

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Thursday, May 6, 2021 3:40 PM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675
Attachments: 2021.05.06 PAI-IOB Comments+HR on CCC 13675.pdf

H

From: elena@txenvirolaw.com <elena@txenvirolaw.com>
Sent: Thursday, May 6, 2021 3:37 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Eric Allmon

E-MAIL: elena@txenvirolaw.com

COMPANY: Perales, Allmon & Ice, P.C.

ADDRESS: 1206 SAN ANTONIO ST
AUSTIN TX 78701-1834

PHONE: 5124696000

FAX:

COMMENTS: Please see attached.

PERALES, ALLMON & ICE, P.C.

ATTORNEYS AT LAW

1206 San Antonio Street
Austin, Texas 78701
(512) 469-6000 • (512) 482-9346 (facsimile)
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Of Counsel:
David Frederick
Richard Lowerre
Brad Rockwell

May 6, 2021

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

Re: Comments and Hearing Request regarding Application of the City of Corpus Christi for Water Rights Permit No. 13675.

Dear Ms. Gharis:

I am writing you on behalf of Ingleside on the Bay Coastal Watch Association ("IOBCWA" or the "Association") regarding the Application of the City of Corpus Christi for Water Rights Permit No. 13675. For the reasons set forth herein, the Application should be denied. If the Application is not denied, IOBCWA requests a contested case hearing regarding the Application. IOBCWA may be contacted through the address and telephone number identified above.

I. IOBCWA is an Affected Person.

IOBCWA satisfies TCEQ's rules regarding associational standing. That is, one or more members of the Association would have standing to request a hearing in their own right; the interests the Association seeks to protect are germane to the Association's purpose; and neither the claim asserted nor the relief requested requires the participation of the individual members in the case.

Encarnacion Serna is a member of IOBCWA. He owns bayfront property at 105 Lost Creek Drive, Portland, Texas. That property has associated littoral rights, which he also owns. Mr. Serna has lived at this residence with his wife for over 20 years. Mr. Serna regularly engages in fishing, swimming, and kayaking in Corpus Christi Bay including areas near the location of the City's proposed intakes for the requested diversion. Mr. Serna often catches fish that he and his family, including 10 grandchildren who frequently visit, consume. These domestic uses of the Bay by Mr. Serna are encompassed within the littoral rights which he possesses, and are preferred uses above the manufacturing use for which

Corpus Christi seeks to divert water.¹ The proximity of Mr. Serna's property interest to the proposed facility intake and his history of fishing and recreating near the proposed facility are personal justiciable interests; these interests will be impaired as a result of the adverse impacts that the proposed diversion will have upon the fish and wildlife habitat and the ecology and productivity of the bay. His interests will be impacted in a manner not common to members of the general public. Mr. Serna has submitted additional comments to TCEQ, and those comments are incorporated here by reference.

Similarly, Uneeda Laitinen, another member of IOBCWA, resides with her husband at 102 Markham Place, Portland, Texas—less than 4 miles of the proposed facility intake. Ms. Laitinen has resided at her residence for about 10 years. Ms. Laitinen's property is right along the bay and near Bayside Park. She enjoys bird-watching from her property, and her husband enjoys fishing in the bay regularly. He often catches fish such as redfish, trout, and flounder, which he and Ms. Laitinen consume and which he shares with nearby residents. The proximity of Ms. Laitinen's property interest to the proposed facility intake and her husband's history of fishing near the proposed facility are personal justiciable interests; these interests will be impacted by the proposed facility in light of the negative impacts that the intake will have upon fish and wildlife habitat and the ecology and productivity of the bay. Ms. Laitinen's, like Mr. Serna's, are personal justiciable interests that will be impacted by the proposed facility in a manner not common to members of the general public.

Captain Daniel Wilkerson is also a member of IOBCWA. Captain Wilkerson is the owner and operator of Family Fishing Charters. Captain Wilkerson is a fishing guide. Three to four times per week, he takes, on average, about 4 individuals fishing along the bay, including in the area near the proposed facility intake. Captain Wilkerson also regularly fishes in the bay with his family. He often catches redfish and trout, which he and his family consume. He and his family also frequent Bayside Park, where they observe dolphins and fish off of the dock at the Park. Captain Wilkerson has expended significant resources to purchase the equipment necessary for his business, including a boat and fishing equipment. The success of his business depends, in large part, on the bay's ecological health and productivity. Captain Wilkerson's business would be impacted by the proposed intake as a consequence of the negative impacts that the proposed intake will have upon fish and wildlife habitat and the ecology and productivity of the bay. Captain Wilkerson's economic interests, together with his recreational interests, are personal justiciable interests that would be impacted by the proposed facility, if permitted, in a manner not common to members of the general public.

Similarly, Captain Chip Harmon is also a member of IOBCWA. He too is a fishing guide and owns a convenience and fishing tackle retail store—Fireside Market, located at 1297 S. Main, Ingleside, Texas. Captain Harmon, like Captain Wilkerson, regularly serves

¹ *Cummins v. Travis County Water Control and Improvement Dist.*, 175 S.W.3d 34, 47 (Tex. App. – Austin, 2005).

as a fishing guide, taking about 4 individuals fishing along the bay, including in the area near the proposed facility intake. Captain Harmon also regularly fishes in the bay. He often catches redfish, trout, and flounder, which he and his family consume. The success of Captain Harmon's business depends, in large part, on the bay's ecological health and productivity. Captain Harmon's business would be impacted by the proposed intake as a consequence of the negative impacts that the proposed intake will have upon fish and wildlife habitat and the ecology and productivity of the bay. Captain Harmon's economic interests, together with his recreational interests, are personal justiciable interests that would be impacted by the proposed facility, if permitted, in a manner not common to members of the general public.

The interests the Association seeks to protect are germane to IOBCWA's purpose. IOBCWA is a 501(c)(3) nonprofit corporation, whose purpose, as described in its bylaws, is as follows: to promote the health, safety, and quality of life for the approximately 700 current residents, property owners, business operators, volunteers for, or employees of Ingleside on the Bay or in Ingleside Cove, located at the convergence of the Corpus Christi and La Quinta Ship Channels, on Corpus Christi Bay. With this purpose as the focus, IOBCWA intends to represent its members by participating in the TCEQ decision-making process.

Finally, neither the claim asserted nor the relief requested—denial of Permit No. 13675—requires participation of the individual members of IOBCWA.

II. The Application does not contain information on the purpose and location of use as required by 30 TAC § 295.5.

The purpose of the use of the water is not stated in definite terms as required by 30 TAC § 295.5, nor is the location of use sufficiently stated. Within the Application, the purpose of use is solely listed as "Municipal and Industrial", which lacks the level of specificity required. Not only should the uses be more particularly set forth, but the particular quantity of water devoted to each of these separate uses is required by the TCEQ rules to be provided. That division of the quantity of water requested for each use has not been provided. Furthermore, the place of use is merely identified as "San Patricio County, Nueces and Aransas Counties." This encompasses 2,402 square miles. Such a generalized description does not constitute a definite identification of the place of use for the water. For these reasons, the information required by 30 TAC § 295.5 has not been provided.

III. The Application does not contain the required information regarding return and surplus flows.

TCEQ rules also require that the Application describe the location of return or surplus flows, as well as requiring that an Application, "shall state with as much accuracy as possible the quantity of return flow expressed in acre-feet per annum." (30 TAC § 295.8).

In this case, much of the water will be rejected as a byproduct of the desalination process, and significant quantities of the water will be discharged after industrial use for purposes such as cooling. Yet, the location of the desalination reject water discharge is not identified in the Application, the location of return water flows after industrial use are not shown in the Application, and the quantity of return flows are not provided in the Application. In this manner, the Application does not contain the information required by 30 TAC § 295.8.

Not only is the location of the desalination reject water unknown, but no permit has even been obtained for such a discharge. Without a discharge permit, or some other demonstrated means of handling the desalination process reject water, the desalination facility proposed is not feasible, and there can be no demonstration that the water would, in fact, be put to a beneficial use. It is improper to grant a water rights permit for the operation of a desalination facility that has no demonstrated ability to fully operate.

IV. The Application has not demonstrated consistency with the State and Regional Water Plan.

The City also has not shown that the proposed project addresses a water supply need in a manner that is consistent with the State Water Plan and applicable approved Regional Water Plan. The current State Water Plan includes a single seawater desalination project with a yield of 20 MGD (22,420 ac-ft/yr).² The water right proposed is for the implementation of a project with an initial yield of 30 MGD, and the proposed project would reach an ultimate yield of closer to 70 MGD. The City has not justified the use of this quantity of water through desalination, which is a significant problem considering that desalination is the most expensive water supply option considered in the Regional Water Plan.³

The Application also does not contain the information addressing environmental impacts that the Regional Water Plan anticipates. The 2016 Regional Water Plan noted the necessity of such information:

The potential environmental effects resulting from the construction of a desalination plant in the vicinity of Nueces Bay and/or Corpus Christi Bay will be sensitive to the siting of the plant and its appurtenances. Environmental analyses including impingement and entrainment will need to be considered as part of the intake evaluation.⁴

The City of Corpus Christi has not considered both impingement and entrainment in its proposed intakes for the project. In fact, no information beyond the general location of appurtenances at the facility has been provided.

² Regional Water Plan, p. 5-50.

³ Regional Water Plan, p. 5-43.

⁴ Regional Water Plan, p. D.9-8.

For these reasons, the proposed facility is not consistent with the approved Regional Water Plan for the area where the appropriation is proposed to be located.

V. The proposed withdrawal is detrimental to the public welfare.

The City of Corpus Christi's intended withdrawal, and the desalination facility it enables, will result in serious and lasting damage to the nearby environment and the community. In addition to the environmental impacts of the intake structures at the facility, the desalination process will significantly contaminate the nearby waters. Reject water will contain large concentrations of brine that will kill and injure nearby aquatic life. Also, the discharged wastewater will potentially contain chemicals associated with the reverse osmosis process, including scale inhibitors, acids, coagulants, ferric chloride, flocculants, cationic polymer, chlorines, bisulfites, and hydrogen peroxides, as well as heavy metals from contact with the plant machinery. Heavy metals from years of refining along La Quinta Channel would be sucked through the intake and dispersed with the discharge brine. These substances would all be potentially damaging to the nearby wildlife. In addition, the facility will create tremendous amounts of solid waste requiring transport and disposal, endangering nearby communities.

The City proposes to use a shoreline intake near La Quinta Island. This area is of special biological importance for critical commercial and sports fishing species. Valuable seagrass habitats are present in this area. There is a significant forage base present in the area that is ecologically important for commercial and sports fishing species, and food for important species is currently plentiful in the immediate area of the proposed intake. Commercially important species that use this area include Blue Crab, shrimp, and important fish species including flounder. Other species present that are important for recreational fishing include Spotted Sea Trout and Croaker. The intake is proposed to be located near sensitive nursery habitat and other areas that are important for a variety of marine life, including possible feeding areas for sea turtles and nesting sites for colonial waterbirds.⁵ Spoil Island also has the potential to be a feeding and resting place for migrating birds, including the federally endangered Piping Plover.⁶ The Whooping Crane numbers have been increasing and this species is expanding its winter foraging grounds. The proposed diversion would potentially eliminate habitat for this species. Furthermore, the shoreline location of the intake structure will necessitate the destruction of coastal wetlands for its installation. Additionally, there are seagrass mitigation efforts underway within a mile of the facility that would be harmed or lost as a result of the environmental impacts of the proposed facility. For these reasons, the location and operation of the intake structure in this area will be detrimental to public welfare.

⁵ Harte Research Institute for Gulf of Mexico Studies, Texas A&M University – Corpus Christi, “TM 2.1 – Identification and Characterization of Potential Impacts [and] Mitigation Measures Related to Intake Discharge Facilities of Seawater Desalination Plants”, 2015, pp. 5-6.

⁶ *Id.*

The proposed desalination project will demand tremendous amounts of electricity from an already fragile electrical grid. Large amounts of energy are required for the withdrawal with high pressure pumps, transport of the water, and waste disposal systems associated with the proposed facility. The installation of critical infrastructure with such an extreme energy need places the reliability of electricity for other uses in the area at risk.

The detriment of the facility to public welfare is only heightened by the cumulative impact of multiple unnecessary proposed desalination facilities within Corpus Christi Bay. The needs of the community should be carefully considered, with permits only issued for those facilities necessary which will be located, designed, and constructed in a manner that would minimize adverse environmental impacts. The City of Corpus Christi's La Quinta facility fails to meet these criteria, and is thus detrimental to the public welfare, and should be denied.

The proposed facility will also have a detrimental impact upon public welfare as a result of the adverse impact of the facility upon recreational uses of the receiving waters. As a perennial water, the Bay is designated as both fishable and swimmable, and these designated uses are to be protected in the water rights permitting process. The intake structures proposed will create significant currents that will inhibit the use of these waters for swimming. The speed of the current will be accelerated should the screens become partially clogged, thereby creating currents of a strength that would be dangerous to persons within the vicinity of the intake structures. These impacts could be avoided by simply moving the facility and associated intake structure to an offshore location. TCEQ should not authorize such an avoidable threat to the safe recreational use of the Bay.

VI. The proposed withdrawal fails to maintain existing uses of the area near the intake, and fails to maintain the ecology and productivity of Corpus Christi Bay near La Quinta Channel.

The location of the proposed withdrawal within an estuary triggers the consideration of specific additional criteria under the TCEQ rules. Pursuant to 30 TAC § 297.55(b), the Commission is to consider the ecology and productivity of the affected bay and estuary system in determining whether to issue a water right. Relatedly, each water rights permit is required to include conditions considered necessary to maintain existing instream uses and water quality of the stream.⁷ As discussed above, the area surrounding the proposed intake location is a rich and productive portion of the Corpus Christi Bay and estuary system. In fact, under the Texas Water Quality Standards, the source waters have been characterized as used for exceptional aquatic life uses.⁸ Issuance of the draft permit fails to protect the ecology and productivity for the impacted bay and estuary system, and fails to

⁷ 30 TAC § 297.41(a)(3)(D), Tex. Water Code 11.147(d).

⁸ 30 TAC § 307.10(1), Appendix A.

maintain existing uses of the impacted source water. The impingement and entrainment impacts of the intake endanger the ecology and productivity of the source waters, and would prevent maintenance of existing uses of the source waters.

The governing statutes for the permitting of desalination projects provide that, “[TCEQ] *by rule* shall prescribe reasonable measures to minimize impingement and entrainment.” (emphasis added).⁹ TCEQ has failed to fulfill this statutory requirement because TCEQ has failed to adopt rules prescribing reasonable measures to minimize impingement and entrainment. It is a violation of statute for TCEQ to process the Application without such rules in place to minimize impingement and entrainment.

Under the applicable statute and rules, the City of Corpus Christi is required to demonstrate that the facility will employ reasonable measures to minimize impingement and entrainment. As has been noted by the Texas Parks and Wildlife Department and General Land Office, “when feasible, directional drilling to install piping below the seabed and drawing water down through a sandy bottom will 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.”¹⁰ Any deviation from that method of water withdrawal to employ an alternate method that would increase the potential impingement or entrainment of wildlife must be justified as necessary.

Yet, the City of Corpus Christi has provided no detail regarding the design and operation of the intake structure that it intends to utilize to withdraw water from the sensitive environmental area where it is proposed to be located. The determination of the design of this structure involves the consideration of detailed information regarding the assemblage of species currently present in the vicinity of the proposed intake structure, the nature of the habitat present in the vicinity of the proposed intake structure, the physical characteristics of the source waterbody, and the detailed characteristics of the intake structure. The requested permit cannot be found adequately protective of the environment and adequately protective of public welfare without substantive information regarding the design and operation of the proposed intake structure for use at the facility. The City has not provided this necessary information.

In considering an application for a water right, the Commission is to consider whether the permit includes all conditions necessary to maintain fish and wildlife habitat.¹¹ Here, the surrounding habitat is both extremely sensitive and extremely valuable. The maintenance of this habitat is simply not possible with a withdrawal of water in the quantity requested and the location proposed by the City of Corpus Christi in its Application.

⁹ Tex. Water Code § 18.003(h).

¹⁰ Tex. Parks and Wildlife Department & Tex. General Land Office, “Marine Seawater Desalination Diversion and Discharge Zones Study” Report to the 84th Texas Legislature, September 1, 2018, p. 3.

¹¹ 30 TAC § 297.41(a)(3)(D).

VII. The proposed withdrawal is inconsistent with the Coastal Management Program.

By this Application, Corpus Christi seeks to divert in excess of 5,000 acre-feet of water annually from within the boundary of the Texas Coastal Management Program ("CMP").¹² Accordingly, issuance of the permit must be consistent with the goals and policies of the CMP.¹³

In light of the environmental impacts that the proposed diversion will have upon Corpus Christi Bay, the issuance of the permit does not achieve the maintenance of a proper ecological environment and the health of the living marine resources as required by the CMP Policies for Appropriations of Water.¹⁴ Under the CMP, TCEQ is to administer the law, "so as to promote the judicious use and maximum conservation and protection of the quality of the environment and the natural resources of the state."¹⁵ As acknowledged in the Coastal Bend Regional Water Plan, the Region has surplus water through 2060, with shortages thereafter only attributable to anticipated manufacturing demands.¹⁶ Even if such a shortfall were to occur, Corpus Christi has not demonstrated that alternatives are not available that would avoid the devastating consequences that its proposed diversion would have upon Corpus Christi Bay. Enabling the environmental degradation that would result from Corpus Christi's exercise of the requested water right when other alternatives are available is inconsistent with the judicious use and maximum conservation of the ecological resources of Corpus Christi Bay.

VIII. Conclusion.

For these reasons, IOBCWA requests that the City of Corpus Christi's Application for Water Rights Permit No. 13675 be denied. If the Executive Director maintains his recommendation that Water Rights Permit No. 13675 be granted, then IOBCWA requests a contested case hearing with regard to the City's Application for Water Rights Permit No. 13675.

Respectfully submitted,

/s/ Eric Allmon

Eric Allmon

PERALES, ALLMON & ICE, P.C.

¹² 31 TAC § 503.1(a).

¹³ 30 TAC § 281.45(a)(2)(A)(i); 31 TAC § 501.15(c).

¹⁴ 31 TAC § 501.33(a)(1)(F).

¹⁵ 31 TAC § 501.33(a)(1).

¹⁶ Region N Water Plan, p. 4-46.

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Austin, Texas 78701
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eallmon@txenvirolaw.com

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Monday, May 3, 2021 9:31 AM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: labreedi@asu.edu <labreedi@asu.edu>
Sent: Saturday, May 1, 2021 9:31 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Lara Breeding

E-MAIL: labreedi@asu.edu

COMPANY:

ADDRESS: 210 CAUSEWAY ST
PORTLAND TX 78374-1572

PHONE: 6023098076

FAX:

COMMENTS: I am a member of the Ingleside on the Bay Coastal Watch Association and I STRONGLY OPPOSE the City of Corpus Christi's placing an intake pipe for a desalination plant in La Quinta Channel. I also request that a public meeting be held for the community to express its concerns and I request that a Contested Case Hearing be held. All of our area

scientists, including from Texas Parks & Wildlife, the General Land Office, the UT Marine Science Institute, and the Harte Research Institute, have said, in published reports, that seawater desalination intake and discharge should only occur in designated areas offshore in the Gulf. There's even an expedited permitting process for this. Knowing all this, WHY would the City of Corpus Christi, a public entity, ever even consider putting intake and discharge inside Corpus Christi Bay?? Why aren't they pursuing the expedited permit process that will keep our Bay safer? Also I am concerned about possible health effects on me or my family from the chemicals used in the desalination process, including pre-treatment. However what would really break my heart is the damage that would occur to the local costal ecosystem. My family travels from across the country to fish with us here in these waters and it's undeniably going to be incredibly damaging to suck 115,349.31 gallons of water from La Quinta Channel every minute!

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Monday, May 3, 2021 10:01 AM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

H

From: Wsbfdci@gmail.com <Wsbfdci@gmail.com>
Sent: Saturday, May 1, 2021 8:39 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: MR W Scott Breeding

E-MAIL: Wsbfdci@gmail.com

COMPANY:

ADDRESS: 1030 BAYSHORE DR
INGLESIDE TX 78362-4647

PHONE: 6023098086

FAX:

COMMENTS: Scott Breeding, 1030 Bayshore Dr, Ingleside on the Bay My home is on the bay facing the Corpus Christi and La Quinta Channels. I fish in La Quinta Channel and Ingleside Cove and am very concerned with maintaining a healthy ecosystem and property values in the area. I STRONGLY OPPOSE the intake pipe in La Quinta Channel. I request a Contested Case hearing for community concern to be heard. My family and I love to fish in La Quinta Channel

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Wednesday, May 5, 2021 1:29 PM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

H

From: mleebrumley@yahoo.com <mleebrumley@yahoo.com>
Sent: Wednesday, May 5, 2021 11:36 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Marsha Bromley

E-MAIL: mleebrumley@yahoo.com

COMPANY:

ADDRESS: 715 S UPPER BROADWAY ST #606
CORPUS CHRISTI TX 78401-3528

PHONE: 3615379417

FAX:

COMMENTS: I live on the bluff above downtown Corpus Christi. I vehemently oppose a desalination plant in the La Quinta turn basin. The vast volume of intake water required will kill small fish and the food chain that larger fish feed upon. This will have a devastating affect on everything that lives in our waters, which in turn affects the whole eco-system we enjoy and find necessary. Our fish and bird populations will be depleted, which in turn affects the lives who

depend on the marine life in our area and which ultimately affects the tourism of our great coastal bend. I totally oppose this plant and request public hearings in order for the general public to have their say in the matter. To think this is happening to allow industry the rights to the desalinated water to pollute our bays and eventually our gulf for the sake of "progress" is poor stewardship of what God has given the coastal bend in the way of beauty and marine life.

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Wednesday, May 5, 2021 1:41 PM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: kellyburnett@hotmail.com <kellyburnett@hotmail.com>
Sent: Wednesday, May 5, 2021 9:02 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Kelley Burnett

E-MAIL: kellyburnett@hotmail.com

COMPANY: Dolphin Connection Ingleside

ADDRESS: 410 N SANDPIPER
INGLESIDE TX 78362-4682

PHONE: 2105488260

FAX:

COMMENTS: I STRONGLY OPPOSE the City of Corpus Christi's placing an intake pipe for a desalination plant in La Quinta Channel! I request that a public meeting be held for the community to express its concerns and I request that a Contested Case Hearing be held!!!According to the permit, the City of Corpus Christi would be allowed to suck

115,349.31 gallons of water from La Quinta Channel every minute. Sucking in that amount of water that fast will require an enormous amount of suction power and I am concerned about aquatic life being trapped or killed in the process. This intake pipe is a death sentence! I and my family members (describe their relationship, such as grandchildren) love to fish/boat/swim/etc. in La Quinta Channel where the intake pipe for the Port of Corpus Christi's desalination facility will be located or in Ingleside Cove where the discharge will flow to. I am concerned that given the number of small larvae which will be sucked up, turned to sludge, and deposited into landfills, fishing will be badly impaired in the region. I am concerned about the amount of salty brine that will be discharged from the desal plant, plus its mixing in with other waste water from the industries in La Quinta Channel. This can't be good for the fish - or for people! If the fish die, then the birds we love to watch will also die or leave the area. I am concerned about possible health effects on me or my family from the chemicals used in the desalination process, including pre-treatment. I fish for business and I am concerned about loss of income that will happen when aquatic life in La Quinta Channel and Corpus Christi Bay is harmed/destroyed by this desal plant. Many of us suffered through the historic winter storm in February 2021 and were without power for several days in freezing temperatures due to the amount of demand placed on the electrical grid in Texas. The operating pumps required to suck 115,349.31 gallons of water per minute will take an enormous amount of power, placing even more strain on the grid. I am opposed to issuing a permit which would demand excessive amounts of energy to supply water for future industrial use. Most of the desalinated water will be used by industry for cooling purposes. Aren't there federal regulations that apply to industrial cooling water intake structures? Since Corpus Christi Bay connects to the Gulf of Mexico, doesn't diverting water from Corpus Christi Bay to support private industry without federal oversight amount to stealing from the Waters of the United States (WOTUS)? Since Texas is already drought-prone and gets very hot, why is the City of Corpus Christi enticing such thirsty high-energy-requiring industries to come here in the first place? Shouldn't they go where it's cooler and where there's more water? Since this desal plant has been listed as a "recommended water strategy" on the Region N Water Plan for 2021, I expect that the City of Corpus Christi will try to get a low-interest loan from the Texas Water Development Board (TWDB) to construct the plant. Isn't it a violation of Texas law to use public funds to support private industry? Who will have to pay back such a loan? All of our area scientists, including from Texas Parks & Wildlife, the General Land Office, the UT Marine Science Institute, and the Harte Research Institute, have said, in published reports, that seawater desalination intake and discharge should only occur in designated areas offshore in the Gulf. There's even an expedited permitting process for this. Why is the City of Corpus Christi, a public entity, insisting on putting intake and discharge inside Corpus Christi Bay in the first place. Aren't they listening? Why aren't they showing the way by pursuing the expedited permit process that will keep our Bay safer? Why is the City applying for this permit? Shouldn't it be the private industries that plan to use the desalinated water? Why aren't industries paying to construct this plant? Why aren't industries paying for pipelines to bring in water from offshore and pump the brine back offshore? After all, they pay for other pipelines that cross San Patricio County, tearing up communities and farm land. Anything else that concerns you about this permit in your own words, since that's most effective.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Wednesday, December 1, 2021 9:23 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675
Attachments: inbound6117056795302318380.pdf

H

From: elida.i.castillo@gmail.com <elida.i.castillo@gmail.com>
Sent: Tuesday, November 30, 2021 9:54 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Elida Castillo

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

COMPANY:

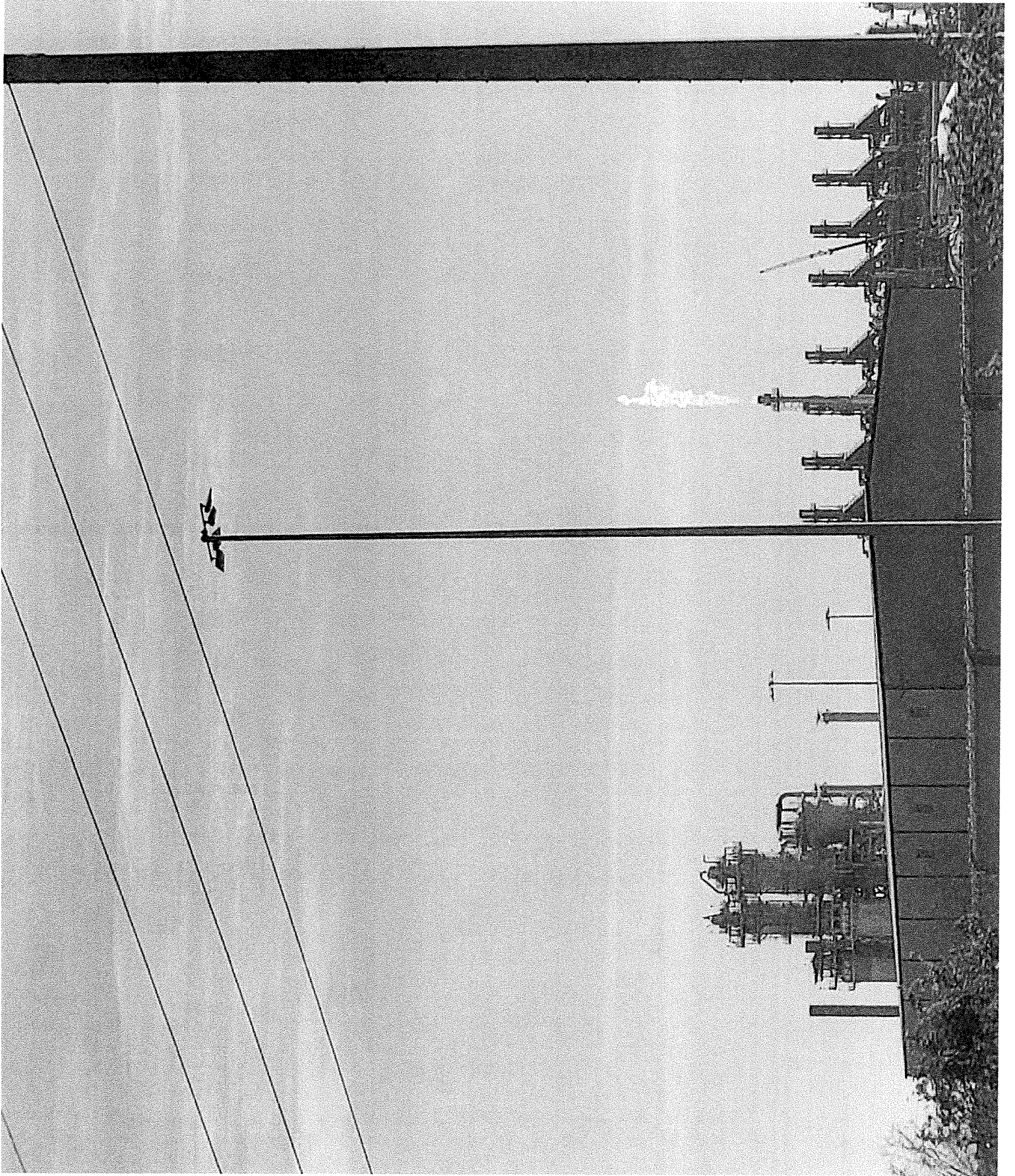
ADDRESS: PO BOX 643
TAFT TX 78390-0643

PHONE: 2108578925

FAX:

COMMENTS: I ask for TCEQ to deny the permit for water intake WRPERM 13675. I am strongly opposed to the project and I ask for a contested case hearing. The affected communities do not know enough about the proposed desalination plants, even though the construction of just one will end our quality of life as we know it. During a time where we should

be conserving water because of the long-term need for clean, drinking water, there's a proposal to desalinate water from the bay for industries who do not care about our water, air, or land. TCEQ, you have a responsibility to protect our environment and ensure our financial futures are not at stake. This will kill the bay, which will destroy the tourism and fishing industries. We do not need this project. If built, it will only lead to more oil and gas projects that do not create the jobs they say, but do harm our health and well-being. Do not buy the lie that this is an uninterrupted supply of water in a drought prone land. If that were the case, a project that consumes 20 million gallons of potable water per day shouldn't have been built. No desal. I'm attaching a pic of what that water looks like on our communities. Flares that emit life shortening pollutants, regulate those..



Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 16, 2021 8:38 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675
Attachments: Untitled design1.pdf

From: elida.i.castillo@gmail.com <elida.i.castillo@gmail.com>
Sent: Monday, November 15, 2021 4:52 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Elida Castillo

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

COMPANY:

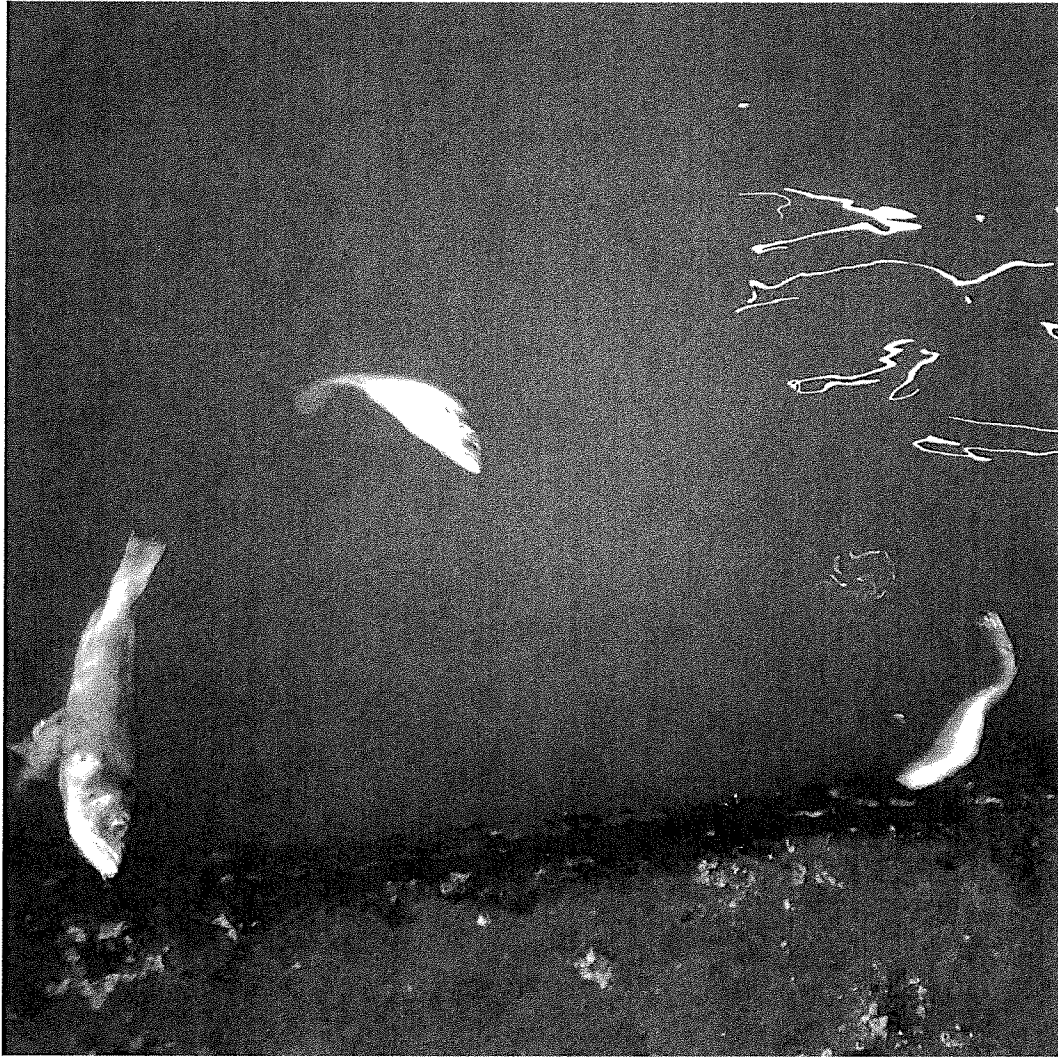
ADDRESS: 131 LERDO ST
TAFT TX 78390-2222

PHONE: 2108578925

FAX:

COMMENTS: I am opposed to the City of Corpus Christi's water rights permit 13675 and all plans to build desalination plants in the area. This project would be detrimental to the environment, lead to water shortages in the future, and have long-term adverse affects on the economy. The idea of taking over 66 BILLION gallons of water per year from an

inlet is asinine. The affected area is critical to many forms of aquatic life and it's a huge recreational area. Plus the land is surrounded by neighborhoods that would be affected by the noise and light pollution. We should be conserving water instead of converting whomever builds this plant into a private wholesaler of a public resource. Our fish and wildlife population has been seriously affected by industry in the area, and there were huge losses suffered during the winter storm. Rather than approving plans like the proposed desalination plants, TCEQ should be doing its best to protect the little precious resources we have remaining on this planet. Please consider the adverse affects such as sludge, the gross amount of water that is wasted by industry, and the impact to our way of life. I'm attaching a picture of some dead fish that were floating in the bay as an example of what we can expect.



Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Wednesday, April 28, 2021 9:39 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

PM

From: elida.i.castillo@gmail.com <elida.i.castillo@gmail.com>
Sent: Tuesday, April 27, 2021 4:59 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Elida Castillo

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

COMPANY:

ADDRESS: 131 LERDO ST
TAFT TX 78390-2222

PHONE: 2106409906

FAX:

COMMENTS: I oppose WRPERM 13675, and I request you hold a public meeting. Many of us suffered through the historic winter storm in February 2021 and were without power for several days in freezing temperatures due to the amount of demand placed on the electrical grid in Texas. The operating pumps required to suck 115,349 gallons of water

per minute will take an enormous amount of power, placing even more strain on the grid. I am opposed to issuing a permit which would demand excessive amounts of energy to supply water only for industrial use.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Wednesday, November 17, 2021 9:48 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

H

From: pegduran1@gmail.com <pegduran1@gmail.com>
Sent: Tuesday, November 16, 2021 10:07 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: MRS Margaret A Duran

E-MAIL: pegduran1@gmail.com

COMPANY: Retired

ADDRESS: 4022 CONGRESSIONAL DR
CORPUS CHRISTI TX 78413-2523

PHONE: 3616969366

FAX:

COMMENTS: I oppose this permit and request a contested case hearing. I am very concerned about the plans to build desalination facilities on Corpus Christi Bay. It is quite shallow and has a narrow outlet. A desalination plant will be harmful to all forms of life there, from microscopic larvae to small and large fish and sea grasses and would certainly be detrimental to the overall water quality. We have experience with red tide already and the health problems involved

especially affecting our lungs. We will see rising water prices as this has happened to other cities that have built desalination plants. Most people do not realize what a great deal of energy is needed to run these plants. We know that this desalinated water is required for and will be used principally by Big Industry, mainly the petrochemical industries. Increasing the industrial presence in our area will be detrimental to our air quality and place us out of attainment with federal guidelines, given the large number of refineries and chemical plants already located in and around our Bay. This will further burden our businesses as well as the citizenry. Increased emissions will worsen climate change. Please be responsible and responsive to the regular people and our environment and deny this permit. Thank you.

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Thursday, May 6, 2021 8:29 AM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM

From: pegduran1@gmail.com <pegduran1@gmail.com>
Sent: Thursday, May 6, 2021 3:39 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Margaret Duran

E-MAIL: pegduran1@gmail.com

COMPANY:

ADDRESS: 4022 CONGRESSIONAL DR
CORPUS CHRISTI TX 78413-2523

PHONE: 3616969366

FAX:

COMMENTS: As a Corpus Christi resident, I oppose desalination in Corpus Christi Bay and in La Quinta Channel. I request you stop the desalination plants, deny WRPERM 13675 and all other desalination permits, and hold a public meeting for community input. Many of us suffered through the historic winter storm in February 2021 and were without power for several days in freezing temperatures due to the amount of demand placed on the electrical grid in Texas. The operating

pumps required to suck 115,349 gallons of water per minute will take an enormous amount of power, placing even more strain on the grid. I am opposed to issuing a permit for desalination plants that would demand excessive amounts of energy to supply water largely for industrial use.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Tuesday, June 9, 2020 11:25 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

PM

From: pegduran1@gmail.com <pegduran1@gmail.com>
Sent: Monday, June 8, 2020 3:24 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: MRS Margaret Duran

E-MAIL: pegduran1@gmail.com

COMPANY:

ADDRESS: 4022 CONGRESSIONAL DR
CORP CHRISTI TX 78413-2523

PHONE: 3616969366

FAX:

COMMENTS: I would like to request a public meeting as I am very concerned about the use of funds to build desalination facilities in the Corpus Christi Bay. It is shallow and has a narrow outlet. A desal plant would be harmful to the larvae and fish already here and would certainly be detrimental to the water quality. Also I am concerned about rising water prices as this has happened to other cities that build desal plants. We know that the desalinated water will

be used principally by new big industry which will also be detrimental to our air quality given that we already have so many refineries and chemical plants. Thank you.

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Friday, May 7, 2021 8:13 AM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: 100kyote@gmail.com <100kyote@gmail.com>
Sent: Thursday, May 6, 2021 11:03 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Larry And Debby Ferrell

E-MAIL: 100kyote@gmail.com

COMPANY:

ADDRESS: 132 SUNSET
INGLESIDE TX 78362-4739

PHONE: 3617795051

FAX:

COMMENTS: We strongly oppose the City of Corpus Christi placing an intake pipe for a desalination plant in La Quinta Channel and request that a public meeting be held for the community to express it's concerns. We also request that a Contested Case Hearing be held. The process action will surely cause damage to the aquatic life.

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Tuesday, May 4, 2021 8:17 AM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: freezematthew@gmail.com <freezematthew@gmail.com>
Sent: Monday, May 3, 2021 10:32 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Matthew Freeze

E-MAIL: freezematthew@gmail.com

COMPANY:

ADDRESS: PO BOX 1570
INGLESIDE TX 78362-1570

PHONE: 3613329494

FAX:

COMMENTS: I STRONGLY OPPOSE the Port of Corpus Christi's placing an intake pipe for a desalination plant in La Quinta Ship Channel I request that a public meeting be held so citizens can express their concerns. I request that a Contested Case Hearing be held I and my family members love to fish/boat/swim/etc. in La Quinta Channel where the intake pipe

for the Port of Corpus Christi's desalination facility will be located or in Ingleside Cove where the discharge will flow to. I am concerned that given the number of small larvae which will be sucked up, turned to sludge, and deposited into landfills, fishing will be badly impaired in the region.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Thursday, April 29, 2021 2:33 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: soulfullbusiness@gmail.com <soulfullbusiness@gmail.com>
Sent: Thursday, April 29, 2021 2:25 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Briana Gutierrez

E-MAIL: soulfullbusiness@gmail.com

COMPANY:

ADDRESS: 1825 JUANITA ST
CORPUS CHRISTI TX 78404-4047

PHONE: 3617017010

FAX:

COMMENTS: Hello, my name is Briana, I live 22 miles from La Quinta Channel, I am not a member of the Ingleside on the Bay Coastal Watch Association. However, I am very concerned about the future implications of the desalination plant to our Corpus Christi bay. I STRONGLY OPPOSE the City of Corpus Christi's placing an intake pipe for a desalination plant in

La Quinta Channel. I request that a public meeting be held for the community to express its concerns. I request that a Contested Case Hearing be held. One of the reasons I have chosen to reside in Corpus Christi is the incredibly diversity of ecosystems that can be found here. As I learn more from grassroots organizations in our community working to preserve our natural resources for us and future generations I grow more concerned about the amount of salty brine that will be discharged from the desal plant, plus its mixing in with other waste water from the big industries in La Quinta Channel. These big industries have more than enough money to apply for the permits that allow the desalination process to take place in designated areas offshore. Why is the city applying for these permits? The city works for the people, the community, us. Not just the big industries. The city should be working to protect this incredible goldmine of an environment, and not working to speedily destroy its natural beauty & diversity for profit. As if we didn't have to worry about the amount of toxic chemicals already in our area due to these big industries, I don't think adding a desalination plant will help. I am concerned about possible health effects on me & my family from the chemicals used in the desalination process, including pre-treatment. I ask that you please educate the community about what you are doing, be transparent, let the scientists talk and let us make the decision. Thank you.

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Tuesday, May 4, 2021 8:36 AM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: sphagens@gmail.com <sphagens@gmail.com>
Sent: Monday, May 3, 2021 7:37 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: MR Steve Hagens

E-MAIL: sphagens@gmail.com

COMPANY:

ADDRESS: 411 WOODHAVEN
INGLESIDE TX 78362-4677

PHONE: 3614432963

FAX:

COMMENTS: I STRONGLY OPPOSE the City of Corpus Christi's placing an intake pipe for a desalination plant in La Quinta Channel I request that a public meeting be held for the community to express its concerns. I request that a Contested Case Hearing be held My family of 5 three children ages 5, 12, and 14 live on Ingleside Cove bayfront and regularly swim

in the bay, fish, and bird watch, and enjoy the natural habitat. The proposed project will not only intake millions of gallons of bay water it will discharge the brine into the channel. This is not an area with a great water interchange via flow. The brine will increasingly collect in the channel and the ships passing through La Quinta channel will then displace the concentrated brine into the shallower (2- 5 feet) of the rest of Ingleside cove making the entire area hypersaline causing destruction of the environment. These types of projects would be better placed where the brine is flushed out due to stronger currents and deeper waters.

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Thursday, May 6, 2021 3:42 PM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: donnaleehoffman@gmail.com <donnaleehoffman@gmail.com>
Sent: Thursday, May 6, 2021 1:01 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Donna Hoffman

E-MAIL: donnaleehoffman@gmail.com

COMPANY:

ADDRESS: 1500 GREGORY ST
AUSTIN TX 78702-2732

PHONE: 5122995776

FAX:

COMMENTS: TCEQ Administrators: I'm Donna Hoffman, 1500 Gregory St., Austin, TX 78702. My phone number is 512-299-5776. I'm the fourth generation of my family from Corpus Christi and while I now live in Austin, Texas, I travel regularly to Corpus Christi to visit my mother, brother, nephews and nieces who live there. I visit Ingleside on the Bay

located on La Quinta Channel and have friends who live there. I also visit various locations on the Bay recreationally and my brother lives a block away from the bayfront. I also am a participant in support of Indigenous People of the Coastal Bend, For the Greater Good, South Texas Human Rights Center, CAPE the Coastal Alliance to Protect the Environment, and I'm a member of the Sierra Club and Texas Campaign for the Environment who like me, are all strongly opposed to this project. I STRONGLY OPPOSE the City of Corpus Christi's placing an intake pipe for a desalination plant in La Quinta Channel. I request that TCEQ hold a public meeting for the community to express its concerns. I request that State Office of Administrative Hearings hold a Contested Case Hearing. According to the permit, the City of Corpus Christi would be allowed to suck 115,349.31 gallons of water from La Quinta Channel every minute. Sucking in that amount of water that fast will require an enormous amount of suction power and I am concerned about aquatic life being trapped or killed in the process. This intake pipe is a death sentence! My family members, friends, and I love to walk, bird watch, swim, fish, kite surf, and watch dolphins in the Bay in La Quinta Channel where the intake pipe for the Port of Corpus Christi's desalination facility would be located or in Ingleside Cove where the discharge will flow to. I am concerned that given the number of small larvae which will be sucked up, turned to sludge, and deposited into landfills, fishing will be badly impaired in the region. I am concerned about the amount of salty brine that will be discharged from the desal plant, plus its mixing in with other wastewater from the industries in La Quinta Channel. This can't be good for the fish - or for people! If the fish die, then the birds we love to watch will also die or leave the area. I am concerned about possible health effects on people from the chemicals used in the desalination process, including pre-treatment. I am concerned about the fishing communities' loss of income that would happen if aquatic life in La Quinta Channel and Corpus Christi Bay were harmed/destroyed by this desal plant. Many of us suffered through the historic winter storm in February 2021 and were without power for several days in freezing temperatures due to the amount of demand placed on the electrical grid in Texas. The operating pumps required to suck 115,349.31 gallons of water per minute will take an enormous amount of power, placing even more strain on the grid. I am opposed to issuing a permit which would demand excessive amounts of energy to supply water for future industrial use. Most of the desalinated water will be used by industry for cooling purposes. Aren't there federal regulations that apply to industrial cooling water intake structures? Since Corpus Christi Bay connects to the Gulf of Mexico, doesn't diverting water from Corpus Christi Bay to support private industry without federal oversight amount to stealing from the Waters of the United States (WOTUS)? Since Texas is already drought-prone and gets very hot, why is the City of Corpus Christi enticing such thirsty high-energy-requiring industries to come here in the first place? Shouldn't they go where it's cooler and where there's more water? Isn't it a violation of Texas law to use public funds to support private industry? Who will have to pay back such a loan? All of our area scientists, including from Texas Parks & Wildlife, the General Land Office, the UT Marine Science Institute, and the Harte Research Institute, have said, in published reports, that seawater desalination intake and discharge should only occur in designated areas offshore in the Gulf. I am asking you to reject this permit and save Corpus Christi Bay. Please go visit and see how beautiful it is. Care about the people and wildlife there. Reject this permit.

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Monday, May 3, 2021 9:29 AM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM

From: donna@texasenvironment.org <donna@texasenvironment.org>
Sent: Sunday, May 2, 2021 7:05 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Donna Hoffman

E-MAIL: donna@texasenvironment.org

COMPANY:

ADDRESS: 1500 GREGORY ST
AUSTIN TX 78702-2732

PHONE: 5122995776

FAX:

COMMENTS: I ask that you deny WRPERM 13675, and I request a public meeting be held for the community to voice its concerns. I oppose the City of Corpus Christi placing an intake pipe for a desalination plant in La Quinta Channel. This water will largely be for industrial use, not for my friends who live there. I don't think bringing polluting corporations to

these communities is worth the cost these desalination plants would have on our Bay, on our wildlife, and on our local fishing and tourism economies.

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Wednesday, May 5, 2021 2:18 PM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

H

From: eshoney10@att.net <eshoney10@att.net>
Sent: Tuesday, May 4, 2021 4:53 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Ellen Honey

E-MAIL: eshoney10@att.net

COMPANY:

ADDRESS: 13001 APPALOOSA CHASE DR
AUSTIN TX 78732-1973

PHONE: 7377035248

FAX:

COMMENTS: Public hearing on WRPERM 13675. I suffered through the winter storm in February 2021 due to the amount of demand placed on the electrical grid in Texas. The operating pumps required to suck 115,349 gallons of water per minute will take an enormous amount of power, placing even more strain on the grid. I am opposed to issuing a

permit which would demand excessive amounts of energy to supply water only for industrial use. RIDICULOUS!
ENVIRONMENTAL IMPACT WOULD BE EGREGIOUS! NO!

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Monday, May 3, 2021 9:30 AM
To: PUBCOMMENT-ELD; PUBCOMMENT-OCC2; PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: Codyjanssen@gmail.com <Codyjanssen@gmail.com>
Sent: Saturday, May 1, 2021 9:40 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Cody T Janssen

E-MAIL: Codyjanssen@gmail.com

COMPANY:

ADDRESS: 210 CAUSEWAY ST
PORTLAND TX 78374-1572

PHONE: 2083152238

FAX:

COMMENTS: I STRONGLY OPPOSE the City of Corpus Christi's placing an intake pipe for a desalination plant in La Quinta Channel I request that a public meeting be held for the community to express its concerns. I request that a Contested Case Hearing be held... I and my family members frequently fish in La Quinta Channel where the intake pipe for the Port of Corpus Christi's desalination facility will be located or in Ingleside Cove where the discharge will flow to. I am

concerned that given the number of small larvae which will be sucked up, turned to sludge, and deposited into landfills, fishing will be badly impaired in the region. Fishing is such a massive draw for tourism in the area why would the city want to hurt that business. Why is the City applying for this permit? Shouldn't it be the private industries that plan to use the desalinated water? I am concerned about possible health effects on me or my family from the chemicals used in the desalination process, including pre-treatment.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Wednesday, November 17, 2021 9:56 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

H

From: uneedalaitinen@gmail.com <uneedalaitinen@gmail.com>
Sent: Tuesday, November 16, 2021 2:53 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: MRS Uneeda E Laitinen

E-MAIL: uneedalaitinen@gmail.com

COMPANY:

ADDRESS: 102 MARKHAM PL
PORTLAND TX 78374-1418

PHONE: 3618773523

FAX:

COMMENTS: City of Corpus Christi La Quinta Desal Intake TCEQ Permit WRPERM 13675 My name is Uneeda Laitinen. My husband (Daniel) and I reside at 102 Markham Place, Portland, Tx 78374. Phone 361-877-3523. We live within one mile of the proposed intake site. Member of: IOBCW We OPPOSE the city of Corpus Christi's proposed Desalination water intake in La Quinta Channel. We request a Contested Case Hearing be held. Citizens of the water district are not in

need of additional water sources. Industry needs the water! Many will speak of gallons per minute intake and the resulting loss of habitat and marine life. To me it boils down to the fact the Bay of Corpus Christi is an ESTUARY! The Estuary of Corpus Christi is one part of a larger system of Estuaries along the Texas Gulf Coast. The Indigenous Peoples and Spaniards recognized and understood the interconnection and codependency of all when they named the system "THE LAGUNA MADRE" in the 1500's. What you do to one estuary will eventually spread to all! The City of Corpus Christi does not have the expertise or knowledge to undertake a project of this complexity. (Example: THE NEW BRIDGE PROJECT) Therefore, it falls to TCEQ to determine the merits of the proposal. I do caution you to carefully consider the cost to the tourist industry, sport and recreational fishing, and negative health consequences to both young and old. We the people of Texas Coastal Bend will be the losers environmentally, financially, spiritually and culturally if TCEQ grants water intake permit 13675. The Petrochemical Industry is on its final curtain call. You can deny this permit and be part of the solution or contribute further to the problem. The choice is yours. Do the right thing for the people of Texas! The water ain't gonna clear up until you get the pigs outta the creek.

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Monday, May 3, 2021 9:10 AM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: uneedalaitinen@gmail.com <uneedalaitinen@gmail.com>
Sent: Sunday, May 2, 2021 2:21 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: MRS Uneeda Laitinen

E-MAIL: uneedalaitinen@gmail.com

COMPANY:

ADDRESS: 102 MARKHAM PL
PORTLAND TX 78374-1418

PHONE: 3618773523

FAX:

COMMENTS: WRPERM 13675 My name is Uneeda Laitinen. I reside at 102 Markham Place, Portland, Texas 78374 My phone number is 361-877-3523 I live within one mile of La Quinta Channel. I am a member of IOBCWA (Ingleside on the Bay Coastal Watch Association). I strongly oppose the City of Corpus Christi placing an intake pipe for a desalination

plant in La Quinta Channel. I request a public meeting be held locally to enable the local community to express its concerns. I request a Contested Case Hearing be held locally. • According to the permit, the City of Corpus Christi would be allowed to suck 115,349 gallons of water per minute from La Quinta Channel. Sucking in that amount of water that fast will require an enormous amount of suction power and I am concerned about aquatic life being trapped or killed in the process. This intake pipe is a death sentence! • Many of us suffered through the historic winter storm in February 2021 and were without power for several days in freezing temperatures due to the amount of demand placed on the electrical grid in Texas. The operating pumps required to suck 115,349 gallons of water per minute will take an enormous amount of power, placing even more strain on the grid. I am opposed to issuing a permit which would demand excessive amounts of energy to supply water solely for industrial use. • The Bay was our primary reason for settling in Portland years ago. I am a birder and have enjoyed the wide variety of birds in the Coastal Bend. My husband is an avid fisherman and was looking forward to his retirement after 42 years at sea. He likes to wade in the water and fish. The Portland Shoreline where the intake pipe for the City of Corpus Christi's desalination facility will be located will kill the fish fry, crab and shrimp larva. I am concerned that given the number of small larvae which will be sucked up, turned to sludge, and deposited into landfills, fishing will be badly impaired and impacted in the region. If the fish die, then the birds we love to watch will also die or leave the area. • I am concerned about possible health effects on me and my family from the chemicals used in the desalination process, including pre-treatment. This is a waste of our valuable aquatic resource considering most of the desalinated water will be used by industry for cooling purposes. • I expect the City of Corpus Christi will try to get a low-interest loan from the Texas Water Development Board (TWDB) to construct the plant. Isn't it a violation of Texas law to use public funds to support private industry? Will the taxpayers and residential water customers have to pay back such a loan? • All our area scientists, including but not limited to Texas Parks & Wildlife, the General Land Office, the UT Marine Science Institute, and the Harte Research Institute, have said, in published reports, that seawater desalination intake and discharge should only occur in designated areas offshore in the Gulf. There is an expedited permitting process for this. Why is the City of Corpus Christi, a public entity, insisting on putting intake and discharge inside Corpus Christi Bay in the first place? Aren't they listening? Why aren't they showing the way by pursuing the expedited permit process that will keep our Bay safe? • The City is applying for this permit. The private industries that plan to use the desalinated water should be the applicant. If industries need so much additional water they require a desalination plant, then industry should pay for the plant. The taxpayer and residential customer should not be required to subsidize an industry many of us do not need or want in our area. • The relatively few jobs created by the industries relocating to the area will not replace the jobs lost due to decline in tourism, recreational fishing, and birding. Also, service jobs will be affected i.e., restaurants, and hotels and motels. Just to name a few. • We do not want to sacrifice our unique environment to satisfy the money lust of a few fat cat investors from in or out of state. Once you destroy our fragile ecosystem you cannot replace it. It is your job TCEQ to protect the environment, do your job and deny permit WRPERM 13675.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Thursday, April 22, 2021 2:44 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: kathrynmasten@yahoo.com <kathrynmasten@yahoo.com>
Sent: Thursday, April 22, 2021 12:29 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: DR. Kathryn Masten

E-MAIL: kathrynmasten@yahoo.com

COMPANY:

ADDRESS: 1006 SANDPIPER
INGLESIDE TX 78362-4689

PHONE: 4695002373

FAX:

COMMENTS: I strongly oppose the granting of this permit, request a public meeting, and request a contested case hearing. These comments extend my comments for Permit WQ0005290000 for the discharge aspect of this planned desal plant. #1) This application is for the water rights (intake) for a planned desal plant that will destroy aquatic life in

Ingleside Cove which adjoins the incorporated city of Ingleside on the Bay (IOB) and feeds IOB's canal. Refer to the Marine Seawater Desalination and Discharge Zones Study by TPWD and GLO (see <https://tpwd.texas.gov/publications/pwdpubs/media/hb2031dz.pdf>) for more acceptable offshore locations for desal intake and discharge. #2) The application does not discuss cumulative impacts of at least 2 other desal plants proposed for La Quinta Ship Channel - one by the City of Ingleside/Poseidon and one by the Port of Corpus Christi. #3) Since the City's permit is located downstream from the Port's planned location, it is important to consider the impacts of alternative brine management strategies under consideration by the Port, which include using brine discharge from their desal plant (upstream by Portland, see WQ0005254000) to remediate the red mud beds from the former Sherwin Alumina plant. This has the potential of sending millions of gallons of polluted (radioactive) waters into La Quinta Ship Channel to be brought in on intake for the City of Corpus Christi's desal plant causing a toxic soup! See the attached Engineering Agreement between the Port and the engineering firm that spells out the scope of work for the study of alternatives. #4) Do not let the state of Texas's first desalination plant be in a shallow bay system - particularly in La Quinta Channel, which is an important waterway for the coastal communities of Portland and IOB. #5) These plants are not needed for water for the people or municipal use, but for cooling thirsty, high-energy using industries that would be more appropriately located in cooler climates with access to fresh water. Such industries should not be located in Texas Gulf coastal locations with existing coastal communities that rely on fishing and water sports. #6) The smell of dead aquatic life impinged or entrained on intake would devastate the tourism industry and citizen and park enjoyment in or near La Quinta Channel. Those who enjoy water sports like paddleboarding, windsurfing, and sailboarding in Portland, would be heavily impacted. Please do not approve this permit. Listen to our scientists and to the people!

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, August 17, 2020 9:37 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ;
PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WQ0005290000
Attachments: TCEQ Wastewater Permit Review Form_V2.docx

Associate to WQ0005290000

Associate to WRPERM 13675

Associate to WRPERM 13676

From: kathrynmasten@yahoo.com <kathrynmasten@yahoo.com>
Sent: Friday, August 14, 2020 11:35 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0005290000

REGULATED ENTY NAME LA QUINTA CHANNEL DESALINATION PLANT

RN NUMBER: RN110940558

PERMIT NUMBER: WQ0005290000

DOCKET NUMBER:

COUNTY: SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: DR. Kathryn Masten

E-MAIL: kathrynmasten@yahoo.com

COMPANY:

ADDRESS: 1006 SANDPIPER
INGLESIDE TX 78362-4689

PHONE: 4695002373

FAX:

COMMENTS: Please see my attached review of the water rights permit and discharge permit applications.

Additional Comments from Kathryn Masten on WQ0005290000

Water Rights Permit Review

Item	Comment
Section 3: Bed and Banks	Questions not answered. The City does not indicate that the questions are not applicable.
Section 4: General Information	This references the Region N Water Plan from 2016 as recommending this project. However, as we found from observing the Region N discussions, being a "recommended water strategy" by virtue of placement on the Region N Water Plan does NOT include any assessment of the merits of a project. Rather, it's just a set of options that are not inconsistent with the Water Plan.
Worksheet 1.1	In response to question 1.b the applicant states "Maximum of 100%," but the application asks for a number to be given in acre-feet
Worksheet 3.0	Subsection 2.d – longitude omits the "-" sign (this is true for the upstream and downstream diversion point worksheets pages 28 and 30)
Worksheet 6.0	1.c. As a feasible conservation alternative to desalination, where was preventing, rather than enticing, high-water-using industries to come to the Coastal Bend evaluated?
Attachment 7 – Supplement to Corpus Christi Water Conservation Plan	The attachment states that the proposed water permit supports the CC Conservation Plan because the water is (at least in part) needed for municipal use. However, as acknowledged in attachment 2 ("Letter from Coastal Bend Regional Water Planning Group"), the 2021 Region N Plan under development shows " manufacturing needs within the 2020-2070 planning period" but does <u>NOT</u> "identify municipal needs for the City of Corpus Christi or their customers." The end of attachment 7 states: "Desalination is the only recommended strategy that has sufficient quantity to meet the projected needs in these counties." Where is there a documented projected need for municipal water in such large quantity? Attracting NEW industries that require a lot of water does not make sense from a conservation perspective. The planned diversion of 166.2 MGD (based on the diversion application) is expected to result in discharge of up to 69 MGD (based on the discharge application), showing that 100 MGD of water will be either used (primarily for plant cooling) or taken to another discharge site. This does not appear to be in a sound conservation practice. What alternative cooling strategies have even been explored, such as solar or wind?

Discharge Permit Review

Since this plant is also supposedly for potable domestic water, shouldn't domestic permitting applications also be completed?

