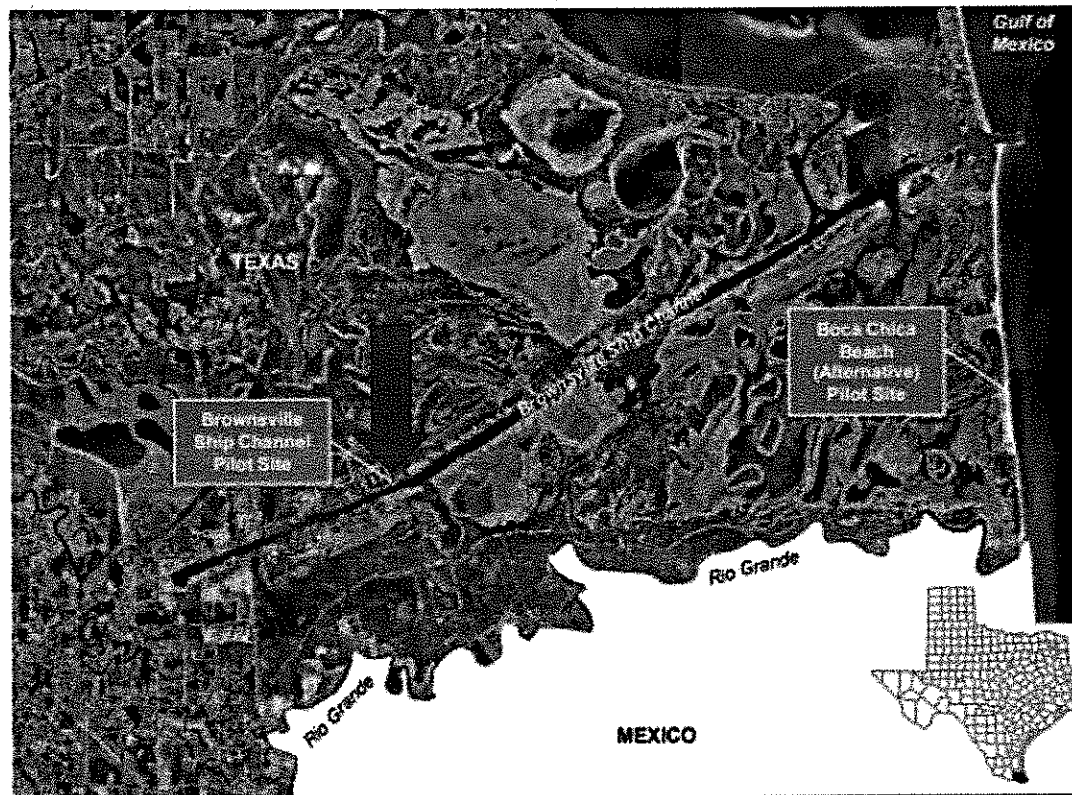


Figure ES-1: Location of the Brownsville Seawater Desalination Pilot Project.

MAJOR PROBLEMS: turbidity, suspended solids and temperature variations caused by passing ships!

BAYWATER DESAL ISSUES

SLIDE 5

1. **UN-PROVEN TECHNOLOGY** IN CLOSED SILTY BAY SYSTEMS – See **SLIDE#4** Brownsville Channel Desal Project failure
2. High in Suspended Solids (turbidity)
3. Limited Bay Circulation will create higher salinities from Brine & Chemical Discharges
4. Will discharge affect Texas State Aquarium intake and Nueces Bay estuary?
5. What do the science experts say? See **SLIDE #6**

Harte Research Institute (HRI)

A Statement on our Desalination Science

SLIDE 6

October 6, 2020

Environmental Issues Associated with Desalination

The primary environmental issues for coastal desalination operations include: 1) Intake of water related to impingement and entrainment of marine organisms; 2) discharge of concentrated brine interfering with movement or disrupting migratory patterns of marine organisms; 3) and, water quality issues, including hypoxia/anoxia and concentration of contaminants.

HRI's overall and primary conclusion in assessing potential desalination intake and discharge sites in Corpus Christi Bay was that an offshore location of intake and discharge would be the best option to minimize impacts on biota, habitats, and water quality. Locations within the bay present many more potential environmental concerns that may not be easily minimized or mitigated. The best available means of minimizing biophysical impacts were provided for each site as part of the evaluation.

Identification and Characterization of Potential Environmental Impacts Mitigation Measures Related to Intake and Discharge Facilities of Seawater Desalination Plants – Dr. Greg Stunz, Endowed Chair for Ocean Health and Fisheries at Harte research Institute and Dr. Paul Montagna, Chair for HydroEcology and Dr. Larry McKinney, Chair for Gulf Strategies.

Regulatory and Permitting Issues Relating to Desalination Seawater Intakes and Concentrate Disposal in Coastal Texas – Dr. Richard McLaughlin, Endowed Chair for Marine Policy and Law at Harte Research Institute

SEVEN DESALINATION FACILITIES PROPOSED WITHIN CORPUS CHRISTI BAY SYSTEM

UN-PROVEN TECHNOLOGY

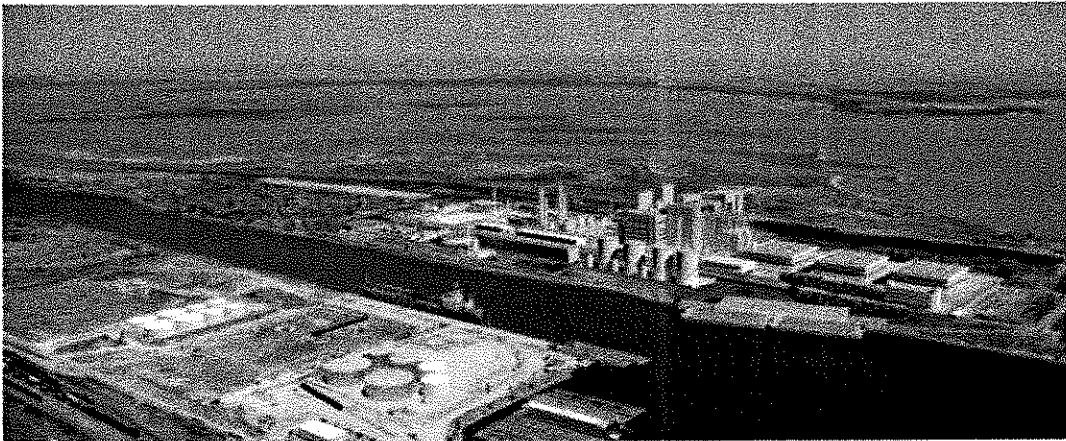
SLIDE 7



WHAT EVER HAPPENED TO CC POLYMER
DESAL PROJECT? SHOULD CITY WAIT TO
SEE IF THIS PROJECT IS FEASIBLE??

SLIDE 8

SHOULD CITY WAIT FOR CC POLYMER DESAL???



Source: Gruppo Mossi & Ghisolfi (M&G) Polymers

Figure 2. Artist's rendering of the polyethylene terephthalate and terephthalic acid plant in the Port of Corpus Christi Inner Harbor. Viola Channel is in the foreground and Nueces Bay in the background.

The two chemical plants require about eight million gallons per day of water for the manufacturing process (M&G Resins USA, LLC, 2014). To meet this requirement, the chemical company plans to build a seawater desalination plant onsite to supply six million gallons per day of water and recover two million gallons per day of water from their internal process. The desalination plant will ensure that a reliable, drought-proof source of water is always available for use at the plants. Additionally, by locating a desalination plant onsite, the quality of water produced can be controlled to meet the requirements of the chemical plants.

