

**CITY OF INGLESIDE
REGULAR PLANNING & ZONING COMMISSION MEETING
AGENDA
SEPTEMBER 16, 2024
6:00 PM**

Notice is hereby given that the Planning and Zoning Commission of the City of Ingleside, Texas, will conduct a meeting at City Hall, 2671 San Angelo Street, on September 16, 2024, at 6:00 PM.

Opening Agenda

1. Call Meeting to Order.

2. Roll Call.

3. Pledge of Allegiance.

4. Citizen Comments and Reports.

Persons wishing to address the Planning and Zoning Commission and who have registered using the Citizen Participation Form will have up to three minutes to speak. In accordance with the Open Meetings Act, Planning and Zoning Commission may not discuss or take action on any item that has not been posted on the agenda. While civil public criticism is not prohibited; disorderly conduct or disturbance of the peace as prohibited by law shall be cause for the chair to terminate the offender's time to speak.

Public Hearing

The Planning & Zoning Commission shall call a public hearing on each item below in this section. Any person wishing to address the Commission on these items should please come forward when that public hearing is called.

5. Conduct a public hearing on an application filed by The Port of Corpus Christi requesting a rezoning for approximately 2,112 acres: Property ID#s 60762, 61476, 67182, 67158, 61499, 67168, 1030271, 67177, 67236, 114650, 67118, 67270, 67091, 69200, 65073, and 69004.

6. Conduct a public hearing regarding an application filed by The Port of Corpus Christi, requesting a special use permit for intensive use for approximately 1,360 acres: Property ID#s 60762, 61476, 67182, 67158, 61499, 67168, 1030271, 67177, 67236, 114650, 67118, 67270, 67091, 69200, 65073, and 69004.

Regular Agenda

7. Deliberate and take appropriate action on an application filed by The Port of Corpus Christi requesting a rezoning for approximately 2,112 acres: Property ID#s 60762, 61476, 67182, 67158, 61499, 67168, 1030271, 67177, 67236, 114650, 67118, 67270, 67091, 69200, 65073, and 69004.

8. Deliberate and take appropriate action on an application filed by The Port of Corpus Christi, requesting a special use permit for intensive use for approximately 1,360 acres: Property ID#s

60762, 61476, 67182, 67158, 61499, 67168, 1030271, 67177, 67236, 114650, 67118, 67270, 67091, 69200, 65073, and 69004.

9. Deliberate and take appropriate action on the acceptance of the Regular Planning & Zoning Commission Minutes of August 19, 2024.

Closing Agenda

10. Items to consider for placement on future agendas.
11. Adjourn.

Special Accommodations

This facility is wheelchair accessible and there are special parking spaces near the main entrance. A request for accommodation or special services must be made 48 hours prior to this meeting. Please contact City Secretary's Office at (361) 776-2517 or Fax (361) 776-1027 or email citycouncilquestions@inglesidetx.gov for further information.

Certification

I, Jana Stork, certify that the above notice of this Regular Meeting of the Planning & Zoning Commission was posted on the City Hall bulletin board at 2671 San Angelo Street, Ingleside, Texas on September 13, 2024 by 1:45 p.m.



Jana Stork, Assistant City Secretary

Notice of Potential Quorum

A quorum of City of Ingleside City Boards, Commissions, and/or Committees may be present at the Regular Meeting of the Planning & Zoning Commission on September 16, 2024, at 6:00 PM.

It is anticipated that members of other City Boards, Commissions, and/or Committees may attend the meeting in numbers that may constitute a quorum of the other City Boards, Commissions, and/or Committees. Notice is hereby given that this meeting, to the extent required by law, is also noticed as a meeting of the other City Boards, Commissions, and/or Committees of the City, whose members may be in attendance. The members of the City Boards, Commissions, and/or Committees may participate in discussions on the items listed on this agenda, which occur at this meeting, but no action will be taken by those in attendance unless such action item is specifically listed on an agenda during a regular or special meeting for the respective Board, Commission, and/or Committee subject to the Texas Open Meetings Act.

This public notice was removed from the official posting board at the Ingleside City Hall on the following:

Date: _____	Time: _____
By: _____ City Secretary's Office City of Ingleside, Texas	

PLANNING & ZONING COMMISSION AGENDA
Regular Meeting: September 16, 2024

AGENDA ITEM: 5

Conduct a public hearing on an application filed by The Port of Corpus Christi requesting a rezoning for approximately 2,112 acres: Property ID#s 60762, 61476, 67182, 67158, 61499, 67168, 1030271, 67177, 67236, 114650, 67118, 67270, 67091, 69200, 65073, and 69004.

SUBMITTED BY: Gene Delauro, Interim Building Official

APPROVED FOR AGENDA:

BACKGROUND:

Public Hearing

FISCAL ANALYSIS:

N/A

RECOMMENDATION:

Public Hearing

ATTACHMENTS:

1. Port of Corpus Christi Rezoning Application



PO Drawer 400 • 2665 San Angelo • Ingleside, TX 78362
Phone: 361-776-3815 - building@inglesidetx.gov

REQUEST FOR ZONING CHANGE

Date Filed: July 23, 2024

Receipt #: _____

Applicant Name: Port of Corpus Christi Authority

Address: 400 Harbor Dr. Corpus Christi, TX. 78401

Phone No.: 361-885-6140

Email Address: Sam@pocca.com

Applicant Status: (check one) Individual () Trust () Partnership () Corporation () Other

Property Owner Name (if different): _____

Address: _____

Phone No.: _____

Email Address: _____

Legal description of property to be rezoned: Multiple Tracts - See attached list

Lot: _____ Blk: _____ Subdivision: _____

Lot Size: _____ Ft X _____ Ft Acres: _____

Street Frontage Location: _____

Address of Property: _____

Present Zoning Classification: Various - See attached list for details

Requested Zoning Classification: I - Industrial District

I CERTIFY THAT THE ABOVE ANSWERS ARE TRUE AND CORRECT. I ALSO UNDERSTAND THAT ATTENDANCE IS MANDATORY, EITHER BY MYSELF OR A REPRESENTATIVE, AT ALL HEARINGS, BOTH PLANNING AND ZONING AND THE CITY COUNCIL, FOR THIS REQUEST TO BE CONSIDERED. I ALSO UNDERSTAND THAT FAILURE TO ATTEND WILL RESULT IN TERMINATION OF PROCESS AND RE-APPLICATION WILL BE REQUIRED.

Planning & Zoning Public Hearing: August 19, 2024 Time: 6:00 p.m.

City Council Public Hearing: October 8, 2024 Time: 6:30 p.m.

2nd Reading @ City Council: October 22, 2024 Time: 6:30 p.m.

Signature of Applicant: _____ Date: _____

Signature of Owner: Kent A. Sutton Date: July 23, 2024

Staff Checklist:

Accepted By: Gene Detavro Date Accepted: 7/23/24 Filing Fee: \$100,102.08 Date Paid: 7/18/24



PO Drawer 400 • 2665 San Angelo • Ingleside, TX 78362
Phone: 361-776-3815 - building@inglesidetx.gov

**SPECIAL USE: SECTION 78-267
OBJECTIONABLE USES**

Date Filed: _____

In accordance with the Planning and Zoning Subdivision Ordinance, Chapter 78, Article IV, application for special use Section 78-267 is requested on the property below:

Applicant:

Name: Port of Corpus Christi Authority

Address: 400 Harbor Dr. Corpus Christi, TX. 78401

Phone #: 361-885-6140

Email Address: sam@pocca.com

Property Owner (If different):

Name: _____

Address: _____

Phone #: _____

Email Address: _____

Legal Description of Property:

Multiple Tracts – See attached list.

Description of proposed uses, approval for which the property is sought:

The McCampbell property is located near Ingleside, in San Patricio County, Texas and contains approximately 2,850 acres. Assuming that three acres of optimal solar panel configuration can support 1MW of panels and generate approximately 2,146MWh per year, the proposed site will accommodate 1,866 acres of solar panels to generate approximately 600MW of renewable energy, equivalent to 1,296,184MWh per year.

The purpose of this project is to construct an approximate 600 megawatt (MW) (0.6 gigawatt (GW)) solar photovoltaic (PV) production facility to help meet the emerging demand (need) for over 2,685 MW

(2.685GW) of new, no-carbon (renewable) electricity in the immediate Port of Corpus Christi region by 2030. Two electrical substations are proposed as part of the project for power distribution.

Description of hazards, such as fire, explosion, noise vibration, dust, or the emission of smoke, odor, or toxic substances, accompanying the proposed use:

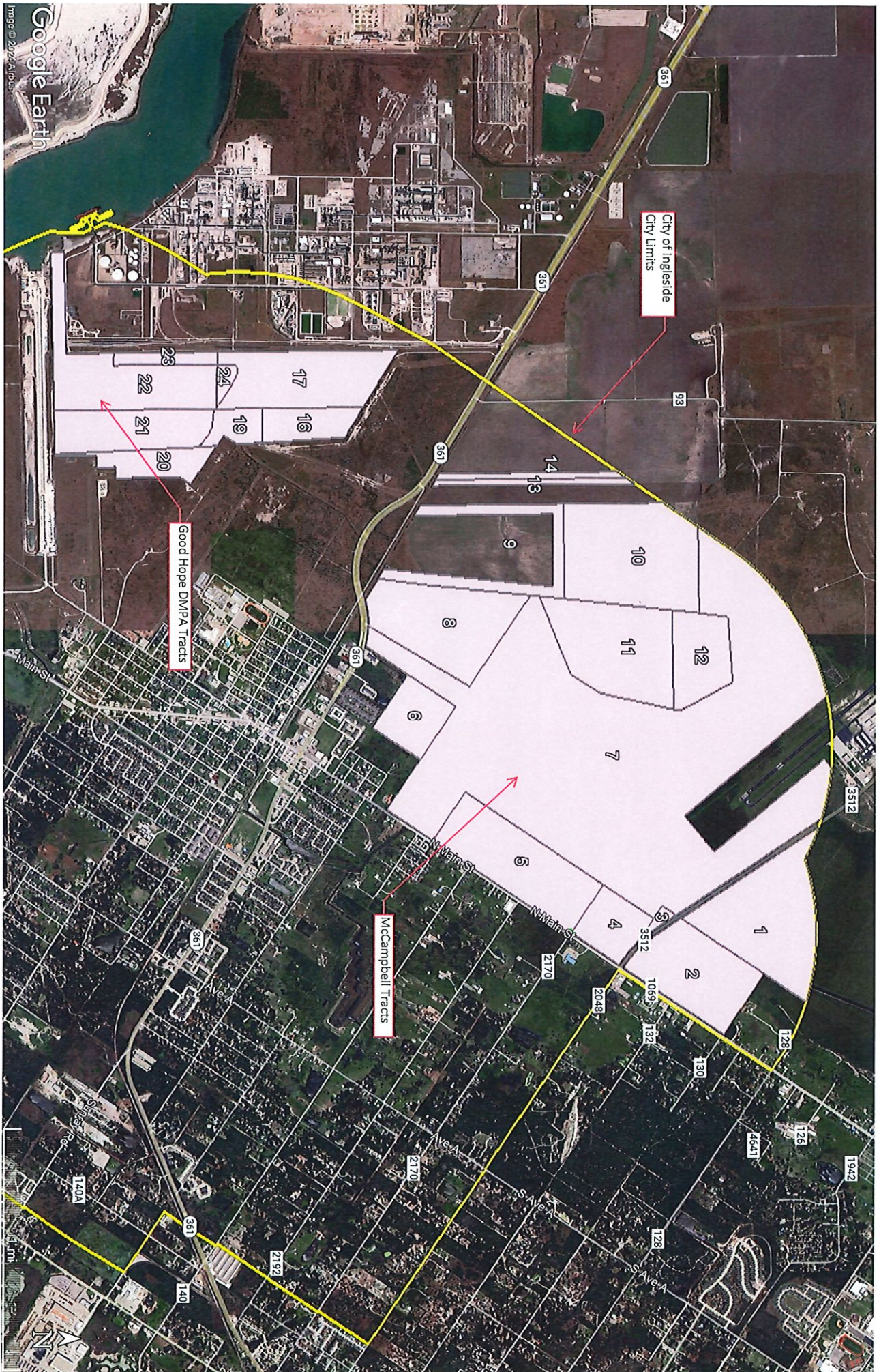
There are no fire, explosion, noise, vibration, dust, smoke, or odor hazards as part of this project.

Description of all safeguards proposed to protect the surrounding property and persons from hazards accompanying the proposed use:

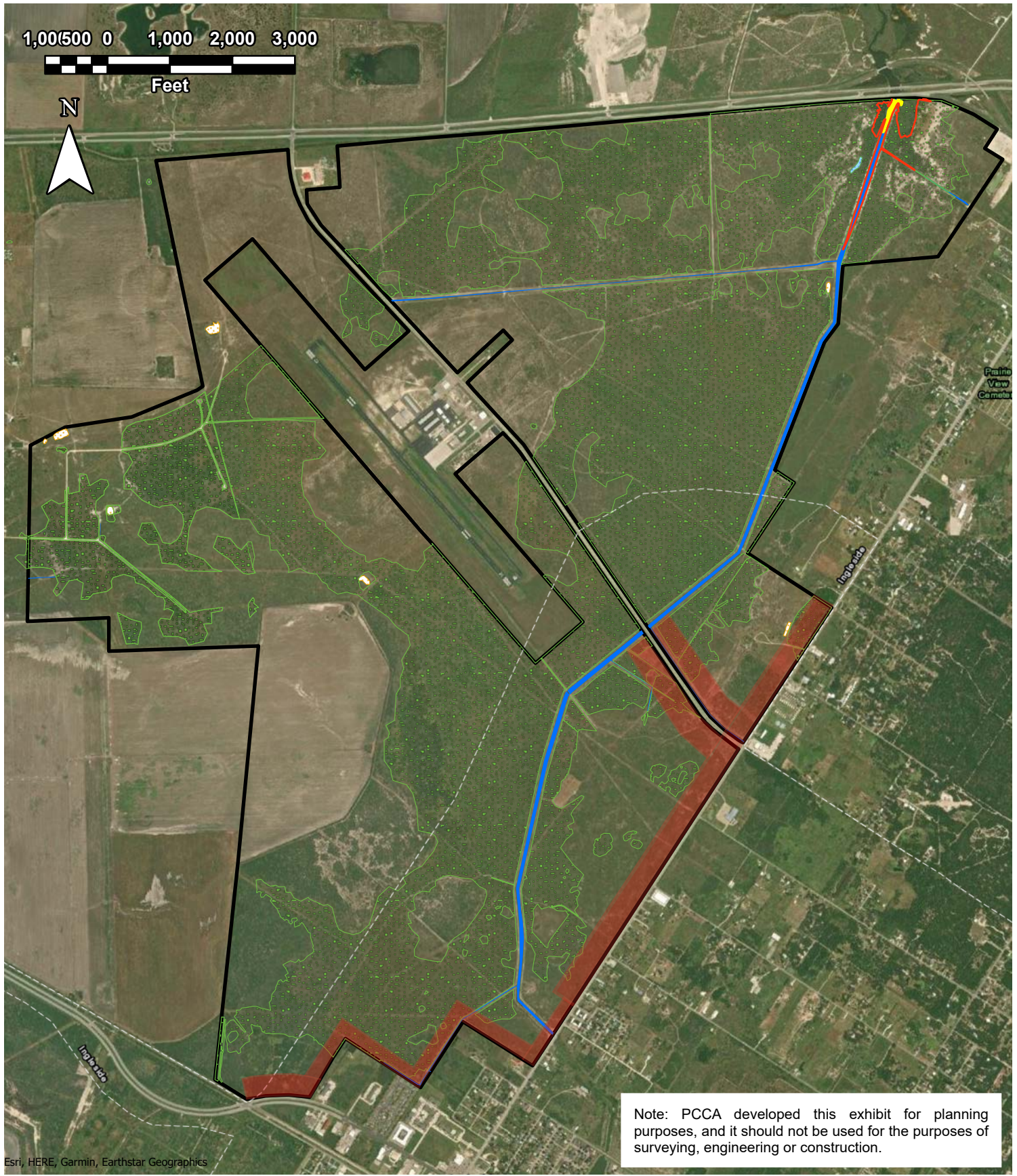
A site plan showing the location of all improvements, landscaping, yard areas, sight and/or noise barriers, existing and planned, on the subject property:

Signature: _____ Date: _____

Zone: _____ Reviewed By: _____ Date: _____



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Legend

- HTL
- MHWL

Aquatic Features

- Drainage Feature (39.3 acres)

- Open Water (0.34 acres)
- Stock Pond (2.40 acres)
- Wetland (1734.25 acres)
- McC Campbell-Davis Tracts