Item	Description	Review Comments
Administrative Report 1.0	Section 1	Item a. is blank for Permit Number and EPA ID.
	Section 2	Co-applicant should include Occidental, since they own the land. It is unclear the specific arrangement between City of Corpus Christi and Occidental, since there is no agreement, such as a deeded easement, included in the application. Who owns the facility? Who will operate it? Who maintains insurance? What's the expense to water ratepayers or taxpayers?
	Section 4	The application specifically asks that the names of two individuals be provided that can be contacted throughout the permit term. Only one individual is provided by the City.
	Section 7	There was no Notice for this application in <u>The News Of San Patricio</u> newspaper. Usually that's where we see TCEQ notices. During COVID-19 area libraries have had limited (or no) open hours. We (Ingleside on the Bay Coastal Watch Association) happened to hear about this permit request from another environmental organization. A notice should have been sent to Mayor Ehmann of Ingleside on the Bay, since our city is located directly downstream (within 3 miles) of the proposed facility. Having a link to notices and complete applications online at a standard place on the TCEQ website should be a requirement and standard practice in this day and age (21 st Century, with the World Wide Web in existence for 25 years now). As it is now, it seems as if notices such as this (for desalination, that has been a contentious issue in the Coastal Bend) are being obscured deliberately from public view. Affected small communities in particular have a hard time knowing about matters that directly affect us because of outdated Public Notice Practices. Also, there is no published Deadline for Public Comments in the Public Notice that we found in the Corpus Christi Caller Times or via the CCTexas/desal website. Without knowing what the actual comment period is, it is impossible to know which "disputed issues of fact or mixed questions of fact and law relating to relevant and material water quality concerns" will be considered by TCEQ as having been "submitted during the comment period". So we assume that these comments are considered "timely" since the CCTexas/desal website, as of today, still says they are accepting comments (as stated in their August 2020 desalination update).
	Section 8	Subsection a. No RN number was provided.
	Section 8	Subsection e. The relationship between the property owner (Occidental) and the City of Corpus Christi is not clear. Is the

Item	Description	Review Comments
		absence of a lease agreement, wouldn't the property owner also own the facility itself? What assurances do taxpayers (water rate payers) have that this is a municipally-owned facility vs. belonging to private industry?
	Section 8	Subsection f. Attachment B is simply a placeholder for long-term lease agreement. This does not seem sufficient. Without being able to see the agreement, it is impossible to assess whether taxpayers' interests are being protected and at what cost.
	Section 9	See subsection "b" and accompanying appendix "c." The topographical map does not include all the elements it is supposed to include. The point of discharge is not marked and labeled. The discharge route is not highlighted for a distance of three stream miles, which would show that Ingleside on the Bay is within the 3-miles downstream. All new and future commercial developments are also supposed to be included. Since "Project Falcon" features so prominently in the City of Corpus Christi's rationale for needing this desalination plant, its location as a "future commercial development" should be on this map. But it is not shown.
	Section 9	Subsection d: Since so many desalination plants are being proposed for La Quinta Channel, it needs its own Segment Number. Simply saying this is discharging into Corpus Christi Bay writ large is insufficient. La Quinta Channel is a nearly closed system, more akin to a bayou.
	Section 9	Subsections "J – L" are left blank, including naming the city nearest the disposal site as well as the latitude and longitude of the disposal site.
	Section 10	<p>Subsection b. and c. Maybe technically no fees or penalties are owed to TCEQ, but the 4/21/20 City of Corpus Christi Council meeting agenda packet contained a document called "Application Affidavit". Item #3 showed the following TCEQ Enforcement Orders against the City of Corpus Christi:</p> <ul style="list-style-type: none"> • TCEQ Enforcement Order Docket No. 2015-1478-PWS-E; • TCEQ Enforcement Order Docket No. 2016-0638-MLM-E; • TCEQ Enforcement Order Docket No. 2018-0201-MWD-E; <p>In addition, the following Consent decree negotiations were reported as ongoing for the following EPA Administrative Orders:</p> <ul style="list-style-type: none"> • Docket CWA-06-2011-1913 Permit Number TX0047082; Docket CWA-06-2011-1914, Permit Number TX0047066; • Docket CWA-06-2011-1915 Permit Number TX0047074; Docket CWA-06-2011-1916, Permit Number TX0047104; • EPA: Docket CWA-06-2011-1917, Permit Number TX0047058;

Item	Description	Review Comments
		<ul style="list-style-type: none"> EPA: Docket CWA-06-2011-1918, Permit Number TX0047121 <p>These EPA matters likely relate to the recent settlement between the EPA and Corpus Christi described in a KRIS-TV6 8/11/20 story at https://www.kristv.com/news/local-news/corpus-christis-new-wastewater-system-will-cost-taxpayers-millions. Since this involved “sanitary sewer overflows into federal waters”, this appears to be especially relevant. If it took a decade for the City to settle this case, what harm can be done from an ill-advised seawater desalination project managed by the same entity?</p> <p>Since Compliance history is relevant, pending matters need to be considered by TCEQ in granting a permit.</p>
Administrative Report 1.1	Section 1	The map provided in appendix “D” does not highlight the discharge route(s) for one mile downstream.
SPIF	Item 8	Permit and EPA numbers not shown. The map provided in attachment “E” does not fulfill the requirement of highlighting the discharge route from the point of discharge for a distance of one mile downstream.
	Item 13	This shows a planned construction date of Quarter 4 of 2021! At our July 8, 2020 meeting with the City of Corpus Christi project team, the indication was that this plant won’t be constructed until closer to 2028, when it is projected to be needed by Project Falcon.
Attachment A: Core Data Form		Item 27, the longitude incorrectly omits the “-” sign.
Technical Report 1.0	Section 1	Item a says this is for “an existing public water system”, but it is clear from presentations that the only reason for bringing in desalination is for industry customers. We have commented elsewhere, including in the 2021 Region N Water Plan, that it is not appropriate for a drought-prone area to entice industries that require huge volumes of water to come here. Since the water is needed mostly for cooling purposes, it doesn’t make sense to come to a hot climate either. This requires a lot of energy, adds to heat and air pollution, and depletes our water resources.
		While item f contends the treatment facility is above 100-year frequency flood level, the intake and discharge locations are not. We are prone to hurricanes, having suffered from two in the last 3 years. What are the protective measures?
		Items g & h refer to the need for dredging and filling as a result of construction. Again, we are surprised by the timeline of January 2021, since we were told the La Quinta desal plant wouldn’t be built until closer to 2028. The claim was that they’re applying for

Item	Description	Review Comments
		permits now because of the favorable financing terms thru the TWDB SWIFT program, thru which they already got funding approved for the Inner Harbor desal plant (despite many public comments and outcry about the deceptive manner in which that funding was approved).
	Section 4	Anticipated discharge date of 2021 is a surprise to us, based on our meeting. What are the chemicals used for Clarifier, Strainer Backwater, and Microfiltration Media Filter Backwash? What chemicals are used for pre-treatment of the intake water?
	Section 8.	With regard to compliance, the following TCEQ Enforcement Orders are pending against the City of Corpus Christi: <ul style="list-style-type: none"> • TCEQ Enforcement Order Docket No. 2015-1478-PWS-E; • TCEQ Enforcement Order Docket No. 2016-0638-MLM-E; • TCEQ Enforcement Order Docket No. 2018-0201-MWD-E; In addition, the following Consent decree negotiations were reported as ongoing for the following EPA Administrative Orders: <ul style="list-style-type: none"> • Docket CWA-06-2011-1913 Permit Number TX0047082; Docket CWA-06-2011-1914, Permit Number TX0047066; • Docket CWA-06-2011-1915 Permit Number TX0047074; Docket CWA-06-2011-1916, Permit Number TX0047104; • EPA: Docket CWA-06-2011-1917, Permit Number TX0047058; • EPA: Docket CWA-06-2011-1918, Permit Number TX0047121
	Section 12	12.a. should be answered "Yes". While the desalination facility itself may (or may not) be planning to use the desalinated water for cooling purposes, the water itself (up to 83 MGD), drawn from the Waters of the U.S., will be used <u>by industry</u> primarily (perhaps exclusively) <u>for cooling</u> . Thus, Items 12.b. thru 12.f. should be completed. The requirements of 316(b) of the Clean Water Act should apply. This seems like an effort to exploit a loophole in the application to avoid federal oversight. Despite efforts by the City of Corpus Christi to depict this desal plant as a domestic water source, the proposed desal plant IS a CWIS (Cooling Water Intake Structure) its with its primary purpose to provide cooling water to industry.
Worksheet 4.0	Section 2	Subsection c: Distance to the sea grass is shown but not the direction. The impacts of that amount of brine discharge, even (and maybe especially) through the proposed diffusers, will be devastating and needs to be addressed. This will, in all likelihood destroy acres of seagrasses that provide vital habitat and nutrients

Item	Description	Review Comments
		for aquatic life. Yet impact on seagrasses is neither mentioned nor mitigated for.
	Section 3	Because of its relatively closed nature, La Quinta Channel should be seen as a separate body of water from Corpus Christi Bay and therefore is an unclassified segment of its own. Therefore, the answer to this should be No.
	Section 4	This should be filled out with La Quinta Channel in mind. It is more like a Bayou, with a finite surface area, depth, etc. Item e. would show that 3 miles downstream of discharge are located our city's canal (on which many residents live) and Ingleside Cove (a major recreational spot).
	Section 5	Item a. Likely all of these elements apply, but especially upstream discharges.
	Section 5	Item b. Likely all apply, especially recreation, fishing, navigation, picnic/park activities.
	Section 5	Item c. Natural Area.
Worksheet 6.0		Depending on how this is viewed, it would seem that there would be some CIU's or SIU's.
Attachment B: Property Owner Info		Placeholder for Long-Term Lease Agreement. Is this acceptable? How does the public know the terms?
Attachment G:	Flow Schematics	DAF is not explained. What happens to make the raw seawater "clarified"? What is in the Thickener? What chemicals are added to the seawater upon intake and as it goes through the desalination process?
Attachment H: Supplemental Info	F&N: Background and Tidal Current Velocity Studies	The Plummer & Associates modeling report fails to conclude that La Quinta Channel is able to tolerate the cumulative brine discharge levels that would result from the proposed desalination plant. It focuses on more detailed analysis on Inner Harbor instead. We look forward to getting the data collected on background flow.
	F&N: Seawater Desalination Source Water Characterization TM	Are there any items that were left out of the sampling plan? Will this schedule continue throughout operations? Please provide the locations for the sampling, and the data (once the final collection of 8/21/20 occurs).

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Tuesday, April 27, 2021 11:26 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: mayorgaelizabeth866@yahoo.com <mayorgaelizabeth866@yahoo.com>
Sent: Sunday, April 25, 2021 3:41 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: MS Mary E Mayorga

E-MAIL: mayorgaelizabeth866@yahoo.com

COMPANY:

ADDRESS: 5502 SARATOGA BLVD 98
CORPUS CHRISTI TX 78413-2948

PHONE: 5126380886

FAX:

COMMENTS: I strongly oppose the City of corpus Christi's placing an intake pipe for a desalination plant in La Quinta Channel. I request a public meeting be held for the community to express its concerns. I request that a contested case hearing be held. I am concerned about the amount of salty brine that we be discharged from the desal plant. This cannot

be good for the fish or for people. If the fish die, the birds I love to watch will die or leave. I am concerned about the possible health effects on me or my family from the chemicals used in the desalination process, including pre-treatment.

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Wednesday, May 5, 2021 2:03 PM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM

From: libmay531@yahoo.com <libmay531@yahoo.com>
Sent: Wednesday, May 5, 2021 1:56 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Elizabeth Mayorga

E-MAIL: libmay531@yahoo.com

COMPANY:

ADDRESS: 5502 SARATOGA BLVD Apt 98
CORPUS CHRISTI TX 78413-2948

PHONE: 5126380886

FAX:

COMMENTS: I am a Corpus Christi resident, and I urge you to prevent the planned desalination plants in Corpus Christi Bay, to deny the pending permits including WRPERM 13675, and to hold a public meeting for the community to fully share their concerns. I am opposed to any intake pipeline for a desalination plant in La Quinta Channel or anywhere in Corpus Christi Bay. So many members of our community love to fish, boat, and swim in the area. I am concerned that

given the number of small larvae which will be sucked up, turned to sludge, and deposited into landfills, both commercial and recreational fishing will be badly impaired in the region.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 30, 2021 10:12 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

WRPERM
119674

RFR

From: jessika.r.mcfarland@gmail.com <jessika.r.mcfarland@gmail.com>
Sent: Tuesday, November 30, 2021 10:09 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Jessika McFarland

E-MAIL: jessika.r.mcfarland@gmail.com

COMPANY:

ADDRESS: 915 VARGAS RD
AUSTIN TX 78741-3557

PHONE: 5708073831

FAX:

COMMENTS: Hello TCEQ. My name is Jessika McFarland and I am a biologist who studied at the University of Texas at Austin, as well as the Marine Sciences Institute branch in Port Aransas. I currently work for the My educational background broadly encompasses ecology, environmental science, climate change impacts, and forestry. I have been reading about the desalination plant being currently proposed, and I am extremely concerned. As a scientist, UT alumni,

and a Texan, I am strongly opposed to this proposal and urge you to reconsider. Although desalination is objectively a good technology for increasing drinking water in coastal areas, dumping excess salt into a bay that does not circulate water well will result in increased concentrations of salinity and will have profound impacts for the ecosystem, as well as those who rely on the fish, oysters and shrimp (both economically, and regarding food security). Also, the fact that this project is being proposed not necessarily to provide drinking water, but to assist Exxon in increasing its capacity for an ethane plant which has measurable effects on the health and wellness of citizens who live in the surrounding area due to volatile organic compounds, nitrogen, carbon monoxide, sulfide, sulfuric acid mist, and sulfur dioxide, according to Exxon SABIC's air quality permit. These toxins are carcinogenic in nature and have the capacity to have devastating impacts on the health and safety of local residents. Additionally, this location is also near the traditional lands of the Karankawa people, where destabilizing the bioproductivity of the region will also have negative effects on them. Communities, ecosystems, food security, and public health are all threatened by this short sighted decision. I urge you to reconsider this project and at the very least, research alternative sites that will not have such intense intersectional impacts. The TCEQ should be obligated to protect the health and safety of Texans, and the health and safety of Texas ecosystems. These are the things that make Texas great, but making decisions based on money and profit over living beings is a great stain on the state of Texas. I am strongly opposed to this proposal and hope that you reconsider. We owe it to future generations to have healthy lands and waters.

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Wednesday, May 5, 2021 1:24 PM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: Alissain@gmail.com <Alissain@gmail.com>
Sent: Wednesday, May 5, 2021 12:48 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: DR. Alissa Mejia

E-MAIL: Alissain@gmail.com

COMPANY:

ADDRESS: 41 CAMDEN PL
CORPUS CHRISTI TX 78412-2612

PHONE: 3615493662

FAX:

COMMENTS: I STRONGLY OPPOSE the City of Corpus Christi's placing an intake pipe for a desalination plant in La Quinta Channel I request that a public meeting be held for the community to express its concerns. I request that a Contested

Case Hearing be held. Our city's tourism economy depends on stopping this. The health of the bay, and all the nature and people it supports, depends on stopping this.

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Thursday, May 6, 2021 8:36 AM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM

From: alissain@gmail.com <alissain@gmail.com>
Sent: Wednesday, May 5, 2021 5:05 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Alissa Mejia

E-MAIL: alissain@gmail.com

COMPANY:

ADDRESS: 41 CAMDEN PL
CORPUS CHRISTI TX 78412-2612

PHONE: 3615493662

FAX:

COMMENTS: I ask that you help stop desalination in Corpus Christi Bay and in La Quinta Channel, deny water rights permit 13675, and hold a public meeting for the community to voice its concerns. As a resident, I oppose the City of Corpus Christi placing an intake pipe for a desalination plant in La Quinta Channel or anywhere in Corpus Christi Bay. This water will largely be for industrial use, not for me, my family, or my neighbors. I don't think bringing polluting

corporations to our community is worth the cost these desalination plants will have on our Bay, on our wildlife, and on our local fishing and tourism economies.

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Friday, May 7, 2021 8:13 AM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

Pm
H

From: j4t7m@yahoo.com <j4t7m@yahoo.com>
Sent: Thursday, May 6, 2021 10:51 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: JAMES T Miday

E-MAIL: j4t7m@yahoo.com

COMPANY:

ADDRESS: 1112 BAYSHORE DR
INGLESIDE TX 78362-4702

PHONE: 3307050698

FAX:

COMMENTS: I live at the eastern end of Ingleside on the Bay on a waterfront property and am a member of Ingleside on the Bay Coastal Watch Association. I vehemently oppose the City of Corpus Christi's placing an intake pipe for a desalination plant in the La Quinta Channel. I request that a public meeting be held for the community to express its

concerns and request that a Contested Case hearing be held. I am opposed to this desalination plant due to damage it will do to our bay and its wildlife due to vast amounts of water being drawn into the pipe at such a volume that will kill any organism that is in the water and also the discharge of the concentrated brine that will further damage the ecosystem of the bay by raising the salinity of the bay. I am sick and tired of the greed of the Port of Corpus Christi and the companies it supports. We have MODA on the Eastern edge of our community and now you want to further destroy our community with a desalination plant on the Western Edge just supply water to further dirty industries in the area. I think Corpus Christi should be looking for more environmentally friendly industries to move into the area. The water in this bay belongs to the people and degrading our bay just to entice the petrol chemical companies to locate here is a violation of the public trust.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Tuesday, April 27, 2021 1:04 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: exe8mill@aol.com <exe8mill@aol.com>
Sent: Friday, April 23, 2021 2:11 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: MR Randy R Miller

E-MAIL: exe8mill@aol.com

COMPANY:

ADDRESS: 722 S SANDPIPER
INGLESIDE TX 78362-4721

PHONE: 3617904537

FAX:

COMMENTS: I oppose the location of the desal intake pipe and request a public meeting and a contested case hearing be held. Many issues remain unexplored which will impact significantly on our community and personal lives.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Tuesday, April 27, 2021 1:04 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675
Attachments: Public Comments - City of CC Desal - Personal Appeal.pdf

eComment = PM, H

Attachment = PM, H

From: emily@nyexp.us <emily@nyexp.us>
Sent: Friday, April 23, 2021 2:24 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

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: My name is Emily Nye. Please accept the attached document as an addendum to my previous comments. I request a public meeting and a contested case hearing on draft water rights permit #13675. Thank you.

Emily C. Nye
1022 Bayshore Dr.
Ingleside, TX 78362

April 23, 2021

Ms. Lauri Gharis, Chief Clerk
Texas Commission on Environmental Quality
Office of the Chief Clerk, MC 105
P.O. Box 13087
Austin, Texas 78701-3087

Dear Ms. Gharis,

My name is Emily Nye. I am the Manager of Public Relations, Research, and Environmental Justice for the Ingleside on the Bay Coastal Watch Association. I live at 1022 Bayshore in Ingleside on the Bay, Texas. I oppose the TCEQ's draft water rights permit #13675 for the City of Corpus Christi's proposed desalination facility on La Quinta Channel and ask that it be denied on account of the fact that the draft permit is opposed to the public interest.

My family has owned property on the coast of San Patricio County, overlooking Corpus Christi Bay, since Mother's Day 1967. Following the philosophy of "work hard, play hard," my grandfather, Former Chief Justice Paul W. Nye of the 13th Court of Appeals, took out a 30 year note to purchase a small, rundown, beach house across from Corpus Christi for \$7,500, which he named "No Le Hace." Every weekend my grandfather would pack up his family, travel over the Harbor Bridge, and eat fried chicken as he watched the sunset on Friday nights. Saturday mornings, he and his boys, including my father (age 7), built the pier, added plumbing, and extended the house. They also fished. My father and his brothers spent hours catching red fish, black drum, and speckled trout. The beauty and serenity of this beachside property was a peaceful respite, away from the business and noise of Corpus Christi.

The legacy of "No Le Hace" continued into my childhood as my uncle, Patrick Nye, took ownership of the property. In the 90s, "No Le Hace" was a central gathering place for my extended family. My grandparents, aunts, uncles, and cousins would come from all corners of the globe to meet on the shores of San Patricio. We swam in the water, sat and talked by the shore, sailed, pretended to be pirates, and fished. We also ate. I have these special times to thank for my continued love of fresh gulf shrimp and red sauce.

In the new millennium, the Nye family suffered great loss as well as abundant joys. My grandparents, Paul and Nina Nye, both passed away, but their legacy grew, as we welcomed the last of their 16 grandchildren, and rejoiced in an additional 18 great-grandchildren. Today, my uncle still owns the original beach property and has built a beautiful new home, decorated with paintings of seashells by his mother, reminders of the original "No Le Hace." In 2020, I came to live in Ingleside on the Bay and moved into the house next door. Over the past year, I have relished watching the sunsets over Corpus Christi, kayaking with dolphins, exploring the spoil islands,

boating in the summertime, and catching redfish, speckled trout, skipjack, and gafftop. In September, my parents, siblings, and eight nieces and nephews came to “No Le Hace” for a birthday party. We had a blast swimming in the water and watching the sunset. A few months later, I invited two of my nieces and a nephew for a special sleepover (ages 7, 9, and 11). After dark, we walked to the end of the pier where, to their surprise, they each caught their own trout. I was so proud! The next day, we built sandcastles on the beach and collected a wide array of seashells.

Living on the shores of San Patricio in Ingleside on the Bay where my grandfather first bought property almost 54 years ago, has been a tremendous blessing. To enjoy the beauty and riches of the land and bay waters with my parents, aunt and uncle, brothers and sister, and nieces and nephews, is a gift beyond measure. Last September, a photo was taken at the new “No Le Hace.” In the photograph, my father is sitting in an old wicker rocking chair, in which his grandmother once rocked his mother, holding his newest grandson. This photo captures the essence of this place – a place spanning generations, where the dead are remembered, new life is celebrated, and the joy of living is passed on from one generation to the next.

To grant this water rights permit, which would critically deteriorate the quality of the bay waters, the vitality of aquatic life, and the abundant bird population, is to ignore the public interest of those who have lived along the Bay for generations. We treasure our homes, our memories, the beauty and serenity of life along the Bay in San Patricio. I hope to one day bring my own children and grandchildren to these shores, teach them to fish and peel boiled shrimp, watch the birds, and tell them stories about their great-grandparents. But will there still be fish to catch? Will the birds have migrated away? Will my family’s home be the same? Out of deep concern, I, hereby, submit a personal appeal to the TCEQ to recognize the public interest – my interest and that of the Nye family – in preserving the quality of this region and to protect the marine environment from permanent and irreversible degradation.

In conclusion, as stated above, I oppose draft water rights permit #13675 on account of its lack of necessity, the harm it will cause the environment, its failure to accurately acknowledge communities of impact, and, ultimately, its opposition to the public interest. I request that a public meeting be held and a contested case hearing be scheduled on the permit at your earliest possible convenience.

Sincerely,

Emily C. Nye

Manager of Public Relations, Research,
And Environmental Justice

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Tuesday, April 27, 2021 1:06 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675
Attachments: Public Comments - City of CC Desal Intake Permit WRPERM 13675.pdf

eComment = PM, H

Attachment = PM, H

From: emily@nyexp.us <emily@nyexp.us>
Sent: Friday, April 23, 2021 2:01 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

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: My name is Emily Nye. I live at 1022 Bayshore Drive in Ingleside on the Bay, Texas, about four miles from the proposed intake location. I strongly oppose draft water rights permit #13675 for the City of Corpus Christi's proposed desalination facility on La Quinta Channel. Please see the attached document for my reasoning. Finally, I request that a public meeting be held for surrounding communities to express their concerns and that a Contested Case Hearing be scheduled. Thank you.

Emily C. Nye
1022 Bayshore Dr.
Ingleside, TX 78362

April 23, 2021

Ms. Lauri Gharis, Chief Clerk
Texas Commission on Environmental Quality
Office of the Chief Clerk, MC 105
P.O. Box 13087
Austin, Texas 78701-3087

Dear Ms. Gharis,

My name is Emily Nye. I am the Manager of Public Relations, Research, and Environmental Justice for the Ingleside on the Bay Coastal Watch Association. I live at 1022 Bayshore in Ingleside on the Bay, Texas, approximately 4 miles from the proposed intake location. I oppose the draft water rights permit #13675 for the City of Corpus Christi's proposed desalination facility on La Quinta Channel and respectfully request that the permit be denied on account of the issues outlined herein.

The draft permit unequivocally asserts that "the Texas Commission on Environmental Quality finds that the issuance of the permit is consistent with the goals and policies of the Texas Coastal Management Program (CMP)." This statement is false or, otherwise, belies a failure on behalf of the TCEQ to adequately investigate the purpose and effects of the above referenced permit. According to Policy Category 18 of the CMP, "Appropriations of Water," when considering a water rights permit, the TCEQ must take into account "the effects, if any, of the issuance of the permit on the bays and estuaries of Texas," yet the water rights permit under consideration is clearly inconsistent with the policies laid out in Category 18 of the Coastal Management Program.

For instance, Policy Category 18 specifically requires consideration of impacts to "the ecology and productivity of the affected bay and estuary system." However, despite the apparent confidence of the draft permit, the City of Corpus Christi's proposed diversion of 186,295 acre-feet of water per year expressly threatens the ecology and productivity of our bay waters. I am speaking of the very real concerns regarding fish kill and larvae destruction commonly associated with intake structures as well as the cumulative impacts of two or more water rights permits very close to the location of the City of Corpus Christi's permit, including the water rights permit applied for by the Port of Corpus Christi and the water rights permit anticipated by the City of Ingleside.

Additionally, Policy Category 18 requires that due consideration be given to "the quantity of water requested and the proposed use of water by the applicant, as well as the needs of those who would be served by the applicant." The quantity of water requested, 186,295 acre-feet, is the equivalent of over 93,000 Olympic size swimming pools drained from La Quinta Channel every year! That amount of bay water is *enormous*. According to the City's application, the proposed use is to meet both municipal and industrial needs. However, according to the 2021 Region N Water Plan and the City of Corpus Christi's 2020 Water Conservation Plan, there is no municipal necessity to divert such a vast quantity of water for processing in a desalination facility. The reality is that the population in our region is growing at a marginal rate, such a low rate in fact, that as stated in the 2020 Water Conservation Plan, an annual average

reduction of 1% would be sufficient to meet the needs of the population for the next 50 years.¹ In other words, *the people of the Coastal Bend do not need desalinated water to survive!*

So, what is all that water for? Industry. And, not even the industries which are already here, but according to the Region N Water plan, *future* industries which the City along with the Port of Corpus Christi hope to entice to the area. Considering that the City is asking to divert a substantial amount of water from Corpus Christi Bay every year for the sole purpose of courting thirsty-industries to the region, the TCEQ should think more carefully before asserting that such a purpose is consistent with the goals and policies of a plan intended to protect our coastal resources from needless development.

The final statute of Policy Category 18 gets at the heart of the issue, placing an emphasis on water conservation and underscoring the authority of the TNRCC (now the TCEQ) to deny a water rights application for which there are feasible alternatives. The statute reads in full:

An applicant for a new or amended water right permit shall submit a water conservation plan in accordance with 30 TAC §295.9 (related to Conservation Plan). The TNRCC shall consider the information contained in the conservation plan in determining whether any feasible alternative to the proposed appropriation exists, whether the proposed amount to be appropriated as measured at the point of diversion is reasonable and necessary for the proposed use, the term and other conditions of the water right and to ensure that reasonable diligence will be used to avoid waste and achieve water conservation. Based upon its review, the TNRCC may deny or grant, in whole or in part, the requested appropriation.

The reality is that alternative means of meeting existing and projected *municipal* demands for our region already exist, including conservation, groundwater (such as the Evangeline Aquifer), and wastewater reclamation. Similarly, alternatives exist for meeting existing industrial demands. Desalination only becomes a “necessity” when industries, requiring an inordinate amount of fresh water to operate, are invited to the Coastal Bend region; however, such a course runs contrary to the principals of avoiding waste and achieving water conservation. The City of Corpus Christi, rather than conserving water resources, is engineering an industrial drought, jeopardizing the natural resources of Corpus Christi Bay in order to attract industries with excessively high water demands to the region.

In conclusion, on the basis of the issues stated above, I request that a public meeting be held for the citizens of San Patricio, Aransas, and Nueces counties to express their concerns, and I request that a contested case hearing be scheduled at the earliest possible convenience.

Sincerely,

Emily C. Nye

Manager of Public Relations, Research,
And Environmental Justice, IOBCWA

¹ See page 13 of the City of Corpus Christi’s 2020 Water Conservation Plan
See also projected population growth rates for the next fifty years in Table 2.1 of the 2021 Region N Water Plan

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Thursday, May 6, 2021 11:44 AM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675
Attachments: IOBCWA_PAN Comments POCC WR 13675 Permit CCH 20210505.pdf

H

From: patrick@nyexp.us <patrick@nyexp.us>
Sent: Thursday, May 6, 2021 11:17 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

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: please find my attached comments to deny permit.

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



May 5, 2021

Ms. Lauri Gharis, Chief Clerk
Texas Commission on Environmental Quality
Office of the Chief Clerk, MC 105
P.O. Box 13087
Austin, Texas 78701-3087

RE: City of Corpus Christi La Quinta Water Rights Desalination Permit #13675
Request for Denial of Permit by TCEQ
Request for Contested Case Hearing

Dear Ms. Gharis,

On behalf of the Ingleside on the Bay Coastal Watch Association (IOBCWA), as its President, I am submitting this request for you to deny the City of Corpus Christi La Quinta Water Rights Desalination Permit #13675 and acknowledge that IOBCWA requests a Contested Case Hearing.

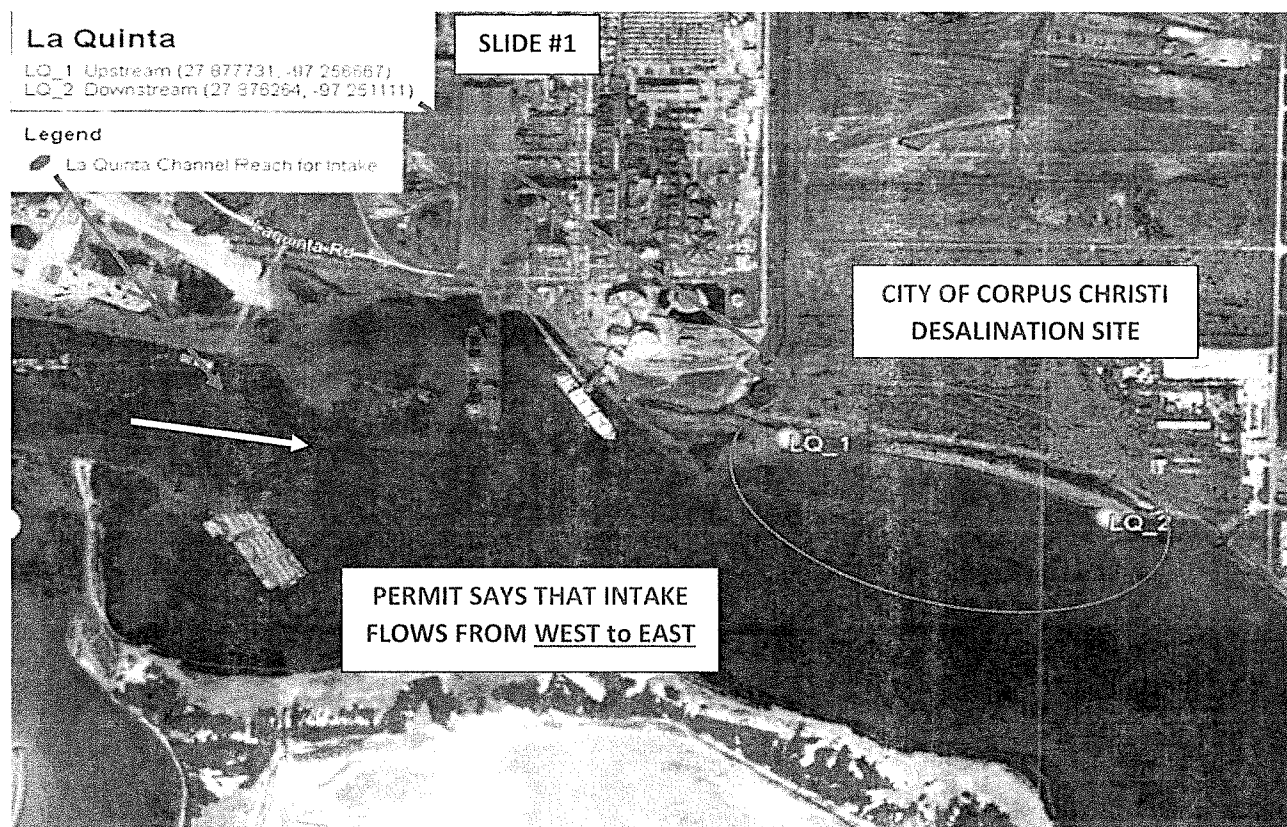
As a born and raised Corpus Christian and now living in Ingleside on the Bay, the idea of desalination within the confines of Corpus Christi Bay is preposterous to even consider given that this technology is unproven in a silty, high-suspended solids, bay environment AND the catastrophic harm desalination causes to the environment. More importantly, this City of Corpus Christi (CITY) Water Rights Permit #13675 (PERMIT) affects the people of coastal communities as the PERMIT will endanger, cause potential harm to individuals, and diminish the quality of life Corpus Christi Bay provides. Fishermen, shrimpers, boaters, property owners, wildlife and birding enthusiast will pay a severe price for the loss of water quality caused by this PERMIT. This PERMIT by the CITY and the water rights permit in La Quinta Channel by the Port of Corpus Christi (POCC), are blatant attempt to bring industry to San Patricio County along with all of the environmental liabilities to its residents. TCEQ should take into consideration that expanding heavy polluting industries into San Patricio County from land annexations by the CITY and a stacked, heavily biased Port of Corpus Christi Commission, brings disproportionate burdens upon an unrepresented population. Unrestricted granting of the PERMIT without following the Coastal Management Plan and adhering to clearly present water need is unwarranted. The TCEQ must carefully consider the ramifications of the water rights PERMIT with an ultimate goal of a discharge permit in its totality.