2.1.2 Corpus Christi, Texas M&G Resins USA, LLC

M&G Resins USA, LLC in Corpus Christi, Texas was issued a TPDES Permit WQ 0005019000 on October 23, 2014 with an expiration date of June 1, 2017 to discharge 9.4 MGD of RO brine concentrate and pretreatment waste into the Corpus Christi Inner Harbor, Water Quality Segment 2484. The permit was amended and re-issued on April 19, 2016 to allow a discharge of 18.9 MGD with expiration on June 1, 2020 and again amended and re-issued on October 26, 2017 to allow a discharge of 38.5 MGD with expiration on June 1, 2022.

The permit was transferred from M&G Resins USA, LCC to Corpus Christi Polymers, LLC on February 28, 2019. The operator, Water Cycle, LLC, anticipates start of operations in summer 2020.

Tampa Bay Seawater Desal Plant

Cost (2010) - \$158 million to construct;
sometimes producing 25 MGD

SLIDE 9

Location –adjacent to the TECO coal/gas fired power plant

The plant has been bankrupted several times since opening



Supplied by W. Vernon Kramer

2015 CARLSBAD DESAL SAN DIEGO, CA
LARGEST IN US 50 MGWPD CAPACITY
SUPPLIES 7% OF SAN DIEGO COUNTY

SLIDE 10

TOTAL COSTS SO FAR \$1 BILLION DOLLARS
EXPECT ENERGY USAGE 35 MW

■ **PRESS RELEASES**

Report on Poseidon Desalination Plant in Carlsbad, California Shows Poor Performance and High Costs



BY **TSEARS**

Published Sep. 26, 2019 Updated Dec. 8, 2020



OPTIONS

SLIDE 11

1. What about recycling effluent & industry's cooling water?
2. Conservation & rainwater use?
3. Gulf Coast Aquifer has hundreds of years supply
4. Region N Water Plan has studied these options but steered in an alternate direction

RESIDENTIAL WATER OPTIONS

CC DRINKING WATER? CONSIDER THIS FIRST!

Here's a summary of the proposals:

Evangeline/ Laguna, LP Hamlet Newsom

- Source: groundwater
- Agreement: take or pay
- Term: negotiable
- Volume: up to 25 million gallons a day
- Cost per 1,000 gallons : \$1.57 for water in the ground, \$2.99 for water delivered to Mary Rhodes Pipeline, \$4.27 for treated water delivered to MRP
- Type of water: raw
- Turnaround: 1.5 years

<p>Evangeline Groundwater \$80 million Construction</p> <ul style="list-style-type: none"> - Drill wells (already fully permitted) - Collect groundwater - Build new pipeline - Deliver 25 MGD of groundwater to the City's O.N. Stevens Treatment Plant - 18 Month construction 	<p>Seawater Desal-Harbor Island/La Quinta Channel \$802/\$457 million Construction</p> <ul style="list-style-type: none"> - Identify, Purchase Site - Permit Site - Design Project/Build Project - Build new pipeline - Deliver 50 MGD/30 MGD - 3+ Years Construction
<p>Operations \$24 million annually</p>	<p>Operations \$130/\$78 million annually</p>
<p>Water Costs \$2.63 per 1,000 gallons raw water \$5.42 per 1,000 gallons treated water¹</p>	<p>Water Costs \$7.13-\$7.12 per 1,000 gallons desalinated seawater</p>

SHOWS THE LOCATION OF EVANGELINE WATER PROJECT NEAR SINTON, TX.

SLIDE 13



Coastal Bend Regional Water Plan | March 2020
 HDR-007003-10028677-275894-015
 Gulf Coast Aquifer Supplies [31 TAC §357.34 & §357.35]

Coastal Bend Regional
 Water Planning Group

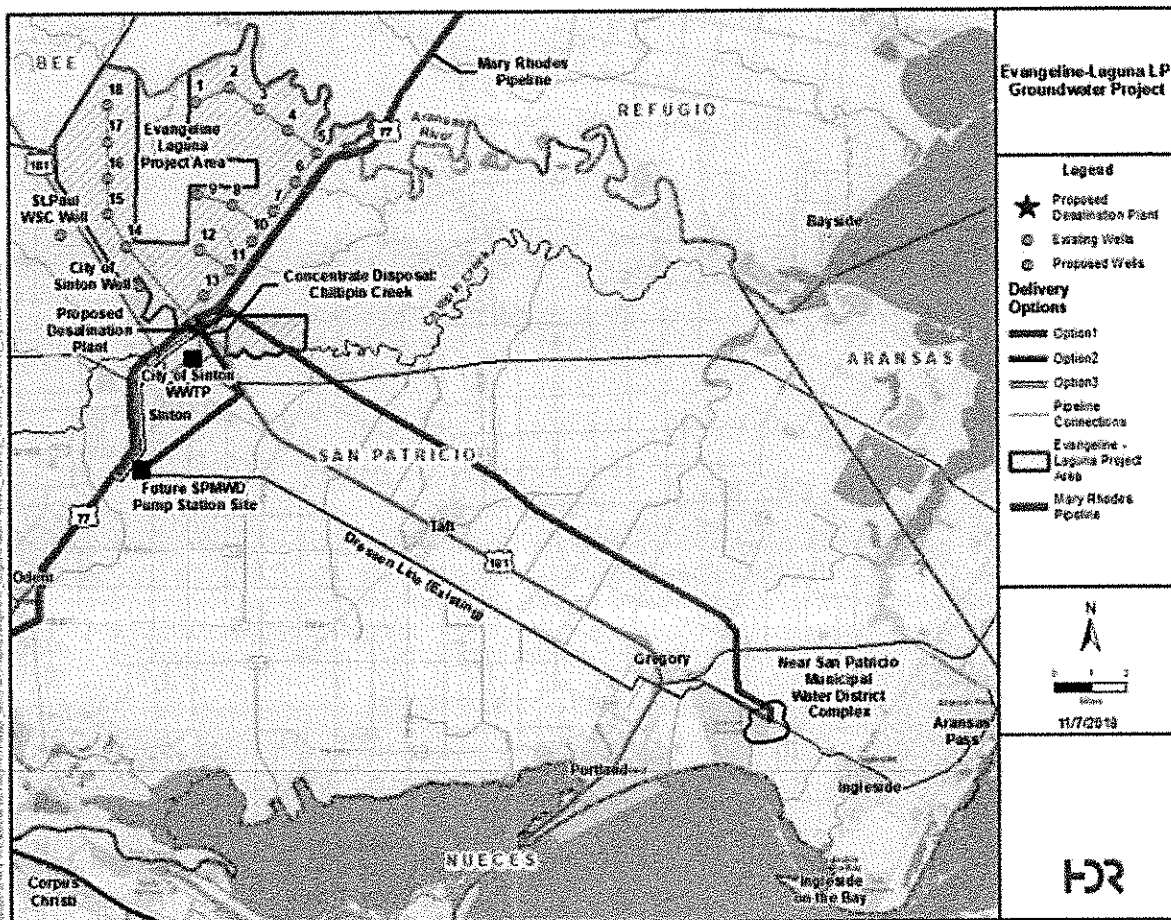


Figure 5D.8.1.
Location of Conceptual Layout of Evangeline/Laguna LP Groundwater Project

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 5:34 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676
Attachments: IOBCWA_Comments CC Inner HarborDesal Permit 202007031.pdf

From: patrick@nyexp.us <patrick@nyexp.us>
Sent: Thursday, March 18, 2021 6:38 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Patrick Arnold Nye

E-MAIL: patrick@nyexp.us

COMPANY: Ingleside on the Bay Coastal Watch Association

ADDRESS: 1018 BAYSHORE DR
INGLESIDE TX 78362-4647

PHONE: 3616581089

FAX:

COMMENTS: SEE ATTACHED COMMENTS - WILL SEND SECOND SLIDES DOCUMENT IN SEPARATE ONLINE COMMENT
TWO DOCUMENTS

Ingleside on the Bay Coastal Watch Association
Patrick A. Nye, President
1018 Bayshore
Ingleside, Texas 78362



March 18, 2021

TCEQ
401 Coordinator, MSC-150
PO Box 13087
Austin, Texas 78711-3038

RE: City of Corpus Christi Inner Harbor Water Rights Desalination Permit #13676
Request for Denial of Permit by TCEQ

Dear Sir or Madam,

On behalf of the Ingleside on the Bay Coastal Watch Association (IOBCWA), as President of the Board of the Association, I am submitting this request for you to deny Permit #13676. As a born and raised Corpus Christian and now living in Ingleside on the Bay, the idea of desal within the confines of Corpus Christi Bay is preposterous to consider given the multiple water resources at the City's choosing. It appears that the push for desalinations would be for industrial use NOT for residential needs. This false narrative is unwarranted sacrificing the very reason we live here, the enjoyment of Corpus Christi Bay's resources and the quality of life for Coastal Bend residents.