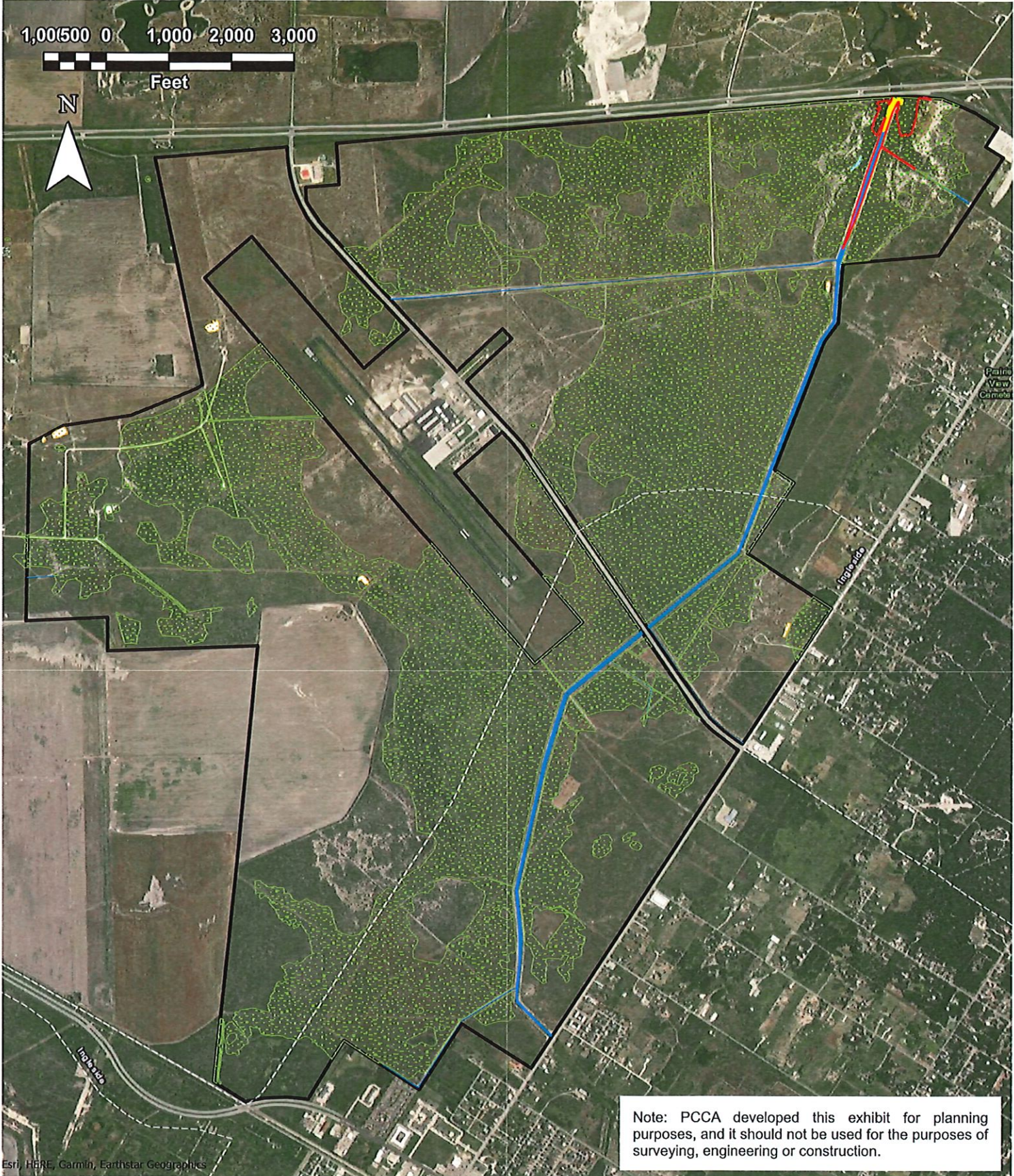


McC Campbell Overview Map

McC Campbell Property
San Patricio County, Texas

Map ID	Property ID	Size (Acres)	Existing Zoning	Proposed Zoning	Special Permit	Legal Description
McC Campbell Tracts						
1	60762	124.3789	R-1 Single Family	I-Industrial	Yes	PT ABST 55 WM BOYD SUR 285.03 ACRES
2	60762	89.4085	R-1 Single Family	I-Industrial	Yes	
3	67182	3.5845	R-1 Single Family	I-Industrial	Yes	T P MCCAMPBELL SUBD BLK 102, 103 TRS 1 THRU 5 (95.31 ACRES)
4	67168	37.3905	R-1 Single Family	I-Industrial	Yes	(1/2 UND INT) OUT OF 40 ACRES TRS 1-4 LB 101 MCCAMPBELL S/D
5		106.4371	R-1 Single Family	I-Industrial	Yes	
6	67177	40.0785	R-1 Single Family	I-Industrial	Yes	UND 1/2 INT IN 38.230 ACRES ABST 262 ROSA TEAL
7	61476	848	R-1 Single Family	I-Industrial	Yes	ABST 124 N FAGAN SUR 390.722 ACRES
8	67236	110.9987	R-1 Single Family	I-Industrial	Yes	ABST 262 ROSA TEAL ANNEXED BY CITY PT OF 267.02 AC TR (120.36 ACRES)
9	114650	45.5766	I-Industrial & R-1 Single Family	I-Industrial	No	ABST 262 ROSA TEAL J.R. STANLEY PROPERTY
10	1030271	145.0886	R-1 Single Family	I-Industrial	No	ABST 262 ROSA TEAL SUR & N. FAGAN SUR 149.12 ACRES
11	67168	114.394	R-1 Single Family	I-Industrial	No	ABST 262 ROSA TEAL SUR 99 ACRES
12	61499	52.8469		I-Industrial	No	ABST 124 N FAGAN 67 ACRES
13	67270	13.287	R-1 Single Family	I-Industrial	No	AB 262 R TEAL SUR & AB 124 N FAGIN SUR ICL E/PT OF 34.9 ACS TRACT OUT OF (13.287 ACRES)
14	67091	12.4199	R-1 Single Family	I-Industrial	No	ABS 262 R TEAL SUR & ABS 124 N FAGIN SUR ICL W/PT OF 34.9 ACS (13.287 ACRES)
1,743.73 Total Needing Rezoning - McC Campbell						
1,360.12 Total Acres Needing Special Permit						
Good Hope Tracts						
16	69004	31.9087	R-1 Single Family	I-Industrial	No	ABST. 292 T. T. WILLIAMSON J. R. STANLEY PROPERTY EXEMPT DR
17	65073	95.1278	R-1 Single Family	I-Industrial	No	ABST 184 WM MCDONOUGH EXEMPT 22.2256 ACRES
19	69200	19.5279	R-1 Single Family	I-Industrial	No	ABS 293 T WILLIAMSON EXEMPT DREDGE SITE 212.69 ACRES
20		32.8128	R-1 Single Family	I-Industrial	No	
21		67.7651	R-1 Single Family	I-Industrial	No	
22		101.6973	R-1 Single Family	I-Industrial	No	
23		13.6152	R-1 Single Family	I-Industrial	No	
24		5.8585	R-1 Single Family	I-Industrial	No	
368.3133 Total Needing Rezoning - Good Hope						
2,112.04 Total Rezoning						

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Legend

- HTL
- MHWL
- Aquatic Features**
- Drainage Feature (39.3 acres)
- Open Water (0.34 acres)
- Stock Pond (2.40 acres)
- Wetland (1734.25 acres)
- McCampbell-Davis Tracts



McCampbell Overview Map

McCampbell Property
San Patricio County, Texas

LEGEND

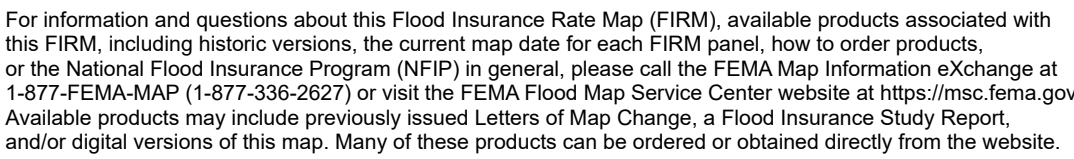
[illegible][illegible]

boundary between Nueces County and San Patricio County is currently being tested. The boundary shown is from the current effective FPL and may be in the future. Information on Nueces County side of boundary is presented for information purposes only.





SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP
FOR DRAFT FIRM PANEL LAYOUT



Communities annexing land on adjacent FIRM panels must obtain a current copy of the adjacent panel as well as the current FIRM Index. These may be ordered directly from the Flood Map Service Center at the number listed above.

To determine if flood insurance is available in this community, contact your Insurance agent or call the National Flood Insurance Program at 1-800-638-6620.

Basemap information shown on this FIRM was provided in digital format by USDA, Farm Service Agency (FSA). This information was derived from NAIP, dated April 11, 2018.

This map was exported from FEMA's National Flood Hazard Layer (NFHL) on **7/9/2024 12:29 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time. For additional information, please see the Flood Hazard Mapping Updates Overview Fact Sheet at <https://www.fema.gov/media-library/assets/documents/118418>

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The base map shown complies with FEMA's base map accuracy standards. This map image is void if the one or more of the following conditions exist:
• The map area does not have a FEMA-approved base map inventory flood zone labels legend scale bar
• The map area does not have a FEMA-approved base map inventory flood zone labels legend scale bar
• The map area does not have a FEMA-approved base map inventory flood zone labels legend scale bar
The LiMWA represents the approximate landward limit of the 5-foot breaking wave. The effects of wave hazards between Zone VE and the LiMWA (or between the shoreline and the LiMWA for areas where Zone VE is not identified) will be similar to, but less severe than, those in Zone VE.

 Limit of Moderate Wave Action (LiMWA)

Map Projection:
GCS, Geodetic Reference System 1980;
Vertical Datum: NAVD88
For information about the specific vertical datum for elevation features, datum conversions, or vertical monuments used to create this map, please see the Flood Insurance Study (FIS) Report for your community at <https://msc.fema.gov>



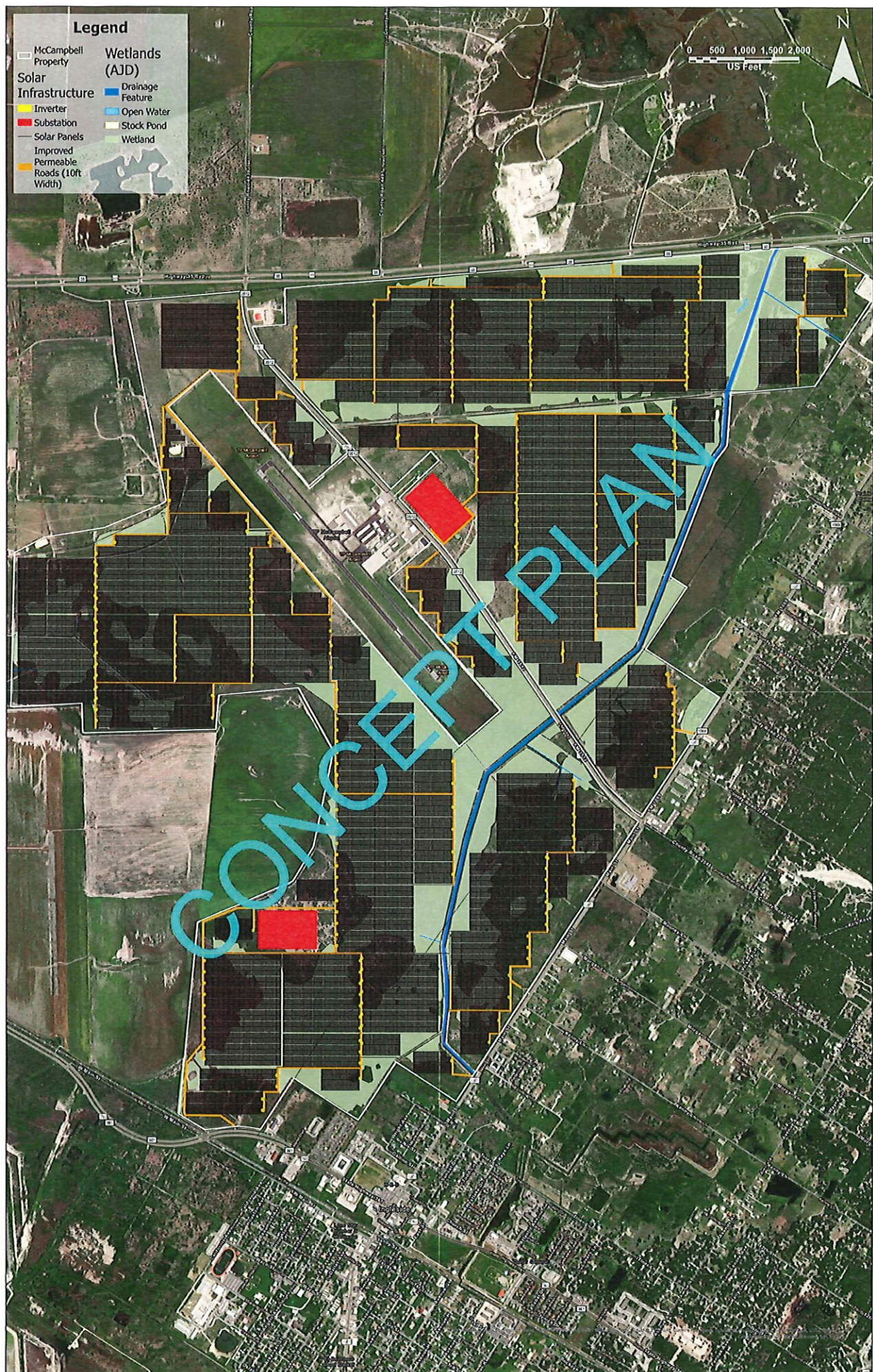
PANEL 465 OF 610

SAN PATRICIO		
COUNTY		
CITY OF	485506	0465
INGLESIDE		
CITY OF CORPUS	485480	0465
CHRISTI		
NUECES COUNTY	485464	0465
UNINCORPORATED		
AREAS	485494	0465

MAP NUMBER
48409C0465E
EFFECTIVE DATE
November 04, 2015

Commercial Zoning

Location	Description	Size
Tract 1	300 Ft. along Hwy. 361	7.5
Tract 2	200 Ft. behind Apartments	22.4
Tract 3	125 Ft. along Hwy. 1069/Drainage	3.44
Tract 4	300 Ft. along Hwy. 1069/3512 (south)	45.2
Tract 5	300 Ft. along Hwy. 1069/3512 (north)	31.5
Total		110.04



No.	Comment	Comment Type	Response	Action Item
USACE				
1.1	The stated purpose is 600 megawatt (MW) solar facility construction and the rationale used references residential power demands. However, the need references existing and new regional industrial off-takers. What are the current and anticipated industrial power needs?	Power Needs	The proposed project is expected to generate renewable electrons for the grid, adding to the existing mix of renewable energy with the potential to serve both residential and industrial demands, including meeting the demands for low-carbon electrons associated with electrolytic hydrogen production. Based on Port Corpus Christi's Hydrogen Hub Application to the Department of Energy, we estimate a potential demand of multiple gigawatts (GW) of demand for renewable energy in phases over the next 10 years.	
1.2	The alternatives analysis incorrectly states that all alternatives have no impacts to special aquatic sites (including wetlands). However, all alternative except for offsite alternative 5 have wetland impacts.	Alternatives Analysis	Port Corpus Christi revised the Alternative Analysis to reflect the correct impacts. See Attachment A.	Updated Alternative Analysis for Wetlands Impacts
1.3	What are the estimated distance related energy transmission efficiency losses? How do they compare based on the alternative sites considered?	Site Selection	The U.S. Energy Information Administration (EIA) estimates approximately 5% of generated electricity is lost through transmission and distribution. Due to the proximity to existing transmission infrastructure, none of the sites evaluated in Port Corpus Christi's alternatives analysis were eliminated based on distance. However, transmission infrastructure currently exists within the McCampbell property, which is fundamentally preferable to offsite transmission, regardless of proximity.	
1.4	The March 31, 2008, wetlands compensatory mitigation rule created a mitigation bank preference to meet mitigation requirements. If the proposed project does not lie within a bank service area please make note of this within the proposed mitigation plan.	Mitigation Banks	No mitigation banks exist within the same watershed as the McCampbell Property. Therefore, Port Corpus Christi developed a Compensatory Mitigation Plan for on-site, in-kind compensatory mitigation to offset unavoidable project impacts as a favorable alternative to offsite mitigation. The mitigation plan has been updated to reflect the absence of a mitigation bank, see Attachment B.	Updated mitigation plan to state lack of mitigation banks
1.5	Compensatory mitigation for unavoidable wetland impacts is based on aquatic resource functional loss. Has the Port conducted a wetland functional assessment pursuant to the Galveston District interim hydrogeomorphic (IHGM) function model? This is the standard procedure to ensure sufficient compensatory mitigation. Additionally, despite the proposed use of timber mats and smaller construction vehicles what consideration has been given to temporal wetland functional loss during project construction? An estimated project construction timeline would facilitate the temporal functional impact assessment.	Mitigation Credits	Port Corpus Christi developed the proposed mitigation plan based on the observed impacts occurring on-site at the time the property was purchased. The proposed restoration will conservatively mitigate unavoidable project impacts on a ratio of approximately 3 to 1. Port Corpus Christi updated this ratio following a detailed classification of the proposed restoration types, which required a more thorough analysis of the potential mitigation potential on-site. The 2.8 to 1 ratio is a more accurate estimate than the originally provided 2.2 to 1. However, the ratio did not incorporate a functional assessment such as the hydrogeomorphic (HGM) model because the methodology is not accepted by the USACE Corpus Christi Regulatory Field Office because it only currently includes the upper Texas Coast. Port Corpus Christi estimates 36 months for total construction, 12 months for road installation, and 24 months for panel installation. Roads will be constructed first to allow panel installation utilizing existing roads, reducing wetland impacts.	Updated for new mitigation ratio