Granting a water rights PERMIT without significant, sound science is against the very principles that the TCEQ, EPA, GLO, TPWD and USFWL have based their environmental authority upon. Evidence filed from the POCC Harbor Island desal during the Contested Case Hearing, is solidly against desalination projects inshore of the barrier islands. Designing of a desalination facility with the intake and discharge offshore is the only logical solution, endorsed by Texas Parks & Wildlife, University of Texas Marine Institute, Harte Institute, and countless other scientists. This is evident by the recently released study by Dr. Kristin Nielsen (and other scientists) of The University of Texas Marine Science Institute (UTMSI) dated March 2021. Her study is about ecotoxicological risks associated with the Port of Corpus Christi's proposed Harbor Island desalination facility permit and states: "Due to the high productivity and ecological value of the habitat in proximity to the site of the proposed facility,

it is imperative that all potential ecological risks be thoroughly evaluated prior to project approval and initiation.” In addition, Dr Nielsen’s study points out other risks: “The potential risks associated with impingement, entrapment and entrainment of aquatic biota (at the seawater intake site), altered hydrodynamics, changes in the transport and settling of larval fishes, and increasing salinity in the Corpus Christi Ship Channel...”

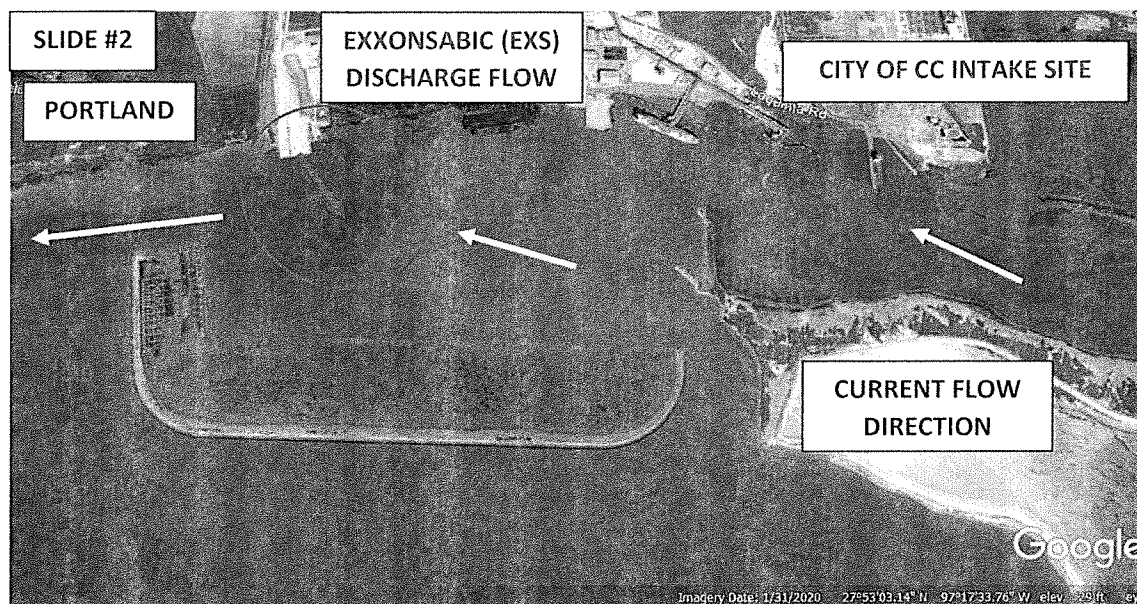
https://repositories.lib.utexas.edu/bitstream/handle/2152/85059/POCC_HI_ERA.pdf?sequence=2&isAllowed=y

Having degrees in Zoology BA and Geology BS, I am particularly concerned with the lack of scientific information and accuracy provided by the water right PERMIT. An image from the PERMIT #13675 application shows the intake and discharge area for the proposed facility (within yellow circle) along La Quinta Channel (Slide #1). What is not detailed is the number of acres of wetlands that will be impacted and/or lost by granting a PERMIT that could ultimately result in a desalination facility. The PERMIT image in Slide #1 proports that the intake would flow from west (left) to east (right) as shown on the pale blue color and yellow arrow. This claim by the City of Corpus Christi’s PERMIT is simply wrong! Common sense tells us that the tremendous volume of water, 166.2 million gallons of bay water per day of intake, would come from the area of least resistance – the La Quinta Ship Channel’s 45’ deep main conduit to the southeast.

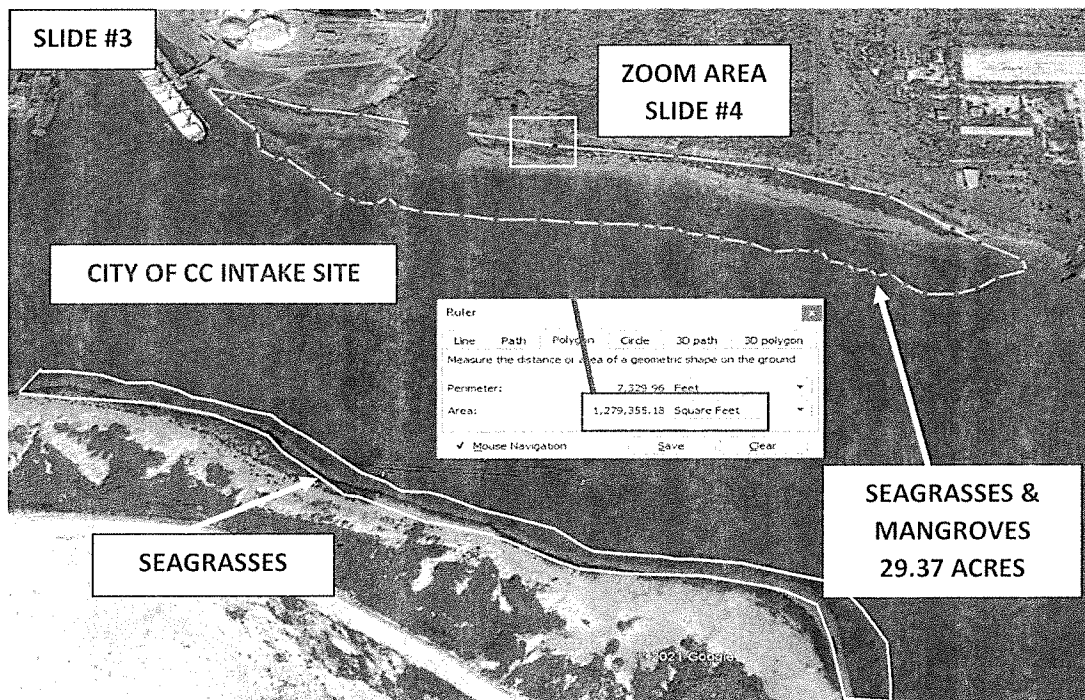


Taking a closer look utilizing the Google Map image from 1/31/2020, there are a number of current-driven silt plumes, moving east to west. (See yellow arrows in Slide #2). Exxon-SABIC’s (EXS) high volume discharge exceeds the current velocity forming a wall that effectively stops the silt plume flow (red circle). The clearer EXS

discharge (green water) outflow exits a narrow pass to continue west along Portland's shoreline into Corpus Christi Bay. This evidence is the complete opposite to the CITY's water right PERMIT's claim of flow direction.

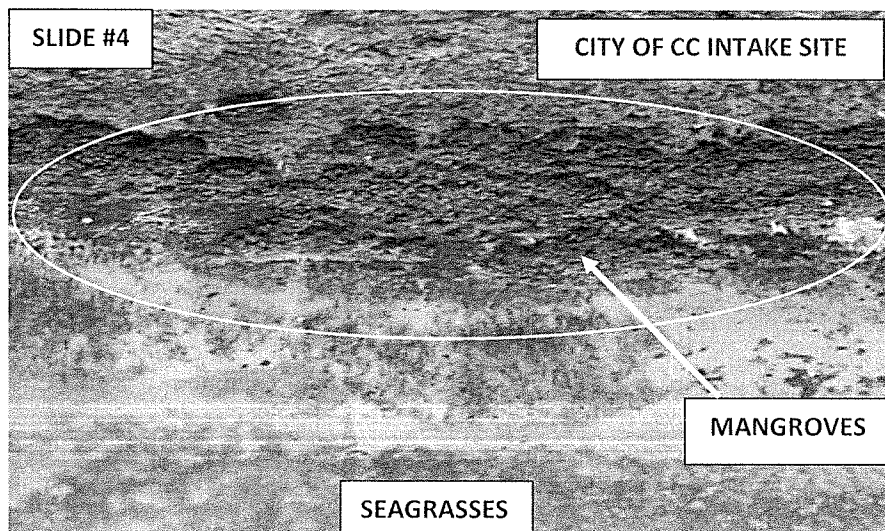


Wetland habitat is critical to the health of Corpus Christi Bay. Scientists have stated that desalination intake and the discharge of brine would be devastating to the fragile estuarine systems. Entrainment and impingement by desalination's intakes cause many organisms within the inflow including larvae to be killed. Quoting Dr. Kristin Nielsen study concerning seagrasses: "Seagrasses are known to be particularly sensitive to habitat disturbances, including physical disturbances, nutrient loading, and pollution. Consequently, their biomass and productivity serves as a key indicator of the extent to which anthropogenic impacts are degrading the health of estuarine systems." Also being lost are mangroves that line the shoreline where the City of Corpus Christi's desalination facility are planned to be located. **Slide #3** consists of a Google Image 1/31/2020 and polygonal area that calculates 29.37 acres of seagrasses and mangrove wetlands would be impacted at the intake and discharge PERMIT site! ($1,279,355.18 \text{ sqft} / 43,560 = 29.37 \text{ acres}$)



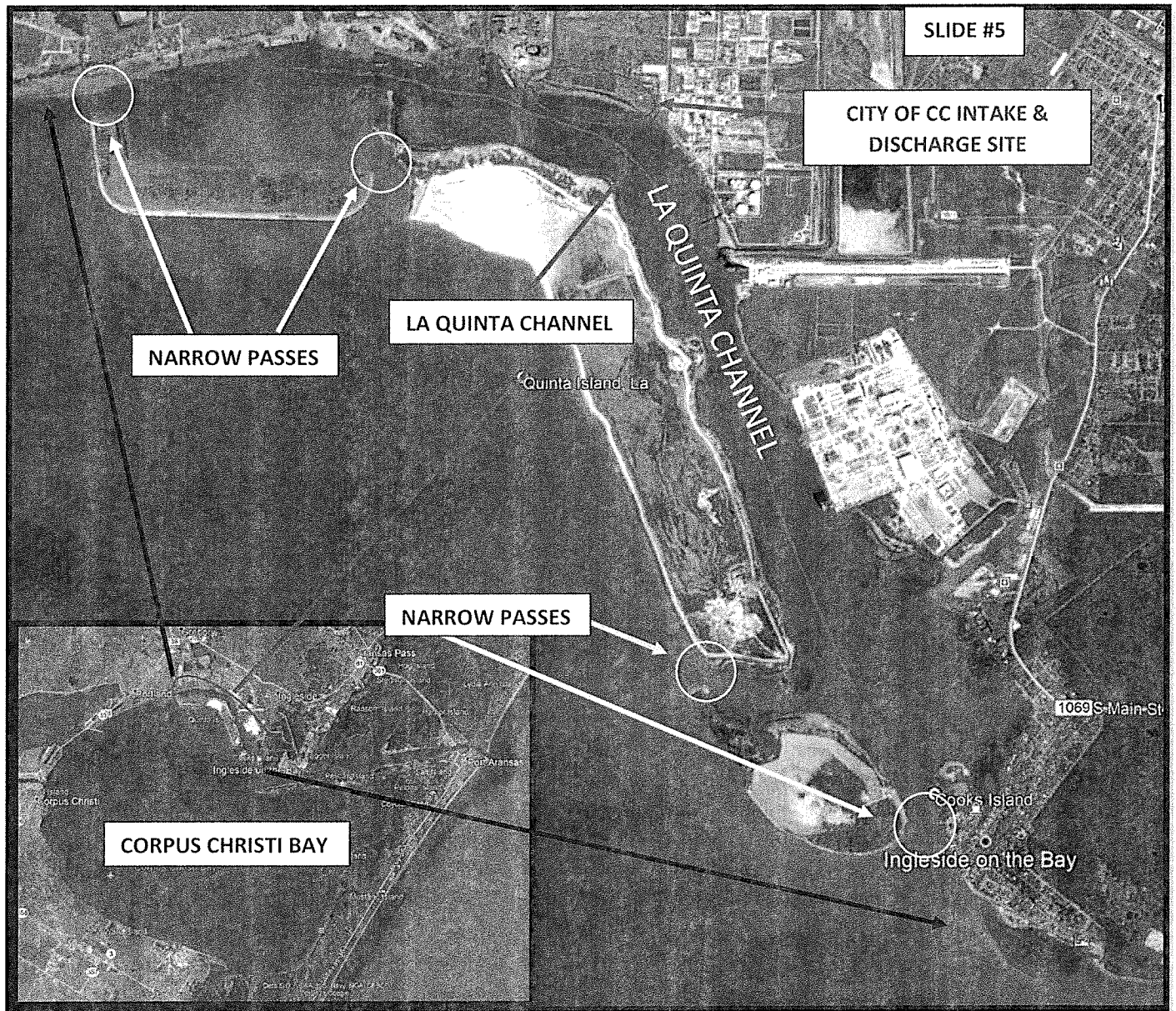
What is alarming is that the 29.37 acres are only a *fraction* of the estuarian impact of the PERMIT and does not include adjacent wetlands along La Quinta Channel, Ingleside Cove nor along Portland's shoreline into Corpus Christi Bay.

A zoom image of the coastline, **Slide #4**, shows just part of a network of mangroves and seagrasses that are located at the intake site. These fertile and precious habitats harbor benthic organisms that are unable to escape contaminants of ecological concern (COPEC). Fish, birds and mammals will feed on these benthic organisms and accumulate toxins within themselves degrading the ecosystem even further. Ultimately the toxins would be ingested by residents in the form of shrimp, crab, and fish.



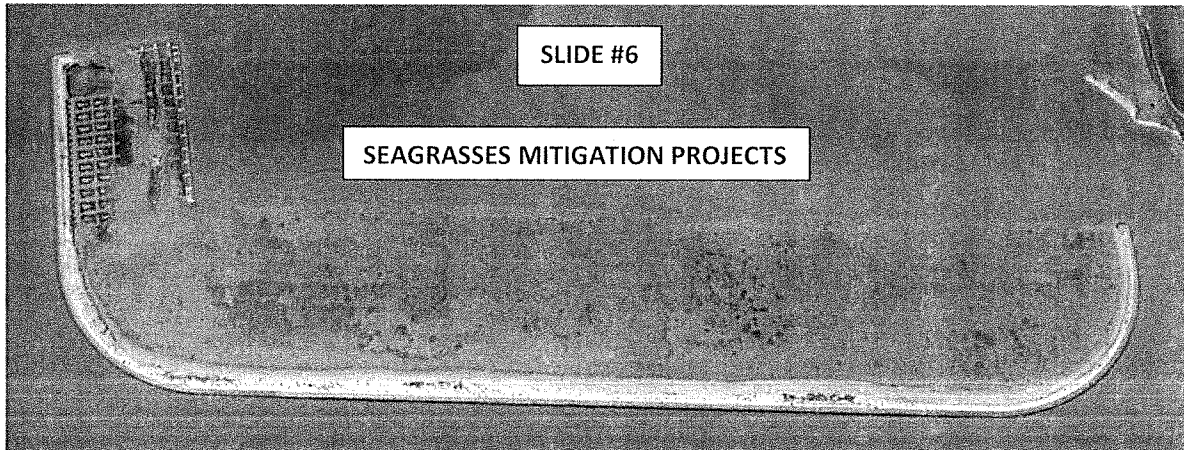
Dr. Kirk Cammarata, a biologist at Texas A&M University-Corpus Christi, sums up the delicate balance and importance of seagrasses in his statement: “Extremes of salinity, as well as very rapid changes of salinity, can cause stress on seagrasses. Seagrasses are at the base of the food chain, and pretty much all of the seafood we eat at some point depends on what happens in seagrass beds. It’s a critically important habitat.” Dr. Larry McKinney, Chair of Gulf Strategies at the Harte Institute explains further: “The bay and its surrounding inlets and channels, like Nueces Bay and Aransas Pass, do not circulate much water. This is common to most bays on the Texas coast, which have minimal inflows from other water sources. If that water is not moving and exchanging with other fresh water and other sea water, you’re just constantly adding very incremental, small amounts of salinity to that bay.” says McKinney of the potential hazards of discharge from desalination plants. “That begins to have all kinds of ecological effects on oysters and shrimp and fish, and the whole structure of the ecosystem.” La Quinta Channels is located in an *extremely* restricted water exchange area with only *four narrow* passes to Corpus Christi Bay! See **Slide #5**.

IOBCWA, Port Aransas Conservancy and Hillcrest Residents Association have joined in the “Petition for Rulemaking” submitted to TCEQ on April 30, 2021 by Eric Allmon and Rick Lowerre (Perales, Allmon & Ice, Law Firm). This Petition requests that the desalination intake use the “best technology available” to “minimize adverse environmental impacts.” Requirements for cooling water intake structures contain much more information concerning the design of the intake structure as well as the environment surrounding the intake structure. At a minimum, the TCEQ should require this level of additional information before proceeding with the CITY’s PERMIT.



Dr. Kristin Nielsen's UTMSI study sums up the ultimate outcome for the PERMIT with this statement: "It is also important to note that a number of sources explicitly state that the ecological impacts of Sea Water Reverse Osmosis operations are expected to be amplified at estuarine discharge sites that experience low rates of water exchange and poor flushing, such as the bay complex connected to the Gulf of Mexico via the Corpus Christi Ship Channel. The aforementioned conditions are also known to further facilitate the accumulation of a variety of COPECs (e.g., metals, OC pesticides, PCBs, PAHs), which may contribute to the intensified effects observed in such systems."

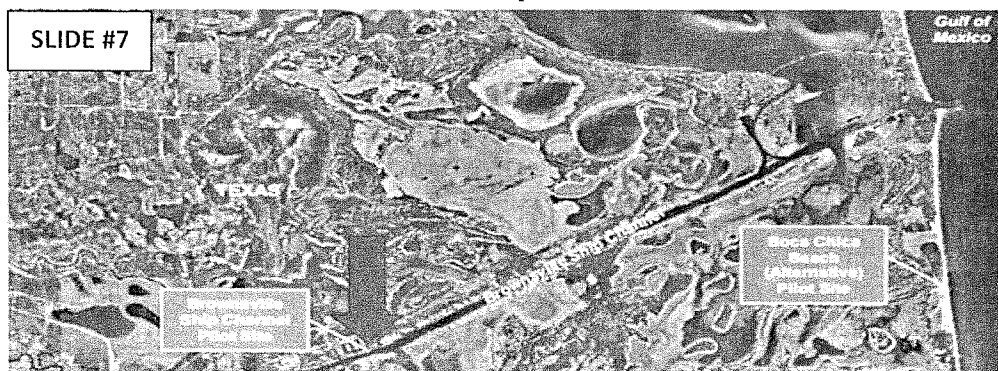
Seagrasses mitigation projects are a tedious and costly endeavor having a terrible history of actually replacing lost wetland habitat. **Slide #6** is an image at the west end of La Quinta Channel where multiple mitigation plots are shown. Impingement and entrainment will undoubtedly occur from larvae and marine life produced in this area as the proximity to seagrass beds and seagrass mitigation plots are nearby. Does the CITY take responsibility for replacement of these mitigation projects if these plots are lost as a result of the water rights PERMIT? What would be the cumulative effects to these plots and other seagrasses and wetlands from the combination of both the POCC and CITY Permits? What mitigation proposals by the CITY have been evaluated for the 29.37 acres of wetlands along the intake and discharge sites? What about mitigation for loss of habitat for Portland shoreline, Ingleside Cove and estuaries along La Quinta Channel?



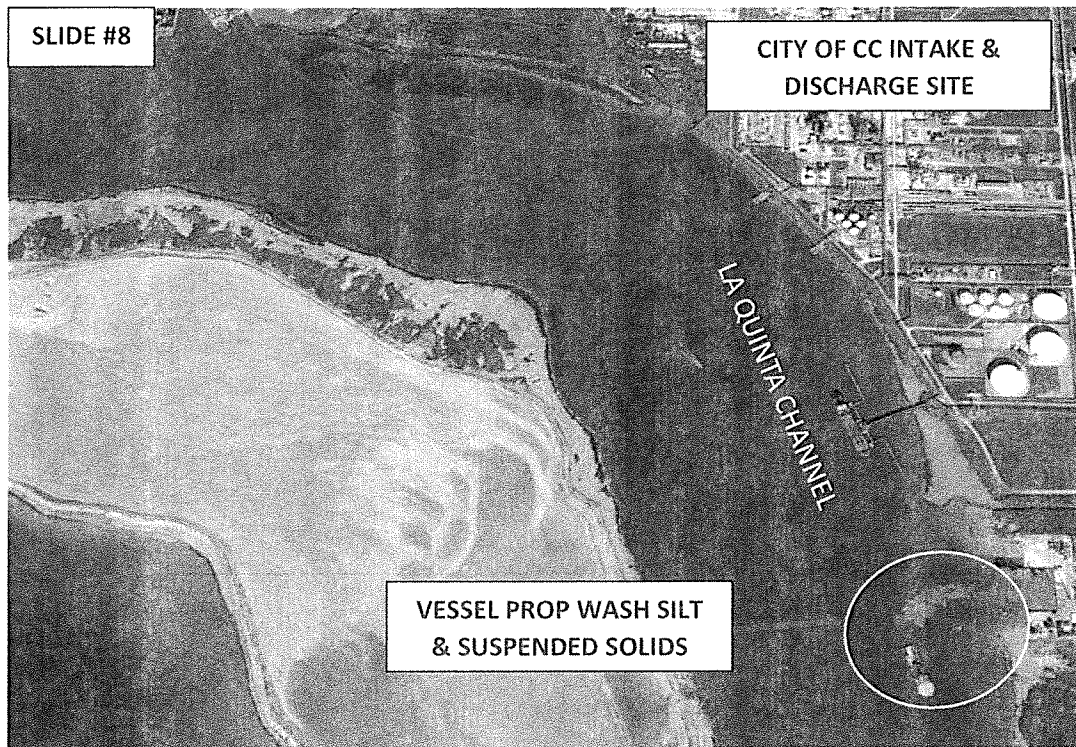
The City of Corpus Christi has no experience nor expertise in building and operating of a desalination facility. Trial and error approach would be an ecological and economic disaster given that bay water desalination facilities do not exist. High suspended solids, larvae and planktonic organisms have plagued desalination facilities especially in Brownsville, Texas ship channel. (See **Slide #7**) Costing \$67 million, this project built in 2008 ultimately failed in its attempt to build only a 2.5 MGD facility. According to W. Vernon Kramer, geology professor at Del Mar and Texas A&M Kingsville, turbidity, suspended solids and temperature variations caused by passing ships were the insurmountable problems Brownsville desalination facility encountered.

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

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



Shown in **Slide #8** is a silt plume resulting from a vessel's movement within La Quinta Channel. Voestalpine, Cheniere, Oxy, Chemours, Subsea 7, barge and tugboat vessels will be coursing La Quinta Channel daily creating plumes by their propellers. Industrial discharges from these facilities as well as from EXS's 9 MGD will mix with the proposed intake resulting in complex chemical mixtures that have yet to be considered in the PERMIT. Maintenance dredging, residues of heavy metals and COPEC from the failed 62-year-old Shermin Alumina would add to the problems an intake pipe would encounter. "Turbidity, suspended solids, and temperature variations" resulting from activities within La Quinta Channel – sound familiar?



Science says, take the intake and discharge offshore. Question is, why grant a perpetual water rights permit when the discharge would be catastrophic? A water rights permit issued prior to identifying the needs of those served by this permit creates the vacuum and a platform of future problems that will forever change our way of life in the Coastal Bend.

In summary, IOBCWA opposes the CITY water rights PERMIT as there is not a "necessity of need" and the extremely high risk of environmental calamity. Proponents for desal are not accurately stating the facts. There are other options including recycling industries wastewater, municipal wastewater as well as the Evangeline Aquifer located in the vicinity of Sinton, Texas that would furnish water for hundreds of years. My prayer is that the TCEQ considers all of the facts in their determination as mandated by TCEQ's mission statement.

Sincerely yours,

Patrick A. Nye
President IOBCWA

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Wednesday, May 5, 2021 1:40 PM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675
Attachments: IOBCWA_PAN Comments POCC WR 13675 Permit CCH 20210505.pdf

H

From: patrick@nyexp.us <patrick@nyexp.us>
Sent: Wednesday, May 5, 2021 9:26 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

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: I vehemently oppose the Water Rights permit for the City of CC in La Quinta Channel and request denial and a contested case hearing.

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



May 5, 2021

Ms. Lauri Gharis, Chief Clerk
Texas Commission on Environmental Quality
Office of the Chief Clerk, MC 105
P.O. Box 13087
Austin, Texas 78701-3087

RE: City of Corpus Christi La Quinta Water Rights Desalination Permit #13675
Request for Denial of Permit by TCEQ
Request for Contested Case Hearing

Dear Ms. Gharis,

On behalf of the Ingleside on the Bay Coastal Watch Association (IOBCWA), as its President, I am submitting this request for you to deny the City of Corpus Christi La Quinta Water Rights Desalination Permit #13675 and acknowledge that IOBCWA requests a Contested Case Hearing.

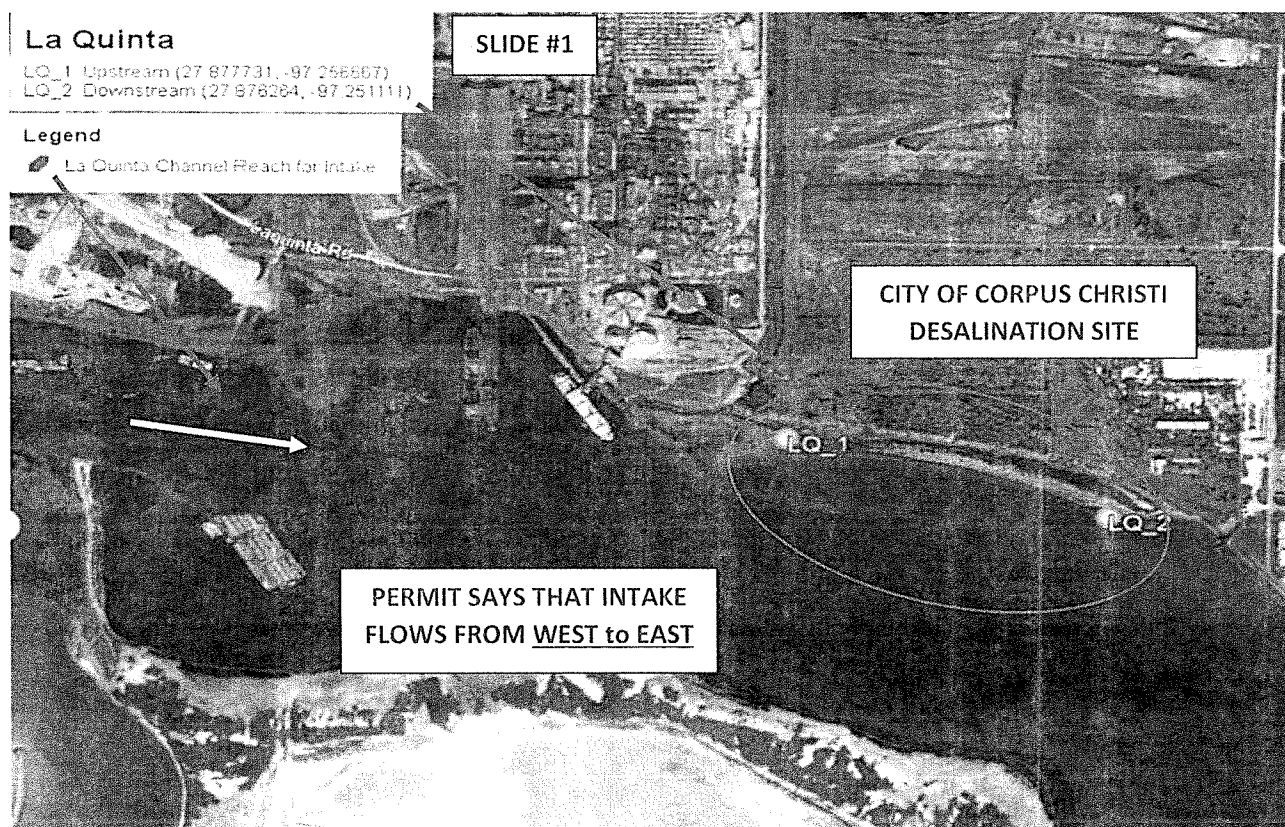
As a born and raised Corpus Christian and now living in Ingleside on the Bay, the idea of desalination within the confines of Corpus Christi Bay is preposterous to even consider given that this technology is unproven in a silty, high-suspended solids, bay environment AND the catastrophic harm desalination causes to the environment. More importantly, this City of Corpus Christi (CITY) Water Rights Permit #13675 (PERMIT) affects the people of coastal communities as the PERMIT will endanger, cause potential harm to individuals, and diminish the quality of life Corpus Christi Bay provides. Fishermen, shrimpers, boaters, property owners, wildlife and birding enthusiasts will pay a severe price for the loss of water quality caused by this PERMIT. This PERMIT by the CITY and the water rights permit in La Quinta Channel by the Port of Corpus Christi (POCC), are blatant attempts to bring industry to San Patricio County along with all of the environmental liabilities to its residents. TCEQ should take into consideration that expanding heavy polluting industries into San Patricio County from land annexations by the CITY and a stacked, heavily biased Port of Corpus Christi Commission, brings disproportionate burdens upon an unrepresented population. Unrestricted granting of the PERMIT without following the Coastal Management Plan and adhering to clearly present water need is unwarranted. The TCEQ must carefully consider the ramifications of the water rights PERMIT with an ultimate goal of a discharge permit in its totality.