My comments are related to 13 Slides attached as INNER HARBOR DESAL CC BAY 20210318 and discussed below:

SLIDE #1 & SLIDE #2- Do you REALLY want to drink THIS WATER?? During the 95 years of Port operations, lax environmental requirements have allowed untold amounts of pollutants to be released into the harbor including heavy metals, carcinogens, plastics, hydrocarbons, coke, sulfur, chrome, mercury, lead and the list goes on. Even after purifying the water, residuals will remain. Perhaps those elected officials in favor of desalination should be the first to drink and utilized desalinated water along with the constituents they represent. **SLIDE #2** is from a Google Map dated 1/31/2020 showing surface storage of coke and sulfur. What is not shown are the products leaked around storage tanks for decades that one source told me are measured in feet of contaminants probably leaking into the Port's Harbor.

KEY ISSUES – SLIDE #3: Described in **SLIDE #3** are some of the reasons for not approving a desalination facility within the Port's Harbor due to long-term contamination.

Has anyone asked the question if this desalination technology has actually succeeded in a silty, high turbidity, marine environment? **SLIDE #4** describes a failed project in the Brownsville Ship Channel in 2008 costing \$67 million to produce 2.5 MGD. Reasons for failure: turbidity, suspended solids and temperature variations caused by ship traffic. Does this sound familiar when you consider the Inner Harbor, La Quinta and Harbor Island locations? **SLIDE #5** describes issues concerning bay water desalination facilities

including environmental effects. **SLIDE #6** is a study and statement provided by the Harte Research Institute concerning desalination saying - TAKE IT OFFSHORE! Who do you believe – our local unbiased scientists or an engineering firm with monetary gains?

SLIDE #7 is a display map of all 7 Proposed Desalination Projects trying to use UNPROVEN TECHNOLOGY in Corpus Christi Bay. Scientists have found that circulation and “flushing” of the Bay’s water occurs on average, once every 1.4 years. Even one desal project would affect the salinities with a cascading negative effect on marine and avian life dependent on the Bay’s resources. If desal is such a sure-fire plan, then where are the examples? Port of Brownsville failed. CC Polymer announced its desal project in 2014 and has yet to be operational. The CC Polymer project in the inner harbor would be utilized for industrial cooling water and promised to be online numerous times in the past. See **SLIDE #8**. Before committing more monies to a failed idea, shouldn’t the citizens, elected officials of Corpus Christi and the surrounding Coastal Bend residents be allowed to witness and study CC Polymers results of an inner harbor desal facility?

SLIDE #9 describes Tampa Bay desal costing \$158 million, which has been bankrupt several times. **SLIDE #10** is an overview of Carlsbad Desal Facility in San Diego, California costing over \$1 billion with operational costs in the \$10’s of millions annually. Is this what the City of Corpus Christi really needs? Permits first, ask questions later and taxpayers pay for the mistakes?

Other Options: SLIDE #11 There are other options, less expensive, more environmentally sensitive and sensible compared to desal.

Recycling industrial water would save million of gallons per day.

Conservation is the easiest option that we have. It doesn’t take much conservation to make long-term differences.

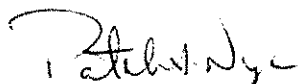
Rainwater use – storing rainwater for home and garden use is utilized worldwide.

Groundwater is our best hope for long-term, residential water use. See **SLIDES #12 & #13**.

Region N Water Plan has studied these options and apparently steered off course to satiate industrial development.

Conclusion: IOBCWA opposes the Inner Harbor Desalination facility due to long term effects by those drinking the water as well as the brine and chemical discharges into our fragile ecosystem. Please consider carefully the BEST option for Corpus Christi and not be taken in by a few untruths stated by proponents of desal in Corpus Christi Bay.

Sincerely yours,



Patrick A. Nye
President IOBCWA

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Thursday, April 1, 2021 9:03 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676
Attachments: Water Bill.pdf

PM

From: bp120380@gmail.com <bp120380@gmail.com>
Sent: Wednesday, March 31, 2021 11:27 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Blanca Parkinson

E-MAIL: bp120380@gmail.com

COMPANY:

ADDRESS: 10801 SILVERTON DR
CORPUS CHRISTI TX 78410-2233

PHONE: 3617042775

FAX:

COMMENTS: My name is Blanca Parkinson; I am a resident of Corpus Christi. My address is 10801 Silvertton Dr. I I was thankful for the opportunity to become better informed regarding this permit during the virtual public meeting on March 18, 2020. Unfortunately, none of the useful information came from the City of Corpus Christi's representatives,

who other than assuring us that they had listened to “very smart” people, dismissed questions. The few answers that they did provide were of absolutely no substance. The questions and comments provided by very hard-working and concerned citizens who are knowledgeable in the details of this permit application and who have really measured the consequences of placing a desalination plant in a closed bay system, were much more informative and substantiated with years of knowledge and experience, than anything the city provided. After attending the virtual public meeting and listening to very “smart people” myself, it is clear that the City of Corpus Christi is not in ANY way prepared to take on a project of this magnitude. The planning and public input necessary for a project this consequential to our city has not taken place. Everything about the application for this permit is wrong. As a resident and taxpayer of Corpus Christi, I oppose WRPERM 13675 for the following reasons: Negative Effects on Marine Life, Community, and Public's Safety