No.	Comment	Comment Type	Response	Action Item
	The permit application references a literature review to determine solar panel wetland shading impacts. What existing benchmark solar facility data was used to make a no wetland effect determination?	Shading	Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Boussetat et al., 2017) and document increased biodiversity (Udrihan et al., 2021), others note less biomass under panels (Armstrong et al., 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading.	
1.6			Within the U.S., however, ongoing research conducted by the National Renewables Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022). (Solar Power World, 2020). (Invenery, 2022). This implies that species are not adversely affected by shading from the PV panels. From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade-tolerant and shade-intolerant herbaceous species (Abella et al., 2020). This study further noted that shade-intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade-tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and wide-spread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade-tolerant or shade-intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.) Regardless of the destination of the renewable electrons generated from this project, they would serve to supplant power derived from fossil fuels, reducing regional emissions, and edging the Coastal Bend Region toward carbon neutrality, which is unequivocally aligned with the public interest (IPCC, 2022). Likewise, the addition of new, ultra-low carbon electricity generation to the ERCOT grid will bolster grid resilience for all users, clearly serving the public interest. Further, the proposed construction techniques and on-site mitigation will preserve and enhance, respectively, the hydrologic function of the site, thereby upholding and serving the public interest of downstream communities for whom the site provides ecosystem (watershed) services.	
1.7	Be advised that the Corps must also determine whether the proposed activities would be contrary to the public interest and additional information may be requested from the applicant to make this determination, especially regarding, but not limited to, conservation, general environmental concerns, fish and wildlife values, navigation, safety, and/or food and fiber production.	Public Interest		
Michael A. Morgan				
2.1	I do object to the proposed solar panels located directly NW of Main st. (FM-1069). Project Plans panels 12 & 13. Those areas are covered in heavy brush & provide important habitat for many forms of wildlife that will be displaced if these areas are disturbed.	Habitat	Wetlands dominate the McCampbell property, which is devoid of heavy brush. As a factor of the property's history of cattle ranching, both the uplands ("heavy brush") and wetlands were subject to controlled burns.	
John Weber				

No.	Comment	Comment Type	Response	Action Item
3.1	Wetlands are an important part of our ecosystem and any existing ones should always be protected. Wetlands are also not a desired location for solar farms because of the difficulty for installation and for the maintenance and cleaning of the panels over the life of the project.	Wetlands	Port Corpus Christi agrees wetlands are a vital component of the local ecosystem. Therefore, Port Corpus Christi designed this project in a manner that fundamentally preserves site hydrology and avoids/minimizes impacts to aquatic resources. To accomplish the goals of this project, Port Corpus Christi commits to the following: • Restore all temporary construction impacts to existing grades; • Limit access improvement to only that which is necessary to support critical operations; • Elevate infrastructure above the ground via helical pilings that do not constitute fill per (40 CFR 232.2); • Locate inverters outside wetlands where possible; • Eliminate the potential of vegetation shading via elevated, tracking panels; • Restore 29.6ac of existing, degraded de facto access paths to natural elevations; • Use automated panel cleaning mechanisms to minimize the need for vehicular access to the site.	
3.2	An alternative location would be in the area, of the appearing to be defunct 600 MW cryo mining operation, located off of McKinzie Rd and State Highway 44. The main electrical appears to be in place already on a robust part of the electrical transmission system.	Site Selection	Port Corpus Christi evaluated several sites during the alternative analysis and determined the McCampbell property to be best suited for an industrial-size solar development. An updated alternatives analysis is provided as a part of this response to comments (see Attachment A).	
3.3	When will the public meeting be held regarding this application?	Public Meeting	The U.S. Army Corps of Engineers should advise if a public meeting is necessary.	
National Marine Fisheries Service (Charrish Stevens)				
4.1	we do not object to the issuance of this permit for SWG-2022-00561, provided the applicant adheres to the mitigation plans included with the public notice	Adherence to Mitigation Plan	Port Corpus Christi thanks the National Marine Fisheries Service for their timely review of this project.	
Cathy Fulton				
5.1	There is missing information to the application that needs to be included and addressed. The information is attached to this email. The Port of Corpus Christi just approved a lease agreement with Howard Energy and Talos to allow POCCA properties to be used for carbon sequestration. The entire McCampbell property is shown for a possible sequestration site, including the solar panel placement areas.	Howard and Talos Lease	The solar development proposed in this permit application represents a single project with independent utility. The lease agreement referenced related to carbon capture and sequestration (CCS), is also a single project with independent utility. The U.S. Environmental Protection Agency (EPA) is the lead federal agency responsible for reviewing the CCS project in accordance with NEPA. Further, the proposed solar installation occupies approximately 186ac of the 2850ac property, providing an opportunity for additional and independent projects.	
Kenneth Teague				
6.1	I recommend that the USACE, USEPA, USFWS, and TPWD conduct a site visit to determine the quality and environmental significance of the aquatic habitats proposed to be destroyed by the applicant. The USEPA should consider whether these habitats may be Aquatic Resources of National Significance, and if so, elevate review with USACE. In particular, USFWS and TPWD should determine whether these habitats have value to the endangered whooping crane.	Request for Site Visits	The USACE conducted several site visits to the property during the issuance of the approved jurisdictional determination (AJD). It is also anticipated that during the Section 7 consultation, USFWS will also conduct site visits. The Section 7 consultation will ensure that the activities of the proposed project take appropriate measures to conserve and protect Federally listed endangered and threatened species and their habitat.	

No.	Comment	Comment Type	Response	Action Item
	I am very concerned that the applicant may have severely avoided disclosing the true impacts of the proposed project on aquatic habitats. The PN only acknowledges impacts to the PN (and presumably the applicant) acknowledge. The USACE and other agencies must determine the actual extent of likely impacts, including impacts of shading from solar panels, on these wetlands. The proposed project must be evaluated in the context of a full disclosure of potential impacts to aquatic habitats, which is not currently the case.	Aquatic Habitat	Section 2 of the application provides an accurate and complete description of the landscape. Wetlands constitute approximately 1,560ac of the McCampbell Property (See Approved Jurisdictional Determination dated August 12, 2022). Hydrology within the property is dominated by a large ditch that conveys stormwater from the City of Ingleside and the site itself downstream to the McCampbell Slough and Port Bay. Salt meadow cordgrass (<i>Spartina spartinae</i>) dominates the site and is observed in both upland and wetland habitats. Wetlands within the property are highly homogenous with little variation in plant assemblages. The property as a whole demonstrates low topographic relief. Elevations within the wetlands range from 4-8ft NAVD88 whereas uplands average 10ft NAVD88. The wetlands on the property overlap a Federal Emergency Management Agency (FEMA) floodplain, with a base flood elevation (BFE) of +11ft NAVD88. Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousset et al., 2017) and document increased biodiversity (Udrifan et al., 2021), others note less biomass under panels (Armstrong et al., 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading. Within the U.S., however, ongoing research conducted by the National Renewables Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022). (Solar Power World, 2020), (Invenery, 2022). This implies that species are not adversely affected by shading from the PV panels. From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade tolerant and shade intolerant herbaceous species (Abella et al., 2020). This study further noted that shade intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and wide-spread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade tolerant or shade intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.) A more detailed Alternatives Analysis was provided in Attachment D of the application. However, an updated alternatives analysis is provided as a part of this response to comments (see Attachment A) to correct an inadvertent error.	
6.2				
6.3	The PN includes a table labeled as "Alternative Analysis Summary". However, it is not possible to interpret the table without any explanation. The applicant should be required to provide the public with the actual Alternatives Analysis, for review and comment.	Alternatives Analysis		

No.	Comment	Comment Type	Response	Action Item																								
6.4	In the absence of any explanation, review of the Alternative Analysis Summary suggests that the applicant has not properly complied with the Clean Water Act, Section 404(b)(1) Guidelines.	Alternatives Analysis	A detailed Alternatives Analysis is provided in Attachment D of the application and an updated alternatives analysis is provided as a part of this response to comments (see Attachment A). As further detailed in the permit application, wetland impacts were minimized and avoided to the greatest possible extent, aligning the project with the Section 404 (b)(1) guidelines.																									
6.5	The applicant has failed to propose mitigation that meets the requirements of the Mitigation Rule.	Mitigation	A detailed mitigation plan in compliance with April 10, 2008, USACE / USEPA Final Mitigation Rule (2008 Mitigation Rule) and 33 DFR 332.4(c)(2) through (c)(14) is provided as Attachment G of the application. An updated Mitigation Plan has been provided as a part of the response to comments (see Attachment B).																									
Paul Kaspar - US EPA																												
7.1	Under the Guidelines, no discharge of dredged or fill material may be permitted by the Corps if: (1) a practicable alternative exists that is less damaging to the aquatic environment so long as that alternative does not have other significant adverse environmental consequences or (2) the nation's waters would be significantly degraded. Under the Guidelines, a project must incorporate all appropriate and practicable measures to first avoid impacts to wetlands, streams, and other aquatic resources and then minimize unavoidable impacts; after avoidance and minimization measures have been applied, the project must include appropriate and practicable compensatory mitigation for the remaining unavoidable impacts. The Guidelines explicitly require evaluation of all direct, secondary, and cumulative impacts reasonably associated with the proposed discharge in determining compliance with Section 230.10(c). Information has not been included to address whether the applicant has adequately considered the entirety of impacts to the affected and surrounding aquatic resources. The existing wetland functions maintain and improve the chemical, physical, and biological integrity of the adjacent bays and waterways by regulating fresh groundwater levels, storing floodwater, removing pollutants and excess nutrients.	Impacts to Aquatic Resources	Port Corpus Christi designed this project in a manner that fundamentally preserves site hydrology and avoids/minimizes impacts to aquatic resources. To accomplish the goals of this project, Port Corpus Christi commits to the following: • Restore all temporary construction impacts to existing grades; • Limit access improvement to only that which is necessary to support critical operations; • Elevate infrastructure above the ground via helical pilings that do not constitute fill per (40 CFR 232.2); • Locate inverters outside wetlands where possible; • Eliminate the potential of vegetation shading via elevated, tracking panels; • Restore 29.6ac of existing, degraded de facto access paths to natural elevations; • Use automated panel cleaning mechanisms to minimize the need for vehicular access to the site. Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project: <table><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce Potential Wetland Impacts</th><th>Net Impact</th></tr><tr><td>Pilings in Wetlands</td><td>Helical pilings</td><td>None - Avoided</td></tr><tr><td>Shading from Panels</td><td>Elevations above BFE and continuous rotation</td><td>None - Avoided</td></tr><tr><td>Trenching for Cables</td><td>Cable elevated on trays</td><td>None - Avoided</td></tr><tr><td>Inverter</td><td>Sited in uplands where applicable</td><td>None - 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None - 13.4ac - offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None - Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None - Restored</td></tr></table>	Potential Project Impacts	Method to Minimize or Reduce Potential Wetland Impacts	Net Impact	Pilings in Wetlands	Helical pilings	None - Avoided	Shading from Panels	Elevations above BFE and continuous rotation	None - Avoided	Trenching for Cables	Cable elevated on trays	None - Avoided	Inverter	Sited in uplands where applicable	None - 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None - 13.4ac - offset with mitigation	Substations	Sited solely in uplands	None - Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None - Restored	
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No.	Comment	Comment Type	Response	Action Item																								
7.2	Specifically, it does not appear that impacts to McCampbell Slough and Port Bay have been addressed such as, but not limited to, loss of filtration, lower dissolved oxygen concentrations, increases in turbidity or toxicity, or losses to local wildlife habitat. Potential impacts to area hydrology and nearby aquatic resources resulting from fill of impacted wetlands should be considered, and further evaluation upon the watershed given the size of the project area may be appropriate. As noted in the draft mitigation plan, roads (such as those proposed by the project) become barriers to surface hydrology limiting sheet flow from the wetlands into existing swales and channels and, ultimately, limiting hydrologic connectivity between the site and downstream estuaries. The installation of the solar panels will likely impede biological function due to the large percentage of wetlands to be subjected to additional shading as the rotating panels are designed to capture maximum daylight. It is unclear if existing evapotranspiration rates be impacted, the extent impacts due to of mowing and maintenance activities, or the impact associated with future decommissioning activities post-project life expectancy.	Impacts to Aquatic Resources	Port Corpus Christi designed this project in a manner that fundamentally preserves site hydrology and avoids/minimizes impacts to aquatic resources. Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project: <table><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce Potential Wetland Impacts</th><th>Net Impact</th></tr><tr><td>Pilings in Wetlands</td><td>Helical pilings</td><td>None - Avoided</td></tr><tr><td>Shading from Panels</td><td>Elevations above BFE and continuous rotation</td><td>None - Avoided</td></tr><tr><td>Trenching for Cables</td><td>Cable elevated on trays</td><td>None - Avoided</td></tr><tr><td>Inverter</td><td>Sited in uplands where applicable</td><td>None - 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None - 13.4ac - offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None - Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None - Restored</td></tr></table> In constructing the proposed project, Port Corpus Christi will improve both the hydrologic functions of the wetlands and free up capacity for upstream stormwater from the surrounding municipalities. Improving the wetland's hydrologic function as a factor of the project will improve downstream water quality including but not limited to, dissolved oxygen, filtration capacity, turbidity, or toxicity. In 1977 USACE authorized the excavation of a drainage ditch through the McCampbell Property to convey stormwater from the City of Ingleside and surrounding areas into the McCampbell Slough. This ditch not only serves to convey stormwater from the Ingleside area but drains the surrounding wetlands within the McCampbell Property. Additionally, impacts resulting from ongoing agricultural use of the McCampbell Property—the existing roads—serve as auxiliary conveyances to the drainage ditch. Port Corpus Christi developed a conceptual site drainage model, which demonstrates a high correlation to stream features and roads within the property. Wetlands function by retaining water until the existing hydrologic regime of the adjacent waterbody naturally removes the water or it evaporates. The excavated drainage ditch, and the existing roads—which serve as auxiliary conveyances to the ditch—prematurely remove standing water from the wetlands within the property and force it downstream into the McCampbell Slough. The additional stormwater, redirected from the wetlands, feeds into the drainage ditch, reducing potential capacity from the upstream communities. Through the execution of the proposed mitigation plan, Port Corpus Christi will eliminate the roads that function as auxiliary conveyance. Future iterations of construction design (especially proposed site access) will further address site stormwater function, focusing on wetland water retention and preventing additional conveyance to the drainage ditch. As a result of the proposed mitigation and additional stormwater-focused design, Port Corpus Christi will restore the natural retention time of the wetlands, preventing premature runoff into the drainage ditch, which will reserve additional stormwater capacity for the upstream communities. Further, the presence of shade does not equate to a loss of biological function in wetlands. An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade tolerant and shade intolerant herbaceous species (Abella et al., 2020). This study further noted that shade intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense	Potential Project Impacts	Method to Minimize or Reduce Potential Wetland Impacts	Net Impact	Pilings in Wetlands	Helical pilings	None - Avoided	Shading from Panels	Elevations above BFE and continuous rotation	None - Avoided	Trenching for Cables	Cable elevated on trays	None - Avoided	Inverter	Sited in uplands where applicable	None - 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None - 13.4ac - offset with mitigation	Substations	Sited solely in uplands	None - Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None - Restored	
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No.	Comment	Comment Type	Response	Action Item
			the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and wide-spread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade tolerant or shade intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.).	
7.3	The PN indicates the applicant has avoided and minimized the environmental impacts through project design, and an alternatives analysis (AA) has been provided. As presented, it is unclear whether the provided AA is sufficiently robust based on the Summary Table provided in the PN. The basis for 600 MW production requirement has not been provided, nor has a justification for a size/scale requirement that characterizes a cost-effective solar development. There is limited information regarding the basis for the siting criteria that were established. It is also unclear whether the geographic search area constraints and siting criteria may have been too narrowly defined to thoroughly evaluate compliance with the Guidelines for the project purpose, or whether the project purpose could be achieved through a combination of on-site and off-site alternatives. We recommend that the Corps of Engineers take this under consideration as it carefully weighs whether it is in the public's interest to authorize the proposed project. As presented, it would appear the identified criteria were more targeted towards the development of property currently owned by the applicant. We recommend the applicant work with the Corps to provide a robust alternatives analysis to assist the Corps in making its factual determinations for compliance with the Guidelines.	Alternatives Analysis	Port Corpus Christi acknowledged EPA's comments on the scope of the alternatives analysis. An updated alternatives analysis is provided as Attachment A. This alternatives analysis considered site availability, cost, logistical limitations, proximity to potential off-takers, and it compared environmental impacts for a no-action alternative, two on-site alternatives, and three off-site alternatives. Port Corpus Christi eliminated several alternatives due to insufficient parcel size, or the presence of shoreline frontage along an existing ship channel. This analysis determined all evaluated sites to be within a suitable distance to existing utility infrastructure. As such, Port Corpus Christi did not eliminate any alternative based on relative proximity to utilities. The alternative that necessitated new property acquisition was eliminated due to the lack of available contiguous parcels of sufficient size and the logistical/temporal constraints in acquisition negotiations relative to anticipated project deployment.	
7.4	The applicant proposes to compensate for the unavoidable impacts to wetlands via a Permittee Responsible Project (PRM) Plan that includes restoring previously degraded wetlands onsite. Specific to the PRM Plan, it is recommended the 3 types of paths/roads to be restored be clearly identified on the mitigation workplan sheets along with quantities of the 3 types of restoration methods targeted. As soil compaction in roadway	Mitigation Plan	Port Corpus Christi included an additional exhibit and quantifications to estimate the type of restoration detailed in the mitigation plan. See Attachment B. Through this exercise, Port Corpus Christi more thoroughly evaluated the restoration potential on-site and determined the site possesses approximately 38,44c of wetland impact, which will be restored, for a mitigation ratio of approximately 3 to 1.	Revised Mitigation Plan to include an exhibit estimating restoration by type of road. Revised mitigation plan to address soil compaction.