Granting a water rights PERMIT without significant, sound science is against the very principles that the TCEQ, EPA, GLO, TPWD and USFWL have based their environmental authority upon. Evidence filed from the POCC Harbor Island desal during the Contested Case Hearing, is solidly against desalination projects inshore of the barrier islands. Designing of a desalination facility with the intake and discharge offshore is the only logical solution, endorsed by Texas Parks & Wildlife, University of Texas Marine Institute, Harte Institute, and countless other scientists. This is evident by the recently released study by Dr. Kristin Nielsen (and other scientists) of The University of Texas Marine Science Institute (UTMSI) dated March 2021. Her study is about ecotoxicological risks associated with the Port of Corpus Christi's proposed Harbor Island desalination facility permit and states: "Due to the high productivity and ecological value of the habitat in proximity to the site of the proposed facility,

it is imperative that all potential ecological risks be thoroughly evaluated prior to project approval and initiation.” In addition, Dr Nielsen’s study points out other risks: “The potential risks associated with impingement, entrapment and entrainment of aquatic biota (at the seawater intake site), altered hydrodynamics, changes in the transport and settling of larval fishes, and increasing salinity in the Corpus Christi Ship Channel...”

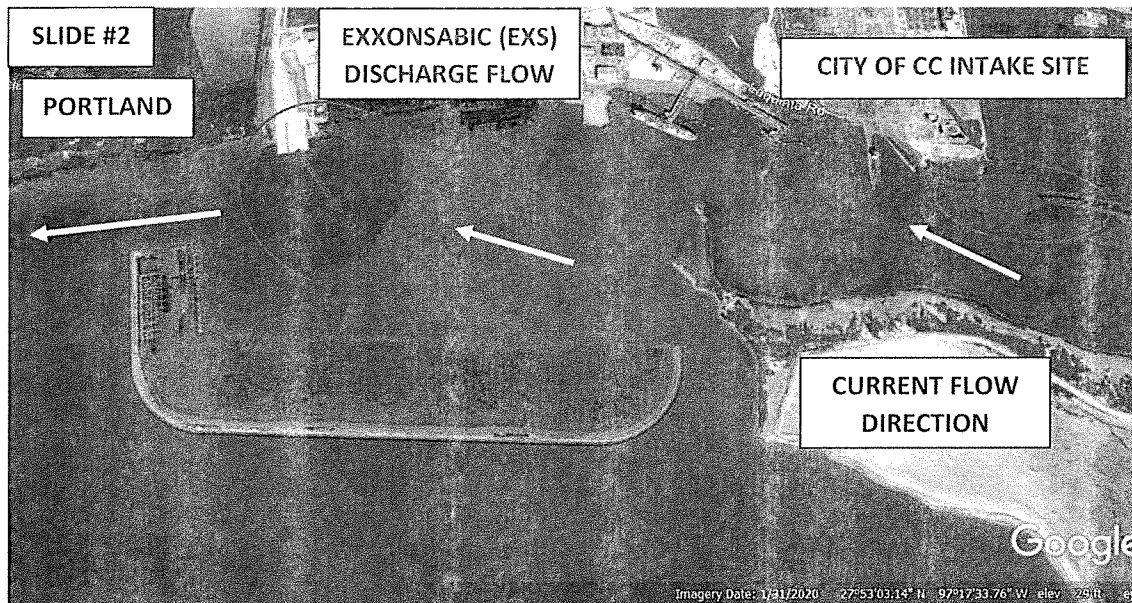
https://repositories.lib.utexas.edu/bitstream/handle/2152/85059/POCC_HI_ERA.pdf?sequence=2&isAllowed=y

Having degrees in Zoology BA and Geology BS, I am particularly concerned with the lack of scientific information and accuracy provided by the water right PERMIT. An image from the PERMIT #13675 application shows the intake and discharge area for the proposed facility (within yellow circle) along La Quinta Channel (Slide #1). What is not detailed is the number of acres of wetlands that will be impacted and/or lost by granting a PERMIT that could ultimately result in a desalination facility. The PERMIT image in Slide #1 proports that the intake would flow from west (left) to east (right) as shown on the pale blue color and yellow arrow. This claim by the City of Corpus Christi’s PERMIT is simply wrong! Common sense tells us that the tremendous volume of water, 166.2 million gallons of bay water per day of intake, would come from the area of least resistance – the La Quinta Ship Channel’s 45’ deep main conduit to the southeast.

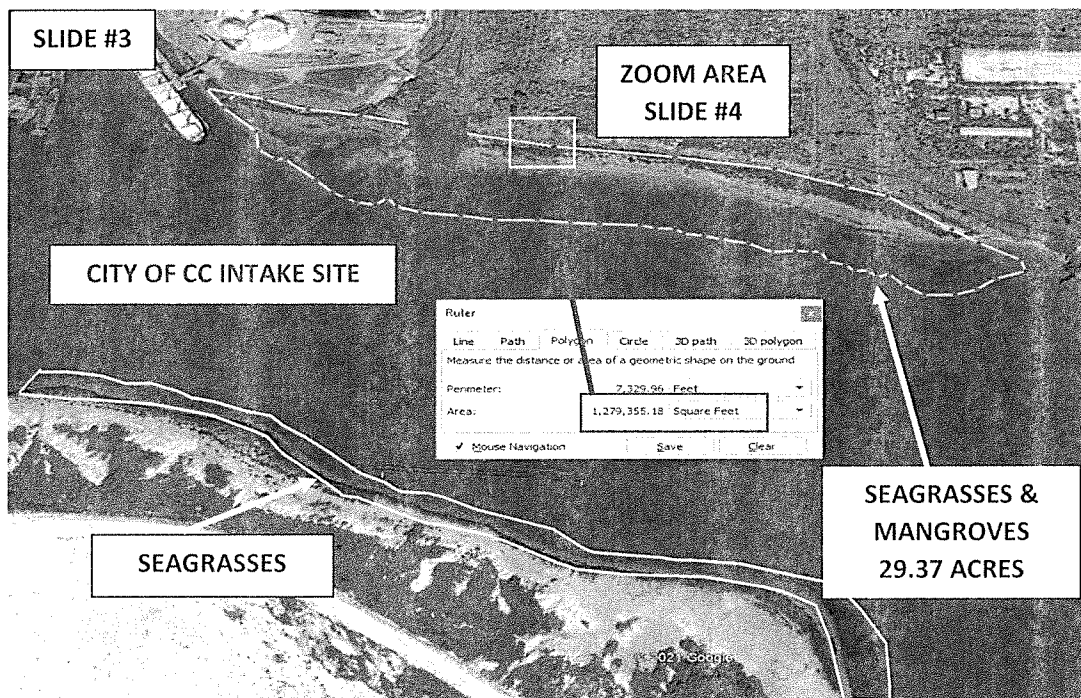


Taking a closer look utilizing the Google Map image from 1/31/2020, there are a number of current-driven silt plumes, moving east to west. (See yellow arrows in Slide #2). Exxon-SABIC’s (EXS) high volume discharge exceeds the current velocity forming a wall that effectively stops the silt plume flow (red circle). The clearer EXS

discharge (green water) outflow exits a narrow pass to continue west along Portland's shoreline into Corpus Christi Bay. This evidence is the complete opposite to the CITY's water right PERMIT's claim of flow direction.

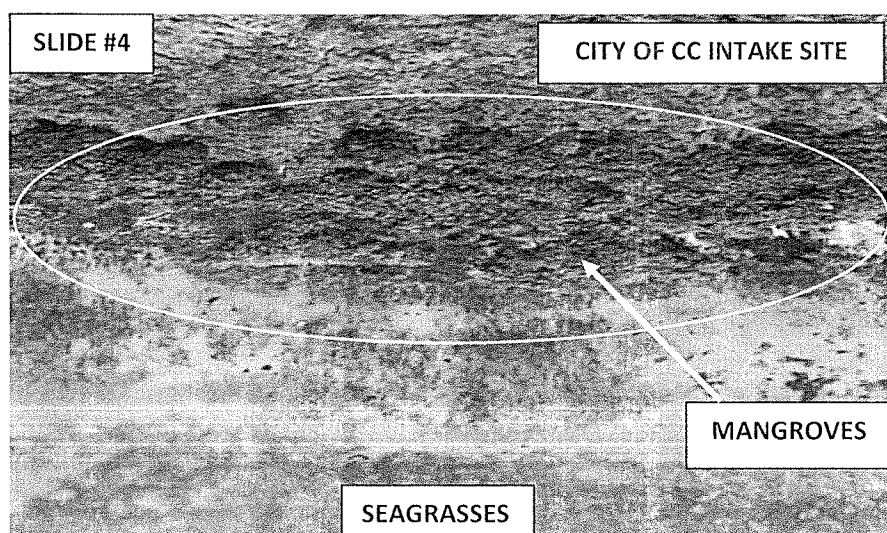


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LA QUINTA CHANNEL

NARROW PASSES

NARROW PASSES

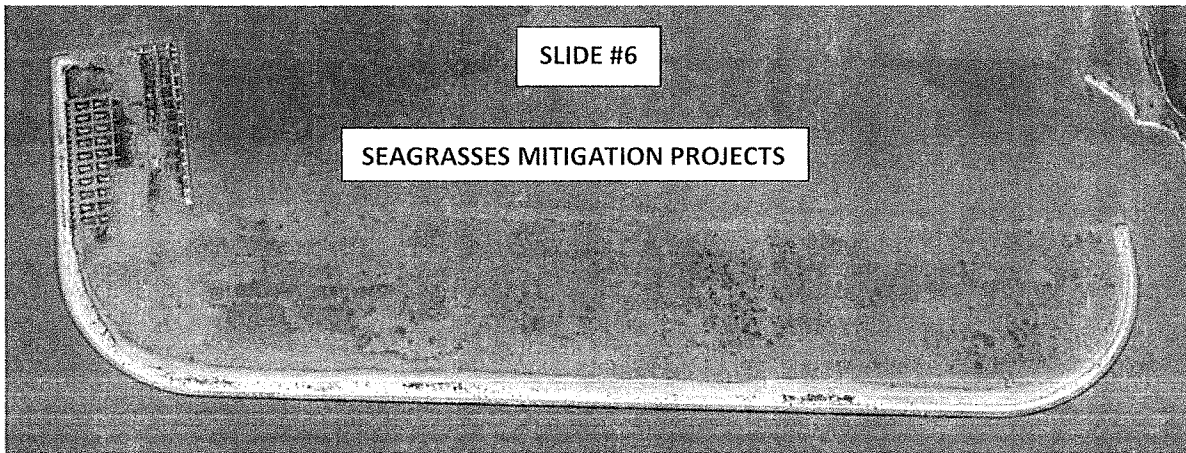
CORPUS CHRISTI BAY

1069 S Main St

Ingeside on the Bay

5

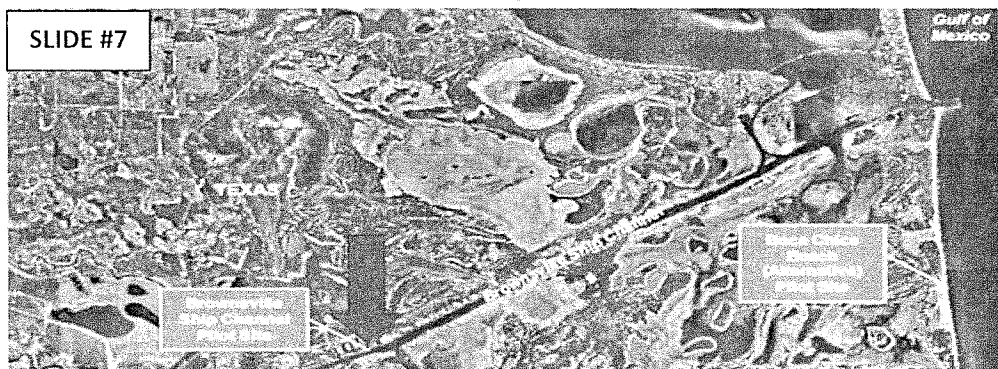
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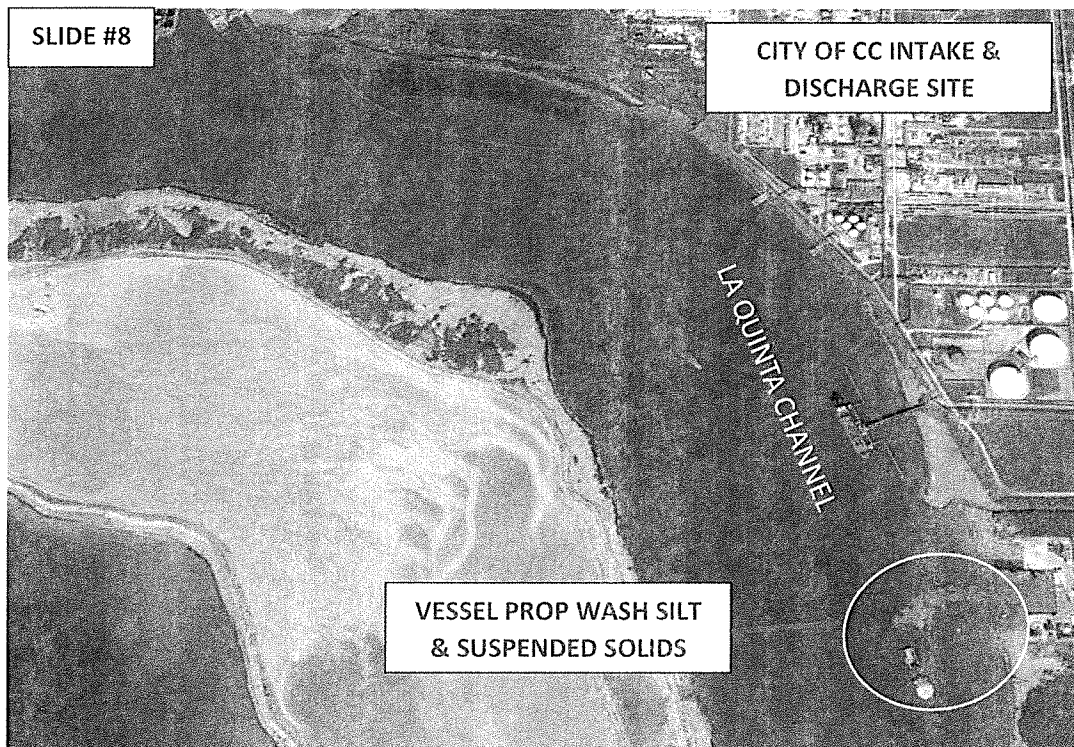
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Sincerely yours,

Patrick A. Nye
President IOBCWA

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Tuesday, April 27, 2021 12:28 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: chelseah6376@gmail.com <chelseah6376@gmail.com>
Sent: Thursday, April 22, 2021 4:24 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Chelsea Oestrick

E-MAIL: chelseah6376@gmail.com

COMPANY:

ADDRESS: 100 WATER WAY AVE
HUTTO TX 78634-4273

PHONE: 5128184549

FAX:

COMMENTS: I STRONGLY OPPOSE the City of Corpus Christi's placing an intake pipe for a desalination plant in La Quinta Channel. I request that a public meeting be held for the community to express its concerns. I request that a Contested Case Hearing be held. My parents live in Ingleside on the Bay. My children, nieces, nephew, parents, and I love to fish,

boat, watch wildlife, and swim in La Quinta Channel where the intake pipe for the Port of Corpus Christi's desalination facility will be located and in Ingleside Cove where the discharge will flow to. This is where our family spends every summer and nearly all vacation time we can get. I am concerned that given the number of small larvae which will be sucked up, turned to sludge, and deposited into landfills, fishing will be badly impaired in the region and this will turn into a place that we won't want to bring our family. This doesn't seem like a safe choice for the environment.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Tuesday, April 27, 2021 12:43 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: blkmstng67@yahoo.com <blkmstng67@yahoo.com>
Sent: Friday, April 23, 2021 9:17 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Theron Oestrick

E-MAIL: blkmstng67@yahoo.com

COMPANY:

ADDRESS: 100 WATER WAY AVE
HUTTO TX 78634-4273

PHONE: 5126368285

FAX:

COMMENTS: To whom it may concern, Hello my name is Theron Oestrick. I am a resident of Williamson County, about 200 miles away from the proposed Desal intake. My family and I frequently visit Ingleside on the Bay for fishing/quick getaway. Being a generational Texan I feel like Ingleside on the Bay is one of the last Texas coastal hideaways not

commercialized. I'll admit I have concerns about the proposed pipes effect on the area. My main concerns are in regards to the ecological aspects. I can only imagine if my concerns are valid it will ultimately effect the local economy. I believe a contested hearing be held as well a a public meeting to ensure concerns are effectively put to rest. Thank you for your time.

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Thursday, May 6, 2021 11:45 AM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: bp120380@gmail.com <bp120380@gmail.com>
Sent: Thursday, May 6, 2021 11:09 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

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. My family owns a home at 105 Lost Creek Dr. Portland TX, 78374, where my children spend several nights a week, this home is "Grandma's house, and it is located about three miles from the proposed intake location. I am also a resident of Corpus Christi, TX, where I have a home at 10801 Silverton Dr. Corpus

Christi, TX 78410. I strongly oppose WR PERM 13675 for the following reasons: **The bay in question for the location of this permit is surrounded by residences, parks, walking trails, bait shops, and area attractions.** The environmental impact of the proposed intake site will harm not only aquatic life, but also the lives of the birds and people who love and rely on this bay for recreation, food, and in the case of the ecotourism industry, livelihoods. **There is a lack of information available to the public, and the public has not had sufficient input in the City's plans.** As of last week, (April 26, 2020), the citizens, Mayor, and City Council of Corpus Christi are still waiting for more detailed information as to the environmental impacts of this project. We are also still waiting for a clear answer as to where the energy required to run such huge plants will come from? During the recent ice storm, thousands of residents in my neighborhood alone were left without power in sub freezing temperatures for over three days. The only explanation given to us by our energy provider was that there was not enough power on the grid to sustain the demand. Since the winter storm, power outages have become a way of life in our area. On 4/13/2021, we received a notice from ERCOT, that "grid conditions were tight". On 4/14/2021, we were notified again by ERCOT that we should conserve energy because of tight grid conditions. On 4/21/2021, AEP reported an outage affecting at least 3,000 residents on the Padre Island area. On 4/24, AEP reported at least 1,800 residents in Corpus Christi were without power. On 4/29/2021, at least 2,700 residents were without power in Corpus Christi, this time the area included a school. On May 1, 2021 there were more than 1,000 residents without power in Port Aransas, hundreds more in the surrounding towns of Beeville, Sinton, Rockport, etc. These were all days with normal, average temperatures, with no severe weather. The question of energy and where it will come from NEEDS to be provided to residents before the City applies for permits and plans projects that will completely disrupt our daily lives and homes. **The City has not clearly provided residents with answers regarding the cost to build and operate, nor any explanation or plans as to how the City will repay loans for a desalination plant, AND honor its agreement with the EPA court, in which the City agreed to pay for over 700 million dollars worth of improvement to our wastewater system in the next fifteen years** I would also like to request a contested case hearing, and a public meeting where we can express our concerns or ask questions. The "town hall meetings" regarding this permit were squeezed into a two week period a couple of weeks before our local Mayoral elections. The meetings were virtual and held in the middle of the pandemic on evenings when many of us were trying to virtually navigate through our jobs and our children's school assignments and classes. These meetings consisted only of scripted, incomplete responses to hand picked questions by the "presenters". In no way, were we allowed the opportunity to clarify any answers given. Many other questions remained ignored or dismissed. I ask again, that you please consider all of the residents in this matter, and deny this permit. Thank you.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 16, 2021 8:35 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675
Attachments: page1letter (1).pdf

From: bp120380@gmail.com <bp120380@gmail.com>
Sent: Tuesday, November 16, 2021 1:03 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

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: Water Rights Permit 13675 should be denied. The applicant has failed to secure funding for a desalination plant. The low-interest loan from the Texas Water Development Board is site specific to a totally different site. These plans burden the ratepayers. The majority of personal income and employment in this City is from The service industry

sector, putting many residents in an economically disadvantaged situation. It is unjust for the City of Corpus Christi to burden taxpayers with the cost of a desalination plant which will not be for their benefit. Because of lack of funding, this application which deviates drastically from the applicable regional water plan, Could affect other potential water management strategies- strategies which could be more affordable for economically disadvantaged residents. In fact, the TCEQ should have denied this permit upon receiving from the Region N water Planning Group, a letter in which the City represents the inconsistencies between the 2016 regional water plan, and the City's outrageous plans, especially knowing that these inconsistencies WILL impact any other potential water strategy for the region. The financial impacts of a desalination plant and delivery of the water were presented to the Corpus Christi City Council by City Staff in the amount of one billion dollars. This plant would exhaust our budget. The location of the proposed intake will also impact all of the other proposed intake locations which are located in very close proximity. Attached is page 1 of the letter

Coastal Bend Regional Water Planning Group

602 North Staples Street, Suite 280, Corpus Christi, Texas 78401

Phone: 361-653-2110; Fax: 361-653-2115

EXECUTIVE COMMITTEE

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Mr. Scott Bledsoe, III, Co-Chair

Water Utilities

Ms. Carola Serrato, Co-Chair

GMA 13

Mr. Lonnie Stewart, Secretary

River Authorities

Mr. Tom Reding, Jr.

Small Business

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Mr. Chuck Burns

Mr. Charles Ring

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Mr. Bill Stockton

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Mr. Mark Sugarek

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Ms. Nelda Barrera

Liaison Region M

Judge Humberto Gonzalez

Liaison Region L

Mr. Con Mims

STAFF:

Nueces River Authority

Ms. Rocky Freund

September 26, 2019

Dr. Kathy Alexander

Technical Specialist, Water Availability Division

Texas Commission on Environmental Quality

MC-160 P.O. Box 13087

Austin, Texas 78711-13087

Dear Dr. Alexander

Re: City of Corpus Christi's water right applications for proposed desal water diversions from the Corpus Christi Inner Harbor and Corpus Christi Bay and General Consistency with Coastal Bend Regional Water Planning Group's 2016 Plan (the Plan)

The Coastal Bend Regional Water Planning Group provides this letter to you at the request of the City of Corpus Christi, Region N's largest wholesale water provider. The City of Corpus Christi is in the process of applying for two water right applications for diversions from the Corpus Christi Inner Harbor and Corpus Christi Bay. The diversions are associated with the development of two seawater desalination plants, one in Nueces County and the other in San Patricio County. According to information provided by the City of Corpus Christi, the plants will provide additional water supplies to meet increasing municipal and industrial demands in the Coastal Bend Region.

The December 2015 *Coastal Bend Regional Water Planning Area Region N Executive Summary and Regional Water Plan (2016 Region N Water Plan)* includes seawater desalination as a recommended water management strategy. The Plan shows a total supply of 22,420 acre-feet (20 MGD) from seawater desalination to meet manufacturing and steam-electric demands in Nueces County and manufacturing demands in San Patricio County (pages 5-42, 5-44, and 5-50 of the Plan). The Plan shows that the City of Corpus Christi and the San Patricio Municipal Water District are project sponsors of the seawater desalination water management strategy (pages 5-43 and 5-49). Section 5D.9 of the Plan describes the strategy and includes cost estimates based on the best information available at the time of Plan submittal.

Since completion of the 2016 Region N Water Plan, the City of Corpus Christi has continued to study implementation of seawater desalination to meet demands in the region. The City's current plan is to develop two seawater desalination facilities that total 30 MGD production initially and are capable of expanding to 70 MGD. As stated above and based on information provided by the sponsor to the region, one plant will be located in San Patricio County and will serve municipal and industrial demands in San Patricio and Aransas Counties and the

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 16, 2021 8:34 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675
Attachments: letter page 2.pdf

From: bp120380@gmail.com <bp120380@gmail.com>
Sent: Tuesday, November 16, 2021 1:12 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

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: Attached is the second page of the letter from the Regional water planning group to Kathy Alexander. Since it clearly lists many inconsistencies between the City's application and the regional water plan, this letter should

have immediately prompted the TCEQ to deny this permit. The City's inconsistencies affect other potential water strategies, especially environmentally, which should be the TCEQ's main concern.

other will be located in Nueces County and will serve municipal and industrial demands in Nueces, Kleberg, and possibly Aransas Counties. The City of Corpus Christi's water right applications would permit diversions for these plants.

One of the requirements in Texas water right permitting is consistency with the appropriate Regional Water Plan. Specifically, Texas Commission on Environmental Quality regulations say that a permit can be granted only if it "addresses a water supply need in a manner that is consistent with the state water plan and the relevant approved regional water plan for any area in which the proposed appropriation is located, unless the commission determines that new, changed, or unaccounted for conditions warrant waiver of this requirement" (30 Texas Administrative Code Section 297.41(a)(3)(E)). Since the proposed projects for which water rights applications are being sought differ from the strategy in the current Plan, this letter is being provided stating that although the applications may be for different amounts and different project configurations than indicated in the Plan, the applications are consistent with the Plan and are will not affect other strategies in the current Plan.

The projects differ from the strategy in the 2016 Region N Water Plan in the following ways: (1) two desalination plants are being proposed (one was shown in the Plan), (2) the initial project yield is 30 MGD (up from the 20 MGD shown in the Plan) and scalable up to 70 MGD (not shown in the Plan), and (3) strategy is now intended to serve both industrial and municipal customers (the 2016 Plan showed strategy to meet industrial needs only and had no municipal shortages identified).

The Coastal Bend Regional Water Planning Group represents that the water right applications are not inconsistent with the 2016 Region N Water Plan, as both locations were cited as possible project locations in the Plan. The seawater desalination water management strategy and associated water rights being sought addresses a projected water supply need for manufacturing users in a manner that is consistent with the approved *2016 Region N Water Plan*. The 2016 Region N Water Plan did not show any municipal needs for the City of Corpus Christi or their customers.

The change from one seawater desalination plant to two and the change in plant size is the sort of revision that occurs as more specific plans and designs are developed to implement water management strategies. The requested water rights and the proposed water management strategy that it supports will not have a negative impact on other water management strategies in the currently approved 2016 Region N Water.

The Coastal Bend is currently developing a new regional water plan. At this time, the proposed seawater desalination plants will be a recommended water management strategy in the plan under development. 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. The requested water rights and the proposed water management strategy that it supports are not expected to have a negative impact on other water management strategies anticipated to be in the regional water plan currently under development assuming that the proposed intake and outfall locations are not in close proximity to alternate water management strategies that may become recommended during the course of the new regional water plan currently under development.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 16, 2021 9:47 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: City of Corpus Christi Intake Permit *Public Meeting* Please read*
Attachments: Re: FW: City of Corpus Christi Intake Permit *Public Meeting* Please read*

From: CHIEFCLK <chiefclk@tceq.texas.gov>
Sent: Tuesday, November 16, 2021 9:06 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: City of Corpus Christi Intake Permit *Public Meeting* Please read*

From: Info <Info@tceq.texas.gov>
Sent: Tuesday, November 16, 2021 9:06 AM
To: CHIEFCLK <chiefclk@tceq.texas.gov>
Subject: City of Corpus Christi Intake Permit *Public Meeting* Please read*

FYI



Thank you,
Fernando Hinojosa,DTM
Fernando.hinojosa@tceq.texas.gov
Texas Commission on Environmental Quality
Environmental Relations Division
512-239-5538
How is our customer service?
Fill out our online customer satisfaction survey
www.tceq.texas.gov/customersurvey

Lori Rowe

From: Blanca P <bp120380@gmail.com>
Sent: Monday, November 15, 2021 7:26 PM
To: Encarnacion Serma
Cc: almouiemd@gmail.com; sailboattx@icloud.com; tim@raubs.com; rickykia@hotmail.com; Cathy Skurow; rosalindachapa@yahoo.com; rachelcab@hotmail.com; olimpia_isabel@hotmail.com; paulina.isabelmcallister@gmail.com; beverly.moore@house.texas.gov; judith.zaffirini@senate.texas.gov; Sally Farris; Eli McKay; maritgarza1991@gmail.com; Eli Martinez; Kim Nygren; Maguire, Charles; hayes.mark@epa.gov; Sstrawbridge@pocca.com; Garza, Sarah; Cathy Fulton; Patrick A. Nye; Ilan Levin; Colin Cox; eallemon@txenvirolaw.com; marisa@envirolaw.com; Brandon Marks; ecastillo@lev.org; Paulette Guajardo; Gil Hernandez [Council]; Greg Smith; Billy Lerma; Peter Zaroni; estebanr2@cctexas.com; Michael Murphy; County Judge Barbara Canales; John Martinez; Info
Subject: Re: FW: City of Corpus Christi Intake Permit *Public Meeting* Please read*
Attachments: image002.png; page1letter.pdf; letter page 2.pdf; 2021rwp Potential water management plan.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good Evening,

Please see the attached document, It is a letter from the Region N Water Planning Group, sent at the request of the City of Corpus Christi to Dr. Kathy Alexander, Technical Specialist, in the Water Availability Division with the TCEQ. The letter was in the application for permit 13675, available on the City's website.

In the letter dated, Sept, 26, 2019 (before the permit was even submitted), the City of Corpus Christi admits that the permit application differs from the appropriate regional water plan in several ways:

- 1.The 2016 Regional Water Plan shows a total supply of 22,240 acre feet (**ONE 20 MGD facility**) as a water management strategy for the entire region to meet future manufacturing and steam-electric demands.
2. The City, in this permit alone (Not including Inner Harbor or the Port of CC's applications) is requesting 8 times the amount of water listed in the appropriate regional water plan for the entire region!

I urge everyone to please read the attached letter. Since one of the requirements of the TCEQ's water rights permitting is consistency with the appropriate Regional Water Plan, this letter raises many questions:

*Why did Dr. Kathy Alexander, along with other permitting reviewers at the TCEQ allow the City of Corpus Christi to submit a permit for an amount of water that deviates so drastically from the regional water plan? The City's permit clearly does interfere with other potential water management strategies (cost , intake location).

* Is the TCEQ bending its own rules with free-for-all waivers?

* Why have Dr. Kathy Alexander and other TCEQ permitting reviewers not required the City to at least correct the "purpose of use" in their application, since they have received notice that it is inconsistent with the City's actual intended purpose of use?"

*Why do Corpus Christi leaders and City Water Staff continue to misrepresent the need for this water , stating many, many times that it is for growth, for people, for both municipal and industrial customers?

Included in this email are links to a few examples of the propaganda being pushed on the community by local leaders. Please watch. The public interest in this matter has been avoided and dismissed with the lie that this water is for the ratepayers. We are also still waiting for a truly open public meeting by the City.

The most important question now is perhaps for the Environmental Justice Dept, of the EPA- Could it be possible that these permit applications are a coordinated effort between the City of Corpus Christi and the TCEQ to commit a horrible case of environmental injustice?

In Corpus Christi, the highest number of personal income comes from the service industry sector. This sector has been affected enormously as a result of the pandemic. This community is composed of mostly economically disadvantaged people, many who are struggling with the cost of basic necessities such as rent, electricity and rising water rates. Our City already has a large amount of homeless and displaced individuals. Could it be possible that in addition to exploiting and polluting the community's natural recreation areas and water bodies, the TCEQ and the City of Corpus Christi are participating in an effort to further burden economically disadvantaged ratepayers with the cost of funding a billion dollar desalination plant for industry?

Lastly, it is important to note that although the 2016 regional water plan listed just ONE 20 MGD plant for the entire region, the 2021 regional water plan has now increased that amount to FIVE mega plants as potential water management strategies. Including 2 plants for the City, 2 plants for the Port of Corpus Christi, and one Massive 100 MGD Plant listed under "Poseidon Regional Project" for the City of Ingleside. (see attachment)
It is clear that our regional water plans are being manipulated to accommodate seawater desalination, rather than seawater desalination being explored as a way to meet the needs of the region. One does begin to wonder what motivates and drives these "leaders".