Although the ship channel is in an area that City representatives like to refer to as an “industrial area”, the Corpus Christ Bay that feeds this ship channel, is not. During the public meeting, one of the city’s representatives mistakenly said the Corpus Christi Ship Channel is a tributary of the bay. It is clear that the Corpus Christi Bay feeds the Corpus Christi Ship Channel (any map will of the area will show this). The CC Ship Channel is not independent of the CC Bay. This permit is essentially going to suck water right out of our bay. This bay is not some pond out in some industrial wasteland. This bay is the face of Corpus Christi and surrounding towns. This bay is home to most of our area attractions including: The CC Museum of Science, The CC Art Museum, The Texas State Aquarium, and the USS Lexington Museum on the Bay. It is on the shores of this bay that we participate in local 5Ks, fun runs, holiday boat parades, and Fourth of July fireworks. This bay hosts the finish line to the famous Beach to Bay Relay Marathon, outdoor summer concerts, sailing regattas, local restaurants, and most of our area’s parades. We residents of CC want to keep our bay healthy for our children and for all the marine life it hosts. The idea that this intake pipe will only affect an “industrial area” is simply not accurate. Our entire city is affected by industrial encroachment. My home, and at least four area neighborhoods (Castle River, High Ridge Estates, Jackson Woods Community, and Nueces Estates) are located less than 8 miles from the site of an explosion last year along Joe Fulton Corridor. Tuloso-Midway Primary School is located 6.3 miles from the Valero Loading Terminal where this explosion and fire took place and claimed lives of local workers. This explosion took place 1.4 miles from Our Lady of Corpus Christi, where my son participates in Incarnate Word Academy’s cross country meets for area schools and home school groups. In addition to explosions, our water has been contaminated by negligence and accidents on the part of the City of CC and these industries. In Dec. of 2016, the city issued a “water ban” alert. This was different from the 3 previous water boils issued that year. This was a “water ban”, meaning not even boiling the water would not make it safe to touch, let alone drink. The city identified a lack of a backflow preventer, which allowed our water to be contaminated. Imagine taking your shower at 9:30 and finding out from the 10:00 o’ clock news that the water you just showered with was contaminated by an asphalt emulsifying agent. That is what many of us residents went through, some had intestinal and skin problems. Our entire city was affected by having to use bottled water for everything. In Sept. of 2020, the City of Corpus Christi was sued by the EPA for violating the Clean Water Act, and by the TCEQ for violating the State Water Code. These consequences of violations affect our entire city, along with the marine life that these bays support. Energy Consumption and Cost During the virtual public meeting, the city’s representatives failed to tell us where the energy required to run such a large pump will come from. They instead dismissed the question. My family, along with over a thousand households in my area alone spent over three days without power. Our homes were between 32-33 degrees during the recent ice storm; our small children were freezing. The only thing we were told was that the grid could not support the spike in usage. I strongly oppose a huge pump near my home that is going to suck enormous amounts of energy. That energy must come from somewhere. Another question left unanswered by the city representatives, is how this will affect our water bills? Due to my husband taking a recent job as a Covid response travel nurse, we were recently away from our home for a month. We received a water bill from the City of CC in the amount of \$144.50 for ZERO usage. We were told by the city that this water is going to be used for municipal purposes. What percentage of it will be used for industrial cooling and other industrial purposes? This is another question that was arrogantly dismissed by the city representatives. We have a right to know. Because of the City of CC’s history of incompetence in complying with federal and state codes and regulations, we also have a right to decide if that would even be water we want to drink, shower with, or perform household duties with. I strongly oppose this permit. I am also requesting a public meeting after Covid restrictions are lifted, so we can speak with City representatives and officials. Something of this magnitude in our city and bay should not be rushed. The citizens of Corpus Christi need to be able to afford our water bills. We need to be able to turn on our heaters and appliances during natural disasters. We need a place to swim, fish, and recreate. We don’t need any more hidden surprises on our utility bills. We don’t need a giant energy- sucking desalination plant down the street from our homes and schools, and we

certainly don't need our closed bay system becoming the toilet of private industries. I have attached a copy of my water bill, which I will note, does not include any water usage. I thank you very much for your time.



**CITY OF
CORPUS
CHRISTI**

Monthly Statement of Utility Services
City of Corpus Christi
P.O. Box 9257 • Corpus Christi, TX 78469-9257
(361) 826-CITY • www.cctexas.com

Account Name: BLANCA M PARKINSON
Account Number: 20390633
Statement Date: 12/17/2020
Due Date: 1/7/2021
Page: Page 1 of 2

SERVICE INFORMATION

Account Name: BLANCA M PARKINSON
Account Number: 20390633
Service Address: 10801 SILVERTON DR
Account Type: SINGLE
Invoice Number: 4288479

QUESTIONS ABOUT YOUR BILL?

Customer Call Center
Monday - Friday:
7:00am - 6:00pm
(361) 826-CITY(2489)
WWW.CCTEXAS.COM

IMPORTANT MESSAGES

A Little Bit Goes a Long Way.

The City of Corpus Christi is closely monitoring the combined lake levels at Lake Corpus Christi and Choke Canyon Reservoir. Water conservation helps protect our water supply. Voluntary actions include:

- Turn off the water when you brush your teeth, shave or wash your face
- Wash full loads in your laundry and dishwasher
- Cover pools or hot tubs when not in use to lessen evaporation

For more information, visit our water conservation website at cctexas.com/conserve.

Small Business Utility Assistance Grant

If your business is suffering due to the COVID-19 pandemic, you may be eligible for a \$500 credit on your utility bill. Go to www.unitedccchamber.com/small-business-grant to apply.

ACCOUNT SUMMARY

PREVIOUS BALANCE	\$193.74
TOTAL PAID SINCE LAST BILL	-\$193.74
NEW CHARGES	
*WATER	\$12.92
TOTAL WATER	\$12.92
WASTE WATER	\$99.50
TOTAL WASTEWATER	\$99.50
Single Family Res	\$5.38
TOTAL STREET FEES	\$5.38
SOLID WASTE (GARBAGE)	\$24.67
TAX	\$2.03
TOTAL SOLID WASTE	\$26.70
NEW CHARGES DUE BY 1/7/2021:	\$144.50
AMOUNT DUE	\$144.50

PLEASE ALLOW 5 BUSINESS DAYS BEFORE DUE DATE TO ENSURE PROPER CREDIT.

*A portion of your water charges are used to pay for stormwater management and infrastructure maintenance, which help prevent flooding and keep pollution from getting into our creeks, bays, estuaries, and ocean.

KEEP TOP PORTION FOR YOUR RECORDS AND RETURN BOTTOM STUB WITH YOUR PAYMENT.



**CITY OF
CORPUS
CHRISTI**

P.O. Box 9257 • Corpus Christi, TX 78469-9257
(361) 826-CITY • www.cctexas.com



Service Address: 10801 SILVERTON DR
Cycle-Route #: 14-58

Account Number	Due Date	Amount Due
20390633	1/7/2021	\$144.50

If payment is received after the due date, a five percent penalty will be assessed.

AMOUNT ENCLOSED \$

MAKE CHECKS PAYABLE TO: CITY OF CORPUS CHRISTI

Working to Serve YOU Better.

BATCH: 1



BLANCA M PARKINSON
10801 SILVERTON DR
CORPUS CHRISTI TX 78410-2233



CITY OF CORPUS CHRISTI
PO BOX 659880
SAN ANTONIO TX 78265-9143



203906330000144500



**CITY OF
CORPUS
CHRISTI**

Monthly Statement of Utility Services
 City of Corpus Christi
 P.O. Box 9257 • Corpus Christi, TX 78469-9257
 (361) 826-CITY • www.cctexas.com

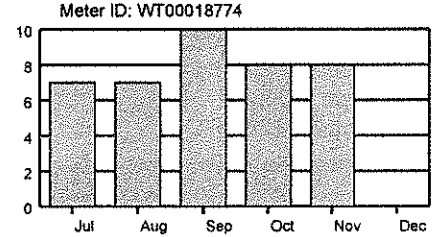
Account Name: **BLANCA M PARKINSON**
 Account Number: **20390633**
 Statement Date: **12/17/2020**
 Due Date: **1/7/2021**
 Page: **Page 2 of 2**

METER INFORMATION

SERVICE PERIOD: 11/13/2020 - 12/14/2020 32 days

Meter ID	Service Type	Current Read	Previous Read	Consumption 12/14/2020
WT00018774	WA	1042	1042	0

CONSUMPTION HISTORY



Moving or Discontinuing your Services?
 To stop or change utility services, please call Customer Call Center
 (361) 826-CITY (2489)

PLEASE HELP US TO SERVE YOU BETTER

- DO NOT SEND CASH
- Sign your check or money order
- Write account number on your check
- Enclose your stub with your check
- No Staples, No Paper Clips
- Thank you for your assistance

OPTIONS AVAILABLE TO PAY YOUR BILL

- Mail payment along with stub in return envelope provided.
- Bank Draft available via Dynamic Portal at www.cctexas.com.
- Online Payment - Register via Dynamic Portal at www.cctexas.com available 24/7.
- By phone 24/7 with a credit or debit card at 361-885-0751.