No.	Comment	Comment Type	Response	Action Item
	areas may inhibit hydrology and vegetative growth, please identify how restoration activities will incorporate measures to address compaction and support vegetative success. If fill material is required, soils should target existing native soils in terms of organic content, classification, and permeability.			
7.5	It is recommended vegetative success criteria include a 75% aerial coverage of native hydrophytic species. Wetland hydrology should also be demonstrated within the restored areas. Monitoring should be conducted every year for a minimum of 5 years, and success criteria should be demonstrated for 2 consecutive years after any adaptive management measures are implemented, before monitoring activities may be ceased. It is unclear if the site protection instrument will sufficiently protect the restored wetlands specifically in regard to whether uses incompatible with mitigation activities such as ranching/grazing activities will be prohibited	Mitigation Plan	The mitigation plan provided with the application represented success criteria greater than 70% coverage and 2 years of monitoring. However, per this comment, Port Corpus Christi updated the mitigation plan to include 75% final success criteria and 2 years of monitoring following the implementation of adaptive management strategies in the mitigation plan. See Attachment B. Port Corpus Christi has yet to determine whether cattle grazing will continue onsite. If USACE deems cattle grazing to be an incompatible land use with the proposed mitigation, the Port will appropriately deed restrict the site.	Revised Mitigation Plan to include 75% final success criteria and 2 years of monitoring following adaptive management implementation.
Lynne Porter				
8.1	I Request a public hearing and Environmental Impact Statement on the Port of Corpus Christi's USACE permit #SWG-2021-00163	Request for Public Hearing and EIS	The U.S. Army Corps of Engineers should advise if a public meeting is necessary. This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement.	
8.2	I am very concerned about the impacts to migratory birds on the Central Flyway	Migratory Birds	Certain types of solar installations, mainly those with thermal concentration towers in the arid west, present a potential risk to migratory birds. The proposed project will not construct a thermal concentration tower. Additionally, while there is very little published research literature indicating that PV panels impact migratory birds in the same way as thermal concentration towers, the state of the practice in the solar industry includes strategies (including alternating the banding of cells within a panel) to help avian species more easily distinguish the presence of solar panels. Port Corpus Christi maintains an open dialog with USFWS specifically on this project to collaborate on both migratory bird and endangered species concerns. Implementation of appropriate measures will occur to mitigate potential impacts on migratory birds. Such measures will be finalized during the Section 7 consultation process.	
8.3	[I am very concerned about] impacts of glare from solar panels on pilots and possible crashes,	Solar Panel Impacts	The Federal Aviation Administration (FAA) recognizes the compatibility between solar PV generation and airport operations (FAA, 2021). "Glare" reflecting from solar panels presents no more risk to pilots than that of passing windows of a building. Additionally, Port Corpus Christi established an open dialog with the San Patricio County Municipal Airport and the respective County Commissioner. To date, neither party has identified a conflict between the two land uses.	
8.4	[I am very concerned about] establishing unlimited solar power to entice new petrochemical companies	Unlimited Solar Power	The proposed project is expected to generate renewable electrons for the grid, adding to the existing mix of renewable energy with the potential to serve both residential and industrial demand. This project will create approximately 600MW of renewable electrons for the grid. This Port Corpus Christi project will: • Diversify regional electricity generation; • Enhance regional energy resilience; • Directly support federal objectives by fostering low carbon hydrogen (H₂) production; • Minimize permanent impacts to aquatic resources;	

No.	Comment	Comment Type	Response	Action Item
			Texas leads the nation in energy consumption across all sectors. The industrial sector, including the state's refineries and petrochemical plants, accounts for more than half of the state's energy consumption and 23% of the nation's total industrial sector energy use. While 1 megawatt (MW) typically produces enough daily power for 1,000 U.S. homes, it is only enough to meet the power needs of 200 Texas homes on a hot summer day. Peak demands reached more than 77,166MW in 2020, breaking the previous record of 74,829MW set in August 2019. The vulnerability of the regional grid and the need for more, and more diverse generation was illustrated at significant economic and social cost by Winter Storm Uri in 2021. Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousselet et al., 2017) and document increased biodiversity (Udriplan et al., 2021), others note less biomass under panels (Armstrong et al., 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading.	
8.5	[I am very concerned about] destruction of habitat beneath the panels	Habitat	Within the U.S., however, ongoing research conducted by the National Renewables Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022). (Solar Power World, 2020), (Invernergy, 2022). This implies that species are not adversely affected by shading from the PV panels. From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade-tolerant and shade-intolerant herbaceous species (Abella et al., 2020). This study further noted that shade-intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade-tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and wide-spread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade-tolerant or shade-intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.)	
8.6	[I am very concerned about] not knowing what this power is going to be used for (possibly experimental projects the Port is pursuing like hydrogen and carbon capture/sequestration)	Power Use	The project is expected to add renewable electrons to the grid, bolstering energy resilience and supplanting power derived from fossil fuels. Renewable electrons generated from this project would be transmitted to potential off-takers through existing infrastructure owned and operated by AEP.	
8.7	[I am very concerned about] inadequate mitigation (wetlands destroyed should be replaced at a 3:1 ratio)	Mitigation Plan	Port Corpus Christi's proposed mitigation plan offsets unavoidable project impacts in a manner consistent with the 2008 Mitigation Rule. The Mitigation Rule stipulates a mitigation plan must ensure no net loss, favoring on-site, in-kind restoration second only to mitigation banks. Since no mitigation banks exist within the project watershed, on-site, in-kind mitigation is the most favorable mitigation strategy. Any ratio exceeding 1 to 1 demonstrates no net loss of wetlands on-site, thus the mitigation as originally proposed, especially as revised in Attachment B, exceeds the criteria for wetland mitigation.	Update for new mitigation ratio

No.	Comment	Comment Type	Response	Action Item
	Why is the Port (a public navigation district) buying up property so far inland - away from navigable waters? How do taxpayers benefit when the Port makes these large swaths of land tax-exempt? Isn't it anti-competitive for the Port to get into the energy business? Is this just a "greenwashing" effort? We won't really know unless the Port and USACE provide answers.	Property Acquisition	Port Corpus Christi developed the proposed mitigation plan based on the observed impacts occurring on-site at the time the property was purchased. The proposed restoration will conservatively mitigate unavoidable project impacts on a ratio of approximately 3 to 1. Port Corpus Christi updated this ratio following a detailed classification of the proposed restoration types, which required a more thorough analysis of the potential mitigation potential on-site. The 2.8 to 1 ratio is a more accurate estimate than the originally provided 2.2 to 1. Port Corpus Christi is a landlord port, meaning that establishing long-term leases with industrial customers is a cornerstone of its operating structure. Waterfront property is at a premium, and thus its highest and best use is for water-dependent functions, such as docks and other maritime infrastructure. Previous Port Commissions determined and affirmed that the acquisition of land, adjacent or accessible by road or rail, to navigable waters of the Port, is necessary for the fundamental operation and development of the navigable waterways. Prior to purchase by the Port in 2018, the Farm/Agriculture Exemption on the McCampbell property yielded \$1,540.22 in annual tax revenue for San Patricio County; in contrast, all built improvements associated with the construction of a solar PV facility on the site will be subject to ad valorem taxation, thereby generating orders of magnitude more tax revenue. Greenwashing is defined as marketing oneself as "environmentally friendly" without taking the commensurate action. Port Corpus Christi has established quantitative environmental performance targets in six areas—including climate action/decarbonization—codified in an environmental policy. This environmental policy creates a framework for implementing creative and innovative solutions and environmental initiatives while facilitating strategic growth. Developing renewable electricity projects to enhance the availability of ultra-low carbon electrons directly contributes to the performance targets defined in the Port's Environmental Policy while directly supporting the decarbonization objectives of our customers and bolstering the overall resilience of the regional electric grid.	
8.8				
Shelia Walton				
	I would like to request a public hearing and an Environmental Impact Study	Public Hearing & EIS request	The U.S. Army Corps of Engineers should advise if a public meeting is necessary. This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement.	
9.1				
	I would like to express concerns about impacts to migratory birds on the Central Flyway.	Migratory Birds	Certain types of solar installations, mainly those with thermal concentration towers in the arid west, present a potential risk to migratory birds. The proposed project will not construct a thermal concentration tower. Additionally, while there is very little published research literature indicating that PV panels impact migratory birds in the same way as thermal concentration towers, the state of the practice in the solar industry includes strategies (including alternating the banding of cells within a panel) to help avian species more easily distinguish the presence of solar panels. Port Corpus Christi maintains an open dialog with USFWS specifically on this project to collaborate on both migratory bird and endangered species concerns. Implementation of appropriate measures will occur to mitigate potential impacts on migratory birds. Such measures will be finalized during the Section 7 consultation process.	
9.2				
	inadequate mitigation (wetlands destroyed should be replaced at a 3:1 ratio) and the	Mitigation ratio	Port Corpus Christi's proposed mitigation plan offsets unavoidable project impacts in a manner consistent with the 2008 Mitigation Rule. The Mitigation Rule stipulates a mitigation plan must ensure no net loss, favoring on-site, in-kind restoration second only to mitigation banks. Since no mitigation banks exist within the project watershed, on-site, in-kind mitigation is the most favorable mitigation strategy. Any ratio exceeding 1 to 1 demonstrates no net loss of wetlands on-site, thus the mitigation as originally proposed, especially as revised in Attachment B, exceeds the criteria for wetland mitigation.	
9.3			Port Corpus Christi developed the proposed mitigation plan based on the observed impacts occurring on-site at the time the property was purchased. The proposed restoration will conservatively mitigate unavoidable project impacts on a ratio of approximately 3 to 1. Port Corpus Christi updated this ratio following a detailed classification of the proposed restoration types,	

No.	Comment	Comment Type	Response	Action Item
	destruction of habitat beneath the panels.	Habitat	Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousselet et al., 2017) and document increased biodiversity (Udrijan et al, 2021), others note less biomass under panels (Armstrong et al, 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading.	
9.4			Within the U.S., however, ongoing research conducted by the National Renewables Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022). (Solar Power World, 2020), (Invernergy, 2022). This implies that species are not adversely affected by shading from the PV panels. From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade-tolerant and shade-intolerant herbaceous species (Abella et al., 2020). This study further noted that shade-intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade-tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and wide-spread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade-tolerant or shade-intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.)	
9.5	Other important concerns would be glare from solar panels on pilots that could cause possible crashes.		The Federal Aviation Administration (FAA) recognizes the compatible land use between solar and airport (FAA, 2021). "Glare" reflecting from solar panels presents no more risk to pilots than that of passing windows of a building. Additionally, Port Corpus Christi established an open dialog with the San Patricio County Municipal Airport and the respective County Commissioner. To date, neither party has identified a conflict between the two land uses.	
9.6	not knowing what this power is going to be used for.		The project is expected to add renewable electrons to the grid, bolstering energy resilience and supplanting power derived from fossil fuels. Renewable electrons generated from this project would be transmitted to potential off-takers through existing infrastructure owned and operated by AEP. The proposed project will add to the existing mix of renewable energy with the potential to serve both residential and industrial demand.	
9.7	Why is the Port (a public navigation district) buying up property so far inland - away from navigable waters? How do taxpayers benefit when the Port makes these large swaths of land tax-exempt? Isn't it anticompetitive for the Port to get into the energy business? Is this just a "greenwashing" effort?		Port Corpus Christi is a landlocked port, meaning that establishing long-term leases with industrial customers is a cornerstone of its operating structure. Waterfront property is at a premium, and thus its highest and best use is for water-dependent functions, such as docks and other maritime infrastructure. Previous Port Commissions determined and affirmed that the acquisition of land, adjacent or accessible by road or rail, to navigable waters of the Port, is necessary for the fundamental operation and development of the navigable waterways.	

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	I would like to express my opinion that this isn't a good place to fill in wetlands as projected in SWG-2021-00163. It will have a direct effect on the residential and commercial areas nearby. There are better areas that will not destroy human habitat.		The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project: <table><thead><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce Potential Wetland Impacts</th><th>Net Impact</th></tr></thead><tbody><tr><td>Pillings in Wetlands</td><td>Helical pillings</td><td>None - Avoided</td></tr><tr><td>Shading from Panais</td><td>Elevations above BFE and continuous rotation</td><td>None - Avoided</td></tr><tr><td>Trenching for Cables</td><td>Cable elevated on trays</td><td>None - Avoided</td></tr><tr><td>Inverter</td><td>Sited in uplands where applicable</td><td>None - 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None - 13.4ac - offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None - Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None - Restored</td></tr></tbody></table>	Potential Project Impacts	Method to Minimize or Reduce Potential Wetland Impacts	Net Impact	Pillings in Wetlands	Helical pillings	None - Avoided	Shading from Panais	Elevations above BFE and continuous rotation	None - Avoided	Trenching for Cables	Cable elevated on trays	None - Avoided	Inverter	Sited in uplands where applicable	None - 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None - 13.4ac - offset with mitigation	Substations	Sited solely in uplands	None - Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None - Restored	
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Nancy Allen - San Patricio Aviation Advisory Board																												
11.1	I would like to request a public hearing to discuss the merits of plans proposed by the Port of Corpus Christi Authority. Plans are underway to extend the runway to better serve corporate industry. This should be discussed openly to better serve our needs and San Patricio Communities.		The U.S. Army Corps of Engineers should advise if a public meeting is necessary. Port Corpus Christi staff are fully informed of the Airport's planned expansion and do not consider it incompatible with the proposed solar facility. Port Corpus Christi staff have an active and ongoing dialogue with the Airport Director and County Commissioner representing this district, and the Port has committed to involving them in the detailed design process for the site to ensure consistency with the Airport's Master Plan.																									
Doug G.																												
12.1	My organization the Redford Ranch Foundation are adamantly opposed to the Port of corpus christ proceeding with this permit application, I request a public hearing [and EIS]		The U.S. Army Corps of Engineers should advise if a public meeting will be held regarding this application. This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement.																									