Links to Corpus Christi Mayor discussing how the public "needs to be educated" about how we "take water for granted":
[Mayor discusses desalination, stormwater initiative \(kristv.com\)](#)

Links to City Manager's misleading statements to local media:
[Desalination plant feedback mostly 'salty' as public comment period ends \(kristv.com\)](#)
[Residentes protestan aprobación de proyecto desalinizador \(telemundocc.com\)](#)

Thank you,
B. Parkinson
Concerned Corpus Christi Resident

----- Forwarded message -----

From: **Encarnacion Serma** <cacheton1@twc.com>

Date: Mon, Nov 15, 2021 at 10:52 AM

Subject: FW: City of Corpus Christi Intake Permit *Public Meeting*

To: <almouiemd@gmail.com>, <sailboattx@icloud.com>, <tim@raubs.com>, <rickykia@hotmail.com>, <cathy.skurow@portlandtx.com>, <bill.wilson@portlandtx.com>, <rwright@portlandtx.com>, <tom.yardley@portlandtx.com>, <troy.bethel@portlandtx.com>, <john.sutton@portlandtx.com>, <john.green@portlandtx.com>, <rosalindachapa@yahoo.com>, <olimpia_isabel@hotmail.com>, <paulina.isabelmcallister@gmail.com>, <bp120380@gmail.com>, <david.krebs@co.san-patricio.tx.us>, <barbara.canales@nuecesco.com>, <beverly.moore@house.texas.gov>, <judith.zaffirini@senate.texas.gov>, Sally Farris <s.farris@att.net>, <rachelcab@hotmail.com>, Eli McKay <eliforcc@outlook.com>, <maritgarza1991@gmail.com>, Paulette Guajardo <paulette.guajardo@cctexas.com>, Gil Hernandez <gil.hernandez@cctexas.com>,

<eli.martinez@tceq.texas.gov>, <kim.nygren@tceq.texas.gov>, Maguire, Charles <maguire.charles@epa.gov>, <hayes.mark@epa.gov>, <Sstrawbridge@pocca.com>, Garza, Sarah <Sarah@pocca.com>, Cathy Fulton <mcf4040@hotmail.com>

Cc: Errol Summerlin <summerline@verizon.net>, Patrick A. Nye <patrick@nyexp.us>, Ilan Levin <ilevin@environmentalintegrity.org>, Colin Cox <colincox@environmentalintegrity.org>, <eallemon@txenvirolaw.com>, <marisa@envirolaw.com>, Brandon Marks <brandon@texasenvironment.org>, <ecastillo@lev.org>

Folks: Dear Portland and Corpus Christi Neighbors and elected officials: If you have time and wish to comment on one of the largest and most stupid and detrimental projects (desalination with reverse osmosis and open intakes and discharges from and to the Corpus Christi Bay/Estuary) I have seen and experienced in my entire 40 + year career as a chemical/environmental/project engineer, **see the links below and follow them to access the correct sites and comment. This virtual public meeting scheduled for tomorrow at 7:00 pm is for a water rights permit WRPERM 13675 where the city of Corpus Christi is requesting in perpetuity the insane amount of 166.2 MGD (the equivalent of thirty 4,000 gallon eighteen wheeler trucks to be sucked out per minute out of our closed shallow Bay System, and if you remember just a few months ago the Port of Corpus also requested in perpetuity from the same segment of water (la Quinta Channel) the other insane amount of 90.4 MGD (16 truckloads per minute) I truly believe at this time that the people applying for, pushing, endorsing, or supporting these projects have lost their mind and urgently need psychiatric treatment. Somebody has got to stop them.**

Remember, desalination projects with reverse osmosis and open intakes and discharges to bays, estuaries and oceans are international scams that have already made their way to the USA. These projects always end up being huge financial failures and catastrophic environmental disasters. Follow up developments in California's Carlsbad, California's Huntington, Florida Tampa Bay, etc. Keep an eye on Poseidon and Seven Seas and any other entity that pushes these scams.

Respectfully;

Encarnacion Serna (Chon) 361-903-5774

From: Ingleside on the Bay Coastal Watch <iobcwa@gmail.com>

Sent: Monday, November 15, 2021 8:49 AM

To: 100kyote@gmail.com; Alexis Soto <aisvol@yahoo.com>; Ann Nyberg <annrnyberg@gmail.com>; Anne Wright <jeffwright6996@gmail.com>; Arturo Lugo <artlugo@icloud.com>; bbautomotive@yahoo.com; Bill Ross <goldrushrider@gmail.com>; BK Winn <winnbk@hotmail.com>; Brandon Marks <brandon@texasenvironment.org>; Brent Winborne <brent@nyexp.us>; brucemundycos@yahoo.com; captaindpw <captaindpw@gmail.com>; carol rowald <carolrowald@yahoo.com>; Carrie Meyer <thirdcoastphoto@gmail.com>; cassidy880@yahoo.com; cecileoslund@hotmail.com; Charles & Linda Vernon <c@iobtx.com>; Charles Boone <boonec@sbcglobal.net>; Charlotte Lawrence <charlawrence1944@gmail.com>; Chip Harmon <captainpescador@aol.com>; Chris Carleton <sandpiperx2003@yahoo.com>; Cindy Young <cindyyoung@cymls.com>; Clark Antone <clarkantone@icloud.com>; claypony3972@gmail.com; cookie.burkhalter@gmail.com; Craig Wadham <wadhamc@netscape.net>; Daniel Gentry <dgentry1952@gmail.com>; Darril Schweitzer <darrilschweizer@gmail.com>; Debra Rowe <debbie@nyexp.us>; Diane Mack <mackbuilders@gmail.com>; Dinah Bowman <dinah@dinahbowman.com>; Donna Boone <donnamboone@sbcglobal.net>; Donna Hoffman <donnaaleehoffman@gmail.com>; drschweizer63@gmail.com; Encarnacion Serna <cacheton1@twc.com>; Errol Summerlin <summerline@verizon.net>; Etta Reynolds <1retta43@gmail.com>; Fran Adams <franadams54@yahoo.com>; Gary Irving <garyirving861@gmail.com>; Gary

Strickland <Gary@feralgeek.com>; gary@baachus.com; girladvisor53@gmail.com; glennguillory7@gmail.com; grahamb47@gmail.com; Hleej2@hotmail.com; Ilan Levin <ilevin@environmentalintegrity.org>; j4t7m@yahoo.com; Jacob Oster <osterj5@gmail.com>; jacque425@gmail.com; James Klein <jeklein20@gmail.com>; James Walton <bingle1947@yahoo.com>; Jennifer Hilliard <hilliard007@gmail.com>; jlaylor@gmail.com; Judy Orr <jujutweetybird@gmail.com>; Judy Tucker <tuckerstxconnect@aol.com>; Julie Nye <julienye1@gmail.com>; Julio Salinas <julsal@gmail.com>; Kathryn Masten-Cain <kathrynmasten@yahoo.com>; Kellen Chiddix <kellennery@hotmail.com>; Kevin Schleicher <kevin.schleicher@yahoo.com>; Lara Breeding <labreedi@asu.edu>; Larry Gillespie <larrygill105@gmail.com>; Lauren Fleer <lfleer@environmentalintegrity.org>; Leslie Rozzell <leslierozzell@gmail.com>; lfernhout@att.net; Linda Foss <windyhillinda@yahoo.com>; liz1@stic.net; lmriley@aol.com; Lucille Contreras <lucille@texastribalbuffaloproject.org>; Lucy <Mangodragonfly@gmail.com>; LuWuavon@gmail.com; Lynne Porter <lynne.porter@inglesideisd.org>; Matthew Chastain <mchastain@bio-west.com>; meshell79@gmail.com; Mike Tierney <mikest_52@yahoo.com>; Nancy Lubbock <nancylubbock19@gmail.com>; nancy_loayza92@yahoo.com; Neil McQueen <vicechair@coastalbend.surfrider.org>; pamelawadham@gmail.com; Pat Amsden <amsdextx@yahoo.com>; Pat Gentry <gentry1952@gmail.com>; Patricia Mitchell <pepperwheels52@gmail.com>; Patrick Nye <patrick@nyexp.us>; patrickmce@msn.com; Payton Campbell <payton_campbell21@yahoo.com>; Randy Cain <RandyLCain@gmail.com>; Reagan David <coastalmngt@gmail.com>; Regina Brutus <gbrutus76@gmail.com>; Rene Gonzalez <rene.d.gonzalez01@gmail.com>; Rhonda Hartman <runrhondarun@hotmail.com>; Richard Roark <raroark0426@gmail.com>; Robert Forbes <forbes_robert@att.net>; Roy Riley <royleejob@gmail.com>; salty salty <salty@stic.net>; Sammi Hill <sammileehill@gmail.com>; Shanna Johnson <ssgrafics@hotmail.com>; Sheila Nagy <sheilanagy69@yahoo.com>; Sheila Walton <sheila_walton1@yahoo.com>; sphagens@gmail.com; Stacey Meany <staceymeaney@gmail.com>; Steve Wilder <slwilder@yahoo.com>; Susan Barnes <susanbarnes970@gmail.com>; Susan Lugo <susanhadleylugo@gmail.com>; Suzi Wilder <wildersuzi@gmail.com>; Tammy Schweizer <taminiski@yahoo.com>; tbsp66@gmail.com; Tom Daley <tdaley@bizstx.rr.com>; Tom Mack <mack3811@gmail.com>; Tom Weakly <frontrangedrilling@gmail.com>; travisjameshill@gmail.com; Trisha Christian <trisha@nyexp.us>; Unadeen Laitinen <unedalaitinen@gmail.com>; vhowison99@gmail.com; Walter Kramer <wkramer@delmar.edu>; Wayne Lake <wtlgonefishin@gmail.com>; Wendy Hughes <hughesemailwendy@yahoo.com>; Williamswes8 <WilliamsWes8@gmail.com>; Wwfamil100 <wwfamily100@gmail.com>

Subject: City of Corpus Christi Intake Permit *Public Meeting*

Dear IOBCWA members,

Tomorrow, **Tuesday, November 16th**, at 7:00pm is the Public Meeting for the City of Corpus Christi's proposed desalination facility in La Quinta channel. The TCEQ will take public comments on the City's water intake application. **Please make plans to attend and make verbal comments during the public comment period.**

To register:

1. Go to: <https://www.gotomeeting.com/webinar/join-webinar>
2. Enter Webinar ID: 930-500-283 and your personal email address
3. Press "Join Webinar" and you will be taken to a registration form.
4. Complete the form and select the option to make a verbal comment.
5. You will receive an automatic email with the link to join tomorrow's webinar

Here are just a *few reasons* why you should attend and **OPPOSE** water intake in La Quinta Channel:

- The City of Corpus Christi wants to take in water downstream of industry discharge and give it to people to drink!
- The intake would suck in and kill fish and other marine animals and organisms.
- The people of the Coastal Bend do NOT need desal. There are plenty of safe, clean alternatives that more than satisfy our regions' municipal water demand.

If you are uncomfortable making a verbal comment during the TCEQ public meeting, please consider making a written comment. To make a written comment, go to <https://www14.tceq.texas.gov/epic/eComment/> and enter permit number ("WRPERM 13675")

You can find more information regarding written comments with suggested content at the IOBCWA website. <https://www.iobcwa.org/city-of-corpus-christi.html>

Join us and protect CC Bay, local wildlife, and our quality of life in the Coastal Bend!

Hope you will attend the public meeting!

Jennifer Hilliard

Ingleside on the Bay Coastal Watch Association

Coastal Bend Regional Water Planning Group

602 North Staples Street, Suite 280, Corpus Christi, Texas 78401

Phone: 361-653-2110; Fax: 361-653-2115

EXECUTIVE COMMITTEE

Water Districts

Mr. Scott Bledsoe, III, Co-Chair

Water Utilities

Ms. Carola Serrato, Co-Chair

GMA 13

Mr. Lonnie Stewart, Secretary

River Authorities

Mr. Tom Reding, Jr.

Small Business

Dr. Pancho Hubert,

VOTING MEMBERS:

Agriculture

Mr. Chuck Burns

Mr. Charles Ring

Counties

Mr. Lavoyger Durham

Mr. Bill Stockton

Electric Utilities

Mr. Gary Eddins

Environmental

Ms. Teresa Carrillo

Mr. Jace Tunnell

Industries

Mr. Joe Almaraz

Mr. Robert Kunkel

Municipalities

Ms. Barbara Reaves

Mr. Mark Scott

Public

Ms. Donna Rosson

Other

Mr. John Burris

Mr. Carl Crull

Small Business

Mr. Bill Dove

GMA 15

Mr. Mark Sugarek

GMA 16

Mr. Andy Garza

NON-VOTING MEMBERS:

TWDB

Ms. Connie Townsend

NRCS

Mr. Tomas Dominguez

TPWD

Dr. Jim Tolan

TDA

Ms. Nelda Barrera

Liaison Region M

Judge Humberto Gonzalez

Liaison Region L

Mr. Con Mims

STAFF:

Nueces River Authority

Ms. Rocky Freund

September 26, 2019

Dr. Kathy Alexander

Technical Specialist, Water Availability Division

Texas Commission on Environmental Quality

MC-160 P.O. Box 13087

Austin, Texas 78711-13087

Dear Dr. Alexander

Re: City of Corpus Christi's water right applications for proposed desal water diversions from the Corpus Christi Inner Harbor and Corpus Christi Bay and General Consistency with Coastal Bend Regional Water Planning Group's 2016 Plan (the Plan)

The Coastal Bend Regional Water Planning Group provides this letter to you at the request of the City of Corpus Christi, Region N's largest wholesale water provider. The City of Corpus Christi is in the process of applying for two water right applications for diversions from the Corpus Christi Inner Harbor and Corpus Christi Bay. The diversions are associated with the development of two seawater desalination plants, one in Nueces County and the other in San Patricio County. According to information provided by the City of Corpus Christi, the plants will provide additional water supplies to meet increasing municipal and industrial demands in the Coastal Bend Region.

The December 2015 *Coastal Bend Regional Water Planning Area Region N Executive Summary and Regional Water Plan (2016 Region N Water Plan)* includes seawater desalination as a recommended water management strategy. The Plan shows a total supply of 22,420 acre-feet (20 MGD) from seawater desalination to meet manufacturing and steam-electric demands in Nueces County and manufacturing demands in San Patricio County (pages 5-42, 5-44, and 5-50 of the Plan). The Plan shows that the City of Corpus Christi and the San Patricio Municipal Water District are project sponsors of the seawater desalination water management strategy (pages 5-43 and 5-49). Section 5D.9 of the Plan describes the strategy and includes cost estimates based on the best information available at the time of Plan submittal.

Since completion of the 2016 Region N Water Plan, the City of Corpus Christi has continued to study implementation of seawater desalination to meet demands in the region. The City's current plan is to develop two seawater desalination facilities that total 30 MGD production initially and are capable of expanding to 70 MGD. As stated above and based on information provided by the sponsor to the region, one plant will be located in San Patricio County and will serve municipal and industrial demands in San Patricio and Aransas Counties and the

other will be located in Nueces County and will serve municipal and industrial demands in Nueces, Kleberg, and possibly Aransas Counties. The City of Corpus Christi's water right applications would permit diversions for these plants.

One of the requirements in Texas water right permitting is consistency with the appropriate Regional Water Plan. Specifically, Texas Commission on Environmental Quality regulations say that a permit can be granted only if it "addresses a water supply need in a manner that is consistent with the state water plan and the relevant approved regional water plan for any area in which the proposed appropriation is located, unless the commission determines that new, changed, or unaccounted for conditions warrant waiver of this requirement" (30 Texas Administrative Code Section 297.41(a)(3)(E)). Since the proposed projects for which water rights applications are being sought differ from the strategy in the current Plan, this letter is being provided stating that although the applications may be for different amounts and different project configurations than indicated in the Plan, the applications are consistent with the Plan and are will not affect other strategies in the current Plan.

The projects differ from the strategy in the 2016 Region N Water Plan in the following ways: (1) two desalination plants are being proposed (one was shown in the Plan), (2) the initial project yield is 30 MGD (up from the 20 MGD shown in the Plan) and scalable up to 70 MGD (not shown in the Plan), and (3) strategy is now intended to serve both industrial and municipal customers (the 2016 Plan showed strategy to meet industrial needs only and had no municipal shortages identified).

The Coastal Bend Regional Water Planning Group represents that the water right applications are not inconsistent with the 2016 Region N Water Plan, as both locations were cited as possible project locations in the Plan. The seawater desalination water management strategy and associated water rights being sought addresses a projected water supply need for manufacturing users in a manner that is consistent with the approved *2016 Region N Water Plan*. The 2016 Region N Water Plan did not show any municipal needs for the City of Corpus Christi or their customers.

The change from one seawater desalination plant to two and the change in plant size is the sort of revision that occurs as more specific plans and designs are developed to implement water management strategies. The requested water rights and the proposed water management strategy that it supports will not have a negative impact on other water management strategies in the currently approved 2016 Region N Water.

The Coastal Bend is currently developing a new regional water plan. At this time, the proposed seawater desalination plants will be a recommended water management strategy in the plan under development. 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. The requested water rights and the proposed water management strategy that it supports are not expected to have a negative impact on other water management strategies anticipated to be in the regional water plan currently under development assuming that the proposed intake and outfall locations are not in close proximity to alternate water management strategies that may become recommended during the course of the new regional water plan currently under development.

Table ES.7.
Potential Water Management Strategies to Meet Long-Term Needs for Current Wholesale Water Providers

WMS ID	Water Management Strategy	Additional Water Supply (ac-ft/yr)	Total Project Cost (\$)	Annual Cost (\$)	Unit Cost of Additional Treated Water (\$ per ac-ft/yr)	Degree of Water Quality Improvement	Environmental Issues/Special Concerns
SD.1	Municipal Water Conservation	up to 18,793	Up to \$94,234,000 for region	Variable	\$498 - \$503	No change	Possible reduction in return flows to bay and estuary
SD.3	Manufacturing Water Conservation	up to 14,733	Highly variable	Highly variable	Variable	Variable. Depends on BMP.	Possible reduction in return flows to bay and estuary
SD.5	Reuse						
	Regional Industrial Wastewater Reuse Plan (6.47 MGD)	7,250	\$137,834,000	\$10,046,000	\$1,386	Improves quality	Potential reduction of freshwater inflows to bay and estuary; construction and maintenance of pipeline corridors
	Regional Industrial Wastewater Reuse Plan (4.47 MGD)	5,010	\$115,502,000	\$8,475,000	\$1,692	Improves quality	
SD.6	Local Balancing Storage Reservoir	4,058	\$21,575,000	\$1,641,000	\$426	No Change	Construction and maintenance of pipeline corridors and terminal storage
SD.7	City of Corpus Christi Aquifer Storage and Recovery						
	Phase I (13 MGD)	14,573	\$68,632,000 to \$90,195,000	\$6,979,000 to \$8,636,000	\$479 to \$606	Improves effluent and groundwater quality	Possible reduction in return flows to bay and estuary
	Phase II (18 MGD)	20,178	\$123,253,000 to \$174,668,000	\$12,189,000 to \$16,383,000	\$604 to \$812	Improves effluent and groundwater quality	Possible reduction in return flows to bay and estuary
SD.8	Gulf Coast Aquifer Supplies						
	Evangelina/Laguna Groundwater Project (Raw)						
	Delivery Option 1- MAG constrained	24,873	\$115,585,000	\$22,210,000	\$893	Slight degradation	Construction and maintenance of pipeline corridors
	Delivery Option 1- Future	28,486	\$115,585,000	\$24,446,000	\$858	Slight degradation	Construction and maintenance of pipeline corridors
	Delivery Option 2- MAG constrained	24,873	\$74,586,000	\$18,492,000	\$743	Slight degradation	Construction and maintenance of pipeline corridors
	Delivery Option 3- MAG constrained	24,873	\$78,063,000	\$19,119,000	\$769	Slight degradation	Construction and maintenance of pipeline corridors
SD.9	Groundwater Desalination						
	Evangelina/Laguna Treated Groundwater Project						
	Delivery Option 1- MAG constrained	19,898	\$190,416,000	\$37,675,000	\$1,893	Significant improvement	Construction and maintenance of pipeline corridors.
	Delivery Option 1- Future	22,788	\$190,416,000	\$39,776,000	\$1,745	Significant improvement	Disposal of concentrated brine created from process may impact fish and wildlife habitats or wetlands.
	Delivery Option 2- MAG constrained	19,898	\$155,431,000	\$34,707,000	\$1,744	Significant improvement	
	Delivery Option 3- MAG constrained	19,898	\$157,550,000	\$35,159,000	\$1,767	Significant improvement	
SD.10	Seawater Desalination						
	City of Corpus Christi- Inner Harbor (10 MGD)	11,201	\$236,693,000	\$36,042,000	\$3,218	Variable. Low to significant improvement.	Disposal of concentrated brine created from process may impact fish and wildlife habitats or wetlands. NRA Basin Highlights report has identified constituents of concern for Corpus Christi and Nueces Bay to consider during treatment based on end-user goal.
	City of Corpus Christi- Inner Harbor (30 MGD)	33,604	\$562,779,000	\$85,875,000	\$2,555	Variable. Low to significant improvement.	
	City of Corpus Christi- La Quinta (20 MGD)	22,402	\$420,372,000	\$62,720,000	\$2,800	Variable. Low to significant improvement.	
	City of Corpus Christi- La Quinta (40 MGD)	44,804	\$768,475,000	\$114,102,000	\$2,547	Variable. Low to significant improvement.	
	Poseidon Regional Project at Ingleside (50 MGD)	56,044	\$724,984,000	\$123,638,000	\$2,206	Variable. Low to significant improvement.	
	Poseidon Regional Project at Ingleside (100 MGD)	112,000	\$1,280,848,000	\$218,932,000	\$1,955	Variable. Low to significant improvement.	
	Port of Corpus Christi Authority- Harbor Island (50 MGD)	56,044	\$802,807,000	\$130,167,000	\$2,323	Variable. Low to significant improvement.	Threatened and endangered species habitat identified near project site. Disposal of concentrated brine created from process may impact fish and wildlife habitats or wetlands. NRA Basin Highlights report has identified constituents of concern for Corpus Christi and Nueces Bay.
	Port of Corpus Christi Authority- La Quinta Channel (30 MGD)	33,604	\$457,732,000	\$77,991,000	\$2,321	Variable. Low to significant improvement.	Disposal of concentrated brine created from process may impact fish and wildlife habitats or wetlands. NRA Basin Highlights report has identified constituents of concern for Corpus Christi and Nueces Bay to consider during treatment based on end-user goal.
SD.11	Regional Water Treatment Plant Facility Expansions- ON Stevens WTP	32,030	\$68,212,000	\$6,266,000	\$565	No Change	None

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 15, 2021 2:25 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675
Attachments: FB_IMG_1625844011870.pdf

From: bp120380@gmail.com <bp120380@gmail.com>
Sent: Monday, November 15, 2021 12:04 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Blanca Parkinson

E-MAIL: bp120380@gmail.com

COMPANY:

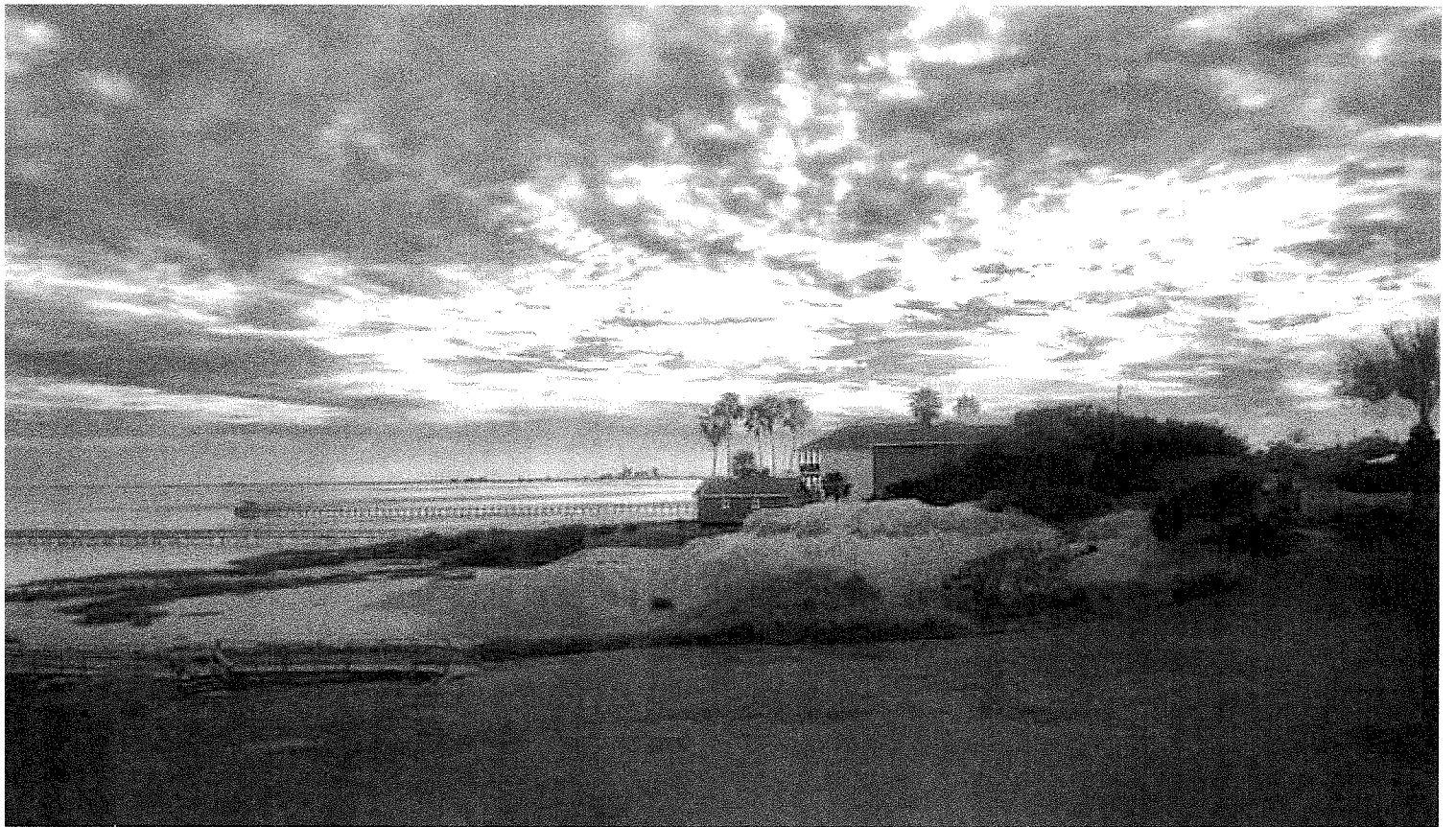
ADDRESS: 10801 SILVERTON DR
CORPUS CHRISTI TX 78410-2233

PHONE: 3617042775

FAX:

COMMENTS: WRPERM 13675 should be denied. The applicant has failed to list any information about the aesthetics of Corpus Christi Bay, which is being considered as a potential water source. The communities and area in close proximity

to this portion of the bay are areas of outstanding natural beauty and should be protected by the TCEQ. See the attachment.



Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 15, 2021 2:26 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675
Attachments: CCBAY21.pdf

From: bp120380@gmail.com <bp120380@gmail.com>
Sent: Monday, November 15, 2021 11:45 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

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: WRPERM 13675 should be denied for the following reasons: The City of Corpus Christi failed to list any recreational uses of the proposed new water source in their application (North Corpus Christi Bay).The applicant failed to list the primary and secondary contact recreational uses of this water body. This bay is used by the Portland and

Coastal Bend community for fishing, swimming, kayaking , and kite surfing. The waterbody also serves for non-contact recreational uses. The attached photo shows the homes along the coast of the area located in very close proximity of the City's and the Port's proposed intake locations.



Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 15, 2021 9:56 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676

Associate to WRPERM 13675

From: bp120380@gmail.com <bp120380@gmail.com>
Sent: Sunday, November 14, 2021 7:47 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: THE TCEQ MUST DENY WRPERM 13675 FOR THE FOLLOWING REASONS: **THERE ARE CURRENTLY NO IDENTIFIED MUNICIPAL NEEDS FOR WATER IN CORPUS CHRISTI OR THEIR CUSTOMERS. **THIS PERMIT, IF GRANTED, ALLOWS THE CITY OF CC THE OPTION TO BUILD UP TO A 70 MGD PLANT- MORE THAN 3 X'S THE AMOUNT IN THE ENTIRE REGION'S 2016 REGIONAL WATER PLAN. **TWDB "LOW-INTEREST" LOAN WOULD HAVE TO BE RE-NEGOTIATED SINCE IT

IS SITE-SPECIFIC TO THE INNER HARBOR. NEW TERMS OF THIS LOAN HAVE NOT BEEN MADE AVAILABLE TO THE TAXPAYERS, NOR WILL IT BE ENOUGH TO PAY FOR A DESAL PLANT.** THIS PERMIT APPLICATION DOES NOT TAKE INTO ACCOUNT THE CUMULATIVE EFFECTS OF THIS INTAKE AND THE PORT'S PROPOSED INTAKE LOCATED IN VERY CLOSE PROXIMITY.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 8, 2021 2:25 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: CORRECTION FW: Public comment on Permit Number WRPERM 13676
Attachments: 0673fd_8a947532b0d04de9819969fa0eb2f3b02.pdf

Associate to Permit WRPERM 13675

From: bp120380@gmail.com <bp120380@gmail.com>
Sent: Monday, November 8, 2021 11:07 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: Blanca Parkinson

E-MAIL: bp120380@gmail.com

COMPANY:

ADDRESS: 10801 SILVERTON DR
CORPUS CHRISTI TX 78410-2233

PHONE: 3617042775

FAX:

COMMENTS: The TCEQ public notice which was mailed to the public and is posted on the City of Corpus Christi desalination information website, provides incorrect information to the public regarding how to submit public comment. The instructions provided lead the public to an application which is NOT water use application 13675, but instead some

application in Kerr County. The TQEQ should provide the correct information to the public and extend to public comment period. Attached is the inaccurate public notice provided y the TCEQ.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



NOTICE OF PUBLIC MEETING FOR A WATER USE PERMIT

APPLICATION NO. 13675

City of Corpus Christi (Applicant) seeks a water use permit to authorize the diversion and use of not to exceed 186,295 acre-feet of water per year, at a maximum diversion rate of 257 cfs (115,349.31 gpm), from a diversion reach on La Quinta Channel (Corpus Christi Bay), San Antonio-Nueces Coastal Basin, for municipal and industrial purposes in San Patricio, Nueces and Aransas counties. Applicant also seeks an exempt interbasin transfer to the portion of San Patricio County in the Nueces River Basin and the portion of Nueces County in the Nueces-Rio Grande Coastal Basin within the City's wholesale water service area. More information on the application and how to participate in the permitting process is given below.

APPLICATION. City of Corpus Christi (Applicant), P.O. Box 9277, Corpus Christi, Texas 78469, has applied to the Texas Commission on Environmental Quality (TCEQ) for a Water Use Permit pursuant to Texas Water Code (TWC) §§ 11.121 and 11.085 and TCEQ Rule Title 30 Texas Administrative Code (TAC) §§ 295.151, et seq. Notice of the application was previously published and mailed to the water rights holders of record in the San Antonio-Nueces Coastal Basin pursuant to Title 30 TAC § 295.151.