AUTHORIZED PAY STATIONS

All local HEB locations
 Please allow 2 business days before due date to ensure proper credit.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 5:39 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676
Attachments: PICC Comments Supporting Issuance of WRPERM 13676_18 Mar 2021.pdf

From: bobpaulison@gmail.com <bobpaulison@gmail.com>
Sent: Thursday, March 18, 2021 5:28 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Robert Paulison

E-MAIL: bobpaulison@gmail.com

COMPANY: Port Industries of Corpus Christi

ADDRESS: PO BOX 223
CORPUS CHRISTI TX 78403-0223

PHONE: 3615632888

FAX:

COMMENTS: See attached file (PICC Comments Supporting Issuance of WRPERM 13676)

Comments submitted by Port Industries of Corpus Christi in support of the draft permit prepared by the Texas Commission on Environmental Quality as the result of the City of Corpus Christi's Application Number 13676 for a water use ("water rights") permit necessary for the operation of desalination facility on the Inner Harbor of Corpus Christi:

Port Industries of Corpus Christi (PICC) is a 20 member industry association made up of companies in Nueces, San Patricio, and Kleberg counties and the Port of Corpus Christi. Member companies include refiners, chemical manufacturers, terminalling facilities, a steel producer, an offshore rig constructor, and other associated companies. All together PICC members employ more than 9,000 direct workers and full-time contractors, and economic activity associated with member facilities is responsible for thousands of additional indirect and induced jobs throughout the area economy.

An ample supply of clean, fresh water is important to everyone in the region, and securing a new water supply that is sustainable, affordable and drought resistant is critical to the future of the area. A new source will enable the City to meet the needs of current customers and supply additional potable water to serve future residential and commercial needs.

Port Industries of Corpus Christi members have been participants in the City of Corpus Christi's current seawater desalination effort and have worked with the City and others throughout the process. We believe it is prudent on the part of the City to pursue this water rights permit at this time and support its approval.

Port Industries of Corpus Christi appreciates the work of the Texas Commission on Environmental Quality and the City of Corpus Christi, and stands ready to continue active participation in efforts to enhance the water supply of the Coastal Bend region.

Submitted by:

Robert J. Paulison
Executive Director
Port Industries of Corpus Christi

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 5:56 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

From: tomrodino@att.net <tomrodino@att.net>
Sent: Thursday, March 18, 2021 11:56 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Thomas B Rodino

E-MAIL: tomrodino@att.net

COMPANY:

ADDRESS: 183 HERON OAKS
ROCKPORT TX 78382-4332

PHONE: 3617291077

FAX:

COMMENTS: My concern is that the withdrawal of very large volumes of water from inshore sources such Corpus Christi Bay and surrounding areas, including the Ship Channel, will have long-term adverse effects on the waters, environment, and fisheries. It is reasonable to expect that the brine discharge from a plant will also to to an inshore site with even greater potential for adverse impacts. A far more preferable location is a coastal plant where both water intakes and

brine discharge can be located offshore in the Gulf where effects would likely be greatly reduced. Both the City of Corpus Christi and the Port of Corpus Christi have multiple options for coastal sites on land already under their control.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 11:51 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

From: ashara.slagger@gmail.com <ashara.slagger@gmail.com>
Sent: Thursday, March 18, 2021 7:13 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Ashara M Slagger

E-MAIL: ashara.slagger@gmail.com

COMPANY:

ADDRESS: 7740 W LITTLE YORK RD Apt 2731
HOUSTON TX 77040-5477

PHONE: 8322105832

FAX:

COMMENTS: Regarding the Discharge Permits for the proposed desalination plants in Corpus Christi, I believe these permits should not be granted. The proposed desalination plants are for proposed industry for the city, and the process of desalination will absolutely wreck the ecology of the bay. These plants are completely unnecessary for the city. While I do not live in Corpus Christi, I have close friends who do, and I have spoke with many residents who do. The common

consensus is that residents do not want these plants to be built. Not only will this wreck the ecology of the bay by increasing salinity, this will also harm the tourism industry and the fishing industry. Many folks rely on the fishing industry for their livelihood. Why should their jobs and livelihood be put at risk for incoming industry to the city? It shouldn't. Please think about the residents of Corpus Christi, their health and wellbeing, their economy, their culture. With industrial buildout, populations that are at risk have more health issues (such as asthma and risk of cancer). Residents who have lived in the city most of their life start to feel pushed out. Please deny these permits.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 11:47 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Written comments, water use permit #13676

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Thursday, March 18, 2021 7:46 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: Written comments, water use permit #13676

From: greg@pioneerresorts.com <greg@pioneerresorts.com>
Sent: Thursday, March 18, 2021 7:31 PM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: Written comments, water use permit #13676

Dear TCEQ

I fully support the City of Corpus Christi's water use permit #13676. It is needed to provide future water use the Corpus Christi region that includes 7 counties.

Please add this to the public record. I was unable to access the TCEQ website link.

Thank you,

Greg Smith

1746 Glenoak

Corpus Christi, TX 78418

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Friday, April 2, 2021 10:01 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676
Attachments: 1 - my written supplemental comments to TCEQ.pdf

From: summerline@verizon.net <summerline@verizon.net>
Sent: Thursday, April 1, 2021 3:45 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Errol Alvie Summerlin

E-MAIL: summerline@verizon.net

COMPANY:

ADDRESS: 1017 DIOMEDE ST
PORTLAND TX 78374-1914

PHONE: 3619605313

FAX:

COMMENTS: Please see the attached supplemental comments on the referenced Permit.

Errol A. Summerlin
1017 Diomedea
Portland, Tx. 78374

Texas Commission on Environmental Quality
Office of the Chief Clerk
MC-105
P.O. Box 13087
Austin, Texas 78711-3087

April 1, 2021

Re: SUPPLEMENTAL COMMENTS
Proposed Water Rights Permit Number WRPERM 13676
Applicant: City of Corpus Christi

Dear Sir/Madam:

I provided prior written comments on the above-referenced Permit Application on March 18, 2021. I would like to provide a few additional comments based upon the oral responses given to questions from the Public at the TCEQ Public Meeting conducted that evening.

1) In response to the question, why was the Inner Harbor chosen for the location of the facility, the Applicant responded the site was chosen because it is not in a neighborhood.

As I stated in my original comments, the facility will be located in the historic neighborhood of Hillcrest, a predominantly Black and Hispanic community. In fact, the facility will be located approximately 2,000 feet from the home of Henry Williams, current President of the Hillcrest Residents Association. The statement by the Applicant reflects the on-going and historic institutional discrimination exacted upon this neighborhood by the City of Corpus Christi and their continuing failure to acknowledge the lives, or even the presence, of the residents. This neighborhood will be disparately impacted by the location of this massive facility and that impact must be assessed before any Permit is granted.

2) The Public asked the question, have other owners of Water Rights been notified? The TCEQ staff re-phrased the question, whether Water Rights already exist? The Applicant responded "Water Rights do not exist; that's why we submitted to the TCEQ."

I recognize that Segment 2481 (Corpus Christi Bay) encompasses two separate Basins, the San Antonio-Nueces Coastal Basin, essentially North of the Nueces River, and the Nueces-Rio Grande Coastal Basin, south of the Nueces River. However, Segment 2481 is regarded as one body of water; there is no dividing wall that extends from the Nueces River to the barrier islands creating a north bay or south Bay. Aquatic life moves freely throughout the bay system. Water Rights for the Diversion in either Basin will impact marine life throughout Segment 2481 through entrainment and impingement. Therefore, the cumulative Water Rights for Diversion must be considered by the TCEQ; and they should not be ignored by the Applicant.