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12.2	concerns like impacts to migratory birds on the Central Flyway		Certain types of solar installations, mainly those with thermal concentration towers in the arid west, present a potential risk to migratory birds. The proposed project will not construct a thermal concentration tower. Additionally, while there is very little published research literature indicating that PV panels impact migratory birds in the same way as thermal concentration towers, the state of the practice in the solar industry includes strategies (including alternating the banding of cells within a panel) to help avian species more easily distinguish the presence of solar panels. Port Corpus Christi maintains an open dialog with USFWS specifically on this project, to collaborate on both migratory bird and endangered species concerns. Implementation of appropriate measures will occur to mitigate potential impacts on migratory birds. Such measures will be finalized during the Section 7 consultation process.	
12.3	impacts of glare from solar panels on pilots and possible crashes		The Federal Aviation Administration (FAA) recognizes the compatible land use between solar and airport (FAA, 2021). "Glare" reflecting from solar panels presents no more risk to pilots than that of passing windows on buildings. Additionally, Port Corpus Christi established an open dialog with the San Patricio County Municipal Airport and the respective County Commissioner. To date, neither party has identified a conflict between the two land uses.	
12.4	establishing unlimited solar power to entice new petrochemical companies		This project is expected to create approximately 600MW of renewable electrons for the grid, serving electricity users of all types. This Port Corpus Christi project will: • Diversify regional electricity generation; • Enhance regional energy resilience; • Directly support federal objectives by fostering low carbon hydrogen (H2) production; • Minimize permanent impacts to aquatic resources; • Preserve site hydrology. Texas leads the nation in energy consumption across all sectors. The industrial sector, including the state's refineries and petrochemical plants, accounts for more than half of the state's energy consumption and 23% of the nation's total industrial sector energy use. While 1 megawatt (MW) typically produces enough daily power for 1,000 U.S. homes, it is only enough to meet the power needs of 200 Texas homes on a hot summer day. Peak demands reached more than 77,166MW in 2020, breaking the previous record of 74,829MW set in August 2019. The vulnerability of the regional grid and the need for more, and more diverse generation was illustrated at significant economic and social cost by Winter Storm Uri in 2021.	
12.5	destruction of habitat beneath the panels		Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousselet et al., 2017) and document increased biodiversity (Udrizjan et al, 2021), others note less biomass under panels (Armstrong et al, 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading. Within the U.S. however, ongoing research conducted by the National Renewables Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022). (Solar Power World, 2020). (Invenery, 2022). This implies that species are not adversely affected by shading from the PV panels. From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade-tolerant and shade-	

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			intolerant herbaceous species (Abella et al., 2020). This study further noted that shade-intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade tolerant herbaceous species. Since the spacing, height, and continuous rotation of the panels preclude persistent and wide-spread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade tolerant or shade intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.	
12.6	not knowing what this power is going to be used for (possibly experimental projects the Port is pursuing like hydrogen and carbon capture/sequestration), inadequate mitigation (wetlands destroyed should be replaced at a 3:1 ratio)		The project will add renewable electrons to the grid, bolstering energy resilience and supplanting power derived from fossil fuels. Renewable electrons generated from this project would be transmitted to potential off-takers through existing infrastructure owned and operated by AEP.	
12.7	Why is the Port (a public navigation district) buying up property so far inland - away from navigable waters? How do taxpayers benefit when the Port makes these large swaths of land tax-exempt? Isn't it anti-competitive for the Port to get into the energy business? Is this just a "greenwashing" effort?		Port Corpus Christi's proposed mitigation plan offsets unavoidable project impacts in a manner consistent with the 2008 Mitigation Rule. The Mitigation Rule stipulates a mitigation plan must ensure no net loss, favoring on-site, in-kind restoration second only to mitigation banks. Since no mitigation banks exist within the project watershed, on-site, in-kind mitigation is the most favorable mitigation strategy. Any ratio exceeding 1 to 1 demonstrates no net loss of wetlands on-site, thus the mitigation as originally proposed, especially as revised in Attachment B, exceeds the criteria for wetland mitigation. Port Corpus Christi is a landlord port, meaning that establishing long-term leases with industrial customers is a cornerstone of its operating structure. Waterfront property is at a premium, and thus its highest and best use is for water-dependent functions, such as docks and other maritime infrastructure. Previous Port Commissions determined and affirmed that the acquisition of land, adjacent or accessible by road or rail, to navigable waters of the Port, is necessary for the fundamental operation and development of the navigable waterways.	
12.8			Prior to purchase by the Port in 2016, the Farm/Agriculture Exemption on the McCampbell property yielded \$1,540.22 in annual tax revenue for San Patricio County; in contrast, all built improvements associated with the construction of a solar PV facility on the site will be subject to ad valorem taxation, thereby generating orders of magnitude more tax revenue. Greenwashing is defined as marketing oneself as "environmentally friendly" without taking the commensurate action. Port Corpus Christi has established quantitative environmental performance targets in six areas—including climate action/decarbonization—codified in an environmental policy. This environmental policy creates a framework for implementing creative and innovative solutions and environmental initiatives while facilitating strategic growth. Developing renewable electricity projects to enhance the availability of ultra-low carbon electrons directly contributes to the performance targets defined in the Port's Environmental Policy while directly supporting the decarbonization objectives of our customers and bolstering the overall resilience of the regional electric grid.	
Mark Wolfe - State Historic Preservation Officer				
13.1	An archaeological survey is required. A Texas Antiquities Permit must be obtained from this office prior to initiation of fieldwork. All fieldwork should meet the Archaeological Survey Standards for Texas. A report of investigations is required and should be produced Reports for a Texas Antiquities Permit should also meet the Council of Texas Archeologists Guidelines for Cultural Resources Management Reports and the Texas Administrative Code. In addition, any buildings 45 years old or older that are located on or adjacent to the tract should be documented with photographs and included in the report.		Port Corpus Christi submitted a scope of work for a cultural resource field survey, to USACE on March 31, 2023. USACE approved this survey scope on March 7, 2023, pending comments from SHPO. A Texas Antiquities Permit will be obtained before conducting any field work. Port Corpus Christi acknowledges SHPO's comments regarding the contents of the report.	

No.	Comment	Comment Type	Response	Action Item
Lara Weiss				
	Better understanding of changes, impacts, mitigations to: Flood zones surrounding and including the cities of Aransas Pass and Ingleside.		Future iterations of site and facility design will require detailed hydrographic modeling. The Federal Emergency Management Administration (FEMA) requires projects within a floodway, like the McCampbell project, to obtain a "No-rise Certification". This certification will ensure the proposed project does not negatively affect the downstream communities of Aransas Pass and Ingleside. In constructing the proposed project, Port Corpus Christi will improve both the hydrologic functions of the wetlands and free up capacity for upstream stormwater from the surrounding municipalities. Improving the wetland's hydrologic function as a factor of the project will improve downstream water quality including but not limited to, dissolved oxygen, filtration capacity, turbidity, or toxicity. In 1977 USACE authorized the excavation of a drainage ditch through the McCampbell Property to convey stormwater from the City of Ingleside and surrounding areas into the McCampbell Slough. This ditch not only serves to convey stormwater from the Ingleside area but drains the surrounding wetlands within the McCampbell Property. Additionally, impacts resulting from ongoing agricultural use of the McCampbell Property—the existing roads—serve as auxiliary conveyances to the drainage ditch. Port Corpus Christi developed a conceptual site drainage model, which demonstrates a high correlation to stream features and roads within the property. Wetlands function by retaining water until the existing hydrologic regime of the adjacent waterbody naturally removes the water or it evaporates. The excavated drainage ditch, and the existing roads—which serve as auxiliary conveyances to the ditch—prematurely remove standing water from the wetlands within the property and force it downstream into the McCampbell Slough. The additional stormwater, redirected from the wetlands, feeds into the drainage ditch, reducing potential capacity from the upstream communities. Through the execution of the proposed mitigation plan, Port Corpus Christi will eliminate the roads that function as auxiliary conveyance. Future iterations of construction design (especially proposed site access) will further address site stormwater function, focusing on wetland water retention and preventing additional conveyance to the drainage ditch. As a result of the proposed mitigation and additional stormwater-focused design, Port Corpus Christi will restore the natural retention time of the wetlands, preventing premature runoff into the drainage ditch, which will reserve additional stormwater capacity for the upstream communities.	
14.1				
14.2	Better understanding of changes, impacts, mitigations to: Wildlife		Port Corpus Christi designed this project in a manner that fundamentally preserves site hydrology and avoids/minimizes impacts to aquatic resources. In doing so, this effectively avoids and mitigates impacts to wildlife present at the site.	
14.3	Better understanding of changes, impacts, mitigations to: Soil		Port Corpus Christi maintains an open dialog with USFWS specifically on this project, to collaborate on both migratory bird and endangered species concerns. Implementation of appropriate measures will occur to mitigate potential impacts on migratory birds. Such measures will be finalized during the Section 7 consultation process.	
14.4	Better understanding of changes, impacts, mitigations to: Groundwater		Port Corpus Christi acknowledges this comment, however, without additional detail, it is impossible to provide an appropriate response.	
14.5	In summary, I am opposed to this project until a public meeting is held that would help your new solar farm neighbors understand the changes being made as well as what positive or negative impacts there will be to their home and city.		Port Corpus Christi acknowledges this comment, however, without additional detail, it is impossible to provide an appropriate response.	
Glenn Guillory				
			The U.S. Army Corps of Engineers should advise if a public meeting is necessary.	

No.	Comment	Comment Type	Response	Action Item
15.1	I request a public hearing on subject permit request.		The U.S. Army Corps of Engineers should advise if a public meeting is necessary.	
15.2	1000+ acres of heavy panels airborne in a major hurricane event?		The proposed project construction will meet State of Texas Windstorm requirements.	
Wendy Hughes				
16.1	I would like to express concerns like impacts to migratory birds on the Central Flyway.		Certain types of solar installations, mainly those with thermal concentration towers in the arid west, present a potential risk to migratory birds. The proposed project will not construct a thermal concentration tower. Additionally, while little research exists to demonstrate PV panels impact migratory birds in the same way as thermal concentration towers, there are strategies (including alternating the banding of cells within a panel) to help avian species more easily distinguish the presence of solar panels. Port Corpus Christi maintains an open dialog with USFWS specifically on this project, to collaborate on both migratory bird and endangered species concerns. Implementation of appropriate measures will occur to mitigate potential impacts on migratory birds. Such measures will be finalized during the Section 7 consultation process.	
16.2	impacts of glare from solar panels on pilots and possible crashes,		The Federal Aviation Administration (FAA) recognizes the compatible land use between solar and airport (FAA, 2021). "Glare" reflecting from solar panels presents no more risk to pilots than that of passing windows on buildings. Additionally, Port Corpus Christi established an open dialog with the San Patricio County Municipal Airport and the respective County Commissioner. To date, neither party has identified a conflict between the two land uses.	
16.3	establishing unlimited solar power to entice new petrochemical companies		This project is expected to create approximately 600MW of renewable electrons for the grid, serving users of all types. This Port Corpus Christi project will: • Diversify regional electricity generation. • Enhance regional energy resilience. • Directly support federal objectives by fostering low-carbon hydrogen (H2) production. • Minimize permanent impacts to aquatic resources. • Preserve site hydrology. Texas leads the nation in energy consumption across all sectors. The industrial sector, including the state's refineries and petrochemical plants, accounts for more than half of the state's energy consumption and 23% of the nation's total industrial sector energy use. While 1 megawatt (MW) typically produces enough daily power for 1,000 U.S. homes, it is only enough to meet the power needs of 200 Texas homes on a hot summer day. Peak demands reached more than 77,166MW in 2020, breaking the previous record of 74,829MW set in August 2019. The vulnerability of the regional grid and the need for more, and more diverse generation was illustrated at significant economic and social cost by Winter Storm Uri in 2021.	
16.4	destruction of habitat beneath the panels		Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousselet et al., 2017) and document increased biodiversity (Udjtjan et al, 2021), others note less biomass under panels (Armstrong et al, 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading.	Within the U.S, however, ongoing research conducted by the National Renewables Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022). (Solar Power World, 2020), (Invenery, 2022). This implies that species are not adversely affected by shading from the PV panels.

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16.5	not knowing what this power is going to be used for (possibly experimental projects the Port is pursuing like hydrogen and carbon capture/sequestration).		The project will add renewable electrons to the grid, bolstering energy resilience and supplanting power derived from fossil fuels. Renewable electrons generated from this project would be transmitted to potential off-takers through existing infrastructure owned and operated by AEP.	
16.6	inadequate mitigation (wetlands destroyed should be replaced at a 3:1 ratio).		Port Corpus Christi's proposed mitigation plan offsets unavoidable project impacts in a manner consistent with the 2008 Mitigation Rule. The Mitigation Rule stipulates a mitigation plan must ensure no net loss, favoring on-site, in-kind restoration second only to mitigation banks. Since no mitigation banks exist within the project watershed, on-site, in-kind mitigation is the most favorable mitigation strategy. Any ratio exceeding 1 to 1 demonstrates no net loss of wetlands on-site, thus the mitigation as originally proposed, especially as revised in Attachment B, exceeds the criteria for wetland mitigation.	
16.7	Why is the Port (a public navigation district) buying up property so far inland - away from navigable waters? How do taxpayers benefit when the Port makes these large swaths of land tax-exempt? Isn't it anti-competitive for the Port to get into the energy business? Is this just a "greenwashing" effort?		Port Corpus Christi is a landlord port, meaning that establishing long-term leases with industrial customers is a fundamental cornerstone of its operating structure. Waterfront property is at a premium, and thus its highest and best use is for water-dependent functions, such as docks and other maritime infrastructure. Previous Port Commissions have determined and affirmed that the acquisition of land, adjacent or accessible by road or rail, to navigable waters of the Port, is necessary for the fundamental operation and development of the navigable waterways. Prior to purchase by the Port in 2018, the Farm/Agriculture Exemption on the McCampbell property yielded \$1,540.22 in annual tax revenue for San Patricio County. In contrast, all built improvements associated with the construction of a solar PV facility on the site will be subject to ad valorem taxation, thereby generating orders of magnitude more tax revenue. Greenwashing is defined as marketing oneself as "environmentally friendly" without taking the commensurate action. Port Corpus Christi has established quantitative environmental performance targets in six areas—including climate action/decarbonization—codified in an environmental policy. This environmental policy creates a framework for implementing creative and innovative solutions and environmental initiatives while facilitating strategic growth. Developing renewable electricity projects to enhance the availability of ultra-low carbon electrons directly contributes to the performance targets defined in the Port's Environmental Policy while directly supporting the decarbonization objectives of our customers and bolstering the overall resilience of the regional electric grid.	
Julie Nye				
17.1	I request a public hearing and Environmental Impact Statement	Copy and Paste	The U.S. Army Corps of Engineers should advise if a public meeting is necessary. This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement.	

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17.2	the impact to migratory birds on the Central Flyway		Certain types of solar installations, mainly those with thermal concentration towers in the arid west, present a potential risk to migratory birds. The proposed project will not construct a thermal concentration tower. Additionally, while there is very little published research literature indicating that PV panels impact migratory birds in the same way as thermal concentration towers, the state of the practice in the solar industry includes strategies (including alternating the banding of cells within a panel) to help avian species more easily distinguish the presence of solar panels. Port Corpus Christi maintains an open dialog with USFWS specifically on this project to collaborate on both migratory bird and endangered species concerns. Implementation of appropriate measures will occur to mitigate potential impacts on migratory birds. Such measures will be finalized during the Section 7 consultation process.	
17.3	impact of glare from solar panels on pilots and possible crashes		The Federal Aviation Administration (FAA) recognizes the compatible land use between solar and airport (FAA, 2021). "Glare" reflecting from solar panels presents no more risk to pilots than that of passing windows on buildings. Additionally, Port Corpus Christi established an open dialog with the San Patricio County Municipal Airport and the respective County Commissioner. To date, neither party has identified a conflict between the two land uses.	
17.4	destruction of habitat beneath the panels		Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousseilot et al., 2017) and document increased biodiversity (Udrijan et al., 2021), others note less biomass under panels (Armstrong et al., 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading.	
17.5	inadequate mitigation (wetlands destroyed should be replaced at a 3:1 ratio).		Within the U.S., however, ongoing research conducted by the National Renewables Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022). (Solar Power World, 2020), (Invenery, 2022). This implies that species are not adversely affected by shading from the PV panels. From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade-tolerant and shade-intolerant herbaceous species (Abella et al., 2020). This study further noted that shade-intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade-tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and widespread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade-tolerant or shade-intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels. Port Corpus Christi's proposed mitigation plan offsets unavoidable project impacts in a manner consistent with the 2008 Mitigation Rule. The Mitigation Rule stipulates a mitigation plan must ensure no net loss, favoring on-site, in-kind restoration second only to mitigation banks. Since no mitigation banks exist within the project watershed, on-site, in-kind mitigation is the most favorable mitigation strategy. Any ratio exceeding 1 to 1 demonstrates no net loss of wetlands on-site, thus the mitigation as originally proposed, especially as revised in Attachment B, exceeds the criteria for wetland mitigation.	