City of Corpus Christi (Applicant) seeks a water use permit to authorize the diversion and use of not to exceed 186,295 acre-feet of water per year, at a maximum diversion rate of 257 cfs (115,349.31 gpm), from a diversion reach on La Quinta Channel (Corpus Christi Bay), San Antonio-Nueces Coastal Basin, for municipal and industrial purposes within the City's wholesale water service area in San Patricio, Nueces and Aransas counties.

Applicant also seeks an exempt interbasin transfer of up to 186,295 acre-feet of water per year to the portion of San Patricio County in the Nueces River Basin and the portion of Nueces County in the Nueces-Rio Grande Coastal Basin within the City's wholesale water service area.

The proposed diversion reach is located along La Quinta Channel (Corpus Christi Bay), San Antonio-Nueces Coastal Basin, in San Patricio County in ZIP Code 78374.

The upper limit of the diversion reach is located at Latitude 27.877731° N, Longitude 97.256667° W, and the lower limit of the diversion reach is located at Latitude 27.876264° N, Longitude 97.251111° W.

The application and fees were received on January 22, 2020. Additional information was received on March 16, 2020. The application was declared administratively complete and accepted for filing with the Office of the Chief Clerk on May 5, 2020.

The Executive Director has completed the technical review of the application and prepared a draft permit. The draft permit, if granted, would include special conditions including, but not limited to, installation of measuring devices. The application, technical memoranda, and Executive Director's draft permit are available for viewing on the TCEQ web page at: https://www.tceq.texas.gov/permitting/water_rights/wr-permitting/view-wr-pend-apps.

Alternatively, you may request a copy of the documents by contacting the TCEQ Office of the Chief Clerk at (512) 239-3300 or by mail at TCEQ OCC, Notice Team (MC-105), P.O. Box 13087, Austin, Texas 78711.

PUBLIC COMMENT / PUBLIC MEETING. You may submit public comments to the Office of the Chief Clerk at the address below. A public meeting will be held and will consist of two parts, an Informal Discussion Period and a Formal Comment Period. A public meeting is not a contested case hearing under the Administrative Procedure Act. During the Informal Discussion Period, the public is encouraged to ask questions of the applicant and TCEQ staff concerning the permit application and the Executive Director's recommendations, but the comments and questions submitted orally during the Informal Discussion Period will not be considered by the Commissioners and no formal response will be made. Responses will be provided orally during the Informal Discussion Period. During the Formal Comment Period, members of the public may state their formal comments orally into the official record. The Executive Director will subsequently summarize the formal comments and prepare a written response which will be considered by the Commissioners before they reach a decision on the application. The Executive Director's written response will be available to the public online or upon request. The public comment period on this application concludes at the close of the public meeting.

The Public Meeting is to be held:

Tuesday, November 16, 2021 at 7:00 PM

Members of the public who would like to ask questions or provide comments during the meeting may access the meeting via webcast by following this link: <https://www.gotomeeting.com/webinar/join-webinar> and entering Webinar ID 930-500-283. It is recommended that you join the webinar and register for the public meeting at least 15 minutes before the meeting begins. You will be given the option to use your computer audio or to use your phone for participating in the webinar.

Those without internet access must call (512) 239-1201 **at least one day prior** to the meeting to register for the meeting and to obtain information for participating telephonically. Members of the public who wish to **only listen** to the meeting may call, toll free, (415) 655-0060 and enter access code 744-190-799.

Las personas que deseen escuchar o participar en la reunión en español pueden llamar al 844-368-7161 e ingresar el código de acceso 904535#. Para obtener más información o asistencia, comuníquese con Jaime Fernández al (512) 239-2566.

Additional information will be available on the agency calendar of events at the following link: <https://www.tceq.texas.gov/agency/decisions/hearings/calendar.html>.

INFORMATION. Citizens are encouraged to submit written comments anytime during the public meeting. Citizens may mail their comments to the Office of the Chief Clerk, TCEQ, Mail Code MC-105, P.O. Box 13087, Austin, Texas 78711-3087 or submit them electronically at <https://www14.tceq.texas.gov/epic/eComment/> by entering ADJ 2026 in the search field before the public comment period closes. If you need more information about the permit application or the permitting process, please call the TCEQ Public Education Program, toll free, at 1-800-687-4040. General information can be found at our Web site at www.tceq.texas.gov. *Si desea información en Español, puede llamar al 1-800-687-4040 o por el internet al <http://www.tceq.texas.gov>.*

Persons with disabilities who need special accommodations at the public meeting should call the Office of the Chief Clerk at (512) 239-3300 or 1-800-RELAY-TX (TDD) at least five business days prior to the meeting.

Issued: October 15, 2021

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 8, 2021 2:23 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13676
Attachments: 0673fd_8a947532b0d04de9819969fa0eb2f3b02.pdf

From: bp120380@gmail.com <bp120380@gmail.com>
Sent: Monday, November 8, 2021 11:07 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: Blanca Parkinson

E-MAIL: bp120380@gmail.com

COMPANY:

ADDRESS: 10801 SILVERTON DR
CORPUS CHRISTI TX 78410-2233

PHONE: 3617042775

FAX:

COMMENTS: The TCEQ public notice which was mailed to the public and is posted on the City of Corpus Christi desalination information website, provides incorrect information to the public regarding how to submit public comment. The instructions provided lead the public to an application which is NOT water use application 13675, but instead some

application in Kerr County. The TQEQ should provide the correct information to the public and extend to public comment period. Attached is the inaccurate public notice provided y the TCEQ.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



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APPLICATION. City of Corpus Christi (Applicant), P.O. Box 9277, Corpus Christi, Texas 78469, has applied to the Texas Commission on Environmental Quality (TCEQ) for a Water Use Permit pursuant to Texas Water Code (TWC) §§ 11.121 and 11.085 and TCEQ Rule Title 30 Texas Administrative Code (TAC) §§ 295.151, et seq. Notice of the application was previously published and mailed to the water rights holders of record in the San Antonio-Nueces Coastal Basin pursuant to Title 30 TAC § 295.151.

City of Corpus Christi (Applicant) seeks a water use permit to authorize the diversion and use of not to exceed 186,295 acre-feet of water per year, at a maximum diversion rate of 257 cfs (115,349.31 gpm), from a diversion reach on La Quinta Channel (Corpus Christi Bay), San Antonio-Nueces Coastal Basin, for municipal and industrial purposes within the City's wholesale water service area in San Patricio, Nueces and Aransas counties.

Applicant also seeks an exempt interbasin transfer of up to 186,295 acre-feet of water per year to the portion of San Patricio County in the Nueces River Basin and the portion of Nueces County in the Nueces-Rio Grande Coastal Basin within the City's wholesale water service area.

The proposed diversion reach is located along La Quinta Channel (Corpus Christi Bay), San Antonio-Nueces Coastal Basin, in San Patricio County in ZIP Code 78374.

The upper limit of the diversion reach is located at Latitude 27.877731° N, Longitude 97.256667° W, and the lower limit of the diversion reach is located at Latitude 27.876264° N, Longitude 97.251111° W.

The application and fees were received on January 22, 2020. Additional information was received on March 16, 2020. The application was declared administratively complete and accepted for filing with the Office of the Chief Clerk on May 5, 2020.

The Executive Director has completed the technical review of the application and prepared a draft permit. The draft permit, if granted, would include special conditions including, but not limited to, installation of measuring devices. The application, technical memoranda, and Executive Director's draft permit are available for viewing on the TCEQ web page at: https://www.tceq.texas.gov/permitting/water_rights/wr-permitting/view-wr-pend-apps.

Alternatively, you may request a copy of the documents by contacting the TCEQ Office of the Chief Clerk at (512) 239-3300 or by mail at TCEQ OCC, Notice Team (MC-105), P.O. Box 13087, Austin, Texas 78711.

PUBLIC COMMENT / PUBLIC MEETING. You may submit public comments to the Office of the Chief Clerk at the address below. A public meeting will be held and will consist of two parts, an Informal Discussion Period and a Formal Comment Period. A public meeting is not a contested case hearing under the Administrative Procedure Act. During the Informal Discussion Period, the public is encouraged to ask questions of the applicant and TCEQ staff concerning the permit application and the Executive Director's recommendations, but the comments and questions submitted orally during the Informal Discussion Period will not be considered by the Commissioners and no formal response will be made. Responses will be provided orally during the Informal Discussion Period. During the Formal Comment Period, members of the public may state their formal comments orally into the official record. The Executive Director will subsequently summarize the formal comments and prepare a written response which will be considered by the Commissioners before they reach a decision on the application. The Executive Director's written response will be available to the public online or upon request. The public comment period on this application concludes at the close of the public meeting.

The Public Meeting is to be held:

Tuesday, November 16, 2021 at 7:00 PM

Members of the public who would like to ask questions or provide comments during the meeting may access the meeting via webcast by following this link: <https://www.gotomeeting.com/webinar/join-webinar> and entering Webinar ID 930-500-283. It is recommended that you join the webinar and register for the public meeting at least 15 minutes before the meeting begins. You will be given the option to use your computer audio or to use your phone for participating in the webinar.

Those without internet access must call (512) 239-1201 **at least one day prior** to the meeting to register for the meeting and to obtain information for participating telephonically. Members of the public who wish to **only listen** to the meeting may call, toll free, (415) 655-0060 and enter access code 744-190-799.

Las personas que deseen escuchar o participar en la reunión en español pueden llamar al 844-368-7161 e ingresar el código de acceso 904535#. Para obtener más información o asistencia, comuníquese con Jaime Fernández al (512) 239-2566.

Additional information will be available on the agency calendar of events at the following link: <https://www.tceq.texas.gov/agency/decisions/hearings/calendar.html>.

INFORMATION. Citizens are encouraged to submit written comments anytime during the public meeting. Citizens may mail their comments to the Office of the Chief Clerk, TCEQ, Mail Code MC-105, P.O. Box 13087, Austin, Texas 78711-3087 or submit them electronically at <https://www14.tceq.texas.gov/epic/eComment/> by entering ADJ 2026 in the search field before the public comment period closes. If you need more information about the permit application or the permitting process, please call the TCEQ Public Education Program, toll free, at 1-800-687-4040. General information can be found at our Web site at www.tceq.texas.gov. *Si desea información en Español, puede llamar al 1-800-687-4040 o por el internet al <http://www.tceq.texas.gov>.*

Persons with disabilities who need special accommodations at the public meeting should call the Office of the Chief Clerk at (512) 239-3300 or 1-800-RELAY-TX (TDD) at least five business days prior to the meeting.

Issued: October 15, 2021

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Monday, November 8, 2021 4:17 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public Notice Water Use Permit Application 13675- Incorrect Information

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

From: Brad Patterson <Brad.Patterson@tceq.texas.gov>
Sent: Monday, November 8, 2021 3:21 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: FW: Public Notice Water Use Permit Application 13675- Incorrect Information

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

From: Blanca P <bp120380@gmail.com>
Sent: Monday, November 8, 2021 10:38 AM
To: Eli Martinez <Eli.Martinez@tceq.texas.gov>; Brad Patterson <Brad.Patterson@tceq.texas.gov>
Subject: Public Notice Water Use Permit Application 13675- Incorrect Information

Good Morning,

I have attached in this e-mail the public meeting notice from the TCEQ regarding water use permit application 13675. I urge you to follow the instructions in the letter, so that you may be aware of the errors in the public notice. The information provided in this letter leads to a completely different permit in Kerr County.

Those interested in providing public comment for the water use permit application submitted by the City of Corpus Christi, are being misdirected. As you may know, the granting of this permit carries enormous social, financial, and environmental consequences for the Coastal Bend Region. For the TCEQ to provide incorrect and inaccurate information to the public, possibly affecting their ability to provide input, is unacceptable.

Is the meeting information accurate?

I request that at the very least, the TCEQ extend the public comment period and reissue the public notice with correct information and instructions to submit public comment regarding this permit. Thank you for your time.

Respectfully,
Blanca Parkinson

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Friday, May 7, 2021 8:19 AM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM

From: bp120380@gmail.com <bp120380@gmail.com>
Sent: Thursday, May 6, 2021 4:37 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

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: I ask that you help stop desalination in Corpus Christi Bay and in La Quinta Channel, deny water rights permit 13675, and hold a public meeting for the community to voice its concerns. As a resident, I oppose the City of Corpus Christi placing an intake pipe for a desalination plant in La Quinta Channel or anywhere in Corpus Christi Bay. This water will largely be for industrial use, not for me, my family, or my neighbors. I don't think bringing polluting

corporations to our community is worth the cost these desalination plants will have on our Bay, on our wildlife, and on our local fishing and tourism economies.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 16, 2021 2:18 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: drlgporter@yahoo.com <drlgporter@yahoo.com>
Sent: Tuesday, November 16, 2021 10:43 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: LYNNE PORTER

E-MAIL: drlgporter@yahoo.com

COMPANY:

ADDRESS: PO BOX 335
INGLESIDE TX 78362-0335

PHONE: 3617767631

FAX:

COMMENTS: I live on Ingleside on the Bay and watch the large ships go by my house daily in the La Quinta Channel. A street and granite blocks and 100 feet are the only separation from those ships. I see first hand what is happening with the wildlife, water, air and seagrass. I STRONGLY OPPOSE the City of Corpus Christi's placing an intake pipe for a

desalination plant in La Quinta Channel. I request that a public meeting be held for the community to express its concerns. I request that a Contested Case Hearing be held. According to the permit, the City of Corpus Christi would be allowed to suck 115,349.31 gallons of water from La Quinta Channel every minute. Sucking in that amount of water that fast will require an enormous amount of suction power and I am concerned about aquatic life being trapped or killed in the process. This intake pipe is a death sentence! How will our wildlife survive when the young baby fish are sucked away. I and my family members love to fish, kayak, boat, swim in La Quinta Channel where the intake pipe for the Port of Corpus Christi's desalination facility will be located or in Ingleside Cove where the discharge will flow to. I am concerned that given the number of small larvae which will be sucked up, turned to sludge, and deposited into landfills, fishing will be badly impaired in the region. I am concerned about the amount of salty brine that will be discharged from the desal plant, plus its mixing in with other waste water from the industries in La Quinta Channel. This can't be good for the fish - or for people! If the fish die, then the birds we love to watch will also die or leave the area. I am concerned about possible health effects on me or my family from the chemicals used in the desalination process, including pre-treatment. Right now we battle MODA (which has a new name) watching discharge and smells in the air. Seagrass has already disappeared. I suffered through the historic winter storm in February 2021 and was without power for 4 days in freezing temperatures due to the amount of demand placed on the electrical grid in Texas. I sleep in 35 degree temps for 4 nights. The operating pumps required to suck 115,349.31 gallons of water per minute will take an enormous amount of power, placing even more strain on the grid. I am opposed to issuing a permit which would demand excessive amounts of energy to supply water for future industrial use. Why is it necessary to put this here. We already have salt level issues in the water. Is money all that matters? What happens when there is no sea and bird life here anymore? Who will answer to this? Why is this such a continuing fight?

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Thursday, April 22, 2021 2:46 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

PM

From: drlgporter@yahoo.com <drlgporter@yahoo.com>
Sent: Thursday, April 22, 2021 12:11 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: LYNNE PORTER

E-MAIL: drlgporter@yahoo.com

COMPANY:

ADDRESS: PO BOX 335 511 Bayshore Drive
INGLESIDE TX 78362-0335

PHONE: 3615631627

FAX:

COMMENTS: I live and work within a mile from the La Quinta Channel and are a member of the Ingleside on the Bay Coastal Watch Association. I STRONGLY OPPOSE the City of Corpus Christi's placing an intake pipe for a desalination plant in La Quinta Channel. I request that a public meeting be held for the community to express its concerns. According to the permit, the City of Corpus Christi would be allowed to suck 115,349.31 gallons of water from La Quinta Channel

every minute. Sucking in that amount of water that fast will require an enormous amount of suction power and I am concerned about aquatic life being trapped or killed in the process. This intake pipe is a death sentence! I and my husband love to fish and kayak in La Quinta Channel where the intake pipe for the Port of Corpus Christi's desalination facility will be located or in Ingleside Cove where the discharge will flow to. I am concerned that given the number of small larvae which will be sucked up, turned to sludge, and deposited into landfills, fishing will be badly impaired in the region. ENOUGH IS ENOUGH!!!! Why is everything about money? The SPARKLING CITY BY THE BAY--Who are we kidding??? I am concerned about the amount of salty brine that will be discharged from the desal plant, plus its mixing in with other waste water from the industries in La Quinta Channel. This can't be good for the fish - or for people! If the fish die, then the birds we love to watch will also die or leave the area. I am concerned about possible health effects on me or my family from the chemicals used in the desalination process, including pre-treatment. Many of us suffered through the historic winter storm in February 2021 and were without power for several days in freezing temperatures due to the amount of demand placed on the electrical grid in Texas. I personally endured 4 nights without power and water in a house that was at 39 degrees...were you? The operating pumps required to suck 115,349.31 gallons of water per minute will take an enormous amount of power, placing even more strain on the grid. I am opposed to issuing a permit which would demand excessive amounts of energy to supply water for future industrial use. Since Corpus Christi Bay connects to the Gulf of Mexico, doesn't diverting water from Corpus Christi Bay to support private industry without federal oversight amount to stealing from the Waters of the United States (WOTUS)? Since Texas is already drought-prone and gets very hot, why is the City of Corpus Christi enticing such thirsty high-energy-requiring industries to come here in the first place? Shouldn't they go where it's cooler and where there's more water? All of our area scientists, including from Texas Parks & Wildlife, the General Land Office, the UT Marine Science Institute, and the Harte Research Institute, have said, in published reports, that seawater desalination intake and discharge should only occur in designated areas offshore in the Gulf. There's even an expedited permitting process for this. Why is the City of Corpus Christi, a public entity, insisting on putting intake and discharge inside Corpus Christi Bay in the first place?

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Thursday, May 6, 2021 8:30 AM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: rodriguez.alexis007@yahoo.com <rodriguez.alexis007@yahoo.com>
Sent: Wednesday, May 5, 2021 11:17 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Alexis Rodriguez

E-MAIL: rodriguez.alexis007@yahoo.com

COMPANY:

ADDRESS: 1455 CABLE RANCH RD Apt 522
SAN ANTONIO TX 78245-2156

PHONE: 5128104860

FAX:

COMMENTS: I live approximately 2.56 hours away from the desal plant and I STRONGLY OPPOSE the City of Corpus Christi's placing an intake pipe for a desalination plant in La Quinta Channel. I request that a public meeting be held for the community to express its concerns. I request that a Contested Case Hearing be held. According to the permit, the

City of Corpus Christi would be allowed to suck 115,349.31 gallons of water from La Quinta Channel every minute. Sucking in that amount of water that fast will require an enormous amount of suction power and I am concerned about aquatic life being trapped or killed in the process. This intake pipe is a death sentence! All of our area scientists, including from Texas Parks & Wildlife, the General Land Office, the UT Marine Science Institute, and the Harte Research Institute, have said, in published reports, that seawater desalination intake and discharge should only occur in designated areas offshore in the Gulf. There's even an expedited permitting process for this. Why is the City of Corpus Christi, a public entity, insisting on putting intake and discharge inside Corpus Christi Bay in the first place. Aren't they listening? Why aren't they showing the way by pursuing the expedited permit process that will keep our Bay safer? Also, enough has been done to harm the Indigenous people of this land. This will only harm us further.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Tuesday, April 27, 2021 11:17 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-
WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

H

From: leslierozzell@gmail.com <leslierozzell@gmail.com>
Sent: Sunday, April 25, 2021 8:14 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: A Leslie Rozzell

E-MAIL: leslierozzell@gmail.com

COMPANY:

ADDRESS: 1030 BAYSHORE DR
INGLESIDE TX 78362-4647

PHONE: 6029038352

FAX:

COMMENTS: Leslie Rozzell, 1030 Bayshore Dr, Ingleside on the Bay My home is on the water facing Corpus Christi Channel where La Quinta Channel merges, and my family and I fish in the waters of La Quinta Channel. I am a member of IOB Coastal Watch. With strong opposition to placing an intake pipe in La Quinta Channel, I request that the community concerns be heard and a Contested Case Hearing be held. We should be protecting the valuable aquatic

wildlife and habitat rather than harming it. The intake pipe will certainly do harm. All of our area scientists, including from Texas Parks & Wildlife, the General Land Office, the UT Marine Science Institute, and the Harte Research Institute, have said, in published reports, that seawater desalination intake and discharge should only occur in designated areas offshore in the Gulf. We should not entice high-water use industries to the area. Industry should be funding intake and discharge installation off-shore. We should not be encouraging damage to the bay environment, and activities that will make our community less healthy.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Tuesday, November 30, 2021 8:54 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

H

From: Mgt5@hotmail.com <Mgt5@hotmail.com>
Sent: Monday, November 29, 2021 10:29 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Margaret R Russo

E-MAIL: Mgt5@hotmail.com

COMPANY:

ADDRESS: 1307 CROSBY ST
PORTLAND TX 78374-2414

PHONE: 3618760144

FAX:

COMMENTS: * I STRONGLY OPPOSE the Port of Corpus Christi's placing an intake pipe for a desalination plant in La Quinta Ship Channel * I request that a Contested Case Hearing be held * My family and I love to kayak fish in La Quinta Channel where the intake pipe for the Port of Corpus Christi's desalination facility will be located. I am concerned that given the number of small larvae which will be sucked up, turned to sludge, and deposited into landfills, fishing will be

badly impaired in the region. * I am concerned about the amount of salty brine that will be discharged from the desal plant, plus its mixing in with other waste water from the industries in La Quinta Channel. This can't be good for the fish – or for people! If the fish die, then the birds we love to watch will also die or leave the area. * I am concerned about possible health effects on me or my family from the chemicals used in the desal.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Friday, November 5, 2021 10:32 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675
Attachments: City of Corpus La Quinta Channel Water Rights Permit.docx

WRPERM
119674

PM
H

From: cacheton1@twc.com <cacheton1@twc.com>
Sent: Friday, November 5, 2021 8:08 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: MR Encarnacion Serna

E-MAIL: cacheton1@twc.com

COMPANY: self

ADDRESS: 105 LOST CREEK DR
PORTLAND TX 78374-1449

PHONE: 3619035774

FAX:

COMMENTS: This permit application should have been denied immediately after it was submitted because it is so deficient in content and the applicant does not present any efforts to protect the aquatic life that will be sucked in

through the inlet (intake) pipes to the process and the lethality/mortality numbers of this aquatic life would be enormous. And there are many other reasons and that is why the attached document is also submitted.

Date: April 7, 2021

My name is Encarnacion Serna. My wife Rosa and I reside at 105 Lost Creek Drive in Portland, Texas. We have lived in this home since July 1991. My telephone number is 361- 903-5774.

I am requesting that TCEQ deny approval of this application, but if unwilling to do this then I am requesting now through this letter that a Public Meeting and a Contested Case Hearing on WRPERM 13675 be granted before allowing the City of Corpus Christi to continue any further with this project. The applicant for this Permit is the City of Corpus Christi of Nueces County and the Engineering firm working on this permit is Freese and Nichols, both referred here as the Applicant.

My property extends to the shores of Corpus Christi bay and beyond into the water to include riparian rights. The application defines the location of the intake point for this desalination plant by providing two global positions on an elongated rectangular footprint. However, it appears the main facility will be located approximately three (3) miles from my home. The Application does not provide a drawing, or sketch, or verbal description of what the inlet structure would look like or how it would be composed of.

I have direct access to the Bay from my home. I fish on these waters (from the mouth of the Corpus Christi inner Harbor to the shores of the cities of Ingleside. In addition to fishing, I have been swimming, wading, gigging and kayaking for years in these waters. So, the one (1) mile radius that would exclude people from more fully participating in the comment and legal process to object against this proposal does not apply to me or anybody else who depend on this body of water for harvesting fish for human consumption and for other human aquatic and marine activities. My family and I consume the fish my children, grandchildren, in-laws, and I catch; as the prices of fresh fish at the market are high and becoming unaffordable. These waters have been sources of recreation for years and have provided fish for my family. Now I have 10 grandchildren and in-laws and we all harvest food, and recreate in these waters.

This desalination facility and its bay water intake structure (whatever it may be) will interfere with the peaceful enjoyment of my home, and do away with a source of food for me and my entire family and must be denied.

I offer the following comments pertaining to the City of Corpus Christi, and pertaining to this permit:

- (a) Lack of sufficient, meaningful technical content; and,
- (b) Deficiencies and inadequacies in providing necessary information to the Public and the Regulating Agency (TCEQ.)
- (c) History of violations, mismanagement and operational/maintenance failures of various water systems owned and operated by the City.
- (d) There is great opposition by the general public and organizations to these desalination projects.

This water rights application is deficient and inadequate in its technical content, including but not limited to the areas listed below:

1. **Engineering Credentials (shoddy/sham application.)** The appropriate forms in this application submitted to the TCEQ in January of 2020 by the city of Corpus were not signed, sealed, and dated by a Registered Professional Engineer (s) Licensed to Practice in The State of Texas. The application has various signatures in various documents in various places but no professional engineer or scientist seals appear anywhere. The Applicant is careless in what it submits to the TCEQ in association with this application, and the TCEQ (whether or not excused by rule) would be careless about the quality, the seriousness, and the efficacy of the technical information tendered in this application, were the agency to accept the tender without a response requiring correction, supplementation, or refiling. And, as a matter of fact, the recently huge opposition presented verbally and in writing against the City of Corpus Christi and the TCEQ [City of Corpus Christi Inner Harbor Desalination water rights permit WRPERM 13676 (information presented before, during, and after) the March 18, 2021 public meeting] by massive amounts of very well informed, educated, and concerned citizens made it very clear and revealed to the public that this application is immensely deficient, and that the people from the general public know more about the application and desalination than the City and the TCEQ representatives who were present during the March 18 meeting. One has to conclude from the statements and answers given by these representatives that these representatives do not know enough about their desalination proposal and that the submitted water rights application (or otherwise they are hiding information that they do not want the public to know) is sham/shoddy in its content. It was also appalling that of the fifty (50) or so members of the public that were allowed to participate only three were in favor of this desalination proposal and the rest of them 40 plus were against. The TCEQ has opportunity to reverse that apparent trend in its management and response to the instant permit application by simply denying “sham/shoddy” applications from the very beginning of the process. And with limited resources and time this would allow the TCEQ and the Applicant to carry out more productive valuable work instead. Remember the City of Corpus Christi and the TCEQ to some extent both operate on tax rate payer’s monies.
2. **Total Lack of Information on the Water Intake Design (failure of application to provide flow impingement and entrainment minimization plan, the information on how aquatic and land life (fauna and flora ecosystems) would be protected from the intake structure (possible and probable circumventing of State and Federal rules and regulations).** This information is missing altogether, nowhere in the application does the Applicant provide this information. Instead, the Applicant dedicates 155 of 193 pages (80 % of the application) to inform the TCEQ and the public how the public should be educated on how to conserve water, how to fix leaks, lengthy statistical information on draught contingency plans, and statistics on water usages, and who the water consumers are, all presented in 2018 and 2019 Water Planning Documents. While all of this information is or might be useful to the TCEQ, what the Applicant needed to have provided on this application was:

- a. What exactly will the intake structure be like.
 - b. Intake pipe sizes (lengths and diameters)
 - c. Types, and number of screens
 - d. Support structures
 - e. Bathymetry evaluation on intake location
 - f. Inlet velocities on pipe entrances (with calculations assumption and criteria used in the generation of these numbers)
 - g. Velocities inside intake pump suction pipes (with calculations assumption and criteria used in the generation of these numbers)
 - h. Velocities inside intake pump discharge entrances (with calculations assumption and criteria used in the generation of these numbers)
 - i. Chemicals and injection rates to be used in pre-treatment.
 - j. Background study based on field data analysis and observations to determine fish, (crustaceans and otherwise) types, species, sizes, population colonies, to include not only adult fish but egg/larva and small sizes ¼ inch or less.
 - k. Mortality rate determination (caused by impingement and entrainment) for the fish and larva at the inlet of the pipes (for fish who do not end up entering the pipes) and mortality rates for those who do end up entering the pipes and would die due to mechanical impacts by the higher velocities once inside the pipes and the equipment.
 - l. Mortality rate determination in pre-treatment caused by the action of chemical injection.
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Note; City of Corpus Christi Inner Harbor desalination flows not included here.

La Quinta Channel/Corpus Christi Bay is going to be “rock n’ rolling” an’ a shaking” due to these brilliant ideas!!! Both the City of Corpus Christi Government the Port of Corpus Christi and the TCEQ have to remember that la Quinta Channel is not only an integral part of the Corpus Christi Bay with its land and marine ecosystems but also Navigable Waters of the United States Government overseen by The Army Corps of Engineers and the USA Coast Guard. Have Corpus City Officials or the TCEQ contacted the following agencies:

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If not; why not? If yes how did these agencies respond?

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5. **The lifting and transporting of an intake volumetric rate of 166.2 MGD will require huge amounts of electrical energy (extraordinary large electrical energy consumption)**
While it is true that the TCEQ currently does not address these types of issues on water rights permits it is imperative and paramount that this issue be addressed. The proposed intake flow for this project alone is gargantuan, 166.2 MGD, [and the Port's two combined proposals are even bigger 228.9 MGD, and the other City's (Inner Harbor) smaller.] This saline flow of Bay water, 166.2 MGD, to be lifted from the Corpus Christi Bay, to be transported through multitudes of pipes and equipment in the intake system, through the pre-treatment system, through the reverse osmosis membranes (having an out-of-the-ordinary osmotic pressure) along with the pressure losses due to the transport of this water (with specific gravities great than 1) across pipes and equipment, through the permeate/product distribution system; and, finally the high salinity discharge waste/retentate back to the bay, would all require enormously sized pumps having gigantic, out-of-the ordinarily sized electrical motors with huge

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Note: The Carlsbad Desalination Plant was originally estimated it would cost approximately **one quarter (1/4) billion dollars. It ended up costing one (1) billion dollars with an operating cost between 49 M\$ and 59M\$.** What would the City of Corpus Christi La Quinta Channel desalination project cost in today's or in future dollars? What would its operating cost be? Who would pay for these costs? How would the City of Corpus Christi obtain these monies?

The forgoing findings listed above and the recent tragic failure (February 2021 freeze) of the electrical power grid to supply enough electric energy to the citizens of Texas during the peak demand periods of the recent freeze *beg and claim* the following

questions from the City of Corpus Christi government, the Port of Corpus Christi authority, and the TCEQ pertaining to these desalination water intake applications:

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 - c. How will the power be generated (nuclear or fossil) where will the plant (s) substations be located at?
 - d. How much more pollution will this power generation produce?
 - e. Who will generate the electrical energy?
 - f. Will the generated power be transmitted and distributed using existing grid(s)?
 - g. Who will pay for it?
 - h. How will it be paid for?
 - i. Has the City or the Port of Corpus talked to Governor Abbot about this?
 - j. Has the City or the Port of Corpus talked to ERCOT about this?
 - k. Has the City or the Port of Corpus talked to the Power companies about this? Are there any behind closed door meetings “going on” with these companies on these issues?
6. **History of violations, mismanagement and operational/maintenance failures of various water systems owned and operated by the City.** Very recently in September of 2020 The Federal Government through the EPA and the State of Texas through the TCEQ filed an enormous law suit against the City of Corpus Christi for violations to the Clean Water Act and violations against The Texas Water Code. In this law suit among the many violations and charges the following were listed:
- a. Failure to comply with the terms and conditions of the City’s Texas Pollutant Discharge Elimination System (TPDES) permits.
 - b. Unpermitted and illegal discharge of pollutants in violation of the Texas Water Code.
 - c. Imminent and substantial endangerment to the health of persons..... with high levels of bacteria in recreational waters at and near beaches.
 - d. Sewer discharges into public and private property.
 - e. Failure to treat waste water at six (6) [not just one but six] waste water treatment plants.