While this list may not be exhaustive, a few Water Rights Permits for Diversion directly from Segment 2481 include:

From the San Antonio-Nueces Coastal Basin –

- the Diversions granted to Corpus Christi Liquefaction, authorized under WR Permit #13610;
- the Diversions granted to Cheniere Land Holdings, LLC, authorized in WR Permit #13605;
- the Diversions granted to Voestalpine Texas, LLC, authorized in WR Permit #13077;
- the Diversions proposed for the Port of Corpus Christi, pending in WR Permit #13630;
- the Diversions proposed for this Applicant, the City of Corpus Christi, pending in WR Permit #13675;
- the Diversions proposed for South Texas Gateway Terminal, LLC, pending in WR Permit #13637.

From the Nueces-Rio Grande Coastal Basin –

- The Diversions granted to M&G Polymers, now CC Polymers, authorized under WR Permit #12986;

The Applicant knows these additional Water Rights exist so why do they deny their existence? The Applicant itself is seeking diversions from multiple locations.

The combined dangers of these diversions to aquatic life in Segment 2481 cannot be ignored. Disregarding the many other diversions, the Applicant's own requests for the diversions of 93,148 and 186,295 acre feet per year, at rates of 57,708 and 115,329 gallons per minute, threaten the life of Segment 2481.

Even one diversion is dangerous, multiple diversions are incomprehensible. The Applicant's Permit should be denied.

Respectfully,

Errol A. Summerlin

Errol A. Summerlin

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Friday, April 2, 2021 10:01 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

From: summerline@verizon.net <summerline@verizon.net>
Sent: Thursday, April 1, 2021 3:43 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Errol Alvie Summerlin

E-MAIL: summerline@verizon.net

COMPANY:

ADDRESS: 1017 DIOMEDE ST
PORTLAND TX 78374-1914

PHONE: 3619605313

FAX:

COMMENTS: Please see the attached supplemental comments. Thank you.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 5:45 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676
Attachments: 1 - my written comments to TCEQ.pdf

From: summerline@verizon.net <summerline@verizon.net>
Sent: Thursday, March 18, 2021 4:48 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: MR Errol Alvie Summerlin

E-MAIL: summerline@verizon.net

COMPANY:

ADDRESS: 1017 DIOMEDE ST
PORTLAND TX 78374-1914

PHONE: 3619605313

FAX:

COMMENTS: Please see the attached comments on the referenced Permit. Thank you.

Errol A. Summerlin
1017 Diomedea
Portland, Tx. 78374

Texas Commission on Environmental Quality
Office of the Chief Clerk
MC-105
P.O. Box 13087
Austin, Texas 78711-3087

March 18, 2021

Re: COMMENTS
Proposed Water Rights Permit Number WRPERM 13676
Applicant: City of Corpus Christi

Dear Sir/Madam:

I am a member of the Coastal Alliance to Protect our Environment (CAPE) and this letter is written to provide Comments regarding the above-referenced permit application.

From the outset, I urge the TCEQ to Deny the Issuance of this Permit and submit the following in support of this Request:

The facility will be located in the historic neighborhood of Hillcrest, a predominantly Black and Hispanic community. This neighborhood will be disparately impacted by the location of this massive facility. Before issuance of any permit that would further the building of this facility, the TCEQ should conduct an Environmental Impact Statement to determine the full degree of impacts on the neighborhood.

The permit is being sought by the City of Corpus Christi but the facility will not be constructed, operated, or maintained by the City and the City has not determined what entity will do so.

The facility will require massive amounts of energy to operate, further exacerbating air quality and greenhouse gas emissions.

The designated uses of Segments 2484 and 2481 include recreational contact, oyster waters and exceptional aquatic life. 2481 is also designated as an Essential Fish Habitat that includes a number of EFH species. Species in the Segment include Lightning Whelk, Blue Crab, Stone Crab, Fiddler Crab, American Alligator, oysters, red drum, spotted seatrout, black drum, striped mullet, southern flounder, hardhead catfish, bottlenose dolphins, pinfish, pigfish, silver perch, smooth puffer, sand seatrout, and numerous others. In addition, the Green Sea Turtle, a threatened species is known to be present in both segments.

The Diversion of waters at a rate of 57,708 gallons per minute will expose the aforementioned aquatic life to impingement of marine organisms when trapped on the intake

screen. Marine organisms are further exposed to entrainment when organisms small enough to pass through the intake screens, such as plankton, fish eggs, and larvae are killed during processing of the salt water. Entrainment organisms are killed by pressure and velocity changes caused by circulating pumps in the plant, chlorine and other chemicals used to prevent corrosion and fouling, and predation by filter feeders like mussels and barnacles that line intake pipes and themselves are considered a fouling nuisance.

The impacts of impingement and entrainment from desalination plants on the marine environment are not well understood. The TCEQ was directed to adopt Rules and Guidelines relating to the prevention of impingement and entrainment but have failed to do so. The lack of any Rules or Guidelines resulted in a Draft permit that only requires the applicant to adopt “reasonable measures” to prevent impingement and entrainment. The Draft Permit does not define what those reasonable measures are and therefore does not provide for any protection to aquatic life. More important, how would such a provision be enforced by the TCEQ since they do not define what the applicant must do to protect aquatic life? The Permit must include definitive measures to be taken on the prevention of impingement and entrainment.

Before granting the Permit, the TCEQ must review the application in accordance with applicable federal law, including

- **Endangered Species Act:** The ESA prohibits any actions that harm or kill threatened or endangered species
- **Marine Mammal Protection Act:** The MMPA generally prohibits harming or killing marine mammals – 16 U.S.C. § 1372
- **Rivers and Harbors Act and Clean Water Act § 404:** The project must comply with federal requirements for Army Corps approval of the construction of any structure in or over a navigable water, 33 U.S.C. § 403, or the addition of fill to any navigable water, 33 U.S.C. § 1344
- **National Environmental Policy Act, ESA, and Essential Fish Habitat:** Any federal involvement in the project, whether through financing, permitting, or otherwise, requires compliance with NEPA and the preparation of an Environmental Impact Statement. 42 U.S.C. § 4331 *et seq.* Similarly, federal involvement requires compliance with the ESA’s consultation requirement. 16 U.S.C. § 1536. And federal involvement requires compliance with the Magnuson-Stevens Act’s Essential Fish Habitat consultation requirement. 16 U.S.C. § 1855(b)

Segment 2484 (referred to as the Inner Harbor) is, in essence, an enclosed body of water with no freshwater intake and the only exchange with Segment 2481 is through the narrow ship channel. The Inner Harbor is the body of water into which numerous industrial facilities discharge their wastewater and stormwater. I acknowledge that all of these individual discharges have received appropriate Permits for their respective operations. But each of these facilities are allowed to discharge any number of pollutants, large amounts of oil and grease and other

contaminants into the Inner Harbor, resulting in an accumulation of millions of gallons of discharges per day.

In addition, the TCEQ has previously granted M&G Polymers, now CC Polymers, a Permit to construct and operate a seawater desalination facility in the Inner Harbor, allowing a daily discharge of 39 million gallons of brine into Segment 2484. The facility will begin operations in 2023. When operating, the discharge will include chemical additives. For example, coagulants, such as ferrous chloride and aluminum chloride, are used to remove suspended matter from the source water; antiscalants, including polyphosphates and phosphonates, are added to the feedwater to prevent the formation of scale precipitates and salt deposits on the desalination equipment; other chemicals used include biocides, anti-foaming additives, and detergents, added during the pretreatment process to prevent membrane fouling

In addition, heavy metals will be discharged, such as copper, zinc, nickel, iron, chromium, and molybdenum. And then of course, there will be a discharge of highly concentrated brine which will slowly spread through the Inner Harbor.