No.	Comment	Comment Type	Response	Action Item
Charles Ardizzone - DOI Fish and Wildlife Service				
18.1	The PN states that a wetlands delineation indicated that approximately 1,560 acres of wetlands are present within the proposed project site. The PCCA stated that the project was designed to preserve, protect, and restore jurisdictional wetlands habitat and that the existing hydrology will be preserved throughout the project site and all temporary construction impacts will be restored to preconstruction conditions. According to PCCA, the ratio of restoration to impacts is 2.2:1, however, the long-term effect to the wetlands is unknown as the solar project has been deemed experimental. With over 50 percent of wetlands in the United States destroyed, it is recommended that all the wetlands should be restored fully to the best possible condition for the life of the project instead of only 5 years.		Port Corpus Christi revised the mitigation plan to include a more robust Long-Term Management Section, which includes annual qualitative assessments in perpetuity of the project. Should the mitigation plan fail at any point during the lifespan of the project, Port Corpus Christi will engage with USACE to restore any long-term wetland loss.	Revised mitigation plan to improve long-term management strategies
18.2	Following the completion of the PCCA McCampbell Solar Project, the remaining wetlands should be held in conservation easement.		Port Corpus Christi will consider a site protection instrument, such as a deed restriction or conservation easement, on the wetlands on the property. Conservation easements necessitate a 3 rd party, typically a nonprofit/NGO that is willing to maintain the easement in perpetuity. Our experience on similar projects suggests that identifying an organization that is capable/willing to assume administrative responsibility for sites such as this, with historic farm/agricultural use and relatively low habitat diversity/productivity, is challenging. As such, other legal instruments for protecting the site may be more practical. The Port commits to exploring such options.	
18.3	Bird deaths due to collisions are known to occur due to the reflective nature of solar panels. The recommendation for preventing these deaths is to build solar farms away from water, including wetlands. In the case of the PCCA McCampbell Solar Project this is not possible since the solar farm will extend over 1,560 acres of wetlands. The Service recommends alternating panels to create a noticeable grid and controlling lighting at night to eliminate reflection and reduce night-time bird collisions.		Certain types of solar installations, mainly those with thermal concentration towers in the arid west, present a potential risk to migratory birds. The proposed project will not construct a thermal concentration tower. Additionally, while there is very little published research literature indicating that PV panels impact migratory birds in the same way as thermal concentration towers, the state of the practice in the solar industry includes strategies (including alternating the banding of cells within a panel) to help avian species more easily distinguish the presence of solar panels. Port Corpus Christi maintains an open dialog with USFWS specifically on this project to collaborate on both migratory bird and endangered species concerns. Implementation of appropriate measures will occur to mitigate potential impacts on migratory birds. Such measures will be finalized during the Section 7 consultation process.	
18.4	The Service recommends adding wetland pollinator plants such as milkweed and surveying for the eastern black rail (<i>Laterallus jamaicensis</i> ssp. <i>jamaicensis</i>) as discussed in several meetings or correspondence with PCCA.		Port Corpus Christi takes this recommendation under advisement and recognizes the compatibility between solar installations and monarch butterfly habitats. Port Corpus Christi will evaluate the feasibility of planting milkweed during the detailed site design process.	
Patrick Nye - Ingleside on the Bay Coastal Watch Association				
			Port Corpus Christi began an Eastern Black Rail Survey in March, which includes both a desktop model and an in-field presence/absence survey, which activity is actively being coordinated with the Corpus Christi Field Services Office. Upon conclusion of the field survey, PCCA will share the results with USFWS as previously discussed.	

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19.1	There are numerous unanswered questions about putting a solar farm at the airport		The Federal Aviation Administration (FAA) recognizes the compatible land use between solar and airport (FAA, 2021). "Glare" reflecting from solar panels presents no more risk to pilots than that of passing windows on buildings. Additionally, Port Corpus Christi established an open dialog with the San Patricio County Municipal Airport and the respective County Commissioner. To date, neither party has identified a conflict between the two land uses. Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The project will place fill in 13.9ac of wetlands as stated in both the permit application and the public notice. The project-related impacts can be seen in the summary table below: <table><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce Potential Wetland Impacts</th><th>Net Impact</th></tr><tr><td>Pilings in Wetlands</td><td>Helical pilings</td><td>None - Avoided</td></tr><tr><td>Shading from Panels</td><td>Elevations above BFE and continuous rotation</td><td>None - Avoided</td></tr><tr><td>Trenching for Cables</td><td>Cable elevated on trays</td><td>None - Avoided</td></tr><tr><td>Inverter</td><td>Sited in uplands where applicable</td><td>None - 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None - 13.4ac - offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None - Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None - Restored</td></tr></table>	Potential Project Impacts	Method to Minimize or Reduce Potential Wetland Impacts	Net Impact	Pilings in Wetlands	Helical pilings	None - Avoided	Shading from Panels	Elevations above BFE and continuous rotation	None - Avoided	Trenching for Cables	Cable elevated on trays	None - Avoided	Inverter	Sited in uplands where applicable	None - 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None - 13.4ac - offset with mitigation	Substations	Sited solely in uplands	None - Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None - Restored	
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19.3	The location of wetlands to be filled in not specified.		The project will place fill in wetlands for access paths and inverters, which is denoted in the permit drawings on the Wetland Impacts (FII) Map on page 18 of 22 of the project drawings.																									
	Impacts to wetlands are unclear, underestimated, and improperly mitigated		Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project: <table><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce Potential Wetland Impacts</th><th>Net Impact</th></tr><tr><td>Pilings in Wetlands</td><td>Helical pilings</td><td>None - Avoided</td></tr><tr><td>Shading from Panels</td><td>Elevations above BFE and continuous rotation</td><td>None - Avoided</td></tr><tr><td>Trenching for Cables</td><td>Cable elevated on trays</td><td>None - Avoided</td></tr><tr><td>Inverter</td><td>Sited in uplands where applicable</td><td>None - 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None - 13.4ac - offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None - Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None - Restored</td></tr></table> Port Corpus Christi proposed sufficient mitigation for wetland impacts, which demonstrates "no net loss" per the 2008 Mitigation Rule. The Mitigation Rule stipulates a mitigation plan must ensure no net loss, favoring on-site, in-kind restoration second only to mitigation banks. Since no mitigation banks exist within the project watershed, on-site, in-kind mitigation is the most favorable	Potential Project Impacts	Method to Minimize or Reduce Potential Wetland Impacts	Net Impact	Pilings in Wetlands	Helical pilings	None - Avoided	Shading from Panels	Elevations above BFE and continuous rotation	None - Avoided	Trenching for Cables	Cable elevated on trays	None - Avoided	Inverter	Sited in uplands where applicable	None - 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None - 13.4ac - offset with mitigation	Substations	Sited solely in uplands	None - Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None - Restored	
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			mitigation strategy. Any ratio exceeding 1 to 1 demonstrates no net loss of wetlands on-site, thus the mitigation as originally proposed, especially as revised in Attachment B, exceeds the criteria for wetland mitigation.	
19.5	The purpose for "new and industrial off-takers" is not in the public's interest		The project is expected to add renewable electrons to the grid, bolstering energy resilience and supplanting power derived from fossil fuels. Renewable electrons generated from this project would be transmitted to potential off-takers through existing infrastructure owned and operated by AEP. The proposed project will add to the existing mix of renewable energy with the potential to serve both residential and industrial demand. Regardless of the end-use of the electrons, the addition of emission-free energy generation sources and enhanced resilience of the regional grid is within the public interest.	
	The project is an example of "Greenwashing"		The proposed project will generate renewable electrons for the grid, adding to the existing portfolio of renewable energy, which will be imperative to realize the demands for green hydrogen generation and ultimate carbon neutrality.	
19.6			Greenwashing is defined as marketing oneself as "environmentally friendly" without taking the commensurate action. Port Corpus Christi has established quantitative environmental performance targets in six areas—including climate action/decarbonization—codified in an environmental policy. This environmental policy creates a framework for implementing creative and innovative solutions and environmental initiatives while facilitating strategic growth. Developing renewable electricity projects to enhance the availability of ultra-low carbon electrons directly contributes to the performance targets defined in the Port's Environmental Policy while directly supporting the decarbonization objectives of our customers and bolstering the overall resilience of the regional electric grid.	
19.7	The Port's plans to be an energy supplier are anti-competitive and outside its purview		The project is expected to yield 600 MW of carbon-free electricity to be delivered via interconnect to the regional electric grid. The Port is not proposing to be a transmission provider or seller/distributor of electricity, and thus the project does not compete with regional electricity providers in any way.	
19.8	Alternatives Analysis Inadequate, but Least Environmentally Damaging Alternatives Exist.		See updated Attachment A.	
19.9	The project requires an EIS		This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement	
19.10	This project is not in the public interest.		The proposed project is expected to generate renewable electrons for the grid, adding to the existing mix of renewable energy with the potential to serve both residential and industrial demand, and bolstering energy resilience and supplanting power derived from fossil fuels. Regardless of the destination of the renewable electrons generated from this project, they would serve to supplant power derived from fossil fuels, reducing regional emissions, and edging the Coastal Bend Region toward carbon neutrality, which is unequivocally aligned with the public interest (IPCC, 2022). Likewise, the addition of new, ultra-low carbon electricity generation to the ERCOT grid will bolster grid resilience for all users, clearly serving the public interest. Further, the proposed construction techniques and on-site mitigation will preserve and enhance, respectively, the hydrologic function of the site, thereby upholding and serving the public interest of downstream communities for whom the site provides ecosystem (watershed) services.	
19.11	Public Access to Information by USACE Galveston is Inappropriately Limited.		Port Corpus Christi has no response to this comment.	
Cathy Fulton				
20.1	I am submitting a request for a public meeting/hearing.		The U.S. Army Corps of Engineers should advise if a public meeting is necessary. This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement.	

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	biennial session. It gives Port's the ability to: donate, exchange, convey, sell, or lease land, improvements, easements, or any other interests in real property to an electric utility																											
Jessica Hernandez																												
	Why add fill when the panels are to be constructed 5 feet off the ground? Why not raise them higher and avoid filling the herbaceous wetlands altogether?. Why not only utilize the acreage at its highest levels and not disrupt the wetlands of this property?		Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project: <table><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce Potential Wetland Impacts</th><th>Net Impact</th></tr><tr><td>Pilings in Wetlands</td><td>Helical pilings</td><td>None – Avoided</td></tr><tr><td>Shading from Panels</td><td>Elevations above BFE and continuous rotation</td><td>None – Avoided</td></tr><tr><td>Trenching for Cables</td><td>Cable elevated on trays</td><td>None – Avoided</td></tr><tr><td>Inverter</td><td>Sited in uplands where applicable</td><td>None – 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None – 13.4ac – offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None – Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None – Restored</td></tr></table>	Potential Project Impacts	Method to Minimize or Reduce Potential Wetland Impacts	Net Impact	Pilings in Wetlands	Helical pilings	None – Avoided	Shading from Panels	Elevations above BFE and continuous rotation	None – Avoided	Trenching for Cables	Cable elevated on trays	None – Avoided	Inverter	Sited in uplands where applicable	None – 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None – 13.4ac – offset with mitigation	Substations	Sited solely in uplands	None – Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None – Restored	
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	Water takes the path of least resistance.. Will the structures (panels) themselves redirect the storm water and where to if the wetlands have been filled? Is it subject to flow towards the city of AP to make its way to the intercostal or will it 24continue its flow into McCampbell slough where it meets with Copano Bay? The nearby communities due to the area having a large portion of it in a flood zone.																											
22.2																												

No.	Comment	Comment Type	Response	Action Item
			Port Corpus Christi has taken a systematic approach to site access in order to address site hydrology holistically, ensuring that hydrologic function is preserved/enhanced. The random amalgamation of de facto access paths that currently crisscross the site have created longstanding barriers to hydrology that the Port proposes to alleviate as part of its compensatory mitigation for unavoidable impacts to jurisdictional habitat (see Mitigation Plan, Attachment B). Subsequent phases of design will identify the ideal placement of culverts to promote the unfettered hydrologic exchange between the wetlands and existing drainage ditch (to which no impacts are proposed). In constructing the proposed project, Port Corpus Christi will improve both the hydrologic functions of the wetlands and freeing up capacity for upstream stormwater from the surrounding municipalities. Improving the wetlands hydrologic function as a factor of the project will improve downstream water quality including but not limited to, dissolved oxygen, filtration capacity, turbidity, or toxicity. In 1977 USACE authorized the excavation of a drainage ditch through the McCampbell Property to convey stormwater from the City of Ingleside and surrounding areas into the McCampbell Slough. This ditch not only serves to convey stormwater from the Ingleside area but drains the surrounding wetlands within the McCampbell Property. Additionally, impacts resulting from ongoing agricultural use of the McCampbell Property—the existing roads—serve as auxiliary conveyances to the drainage ditch. Port Corpus Christi developed a conceptual site drainage model, which demonstrates a high correlation to stream features and roads within the property. Wetlands function by retaining water until the existing hydrologic regime of the adjacent waterbody naturally removes the water or it evaporates. The excavated drainage ditch, and the existing roads—which serve as auxiliary conveyances to the ditch—prematurely remove standing water from the wetlands within the property and force it downstream into the McCampbell Slough. The additional stormwater, redirected from the wetlands, feeds into the drainage ditch, reducing potential capacity from the upstream communities. Through the execution of the proposed mitigation plan, Port Corpus Christi will eliminate the roads that function as auxiliary conveyance. Future iterations of construction design (especially proposed site access) will further address site stormwater function, focusing on wetland water retention and preventing additional conveyance to the drainage ditch. As a result of the proposed mitigation and additional stormwater-focused design, Port Corpus Christi will restore the natural retention time of the wetlands, preventing premature runoff into the drainage ditch, which will reserve additional stormwater capacity for the upstream communities.	
22.3	The vegetation. A portion of this land was subjected to a control burn a few years ago, when was the vegetation study and analysis done and recorded to determine if any sensitive plants within the property? This is critical habitat for many species but would most defiantly affect the migratory birds that pass thru this fly zone region.		A wetland delineation report, which documented all vegetation within the McCampbell property at over 181 sample points, was approved by the USACE on August 12, 2022.	
22.4	Will all fill in material be of natural material or might it come from man made reclaimed crushed concrete? These are a few of my initial concerns regarding this project and I would like to request a public hearing.		The detailed site design for the project will specify the exact characteristics of fill material, which a contractor will be required to meet during construction. As a matter of standard practice, Port Corpus Christi requires clean fill, free of contaminants on construction projects. However, the access roads will be constructed with caliche, crushed aggregate, or other similar permeable materials.	
Errol Summerlin – Coastal Alliance to Protect our Environment				
23.1	The Public Notice to fill in 13.9 acres of wetlands does not represent the Project Plans for a 1866-acre solar farm		Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project:	

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23.2	Location of wetlands to be filled is not specified		The project will place fill in wetlands for access paths and inverters, which is denoted in the permit drawings on the Wetland Impacts (FII) Map on page 18 of 22 of the project drawings.																						
	Impacts to wetlands are unclear, underestimated, and improperly mitigated		Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project: <table><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce Potential Wetland Impacts</th><th>Net Impact</th></tr><tr><td>Pilings in Wetlands</td><td>Helical pilings</td><td>None – Avoided</td></tr><tr><td>Shading from Panels</td><td>Elevations above BFE and continuous rotation</td><td>None – Avoided</td></tr><tr><td>Trenching for Cables Inverter</td><td>Cable elevated on trays Sited in uplands where applicable</td><td>None – Avoided None – 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None – 13.4ac – offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None – Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None – Restored</td></tr></table>	Potential Project Impacts	Method to Minimize or Reduce Potential Wetland Impacts	Net Impact	Pilings in Wetlands	Helical pilings	None – Avoided	Shading from Panels	Elevations above BFE and continuous rotation	None – Avoided	Trenching for Cables Inverter	Cable elevated on trays Sited in uplands where applicable	None – Avoided None – 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None – 13.4ac – offset with mitigation	Substations	Sited solely in uplands	None – Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None – Restored	
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23.3			Port Corpus Christi proposed sufficient mitigation for wetland impacts, which demonstrates "no net loss" per the 2008 Mitigation Rule. The Mitigation Rule stipulates a mitigation plan must ensure no net loss, favoring on-site, in-kind restoration second only to mitigation banks. Since no mitigation banks exist within the project watershed, on-site, in-kind mitigation is the most favorable mitigation strategy. Any ratio exceeding 1 to 1 demonstrates no net loss of wetlands on-site, thus the mitigation as originally proposed, especially as revised in Attachment B, exceeds the criteria for wetland mitigation. The project is expected to add renewable electrons to the grid, bolstering energy resilience and supplanting power derived from fossil fuels. Renewable electrons generated from this project would be transmitted to potential offtakers through existing infrastructure owned and operated by AEP. The proposed project will add to the existing mix of renewable energy with the potential to serve both residential and industrial demand. Regardless of the end-use of the electrons, the addition of emission-free energy generation sources, and enhanced resilience of the regional grid are within the public interest.																						
23.4	The purpose for "new and industrial offtakers" is not in the public interest																								

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23.5	The Port's plan to be an enegy supplier are anti-competitive and outside its purview as a Navigation District		The project is expected to yield 600 MW of carbon-free electricity to be delivered via interconnect to the regional electric grid. The Port is not proposing to be a transmission provider or seller/distributor of electricity, and thus the project does not compete with regional electricity providers in any way.																									
23.6	Alternatives Analysis is inadequate		Please see the updated Alternatives Analysis provided as Attachment A.																									
23.7	This project requires an Environmental Impact Statement		This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement.																									
23.8	The project is not in the public interest		Regardless of the destination of the renewable electrons generated from this project, they would serve to supplant power derived from fossil fuels, reducing regional emissions, and edging the Coastal Bend Region toward carbon neutrality, which is unequivocally aligned with the public interest (IPCC, 2022). Likewise, the addition of new, ultra-low carbon electricity generation to the ERCOT grid will bolster grid resilience for all users, clearly serving the public interest. Further, the proposed construction techniques and on-site mitigation will preserve and enhance, respectively, the hydrologic function of the site, thereby upholding and serving the public interest of downstream communities for whom the site provides ecosystem (watershed) services.																									
Cindy Adams-Smith, M.S. - TPWD																												
	Impacts to wetland functions should be avoided and minimized to the extent practicable to support the attainment of water quality standards for the Mission-Aransas Estuary		Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project:																									
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	The applicant should consider exploring additional alternatives to identify the least environmentally damaging practicable alternative.		Please see the updated Alternatives Analysis provided as Attachment A.																									
24.2																												
24.3	If the proposed project is but part of a larger effort, the U.S. Army Corps of Engineers (USACE) should determine the appropriate scope of the proposed project, identify any connected facilities or actions, and evaluate the need to develop an Environmental Impact Statement (EIS).		The solar development proposed in this permit application represents a single project with independent utility. The project will add renewable electrons to the grid, bolstering energy resilience and supplanting power derived from fossil fuels. Renewable electrons generated from this project would be transmitted to potential off-takers through existing infrastructure owned and operated by AEP.																									

