

**TCEQ Response to Written Comments on the
Draft Guidance for Assessing and Reporting Surface Water Quality in Texas
for the 2026 Texas Integrated Report (IR) from Members of the TCEQ
Surface Water Quality Assessment Advisory Workgroup (SWQAAWG)
November 7, 2025**

Tracking Number	Commenter	Comment	TCEQ Response
001	Jason Hale	<p>I'm concerned that seawater desalination creates a new potential for highly stratified layers in a water segment that will not be protected by the current water quality standards for dissolved oxygen or salinity.</p> <p>There is a fully permitted seawater desalination facility here in Corpus that has a pipe outfall. I have a letter between City engineers and the TCEQ describing how this facility will have very little mixing and most of the brine concentrate will settle to the bottom of the channel.</p> <p>"The discharge is a dense brine that would settle quickly to the bottom of the channel. Any mixing at the bottom of the 45 feet deep channel would be minimal." - Freese and Nichols in a letter to TCEQ (Page 7, March 1st 2024)</p> <p>This is likely to result in having the bottom 10% to 20% of the water column being extremely impaired in dissolved oxygen (or at least be hypersaline) while the other layers may not. My concern is that given the current averaging of the entire water column, areas like this may be acceptable.</p> <p>My question is, has the surface water quality standards advisory work group considered the new challenges to water quality that seawater desalination poses, and if so, when did these conversations take place, and what were the results of those discussions?</p>	<p>TCEQ acknowledges this comment. The Surface Water Quality Standards Advisory Workgroup (SWQSAWG) would be more appropriate for addressing this question. This group is responsible for the development of water quality standards and criteria for coastal saline waters. The SWQAAWG will participate in this effort to ensure that any future assessment protocols align with water quality standards.</p>