

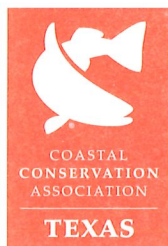
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CONSERVATION & PROTECTION OF MARINE LIFE

6919 Portwest Drive, Suite 100 | Houston, Texas 77024
p 713.626.4222 | f 713.961.3801 | CCATexas.org

Re: Notice of Application and Preliminary Decision For TPDES Permit No.
WQ0005253000

Dear Sir or Madam:

The Coastal Conservation Association - Texas ("CCA") is a national non-profit organization of nearly 70,000 recreational anglers and outdoor enthusiasts. The mission of CCA is to advise and educate the public on conservation of marine resources. The objective of CCA is to conserve, promote and enhance the present and future availability of those coastal resources for the benefit and enjoyment of the general public.

The Port of Corpus Christi Authority of Nueces County proposes to permit and/or operate a desalination facility on Harbor Island with a discharge in the Corpus Christi Channel. The location of the proposed discharge is within the Redfish Bay State Scientific Area (RBSSA). Per Texas Parks and Wildlife, the RBSSA contains the northernmost extensive stands of seagrass on the Texas coast. This includes 14,000 acres of submerged seagrass beds with all five species of seagrass found in Texas. The RBSSA is a component of both the Aransas and Corpus Christi ecosystems and has about 50 square miles of prime fishing habitat. It contains a unique and fragile environment of not only seagrass beds but also oyster reefs, marshes, and mangroves while providing a feeding habitat for shrimp, crabs, and gamefish, waterfowl, shorebirds and turtles.

The proposed discharge location is a major corridor for the annual migration of adult southern flounder and spawning grounds for large aggregates of sheepshead. The location is also critical for the recruitment of red drum larvae and southern flounder juveniles during the most vulnerable stages of their life history. The Corpus Christi and Aransas Channels are vital to numerous aquatic species, including but not limited to: blue crabs, menhaden, flounder species, shrimp species, sciaenids, trout, croaker, sea turtles, pinfish, pigfish, gafftopsail catfish, tarpon, tripletail and ling, all of which need to use these coastal passes to reach their preferred habitats and food sources during various life stages.

The Corpus Christi and Aransas Bay systems offer abundant fishing opportunities, and both are favored fishing destinations for locals and visitors alike. The Texas economy benefits from recreational fishing trips through angler spending on goods and services such as lodging, food, tackle, gear, ice, bait, and fuel. In 2016, Texas A&M Agrilife Extension and Sea Grant Texas published reports detailing the economic impacts of marine recreational fishing in the Corpus Christi and Aransas

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Bay systems. Marine recreational fishing in these bay systems supports a combined 1,249 jobs, and generates \$44.9 million in labor income, \$69.5 million in GDP contribution and \$122.7 million in total economic impact. Without healthy fisheries, the local economy supported by recreational fishing, birding, and tourism will suffer greatly.

For the reasons mentioned above, CCA is opposed TPDES Permit No. WQ0005253000, to authorize the discharge of water treatment wastes at a daily average flow of not to exceed 95,600,000 gallons per day into the Corpus Christi Channel.

As highlighted in the Harte Research Institute for Gulf of Mexico Studies July 10, 2015 report to the City of Corpus Christi, there are other locations identified in the Corpus Christi Bay area that are more suitable for seawater desalination plants with far fewer impacts to the ecosystem. We understand the need to supply industries and municipalities in the Coastal Bend with a consistent supply of freshwater and that desalination will be considered moving forward. For any operation to be considered we offer the following recommendations:

- Desalination operations should pipe the effluent discharge into offshore waters to minimize the impacts to fragile ecosystems.
- Intake piping for any desalination plant should be installed below the seabed via directional drilling. This will prevent impingement on organisms on intake screens exposed to open water, and entrapment of other organisms carried with the feedwater through the intake screen.
- Site-specific studies of conditions at proposed locations should be conducted to identify environmental impact and risks to the ecosystem.

Theodore Roosevelt, generally acknowledged as the President who launched the conservationist movement in this country once said that "It is not what we have that will make us a great nation; it is the way in which we use it." CCA wants to ensure good stewardship in the use of the resources entrusted to us and it is our expectation that state government, industry and stakeholders work together to develop sensible solutions to meet the demands of our growing population.

Sincerely,

Robby Byers
Executive Director
Coastal Conservation Association Texas