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	Once the applicant has sufficiently demonstrated that there are no practicable alternatives to the proposed project site with fewer environmental impacts, the applicant should evaluate onsite alternatives to demonstrate that onsite impacts have been avoided and minimized to the extent practicable.		Port Corpus Christi evaluated several sites during the alternative analysis and determined the McCampbell property to be best suited for an industrial-size solar development. An updated alternatives analysis is provided as a part of this response to comments (see Attachment A). Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project: <table><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce Potential Wetland Impacts</th><th>Net Impact</th></tr><tr><td>Pilings in Wetlands</td><td>Helical pilings</td><td>None - Avoided</td></tr><tr><td>Shading from Panels</td><td>Elevations above BFE and continuous rotation</td><td>None - Avoided</td></tr><tr><td>Trenching for Cables</td><td>Cable elevated on trays</td><td>None - Avoided</td></tr><tr><td>Inverter</td><td>Sited in uplands where applicable</td><td>None - 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None - 13.4ac - offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None - Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None - Restored</td></tr></table>	Potential Project Impacts	Method to Minimize or Reduce Potential Wetland Impacts	Net Impact	Pilings in Wetlands	Helical pilings	None - Avoided	Shading from Panels	Elevations above BFE and continuous rotation	None - Avoided	Trenching for Cables	Cable elevated on trays	None - Avoided	Inverter	Sited in uplands where applicable	None - 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None - 13.4ac - offset with mitigation	Substations	Sited solely in uplands	None - Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None - Restored	
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	The applicant should limit facilities to upland areas of the property to avoid and minimize wetland impacts. The applicant should also consider reducing the number of solar panels and associated infrastructure to lessen the project footprint and/or consider the use of multiple properties to construct a 600 MW PV solar panel development.		Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project: <table><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce Potential Wetland Impacts</th><th>Net Impact</th></tr><tr><td>Pilings in Wetlands</td><td>Helical pilings</td><td>None - Avoided</td></tr><tr><td>Shading from Panels</td><td>Elevations above BFE and continuous rotation</td><td>None - Avoided</td></tr><tr><td>Trenching for Cables</td><td>Cable elevated on trays</td><td>None - Avoided</td></tr><tr><td>Inverter</td><td>Sited in uplands where applicable</td><td>None - 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None - 13.4ac - offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None - Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None - Restored</td></tr></table>	Potential Project Impacts	Method to Minimize or Reduce Potential Wetland Impacts	Net Impact	Pilings in Wetlands	Helical pilings	None - Avoided	Shading from Panels	Elevations above BFE and continuous rotation	None - Avoided	Trenching for Cables	Cable elevated on trays	None - Avoided	Inverter	Sited in uplands where applicable	None - 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None - 13.4ac - offset with mitigation	Substations	Sited solely in uplands	None - Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None - Restored	
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24.6	The applicant should reach out to San Patricio County to determine if the proposed project is compatible with airport operations. A post-construction monitoring plan should be developed to determine whether bird fatalities (or other wildlife impacts) are occurring, and an adaptive management plan should be developed to minimize these potential impacts.		Port Corpus Christi staff are fully informed of the Airport's planned expansion and do not consider it incompatible with the proposed solar facility. Port Corpus Christi staff have an active and ongoing dialogue with the Airport Director and County Commissioner representing this district, and the Port has committed involving them in the detailed design process for the site to ensure consistency with the Airport's Master Plan. Port Corpus Christi is currently coordinating with USFWS and this Section 7 consultation will determine what if any, long-term monitoring is required to address impacts to birds.	
24.7	A hydrologic functional assessment should be completed to identify the directional flow of water at pre-restoration conditions and post-construction surveys to determine if the restoration was successful. The following information should be provided to support the proposed hydrologic design:		Future iterations of design will require detailed hydrographic modeling. The Federal Emergency Management Administration (FEMA) requires projects within a floodway, like the McCampbell project, to obtain a "No-rise Certification". Technical data, approved by a professional engineer, serves as the basis for the certification (FEMA, 2020). In association with this, the Port of Corpus Christi will expand this model to further inform pertinent details to the project, including but not limited to, culvert size, placement and spacing, the height of access paths, and whether low water crossings are more suitable in certain portions of the site.	
24.8	Provide following figures to support the proposed hydrologic design: A figure of existing surface hydrology conditions that shows arrows indicating the directions of surface water flow throughout the entire site including water inflow and outflow of each wetland and water feature (e.g., stormwater ditch, McCampbell Slough, etc.) at the project site.		In late 2019, Port Corpus Christi executed a contract with Hanson Professional Services, Inc. to complete an existing conditions hydrologic and hydraulic analysis of McCampbell Slough. The scope of analysis included the area between State Highway 361, State Highway 35, and Farm-to-Market Road 1069. This information was utilized in planning the proposed solar development. During the design of the solar development, the model will be updated to further evaluate and inform the final design.	
24.9	A figure of proposed surface hydrology conditions that shows arrows indicating the directions of surface water flow throughout the entire site including water inflow and outflow of each wetland and water feature at the project site. TPWD recommends that the USACE not issue a permit for the project as proposed. The applicant should incorporate the above recommendations into revised project plans that fully evaluate practicable alternatives and avoids and minimizes impacts to special aquatic sites		Port Corpus Christi's strategic growth and land use decisions are data-driven, guided by purpose-built Geographic Information Systems (GIS) decision support tools that prioritize compatibility with adjacent/non-industrial land uses and avoidance of sensitive environmental habitats. In Port Corpus Christi's evaluation of the highest and best use of the property, only a project, which minimized wetland impacts is a compatible land use. Pillings to support solar panels do not act as fill, nor impact wetlands; therefore, solar is a compatible land use for the property. Despite the lack of conclusive evidence for shading impacts of wetland vegetation, Port Corpus Christi elected to only use continuously rotating solar panels and added elevation to the panels—several feet above industry standard—to increase light penetration to the ground. Further, the conceptual design focused on minimizing wetland impacts from substations and access roads to the greatest extent. After analyzing several onsite alternatives, Port Corpus Christi successfully developed a holistic use of the property, which limits impacts to 1% of the wetlands onsite.	need exhibits showing hydrology
Brenton B. Lewis - City Manager, City of Ingleside				

No.	Comment	Comment Type	Response	Action Item
25.1	The City of Ingleside is requesting a public hearing and additional information regarding the proposed fill area at the McCampbell-Porter Airport.		The U.S. Army Corps of Engineers should advise if a public meeting is necessary.	
25.2	The airport and surrounding area are located partially in the city limits of the City of Ingleside and the McCampbell Slough is a major drainage area that affects the City of Ingleside.		The Federal Aviation Administration (FAA) recognizes the compatible land use between solar and airport (FAA, 2021). "Glare" reflecting from solar panels presents no more risk to pilots than that of passing windows on buildings. Additionally, Port Corpus Christi established an open dialog with the San Patricio County Municipal Airport and the respective County Commissioner. To date, neither party has identified a conflict between the two land uses.	
26.1	The proposed project is adjacent to the bays and estuaries, and beaches of the Texas Coast. The wooded oak motts are a rare habitat along this heavily used migratory bird flyway. Migrating birds use the wetlands to feed and roost. Also the birds often confuse shiny surfaces, such as solar panels, for water, and are injured when trying to land, or feed.		Future iterations of design will require detailed hydrographic modeling. The Federal Emergency Management Administration (FEMA) requires projects within a floodway, like the McCampbell project, to obtain a "No-rise Certification". Technical data, approved by a professional engineer, will serve as the basis for the certification and demonstrate the proposed project does not impact stormwater offsite.	
26.2	There are thousands of acres of fallow agricultural fields slightly inland, devoid of wetlands or woodlands that would avoid most of the impacts to migratory birds		Based on the wetland delineation and associated AID, no oak mottes exist on the McCampbell Property. However, Port Corpus Christi will incorporate strategies to minimize impacts to migratory birds in future iterations of design as a result of the ongoing coordination with USFWS.	
Tom Shearer				
Jennifer Hilliard - Ingleside on the Bay Coastal Watch Association				
27.1	I am requesting that the U.S. Army Corps of Engineers require a full Environmental Impact Statement for this project and provide a public hearing.		An Environmental Impact Statement is not warranted since this project does not constitute a major federal action.	
27.2	Wetlands are vital and dynamic ecosystems that provide numerous benefits to society, including improved surface water quality, flood control, groundwater recharge, and of course wildlife habitat.		The U.S. Army Corps of Engineers should advise if a public meeting is necessary.	
27.3	The spacing of the panels covers the entire ground area except where roads are installed. The area covered by the panel will not maintain its existing floristic and hydrologic quality and should be considered in mitigation totals.		Port Corpus Christi agrees wetlands are a vital component of the local ecosystem. Port Corpus Christi designed this project in a manner that fundamentally preserves site hydrology and avoids/minimizes impacts to aquatic resources. To accomplish the goals of this project, Port Corpus Christi commits to the following: • Restore all temporary construction impacts to existing grades; • Limit access improvement to only that which is necessary to support critical operations; • Elevate infrastructure above the ground via helical pilings that do not constitute fill per (40 CFR 232.2); • Eliminate the potential of vegetation shading via elevated, tracking panels. • Restore 29 6ac of existing, degraded de facto access paths to natural elevations • Use automated panel cleaning mechanisms Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousset et al., 2017) and document increased biodiversity (Ududan et al., 2021), others note less biomass under panels (Armstrong et al., 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than	

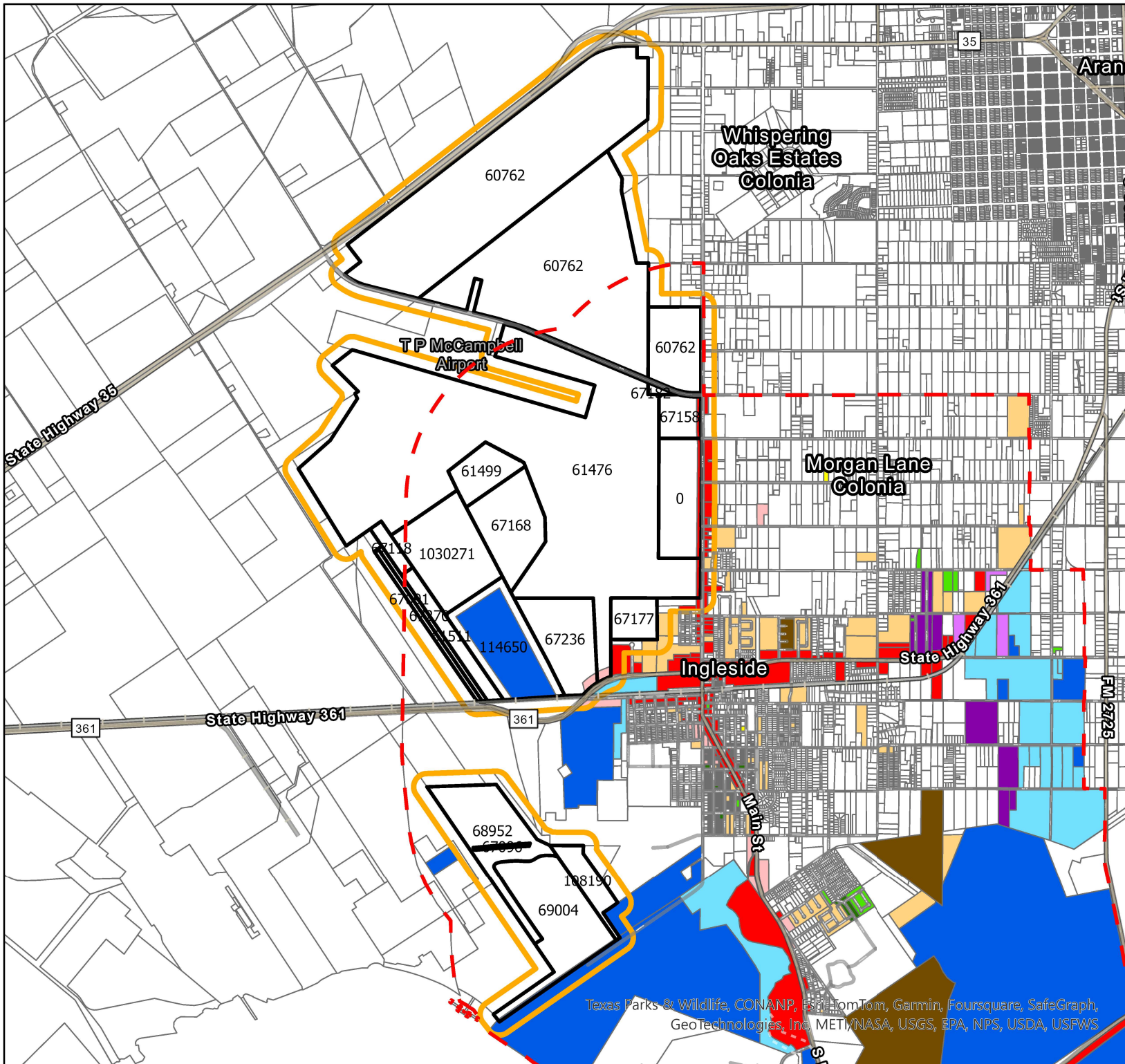
No.	Comment	Comment Type	Response	Action Item
			in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading. Within the U.S., however, ongoing research conducted by the National Renewables Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022), (Solar Power World, 2020), (Invenery, 2022). This implies that species are not adversely affected by shading from the PV panels. From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade-tolerant and shade-intolerant herbaceous species (Abella et al., 2020). This study further noted that shade-intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade-tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and widespread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade-tolerant or shade-intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.)	
	They have grossly underestimated the amount of compensatory mitigation to the access roads and inverter footings.		Port Corpus Christi's proposed mitigation plan offsets unavoidable project impacts in a manner consistent with the 2008 Mitigation Rule. The Mitigation Rule stipulates a mitigation plan must ensure no net loss, favoring on-site, in-kind restoration second only to mitigation banks. Since no mitigation banks exist within the project watershed, on-site, in-kind mitigation is the most favorable mitigation strategy. Any ratio exceeding 1 to 1 demonstrates no net loss of wetlands on-site, thus the mitigation as originally proposed, especially as revised in Attachment B, exceeds the criteria for wetland mitigation. Port Corpus Christi developed the proposed mitigation plan based on the observed impacts occurring on-site at the time the property was purchased. The proposed restoration will conservatively mitigate unavoidable project impacts on a ratio of approximately 3 to 1. Port Corpus Christi updated this ratio following a detailed classification of the proposed restoration types, which required a more thorough analysis of the potential mitigation potential on-site. The 2.8 to 1 ratio is a more accurate estimate than the originally provided 2.2 to 1.	
27.4			U.S. Army Corps of Engineers reviewed and approved a wetlands delineation report—which contained 161 sample points documenting on-site vegetation—as part of the issuance of an Approved Jurisdictional Determination (AJD) for the McCampbell Property, which AJD was issued on August 12, 2022. Please see the updated Alternatives Analysis provided as Attachment A.	
27.5	They have not provided an inventory of the wetlands or an inventory of the species.			
27.6	There are previously disturbed sites that are better suited for this project.		Five distinct cover types identified within the property include emergent wetlands; uplands comprised of mesquite/mottes/shrubs and grassland mosaic; drainage features; stock ponds, and previously disturbed access paths. The USACE-issued AJD, No. SWG-2021-00163 identified 1558.3ac of jurisdictional wetlands on the site.	
27.7	Maintenance of growth around panels requires chemical or machines that further endanger the function of the wetland and all that are connected hydraulically.		Vegetation within the wetlands has similar characteristics throughout the entire survey area and did not change significantly. Vegetation within the wetland sample areas is dominated by Gulf cordgrass (<i>Spartina spartinae</i>), brushy sea oxeye daisy (<i>Borrichia frutescens</i>), shoregrass (<i>Distichlis littoralis</i>), sand spike rush (<i>Eleocharis palustris</i>), coastal salt grass (<i>Distichlis</i>	