NOTE: Among the causes listed were: poor maintenance and operations occurring on numerous occasions since 2007 **(thirteen 13 years of non-compliance and violations!)**

Not too long ago, around December 2016 local industry contaminated the City’s drinking water system with an asphalt demulsifier. Local news reported the event and international news, the BBC reported the contaminating substance to be AA-86 an asphalt demulsifier which can burn human skin, and reported that on the Wednesday of that week 320,00 people were told by the City not to touch, drink or use the water. This

highlights another existing seriously dangerous situation. In the city of Corpus Christi, the potable water distribution system is shared by both domestic users, commercial users and households. At the root of the problem was the failure of a backflow preventer system which if it had been maintained, inspected, repaired, or replaced in a timely manner the incident would not have occurred.

Many other times, too many to list here due to time and space limitations, the City frequently advises and requires its citizens to boil the water, or not to drink it at all, due to various other causes, again too many to list on this space. Yet the City currently imposes gigantic water rates on its citizens, for water that the citizens cannot drink, cannot cook, and cannot even bathe in it.

7. **Currently there is a tremendous and massive opposition from the general public, several non- profit organizations (more than eight) Coastal Bend local governments, State agencies (TCEQ OPIC, SOAH Judges) and a good number of elected state officials.** This is evidenced by: 1. Recent (December 2020) decisions and recommendations by OPIC and SOAH judges against a similar project The Port of Corpus Christi Desalination Project on Harbor Island, 2. The massive participation and large number of protests manifested in the recent (March 2021) public meeting pertaining to The City of Corpus Christi Inner Harbor Desalination Project, where of the 50 plus people that were allowed to speak only 2 or 3 were in favor of the project and 47 plus were against it . 3. The thousands of verbal and written comments submitted year to day against these desalination projects asking the TCEQ and our elected officials to stop the madness and the rush of these detrimental project proposals and requesting public meetings and contested case hearings, and 4. the significant number of professionals (engineers, lawyers, teachers, nurses, college students etc.) that have now joined the opposition to these projects.

In Conclusion This sham/shoddy application by the City of Corpus Christi must be denied immediately by the TCEQ, or withdrawn immediately by the City of Corpus Christi. The unnecessary adverse and catastrophic; environmental, socio-economic, and liability impacts, that would be created by the city; if this; or any of the other desalination project is implemented would be a disaster. If this denial/withdrawal does not occur, ***I Encarnacion Serna (Chon) hereby request that public meetings be conducted and a contested case hearing be granted on this application.***

Respectfully:

Encarnacion Serna (Chon)

105 Lost Creek

Portland Texas 78374

361-903-5774

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Thursday, April 8, 2021 8:29 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675
Attachments: City of Corpus La Quinta Channel Water Rights Permit.docx

eComment – PM, H

Attachment – PM, H

From: cacheton1@twc.com <cacheton1@twc.com>
Sent: Wednesday, April 7, 2021 11:59 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Encarnacion Serna

E-MAIL: cacheton1@twc.com

COMPANY: self

ADDRESS: 105 LOST CREEK DR
PORTLAND TX 78374-1449

PHONE: 3619035774

FAX:

COMMENTS: I request that this permit application be denied immediately because it is a "sham/shoddy application and because the project it proposes, if implemented, would result in catastrophic CONSEQUENCES TO the Citizens of South

Texas in the Coastal Bend Communities. if this application is not denied immediately, then hereby I am requesting a contested case hearing and a public open meeting to discuss the many serious issues with this application. SEE COMMENTS AND REASONS ON THE ATTACHED WORD DOCUMENT.

Date: April 7, 2021

My name is Encarnacion Serna. My wife Rosa and I reside at 105 Lost Creek Drive in Portland, Texas. We have lived in this home since July 1991. My telephone number is 361- 903-5774.

I am requesting that TCEQ deny approval of this application, but if unwilling to do this then I am requesting now through this letter that a Public Meeting and a Contested Case Hearing on WRPERM 13675 be granted before allowing the City of Corpus Christi to continue any further with this project. The applicant for this Permit is the City of Corpus Christi of Nueces County and the Engineering firm working on this permit is Freese and Nichols, both referred here as the Applicant.

My property extends to the shores of Corpus Christi bay and beyond into the water to include riparian rights. The application defines the location of the intake point for this desalination plant by providing two global positions on an elongated rectangular footprint. However, it appears the main facility will be located approximately three (3) miles from my home. The Application does not provide a drawing, or sketch, or verbal description of what the inlet structure would look like or how it would be composed of.

I have direct access to the Bay from my home. I fish on these waters (from the mouth of the Corpus Christi inner Harbor to the shores of the cities of Ingleside. In addition to fishing, I have been swimming, wading, gigging and kayaking for years in these waters. So, the one (1) mile radius that would exclude people from more fully participating in the comment and legal process to object against this proposal does not apply to me or anybody else who depend on this body of water for harvesting fish for human consumption and for other human aquatic and marine activities. My family and I consume the fish my children, grandchildren, in-laws, and I catch; as the prices of fresh fish at the market are high and becoming unaffordable. These waters have been sources of recreation for years and have provided fish for my family. Now I have 10 grandchildren and in-laws and we all harvest food, and recreate in these waters.

This desalination facility and its bay water intake structure (whatever it may be) will interfere with the peaceful enjoyment of my home, and do away with a source of food for me and my entire family and must be denied.

I offer the following comments pertaining to the City of Corpus Christi, and pertaining to this permit:

- (a) Lack of sufficient, meaningful technical content; and,
- (b) Deficiencies and inadequacies in providing necessary information to the Public and the Regulating Agency (TCEQ.)
- (c) History of violations, mismanagement and operational/maintenance failures of various water systems owned and operated by the City.
- (d) There is great opposition by the general public and organizations to these desalination projects.

This water rights application is deficient and inadequate in its technical content, including but not limited to the areas listed below:

1. **Engineering Credentials (shoddy/sham application.)** The appropriate forms in this application submitted to the TCEQ in January of 2020 by the city of Corpus were not signed, sealed, and dated by a Registered Professional Engineer (s) Licensed to Practice in The State of Texas. The application has various signatures in various documents in various places but no professional engineer or scientist seals appear anywhere. The Applicant is careless in what it submits to the TCEQ in association with this application, and the TCEQ (whether or not excused by rule) would be careless about the quality, the seriousness, and the efficacy of the technical information tendered in this application, were the agency to accept the tender without a response requiring correction, supplementation, or refiling. And, as a matter of fact, the recently huge opposition presented verbally and in writing against the City of Corpus Christi and the TCEQ [City of Corpus Christi Inner Harbor Desalination water rights permit WRPERM 13676 (information presented before, during, and after) the March 18, 2021 public meeting] by massive amounts of very well informed, educated, and concerned citizens made it very clear and revealed to the public that this application is immensely deficient, and that the people from the general public know more about the application and desalination than the City and the TCEQ representatives who were present during the March 18 meeting. One has to conclude from the statements and answers given by these representatives that these representatives do not know enough about their desalination proposal and that the submitted water rights application (or otherwise they are hiding information that they do not want the public to know) is sham/shoddy in its content. It was also appalling that of the fifty (50) or so members of the public that were allowed to participate only three were in favor of this desalination proposal and the rest of them 40 plus were against. The TCEQ has opportunity to reverse that apparent trend in its management and response to the instant permit application by simply denying “sham/shoddy” applications from the very beginning of the process. And with limited resources and time this would allow the TCEQ and the Applicant to carry out more productive valuable work instead. Remember the City of Corpus Christi and the TCEQ to some extent both operate on tax rate payer’s monies.
2. **Total Lack of Information on the Water Intake Design (failure of application to provide flow impingement and entrainment minimization plan, the information on how aquatic and land life (fauna and flora ecosystems) would be protected from the intake structure (possible and probable circumventing of State and Federal rules and regulations).** This information is missing altogether, nowhere in the application does the Applicant provide this information. Instead, the Applicant dedicates 155 of 193 pages (80 % of the application) to inform the TCEQ and the public how the public should be educated on how to conserve water, how to fix leaks, lengthy statistical information on draught contingency plans, and statistics on water usages, and who the water consumers are, all presented in 2018 and 2019 Water Planning Documents. While all of this information is or might be useful to the TCEQ, what the Applicant needed to have provided on this application was:

- a. What exactly will the intake structure be like.
 - b. Intake pipe sizes (lengths and diameters)
 - c. Types, and number of screens
 - d. Support structures
 - e. Bathymetry evaluation on intake location
 - f. Inlet velocities on pipe entrances (with calculations assumption and criteria used in the generation of these numbers)
 - g. Velocities inside intake pump suction pipes (with calculations assumption and criteria used in the generation of these numbers)
 - h. Velocities inside intake pump discharge entrances (with calculations assumption and criteria used in the generation of these numbers)
 - i. Chemicals and injection rates to be used in pre-treatment.
 - j. Background study based on field data analysis and observations to determine fish, (crustaceans and otherwise) types, species, sizes, population colonies, to include not only adult fish but egg/larva and small sizes ¼ inch or less.
 - k. Mortality rate determination (caused by impingement and entrainment) for the fish and larva at the inlet of the pipes (for fish who do not end up entering the pipes) and mortality rates for those who do end up entering the pipes and would die due to mechanical impacts by the higher velocities once inside the pipes and the equipment.
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 - c. How will the power be generated (nuclear or fossil) where will the plant (s) substations be located at?
 - d. How much more pollution will this power generation produce?
 - e. Who will generate the electrical energy?
 - f. Will the generated power be transmitted and distributed using existing grid(s)?
 - g. Who will pay for it?
 - h. How will it be paid for?
 - i. Has the City or the Port of Corpus talked to Governor Abbott about this?
 - j. Has the City or the Port of Corpus talked to ERCOT about this?
 - k. Has the City or the Port of Corpus talked to the Power companies about this? Are there any behind closed door meetings "going on" with these companies on these issues?
6. **History of violations, mismanagement and operational/maintenance failures of various water systems owned and operated by the City.** Very recently in September of 2020 The Federal Government through the EPA and the State of Texas through the TCEQ filed an enormous law suit against the City of Corpus Christi for violations to the Clean Water Act and violations against The Texas Water Code. In this law suit among the many violations and charges the following were listed:
- a. Failure to comply with the terms and conditions of the City's Texas Pollutant Discharge Elimination System (TPDES) permits.
 - b. Unpermitted and illegal discharge of pollutants in violation of the Texas Water Code.
 - c. Imminent and substantial endangerment to the health of persons..... with high levels of bacteria in recreational waters at and near beaches.
 - d. Sewer discharges into public and private property.
 - e. Failure to treat waste water at six (6) [not just one but six] waste water treatment plants.

NOTE: Among the causes listed were: poor maintenance and operations occurring on numerous occasions since 2007 (thirteen 13 years of non-compliance and violations!)

Not too long ago, around December 2016 local industry contaminated the City's drinking water system with an asphalt demulsifier. Local news reported the event and international news, the BBC reported the contaminating substance to be AA-86 an asphalt demulsifier which can burn human skin, and reported that on the Wednesday of that week 320,00 people were told by the City not to touch, drink or use the water. This

highlights another existing seriously dangerous situation. In the city of Corpus Christi, the potable water distribution system is shared by both domestic users, commercial users and households. At the root of the problem was the failure of a backflow preventer system which if it had been maintained, inspected, repaired, or replaced in a timely manner the incident would not have occurred.

Many other times, too many to list here due to time and space limitations, the City frequently advises and requires its citizens to boil the water, or not to drink it at all, due to various other causes, again too many to list on this space. Yet the City currently imposes gigantic water rates on its citizens, for water that the citizens cannot drink, cannot cook, and cannot even bathe in it.

7. **Currently there is a tremendous and massive opposition from the general public, several non- profit organizations (more than eight) Coastal Bend local governments, State agencies (TCEQ OPIC, SOAH Judges) and a good number of elected state officials.** This is evidenced by: 1. Recent (December 2020) decisions and recommendations by OPIC and SOAH judges against a similar project The Port of Corpus Christi Desalination Project on Harbor Island, 2. The massive participation and large number of protests manifested in the recent (March 2021) public meeting pertaining to The City of Corpus Christi Inner Harbor Desalination Project, where of the 50 plus people that were allowed to speak only 2 or 3 were in favor of the project and 47 plus were against it . 3. The thousands of verbal and written comments submitted year to day against these desalination projects asking the TCEQ and our elected officials to stop the madness and the rush of these detrimental project proposals and requesting public meetings and contested case hearings, and 4. the significant number of professionals (engineers, lawyers, teachers, nurses, college students etc.) that have now joined the opposition to these projects.

In Conclusion This sham/shoddy application by the City of Corpus Christi must be denied immediately by the TCEQ, or withdrawn immediately by the City of Corpus Christi. The unnecessary adverse and catastrophic; environmental, socio-economic, and liability impacts, that would be created by the city; if this; or any of the other desalination project is implemented would be a disaster. If this denial/withdrawal does not occur, *I Encarnacion Serna (Chon) hereby request that public meetings be conducted and a contested case hearing be granted on this application.*

Respectfully:

Encarnacion Serna (Chon)

105 Lost Creek

Portland Texas 78374

361-903-5774

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Wednesday, August 5, 2020 9:45 AM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: CORRECTION: Public comment on Permit Number WRPERM 13675

PM
H

From: PUBCOMMENT-OCC
Sent: Monday, July 20, 2020 8:47 AM
To: PUBCOMMENT-OCC2 <pubcomment-occ2@tceq.texas.gov>; PUBCOMMENT-OPIC <pubcomment-opic@tceq.texas.gov>; PUBCOMMENT-ELD <pubcomment-eld@tceq.texas.gov>; PUBCOMMENT-WWW-WRAS <pubcomment-www-wras@tceq.texas.gov>
Subject: FW: Public comment on Permit Number WRPERM 13675

H

From: cacheton1@twc.com <cacheton1@twc.com>
Sent: Thursday, July 16, 2020 2:06 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Encarnacion Serna

E-MAIL: cacheton1@twc.com

COMPANY:

ADDRESS: 105 LOST CREEK DR
PORTLAND TX 78374-1449

PHONE: 3619035774

FAX:

COMMENTS: I request a public hearing (not a virtual conference on computer screens and smart phones) but a physical meeting with TCEQ and all stakeholders present

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, July 20, 2020 8:47 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

H

From: cacheton1@twc.com <cacheton1@twc.com>
Sent: Thursday, July 16, 2020 2:06 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Encarnacion Serna

E-MAIL: cacheton1@twc.com

COMPANY:

ADDRESS: 105 LOST CREEK DR
PORTLAND TX 78374-1449

PHONE: 3619035774

FAX:

COMMENTS: I request a public hearing (not a virtual conference on computer screens and smart phones) but a physical meeting with TCEQ and all stakeholders present

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Monday, July 20, 2020 8:48 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

H
PM

From: cacheton1@twc.com <cacheton1@twc.com>
Sent: Thursday, July 16, 2020 2:04 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Encarnacion Serna

E-MAIL: cacheton1@twc.com

COMPANY:

ADDRESS: 105 LOST CREEK DR
PORTLAND TX 78374-1449

PHONE: 3619035774

FAX:

COMMENTS: Request a public hearing (Not a virtual conference on computer screen or with smart phones, but a physical meeting with TCEQ and all stake holders after the pandemic is gone and things go back to normal

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Thursday, July 2, 2020 8:36 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WQ;
PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WQ0005290000

H
+ associate to WRPERM 13675
+ associate to WRPERM 13676
+ associate to WQ0005289000

From: cacheton1@twc.com <cacheton1@twc.com>
Sent: Tuesday, June 30, 2020 10:56 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WQ0005290000

REGULATED ENTY NAME LA QUINTA CHANNEL DESALINATION PLANT

RN NUMBER: RN110940558

PERMIT NUMBER: WQ0005290000

DOCKET NUMBER:

COUNTY: SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Encarnacion Serna

E-MAIL: cacheton1@twc.com

COMPANY: self

ADDRESS: 105 LOST CREEK DR
PORTLAND TX 78374-1449

PHONE: 3619035774

FAX:

COMMENTS: The City of Corpus Christi and the TCEQ need to schedule a public hearing on this permit application and the other permits (WRPERM 13675, 13676 and permit WQ 0005289000) all pertaining to water desalination projects

that will draw water in the millions of gallons per day drawing water on their intakes from La Quinta Channel and Corpus Christi Bay and the discharge of concentrated reject water back to the same water bodies. They need to be transparent and honest and tell the public how these waters, sludges etc being returned to these bodies will pollute and affect the ecosystem in these water bodies. They need to explain in detail the nature (i.e. the chemical composition and quantities of all streams going and leaving the reverse osmosis plant, along the same information on all streams entering and leaving the necessary pre- treatment processes. The City of Corpus Christi and the TCEQ need to provide material balances showing flows and compositions leaving and entering the processes including chemicals and MSDS pertaining to these proposed processes. They also need to conduct studies to determine how these quantities of concentrated reject water going back to the bays and Channel will affect all marine life in these bodies of water.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Tuesday, June 30, 2020 2:40 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: CORRECTION CODE FW: Public comment on Permit Number WRPERM 13675

H

From: cacheton1@twc.com <cacheton1@twc.com>
Sent: Tuesday, June 30, 2020 8:45 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: MR Encarnacion Serna

E-MAIL: cacheton1@twc.com

COMPANY: Self

ADDRESS: 105 LOST CREEK DR
PORTLAND TX 78374-1449

PHONE: 3619035774

FAX:

COMMENTS: THE TCEQ along with the City of Corpus Christi need to conduct a public hearing and explain to the public of the Coastal Bend and other Industries affected by the intake of 166 MGD water from La Quinta Channel exactly what sea water desalination is and how it will pollute these navigable waters. They need to explain in detail how the reverse osmosis process works, exactly what discharge streams it will generate whether or not these streams go to the Channel or not. They also need to explain how the high volumes and high velocities and screens on the intake inlet duct or pipe

will protect all types of marine life, fish, bird, mammal, and humans etc. will be protected. They also need to explain what type of disturbance it will create on the surface and bottom at this intake point.

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Wednesday, December 1, 2021 9:23 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

H

From: Anniespade9@gmail.com <Anniespade9@gmail.com>
Sent: Tuesday, November 30, 2021 9:27 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Annie Spade

E-MAIL: Anniespade9@gmail.com

COMPANY:

ADDRESS: 13508 TRAIL DRIVER
AUSTIN TX 78737-9529

PHONE: 5124680699

FAX:

COMMENTS: I am a fourth generation native Texan, living 170 miles from the proposed plant. For 40 years I have been visiting the area several times a year to camp and birdwatch in the area, and family members fish there as well. I am a member of CAPE. I STRONGLY OPPOSE the Port of Corpus Christi's placing and intake pipe for a desalination plant in La Quinta Ship Channel. I request that a Contested Case Hearing be held. Sucking well over 100,000 gallons of water a

minute from the channel is a death sentence for aquatic life. And then the discharge into Ingleside Cove will hypersalinate this important nursery for aquatic life, negatively affecting the survival of fish, birds and the entire food chain in the area. Further, these waters belong to the United States. Diverting water from Corpus Christi Bay aka the Gulf of Mexico calls for federal oversight. Further, since Texas is hot and drought-prone, and given to water shortages, it does not make sense to welcome such thirsty industry to the Texas Coast in the first place. To protect our precious and beautiful coastal environment with its rich and unique wildlife, Texas Parks and Wildlife, the General Land Office UT Marine Science Center and Harte Institute have all published studies recommending that desal intake and discharge should only happen in designated OFFSHORE areas! There's even an expedited permitting process for this. It makes NO SENSE to circumvent these recommendations and this process. And, by the way, why is the City of Corpus Christi submitting this proposal and footing the bill for private enterprise?!? I smell a RAT that warrants further thought and investigation!

Lori Rowe

From: PUBCOMMENT-OCC
Sent: Wednesday, December 1, 2021 9:49 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

H

From: gary@feralgeek.com <gary@feralgeek.com>
Sent: Tuesday, November 30, 2021 3:29 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: TX

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Arnold Gary Strickland

E-MAIL: gary@feralgeek.com

COMPANY:

ADDRESS: 84 BAYSHORE DR Box G
INGLESIDE TX 78362-4872

PHONE: 2817281108

FAX:

COMMENTS: To: Office of the Chief Clerk, TCEQ From: Arnold Gary Strickland 84 Bayshore Dr., Box G Ingleside on the Bay, TX 78362 Phone: 281-728-1108 I live in Bahia Marina, which borders Ingleside Cove, and is adjacent to the La Quinta Channel. My home is on the water, approximately 200 yards from La Quinta. I am a member of the Ingleside on the Bay Coastal Watch Association. I STRONGLY OPPOSE the Port of Corpus Christi's placing an intake pipe for a

desalination plant in La Quinta Ship Channel for the following reasons: 1. The desal plant has the potential to adversely impact the local fish and wildlife that live and breed on or near La Quinta Ship Channel, including marine mammals. Additionally, the local tourist industry, sport and commercial fishing interests, and the quality of life of the citizens who live on or near the La Quinta Ship Channel stand to be greatly diminished. 2. Our area scientists, including from Texas Parks & Wildlife, the General Land Office, the UT Marine Science Institute, and the Harte Research Institute, have said, in published reports, that seawater desalination intake and discharge should only occur in designated areas offshore in the Gulf. There's even an expedited permitting process for this. 3. I am concerned about possible health effects on me, my family, my neighbors, my friends, and visitors from the chemicals used in the desalination process, including pre-treatment. 4. I, my friends, and neighbors love to fish/boat/swim/etc. in La Quinta Channel where the intake pipe for the Port of Corpus Christi's desalination facility will be located or in Ingleside Cove where the discharge will flow to. I am concerned that given the number of small larvae which will be sucked up, turned to sludge, and deposited into landfills, fishing will be badly impaired in the region. I request that a Contested Case Hearing be held. Sincerely, Arnold Gary Strickland Ingleside on the Bay, TX

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Thursday, May 6, 2021 4:07 PM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

Pm
H

From: kthor25@outlook.com <kthor25@outlook.com>
Sent: Thursday, May 6, 2021 3:52 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Karen Thorwaldson

E-MAIL: kthor25@outlook.com

COMPANY:

ADDRESS: 1017 WILSHIRE PL
CORPUS CHRISTI TX 78411-2326

PHONE: 3614467449

FAX:

COMMENTS: I STRONGLY OPPOSE THIS PERMIT to place an intake pipe for a desalination plant in La Quinta Channel. I request that a public meeting be held for the community to express its concerns. I also request that a Contested Case Hearing be held. I and my friends and family enjoy kayaking, fishing and swimming in La Quinta Channel. The intake pipe

will kill significantly large amounts of fish and sealife larvae and degrade the fishing in the area. As the fish decline, so will many other forms of wildlife that depend on them for sustenance. The birds will decline. This will directly affect the varied forms of tourism that bring vacationers to spend their time and money here. I am aware that the resulting warm brine discharge, including pre-treatment chemicals, will also negatively affect water quality, at what risk to those of us who swim there? Any desalination plants the City proposes should have their intake and discharge pipes in the open ocean, not our closed Corpus Christi Bay! It is clear from my research that the majority of this proposed treated water will go to the industrial heavy water users in San Patricio County. Will Corpus Christi get a low-interest loan from the Texas Water Development Board to construct this plant? Who will pay it back? It is a violation of Texas law to use public funds to support private industry. Why aren't these industries applying for this permit and paying to construct this plant? The General Land Office, the Harte Research Institute, Texas Parks and Wildlife and the UT Marine Science Institute all have published reports that state that seawater desalination intake and discharge should only occur in designated areas OFFSHORE in the Gulf of Mexico. It would be irresponsible for the City to ignore this overwhelming scientific consensus! If these industries will be the beneficiaries of any proposed desalination plant, it should be they who apply for an expedited water intake permit from the open ocean and pay for the construction of the plant and the pipes for intake and discharge. If the City of Corpus Christi does so, won't the taxpayers end up responsible for paying for it?

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Friday, June 26, 2020 11:22 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

PM

From: kthor25@outlook.com <kthor25@outlook.com>
Sent: Thursday, June 25, 2020 6:25 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Karen Jo Thorwaldson

E-MAIL: kthor25@outlook.com

COMPANY:

ADDRESS: 1017 WILSHIRE PL
CORPUS CHRISTI TX 78411-2326

PHONE: 3614467449

FAX:

COMMENTS: I would like to request a public meeting on this water rights permit for a desalinization plant on La Quinta Channel. The rate of water intake is purported to be in excess of 115,000 gallons PER MINUTE. This brings up two main concerns: 1. Aquatic life will be trapped in the pipeline suction and will not be able to escape, resulting in their death. Aquatic life will also be stuck on the screens by the force of the suction resulting in impingement. This also means certain death. Aquatic life small enough to pass through the screens and enter the treatment process will also be killed.

2. Many industrial facilities are located along this narrow channel. The intake here would be dangerously near these industrial wastewater discharges. No one wants less fish in Corpus Christi Bay, especially when this desal facility is to be used for planned industry, not the residents of the area!

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Wednesday, May 5, 2021 2:59 PM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: ftissot01@outlook.com <ftissot01@outlook.com>
Sent: Wednesday, May 5, 2021 2:58 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

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: To whom it may concern, My name is Florence Tissot and I live in Corpus Christi, one block from Corpus Christi Bay and literally right across the bay from the La Quinta Channel. I SRONGLY OPPOSE the city of Corpus Christi's placing an intake pipe for a desalination plant in La Quinta Channel. I also request that there be a public hearing on this

permit and that a Contested Case Hearing be held. Corpus Christi Bay is a key tourist destination and enjoyed by a vast majority of the citizens of Corpus Christi. Personally, I use the bay recreationally for water sports such as windsurfing. Placing an intake pipe in the La Quinta Channel is a horrible plan. It has all the potential for a catastrophic impact on the environment and our local wildlife. The suction and the discharge is sure to have huge negative impact on the health of the fish population, and a negative impact on the fish population will translate to a negative impact on the bird population. In addition, the power required to operate the pumps described in the plan will be an enormous burden on our already-strained power grid. Finally, the plans for a desalination plant is to support water-thirsty industries. We are already drought prone in South Texas and inviting this kind of industry to operate in our region does not make any sense. All of our area scientists agree and have published recommendations that any seawater intake and discharge should happen only in designated areas offshore. Why are we so willing to ignore their recommendations? Finally, there seems to be many legal questions surrounding this permit. Why is the city of Corpus Christi applying for the permit and not the private industry that needs all this water? If the city of Corpus Christi is going to request a loan from TWDB for the construction of the plant, wouldn't this be a violation of Texas Law to use public funds to support private industries? Also at the federal level, there are questions around whether the plant will need to adhere to federal regulations on industrial cooling water structures. Does the city have a plan on how they will adhere to these regulations? There is no doubt that, were the project to move forward, environmental groups would sue the city of Corpus Christi on these basis, and the project would end up tied up in court for years. For all of these reasons, I STRONGLY OPPOSE the city of Corpus Christi's placing an intake pipe for a desalination plant in La Quinta Channel. I also request that there be a public hearing on this permit and that a Contested Case Hearing be held. Sincerely, Florence Tissot

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Tuesday, June 16, 2020 8:55 AM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

PM

From: ftissot01@outlook.com <ftissot01@outlook.com>
Sent: Sunday, June 14, 2020 3:06 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: SAN PATRICIO

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 13675 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.

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Tuesday, May 11, 2021 9:49 AM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: mwilliams3157@att.net <mwilliams3157@att.net>
Sent: Saturday, May 8, 2021 8:42 AM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Mark Williams

E-MAIL: mwilliams3157@att.net

COMPANY:

ADDRESS: 1025 FIJI DR
ROCKPORT TX 78382-7084

PHONE: 2145871915

FAX:

COMMENTS: I STRONGLY OPPOSE the City of Corpus Christi's placing an intake pipe or discharge for a desalination plant in La Quinta Channel or anywhere else in our bay complex. I request that a public meeting be held for the community to express its concerns. I request that a Contested Case Hearing be held I live 11 miles from the proposed intake site and

regularly fish Corpus Christi and Redfish bays. I strongly believe that all intake and discharge for desalination should be located in the Gulf of Mexico where impacts can be minimized. Our bays already suffer from periodic droughts which stress fish populations and detrimentally affect the reproductive cycle. Removing bay water and discharging super-saturated brine will have devastating impacts to our sea life. The proposed desalination operations will threaten our protected sea grasses and threatened and endangered sea turtle populations. I STRONGLY OPPOSE THE PROPOSED DESALINATION PROJECT IN THE BAY SYSTEM.

Elisa Guerra

From: PUBCOMMENT-OCC
Sent: Tuesday, April 27, 2021 12:28 PM
To: PUBCOMMENT-OCC2; PUBCOMMENT-OPIC; PUBCOMMENT-ELD; PUBCOMMENT-WWW-WRAS
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: luwuavon@gmail.com <luwuavon@gmail.com>
Sent: Thursday, April 22, 2021 4:11 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: LUHANNAH WUSTERHAUSEN

E-MAIL: luwuavon@gmail.com

COMPANY: Sunset Hideaway

ADDRESS: PO BOX 1523
INGLESIDE TX 78362-1523

PHONE: 5122697475

FAX:

COMMENTS: I STRONGLY OPPOSE the City of Corpus Christi's placing an intake pipe for a desalination plant in La Quinta Channel I request that a public meeting be held for the community to express its concerns. I request that a Contested Case Hearing be held

Melissa Schmidt

From: PUBCOMMENT-OCC
Sent: Wednesday, May 5, 2021 2:20 PM
To: PUBCOMMENT-WWW-WRAS; PUBCOMMENT-ELD; PUBCOMMENT-OCC2;
PUBCOMMENT-OPIC
Subject: FW: Public comment on Permit Number WRPERM 13675

PM
H

From: Mistykyatt@yahoo.com <Mistykyatt@yahoo.com>
Sent: Tuesday, May 4, 2021 4:06 PM
To: PUBCOMMENT-OCC <PUBCOMMENT-OCC@tceq.texas.gov>
Subject: Public comment on Permit Number WRPERM 13675

REGULATED ENTY NAME WRPERM 13675

RN NUMBER: RN110940590

PERMIT NUMBER: WRPERM 13675

DOCKET NUMBER:

COUNTY: ARANSAS, NUECES, SAN PATRICIO

PRINCIPAL NAME: CITY OF CORPUS CHRISTI

CN NUMBER: CN600131858

FROM

NAME: Misty Kay Wyatt

E-MAIL: Mistykyatt@yahoo.com

COMPANY:

ADDRESS: 961 S ARCH ST
ARANSAS PASS TX 78336-5326

PHONE: 3613318220

FAX:

COMMENTS: I STRONGLY OPPOSE the Port of Corpus Christi's placing an intake pipe for a desalination plant in La Quinta Ship Channel I request that a public meeting be held so citizens can express their concerns. I request that a Contested Case Hearing be held All of our area scientists, including from Texas Parks & Wildlife, the General Land Office, the UT

Marine Science Institute, and the Harte Research Institute, have said, in published reports, that seawater desalination intake and discharge should only occur in designated areas offshore in the Gulf. There's even an expedited permitting process for this. Why is the City of Corpus Christi, a public entity, insisting on putting intake and discharge inside Corpus Christi Bay in the first place. Aren't they listening? Why aren't they showing the way by pursuing the expedited permit process that will keep our Bay safer?