All of the aforementioned discharges will flow to the intake location for the diversion allowed in the proposed Permit. To compound the quality of the water at the diversion point, the City operates the Broadway Wastewater Treatment Plant in the area. The domestic wastewater from this facility is discharged near the intake structure. While it is “treated” wastewater, the EPA recently found the applicant City of Corpus Christi in violation of numerous provisions of the Clean Water Act relating to contaminants included in the discharges from its wastewater treatment plants. Indeed, prior to its reconstruction, the TCEQ found the BWTP in violation of its Permit on numerous occasions.

The applicant is seeking the Diversion for both industrial and municipal uses that includes drinking water for thousands of residents. The water diverted will ultimately result in a supply of drinking water that will amount to approximately 11% of the daily consumption of municipal water.

Neither the application or the Draft Permit provide any assurance that the cumulative contaminants from all of these discharges has been properly addressed in the process of taking the diverted water and transforming it into safe drinking water for human consumption and not detrimental to public welfare.

Regarding the industrial use, the Applicant has failed to provide and the Permit imposes no real measures for complying with a water conservation plan for industrial use. That plan must include:

(1) a description of the use of the water in the production process, including how the water is diverted and transported from the source(s) of supply, how the water is utilized in the production

process, and the estimated quantity of water consumed in the production process and therefore unavailable for reuse, discharge, or other means of disposal;

(2) specific, quantified five-year and ten-year targets for water savings and the basis for the development of such goals;

(3) a description of the device(s) and/or method(s) within an accuracy of plus or minus 5.0% to be used in order to measure and account for the amount of water diverted from the source of supply;

(4) leak-detection, repair, and accounting for water loss in the water distribution system;

(5) application of state-of-the-art equipment and/or process modifications to improve water use efficiency; and

(6) any other water conservation practice, method, or technique which the user shows to be appropriate for achieving the stated goal or goals of the water conservation plan.

To compound this failure, the City of Corpus Christi allows large industrial users to pay a small fee to the City to exempt them from any curtailment of their water supply through Stage 3 Drought Restrictions. Only when the Drought Stage is "critical" will these industrial users be required to conserve. So, there is no incentive to comply with any water conservation plan on an ongoing basis.

For all of the aforementioned reasons, the Applicant's Permit should be denied.

Thank you.

Respectfully,

Errol A. Summerlin

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Tuesday, March 9, 2021 9:50 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

From: tom.tagliabue@gmail.com <tom.tagliabue@gmail.com>
Sent: Monday, March 8, 2021 5:07 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Tom Tagliabue

E-MAIL: tom.tagliabue@gmail.com

COMPANY:

ADDRESS: 6025 OCEAN DR
CORPUS CHRISTI TX 78412-2863

PHONE: 3619914619

FAX:

COMMENTS: I strongly support the City's water right application. They are the only entity with the personnel, training, customer base and delivery system to feasibly implement a seawater desalination plant. The City has meticulously studied the options and selected reasonable intake and disposal solutions with mitigation for environment. The City is a major regional water supplier (18 counties and about 500K users), has surface water rights, pipelines, and IBT permits to

maximize industrial water supply during a time of drought without sticking it to residential consumers. No other entity in the Coastal Bend is qualified to have a seawater water right. The City's role in the regional water planning process demonstrates strategic planning over more than 30 years to secure adequate water to serve the variety of water uses. The City is the ONLY entity with this authority and expertise. The Mayor and City Council are responsible to voters while appointed bodies (like the Port of Corpus Christi) answers to no one. Giving any water rights to a non-responsive and grossly mismanaged entity like the Port of Corpus Christi is dangerous and would jeopardize public confidence in the future water supply for the region. Please reward the City of Corpus Christi for its steady leadership in water supply by approving its water right application.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Tuesday, June 16, 2020 8:52 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

PM

From: ftissot01@outlook.com <ftissot01@outlook.com>
Sent: Sunday, June 14, 2020 3:22 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER:

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Florence Tissot

E-MAIL: ftissot01@outlook.com

COMPANY:

ADDRESS: 3560 ARANSAS ST
CORPUS CHRISTI TX 78411-1336

PHONE: 3618510403

FAX:

COMMENTS: I vehemently oppose the granting of permit WRPERM 13676 and I am hereby requesting a public meeting on this permit. I have lived in the Coastal Bend for almost 20 years after living all over the world, and this place is very special. The recent deluge of permit requests to build desalination plants, if they were to be approved, is sure to absolutely ruin this place. The impact on our Bay and Estuaries would be catastrophic. These projects would put a tremendous amount of stress on a system that is already stressed due to climate change and the already considerable

pollution generated by industries in the area. The only purpose of these desalination plants is to meet the unreasonable demand for water from industries that are soon to become obsolete. It is time for the Coastal Bend and Texas to start looking towards the future and serve the need of the public at large instead of the private interests of a few already extremely rich individual. TCEQ must deny this permit and hold a public meeting on it to allow the community to voice its opposition to it.



#47141

NUECES COUNTY
901 LEOPARD STREET, ROOM 303.05
CORPUS CHRISTI, TX 78401-3689

FELICIA RAY HAJEK
COMMISSIONER'S ASSISTANT

CAROLYN VAUGHN
COUNTY COMMISSIONER, PRECINCT 1

(361) 888-0245
(361) 692-9819 - CELL
(361) 888-0470 - FAX

REVIEWED

SEP 14 2020 PM

By GCW

RECEIVED
SEP 03 2020
EXECUTIVE OFFICE
CHIEF CLERK'S OFFICE
2020 SEP 14 AM 11:59

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY

Mr. Toby Baker, BUILDING 5
Executive Director
TCEQ
12100 Park 35 Circle
Austin Texas 78753

Re: Request for Public Meeting - City of Corpus Christi TCEQ Permits - Inner Harbor Proposed
Seawater Desalination Plant

- Intake permit application: WRPERM 13676
- Discharge permit application: WQ0005290000

Dear Mr. Baker:

The role of TCEQ is invaluable in ensuring the regulation and oversight of many activities which would adversely impact the people in our great state. I've seen the importance of what you do first-hand. As a former Corpus Christi Council Member, the TCEQ team stepped in during a difficult time and did a great job. In December 2016 when one of our industrial customers contaminated our water system – forcing a city-wide water boil restriction that lasted for 13 days - we relied on your team for accurate, unbiased information and testing. Now serving as Nueces County Commissioner, your oversight is vital as we work with industry to ensure appropriate construction and operations.

I am reaching out to you because I would like TCEQ to hold a public meeting on this application. Virtually all official discussions regarding this project by the Mayor and Council have taken place in Executive Session, keeping our citizens in the dark. And, on August 25, 2020, this Council took the unprecedented step of committing our citizens to the first \$11 million needed to construct this plant (with \$222 million more authorized), not waiting for a final determination from your agency. To me, that demonstrates total disrespect for the TCEQ permitting process. As a citizen and public official, this concerns me greatly as these elected officials have used COVID-19 to further exclude citizen participation.

As the Mayor and Council have not been forthcoming, I have been working to learn more about the impacts seawater desalination might have on our Inner Harbor and Corpus Christi Bay. What I have learned is that this plant could be devastating to the habitats of vital ecological systems, ultimately impacting our fish populations, our quality of life, and our economy.

A study done by renown scientists at a local university showed that the concentrated heavy metals and brine from the discharge could build up in as little as five years. At a minimum, the effects could be foul odors. At the worst, the concentration would reach a level that would create a "dead zone" in the benthic systems in these waterways. As concentrations increase, the Port of Corpus Christi would exceed its permit limits, forcing it to close. Again, this study, which did not support the Mayor and Council's push for desal, was never made readily available to the public.



NUECES COUNTY
901 LEOPARD STREET, ROOM 303.05
CORPUS CHRISTI, TX 78401-3689

FELICIA RAY HAJEK
COMMISSIONER'S ASSISTANT

CAROLYN VAUGHN
COUNTY COMMISSIONER, PRECINCT 1

(361) 888-0245
(361) 692-9819 - CELL
(361) 888-0470 - FAX

This lack of concern for the environment by Joe McComb is not surprising. Many in our community remember how hard he fought against the State's Agreed Order for environmental flows required as a result of the construction of Choke Canyon Dam.

And, it seems that vital information in the permit application was omitted. CC Polymers has a permitted 10 mgd Seawater Desalination plant permitted for same area. The information provided by the city does not readily reflect the heavy metals/brine anticipated from the operation of this plant.

Seawater desalination plants are not common in the United States. In fact, this environmentally dangerous "water manufacturing plant" would be the first in the Texas. As such, there are many reasons why a Public Meeting conducted openly and objectively by TCEQ would be invaluable. Most importantly, information vital to the people of this city and the millions of people who love the recreational fishing, beautiful beaches (Bay and Gulf) and natural beauty would be available to asses what's at risk if this plant is built. And, unfortunately, if the science by "honest brokers" (not "science-for-hire") turns out to be true, the citizens of Corpus Christi would be paying for a \$1/4 billion plant they can never use.

Thank you for your consideration. I would welcome the opportunity to discuss this request further and, should you agree, to speak at a hearing that could benefit our City, our County, and our State.

Sincerely,

A handwritten signature in cursive script that reads "Carolyn Vaughn".

Carolyn Vaughn
Nueces County Commissioner
Precinct 1

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 11:50 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

From: js_weber@hotmail.com <js_weber@hotmail.com>
Sent: Thursday, March 18, 2021 7:35 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: John Weber

E-MAIL: js_weber@hotmail.com

COMPANY:

ADDRESS: 609 NAPLES ST
CORPUS CHRISTI TX 78404-2911

PHONE: 3617395691

FAX:

COMMENTS: Thank you for taking comment regarding this filing. I have many issues regarding this permit. It seems the location of the intake and outflow are poorly located. Any intake and outflow should be located at least 600 meters offshore per DEQ. I would like to know where the electricity will be sourced. Our area had a greater number residents that were without electricity during the Arctic blast because of contracts with corporations to have uninterrupted

electricity. Will the city agree to have electricity shut off before residents in a rolling blackout situation? How much will the electricity cost on an annual basis? What will be the green house gases associated with the project and electricity generation for the project? How can the water be considered safe during algae blooms? How will water be processed after oil and other toxic chemical spills that normally happen during the Port's operations? The data shows that this water is not needed for citizens water use. The City could attract low water use corporations to the area for economic development. The City also has not even attempted low hanging fruit conservation measures including but not limited to: incentives for low flow toilets, shower heads, xeriscaping, grey water and rainwater collection. Why has the City approved multiple new car washes? It seems no effort has been made for conservation.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 5:57 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

From: bgw@spmwd.net <bgw@spmwd.net>
Sent: Thursday, March 18, 2021 8:10 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13676

REGULATED ENTY NAME WRPERM 13676

RN NUMBER: RN110941192

PERMIT NUMBER: WRPERM 13676

DOCKET NUMBER: 2020-1559-WR

COUNTY: NUECES

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Brian Williams

E-MAIL: bgw@spmwd.net

COMPANY: San Patricio Municipal Water District

ADDRESS: PO BOX 940
INGLESIDE TX 78362-0940

PHONE: 3616436521

FAX:

COMMENTS: My name is Brian Williams and I am the General Manager of the San Patricio Municipal Water District. I would like to submit the attached Resolution to the public record.(this may have already been submitted via Brad Patterson, TCEQ)

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, March 22, 2021 5:59 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Resolution in support of Water Use Permit No. 13676
Attachments: 20210317154027633.pdf

From: Brad Patterson <Brad.Patterson@tceq.texas.gov>
Sent: Thursday, March 18, 2021 8:00 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: Resolution in support of Water Use Permit No. 13676

From: Brian Williams <BGW@spmwd.net>
Sent: Thursday, March 18, 2021 7:33 AM
To: Brad Patterson <Brad.Patterson@tceq.texas.gov>
Cc: leah.olivarri@olivarri.com
Subject: Resolution in support of Water Use Permit No.

Brad,

My name is Brian Williams and I am the General Manager of the San Patricio Municipal Water District. I would like to add the attached resolution in support of Water Use Permit No. 13676 to the record of the public hearing. Please provide guidance, do I need to read it directly into the record during the hearing or just describe it and it becomes part of the record. Thanks for your help.

Brian G. Williams, P.E.

San Patricio Municipal Water District

P.O. Box 940
Ingleside, Texas 78362
Office Phone (361) 777-4037
Cell Phone (361) 815-7933



<http://www.sanpatwater.com>

Notice: Texas has a very broad public records law. All written communications to and from the San Patricio Municipal Water District officials/employees using District equipment are public records and available to the public and media. Your email communications may be subject to public disclosure.

RESOLUTION

WHEREAS, the City of Corpus Christi submitted a water use ("water rights") application to the Texas Commission of Environmental Quality in order to operate a seawater desalination facility to be located on the Inner Harbor in Corpus Christi;

WHEREAS, the City seeks a water right to divert up to 93,148 acre feet per year from the Tule Lake Channel (Corpus Christi Ship Channel – Inner Harbor) Nueces – Rio Grande Coastal Basin, at a maximum flow rate of 129 cfs (57,708 gpm) Corpus Christi Bay, to supply process water for a seawater desalination plant;

WHEREAS, the Texas Commission on Environmental Quality has considered this application and has prepared a draft permit for the requested water use;

WHEREAS, the Texas Commission on Environmental Quality seeks written public comment on this draft permit and will also hold a public meeting on this draft permit on March 18, 2021;

WHEREAS, the San Patricio Municipal Water District, established in 1951 by the by the Texas Legislature (52nd session), receives its water supply from the City of Corpus Christi which acts as the regional developer and provider of water;

WHEREAS, the San Patricio Municipal Water District supplies potable water to nine municipalities (Aransas Pass, Gregory, Ingleside, Ingleside on the Bay, Odem, Portland, Rockport/Fulton, Taft, and jointly with City of Corpus Christi, Port Aransas) in three counties (San Patricio, Aransas and Nueces) which is used to meet the residential and commercial needs of customers in these municipal areas;

WHEREAS, the San Patricio Municipal Water District, also supplies potable water to Rincon Water Supply Corporation and Seaboard Water Supply Corporation;

WHEREAS, the San Patricio Municipal Water District, also supplies industrial process and untreated water to San Patricio industrial customers, which is critical to the economic viability of San Patricio County and the people living in it;

WHEREAS, the Board of Directors of the San Patricio Municipal Water District is a seven member elected body with its members representing distinct geographic areas of San Patricio and Aransas County that roughly correspond with the municipalities served within and one appointed member that has historically represented industry;

WHEREAS, securing new water supplies that are sustainable, affordable and drought resistant is critical to the future of this region in order to meet the needs of its current customers and allow for additional potable water to serve residential and commercial needs;

PASSED AND APPROVED on the 16 day of March, 2021:

Billie Jo Tennill, Odem Director

Billie Jo Tennill

Troy Mircovich, Ingleside Director

Troy Mircovich

Doil Kellar, Aransas Pass Director

Doil Kellar

Alan Miller, Taft Director

Alan Miller

Larry Kalich, Gregory Director

Larry Kalich

Danny Cox, Rockport Director

Danny Cox

Tom Bridges, Portland Director

Tom Bridges

Ed Rainwater, Appointive Director

Ed Rainwater

ATTEST:

San Patricio Municipal Water District

Rebecca Klaevemann
Rebecca Klaevemann
Secretary

Billie Jo Tennill
Billie Jo Tennill
President