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			Response <i>spicata</i>), bitter panic grass (<i>Panicum amarum</i>), seaside American aster (<i>Symphoricarum subulatum</i>), chairmakers club-rush (<i>Scheuchoplectus americanus</i>), marsh primrose-willow (<i>Ludwigia palustris</i>), Kleingrass (<i>Panicum coloratum</i>), torpedo grass (<i>Panicum repens</i>), seashore dropseed (<i>Sporobolus virginicus</i>) in the herb stratum. Given the vegetative community present at the site, mechanical maintenance is not anticipated with the use of elevated panels. Additionally, elevated panels will also allow for continued use of the site for grazing by sheep or cattle.																									
	The Port has not provided adequate data on the fill material to be placed in an active hydraulic system.		The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project: <table><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce Potential Wetland Impacts</th><th>Net Impact</th></tr><tr><td>Pilings in Wetlands</td><td>Helical pilings</td><td>None - Avoided</td></tr><tr><td>Shading from Panels</td><td>Elevations above BFE and continuous rotation</td><td>None - Avoided</td></tr><tr><td>Trenching for Cables</td><td>Cable elevated on trays</td><td>None - Avoided</td></tr><tr><td>Inverter</td><td>Sited in uplands where applicable</td><td>None - 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None - 13.4ac - offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None - Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None - Restored</td></tr></table>	Potential Project Impacts	Method to Minimize or Reduce Potential Wetland Impacts	Net Impact	Pilings in Wetlands	Helical pilings	None - Avoided	Shading from Panels	Elevations above BFE and continuous rotation	None - Avoided	Trenching for Cables	Cable elevated on trays	None - Avoided	Inverter	Sited in uplands where applicable	None - 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None - 13.4ac - offset with mitigation	Substations	Sited solely in uplands	None - Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None - Restored	
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Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None - Restored																										
27.8			The final design of the development will stipulate ideal characteristics of fill material, which a contractor will be required to meet during construction. As a matter of standard practice, Port Corpus Christi requires clean fill, free of contaminants on construction projects. However, the access roads will be constructed with caliche, crushed aggregate or other similar permeable materials.																									
	The Port of Corpus Christi as a public entity is not approved to develop assets to provide energy for its clients.		The project is expected to add renewable electrons to the grid, bolstering energy resilience and supplanting power derived from fossil fuels. Renewable electrons generated from this project would be transmitted to potential offtakers through existing infrastructure owned and operated by AEP. The proposed project will add to the existing mix of renewable energy with the potential to serve both residential and industrial demand. Regardless of the end-use of the electrons, the addition of emission-free energy generation sources, and enhanced resilience of the regional grid are within the public interest.																									
27.9			The project is expected to yield 600 MW of carbon-free electricity to be delivered via interconnect to the regional electric grid. The Port is not proposing to be a transmission provider or seller/distributor of electricity, and thus the project does not compete with regional electricity providers in any way.																									
27.10	Providing power to polluting fossil fuel industries is not in the public interest.		Regardless of the destination of the renewable electrons generated from this project, they would serve to supplant power derived from fossil fuels, reducing regional emissions, and edging the Coastal Bend Region toward carbon neutrality, which is unequivocally aligned with the public interest (IPCC, 2022). Likewise, the addition of new, ultra-low carbon electricity generation to the ERCOT grid will bolster grid resilience for all users, clearly serving the public interest. Further, the proposed construction techniques and on-site mitigation will preserve and enhance, respectively, the hydrologic function of the site, thereby upholding and serving the public interest of downstream communities for whom the site provides ecosystem (watershed) services.																									

No.	Comment	Comment Type	Response	Action Item
			The project is expected to yield 600 MW of carbon-free electricity to be delivered via interconnect to the regional electric grid. The Port is not proposing to be a transmission provider or seller/distributor of electricity, and thus the project does not compete with regional electricity providers in any way. Per standard lease agreement language, all constructed infrastructure becomes the property of the Port of Corpus Christi, unless the Port otherwise notifies the lessee. Port Corpus Christi maintains existing disposition requirements (per our Procurement Policy) that will be followed for any infrastructure on Port property.	
27.11	A plan should be approved for the decommission restoration of the site to prior or improved condition.			
27.12	The Port of Corpus Christi's proposal does not show how providing solar powered electricity to polluting industries is in the Public. The immediate suggestion of increased employment at the sacrifice of our most precious marine resources is being used repeatedly by industry to create a stranglehold on our economy by placing all our resources at the feet of the fossil fuel industry while destroying the natural resources that sustain thousands of jobs in the commercial fishing and tourism industry.		Regardless of the destination of the renewable electrons generated from this project, they would serve to supplant power derived from fossil fuels, reducing regional emissions, and edging the Coastal Bend Region toward carbon neutrality, which is unequivocally aligned with the public interest (IPCC, 2022). Likewise, the addition of new, ultra-low carbon electricity generation to the ERCOT grid will bolster grid resilience for all users, clearly serving the public interest. Further, the proposed construction techniques and on-site mitigation will preserve and enhance, respectively, the hydrologic function of the site, thereby upholding and serving the public interest of downstream communities for whom the site provides ecosystem (watershed) services.	
Robyn Cobb				
	I would like to request that the Corps hold a public hearing in order to fully describe this project and answer questions from concerned citizens. The project location is adjacent to a slough that drains to Copano Bay. The entire drainage area is well known for its habitat value to waterfowl, wading birds, and many other species. According to the National Audubon Society, it is especially important to carefully select sites for large solar installations. Careful siting of a solar farm entails avoiding disruption of existing bird habitat and doing all things possible to minimize the chances that birds would collide with the panels and all associated infrastructure such as transmission lines and substations.		The U.S. Army Corps of Engineers should advise if a public meeting is necessary. Port Corpus Christi designed this project in a manner that fundamentally preserves site hydrology and avoids/minimizes impacts to aquatic resources, thereby protecting existing habitats. To accomplish the goals of this project, Port Corpus Christi commits to the following: • Restore all temporary construction impacts to existing grades; • Limit access improvement to only that which is necessary to support critical operations; • Elevate infrastructure above the ground via helical pilings that do not constitute fill per (40 CFR 232.2); • Locate inverters outside wetlands where possible; • Eliminate the potential of vegetation shading via elevated, tracking panels; • Restore 29.6ac of existing, degraded de facto access paths to natural elevations • Use automated panel cleaning mechanisms Certain types of solar installations, mainly those with thermal concentration towers in the arid west, present a potential risk to migratory birds. The proposed project will not construct a thermal concentration tower. Additionally, while little research exists to demonstrate PV panels impact migratory birds in the same way as thermal concentration towers, there are strategies (including alternating the banding of cells within a panel) to help avian species more easily distinguish the presence of solar panels. Port Corpus Christi maintains an open dialog with USFWS specifically on this project, to collaborate on both migratory bird and endangered species concerns. Implementation of appropriate measures will occur to mitigate potential impacts on migratory birds. Such measures will be finalized during the Section 7 consultation process. No overhead power lines are proposed for the McCampbell property as all renewable electrons generated from this project would be transmitted to potential off-takers through existing infrastructure owned and operated by AEP.	
28.1				

No.	Comment	Comment Type	Response	Action Item
28.2	The project design will cover large swaths of ground, shading areas that are naturally exposed to sunlight leading to alteration of the vegetation and habitat value. The project also appears to have potential to impact sheet flow from the area being built over into the wetlands into the natural drainage system, thereby altering the function of the existing wetlands as well. Due to the potential negative impacts on habitat and birds, I do think a public hearing is in order.		Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousseilat et al., 2017) and document increased biodiversity (Udrian et al., 2021), others note less biomass under panels (Armstrong et al., 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading. Within the U.S., however, ongoing research conducted by the National Renewables Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022). (Solar Power World, 2020), (Invenery, 2022). This implies that species are not adversely affected by shading from the PV panels. From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade-tolerant and shade-intolerant herbaceous species (Abella et al., 2020). This study further noted that shade-intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade-tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and widespread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade-tolerant or shade-intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.)	
28.1	I am requesting a Public Hearing. The project location is adjacent to a slough that drains to Copano Bay. The entire drainage area is known for its habitat value to waterfowl, wading birds, and many other species. According to the National Audubon Society, it is especially important to carefully select sites for large solar installations. Careful siting of a solar farm entails avoiding disruption of existing bird habitat and doing all things possible to minimize the chances that birds would collide with the panels and all associated infrastructure such as transmission lines and substations.		The U.S. Army Corps of Engineers should advise if a public meeting is necessary. Port Corpus Christi designed this project in a manner that fundamentally preserves site hydrology and avoids/minimizes impacts to aquatic resources, thereby protecting existing habitat. To accomplish the goals of this project, Port Corpus Christi commits to the following: • Restore all temporary construction impacts to existing grades; • Limit access improvement to only that which is necessary to support critical operations; • Elevate infrastructure above the ground via helical pilings that do not constitute fill per (40 CFR 232.2); • Locate inverters outside wetlands where possible; • Eliminate the potential of vegetation shading via elevated, tracking panels. • Restore 29.6ac of existing, degraded de facto access paths to natural elevations • Use automated panel cleaning mechanisms Certain types of solar installations, mainly those with thermal concentration towers in the arid west, present a potential risk to migratory birds. The proposed project will not construct a thermal concentration tower. Additionally, while little research exists to demonstrate PV panels impact migratory birds in the same way as thermal concentration towers, there are strategies (including alternating the banding of cells within a panel) to help avian species more easily distinguish the presence of solar panels. Port	
Linda Fuiman				

No.	Comment	Comment Type	Response	Action Item
			Corpus Christi maintains an open dialog with USFWS specifically on this project, to collaborate on both migratory bird and endangered species concerns. Implementation of appropriate measures will occur to mitigate potential impacts on migratory birds. Such measures will be finalized during the Section 7 consultation process. No overhead power lines are proposed for the McCampbell property as all renewable electrons generated from this project would be transmitted to potential off-takers through existing infrastructure owned and operated by AEP.	
29.2	The project design looks as though it will cover large swaths of ground, shading areas that are naturally exposed to sunlight leading to alteration of the vegetation and habitat value		Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousselet et al., 2017) and document increased biodiversity (Udrihan et al., 2021), others note less biomass under panels (Armstrong et al., 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading. Within the U.S. however, ongoing research conducted by the National Renewable Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022). (Solar Power World, 2020). (Invenery, 2022). This implies that species are not adversely affected by shading from the PV panels. From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade-tolerant and shade-intolerant herbaceous species (Abella et al., 2020). This study further noted that shade-intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade-tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and widespread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade-tolerant or shade-intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.)	



660 Rezoning

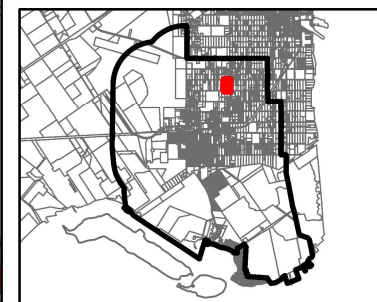
McCampbell Tract & Good Hope DMPA
File Date: 07/23/2024

P&Z Date: 08/19/24
Council Date: 10/22/2024

Legend

- COI City Limits
- RoadCenterLine_20190827
- Subject Parcels
- 400 ft Buffer
- General Commercial
- Industrial
- Light Industrial
- Single Family Residential

This product is for informational purposes only and may not have been prepared for or be suitable for use in legal, engineering, or surveying products. It does not represent an on-the-ground survey and only represents the relative location of property boundaries.



0 2,000 4,000
Feet

Texas Parks & Wildlife, CONANP, Esri, TomTom, Garmin, Foursquare, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS

SCHWENKE ERIC
4407 S FM 1069
ARANSAS PASS, TX 78336

SCHWENKE ERIC & DIANE
SCHWENKE
2665 W HIGHLAND
INGLESIDE, TX 78362

GRANADOS ALEJANDRO & ELISA
1591 4TH STREET
INGLESIDE, TX 78362

SMITH RONALD GENE
3821 FM 1069
ARANSAS PASS, TX 78336

WALTON SILVIA
3933 FM 1069
ARANSAS PASS, TX 78336

GONZALES JENNY
HRISSIKOPOULOS
4055 JOHNSTONVILLE
SUSANVILLE, CA 96130

HRISSIKOPOULOS PAUL
7428 HOLLYWOOD BLVD APT 309
LOS ANGELES, CA 90046

HRISSIKOPOULOS CHARLES P
PALADIN TAX CONSULTANTS LLC
405 CHASE DRIVE
CORPUS CHRISTI, TX 78412

POOL HELEN HRISSIKOPOULOS
PALADIN TAX CONSULTANTS LLC
301 CAPE ARON DRIVE
CORPUS CHRISTI, TX 78412

HRISSIKOPOULOS HOMER P JAMES
PALADIN TAX CONSULTANTS LLC
310 BAYCLIFF DRIVE
CORPUS CHRISTI, TX 78412

HRISSIKOPOULOS PAT K FAMILY
TRUST GUARDIAN PROPERTY TAX
CONSULTANTS LLC
301 CAPE ARON DRIVE
CORPUS CHRISTI, TX 78412

RODRIGUEZ NOE & LUISA PRO
2587 CR 1996
ARANSAS PASS, TX 78336

AYON ENRIQUE AND LUZ M
DIOSDADO
3934 FM 1069
ARANSAS PASS, TX 78336

RUGGIERO LUISE & RAYMOND
2574 CR 2010
ARANSAS PASS, TX 78336

DIOSDADO JUAN R & LUIZ M
3924 FM 1069
ARANSAS PASS, TX 78336

DAVIDSON JOHN MASON
PO BOX 4639
CORPUS CHRISTI, TX 78469

J M DAVIDSON INC
2564 CR 1960
ARANSAS PASS, TX 78336

DAVIDSON JOHN
PO BOX 1304
PORTLAND, TX 78374

REYNOLDS PEARL E & JAMES LEE
3844 FM 1069
ARANSAS PASS, TX 78336

LIBERT DAVID
2570 CR 2028
ARANSAS PASS, TX 78336

TUGGLE GARRY & BONNIE
PO BOX 738
ARANSAS PASS, TX 78335

NESTOR ANGEL REAL ESTATE LLC
2532 WILLIAMS
ARANSAS PASS, TX 78336

PRITCHETT ROGER D & GLINDA A
3780 FM 1069 UNIT 8
ARANSAS PASS, TX 78336

MR W FIREWORKS INC
PO BOX 114
SOMERSET, TX 78069

ARANSAS WW R LLC
5924 BEAR CREEK DR E
FT WORTH, TX 76126

EDWARDS GARY ARTHUR KAREN
GAY E WO AND LEAH REE
EDWARDS LOCKHART
253 CARMEL DR
SANDIA, TX 78383

NORTH BAY FELLOWSHIP
3530 MAIN ST
INGLESIDE, TX 78362

SNP HOLDINGS LLC
PO BOX 272000
CORPUS CHRISTI, TX 78427

GULF SOUTH PIPELINE COMPANY
ATTN: PROPERTY TAX DEPT
PO BOX 829
HOUSTON, TX 77001

MORGAN MICHAEL A
2378 MORGAN LANE
INGLESIDE, TX 78362

SMALLEY CLAUDETTE & MICHAEL
SMALLEY
2923 LOVERS LANE
INGLESIDE, TX 78362

LATTIERE MACKESON K & NICOLE
R
2372 KENNEY LN
INGLESIDE, TX 78362

HERNANDEZ JESSICA BARRON
2019 KENNEY LN
INGLESIDE, TX 78362

COBERN JOSHUA S & JANETZY
2390 KENNEY LN
INGLESIDE, TX 78362

ARROW SELF STORAGE LLC
21 S 3818 W
REXBURG, ID 83440

FLORES JUVENAL M
2516 AVE E
INGLESIDE, TX 78362

FULTON TERESA AND JACK E
FULTON
429 CORONADO AVE
SAN ANTONIO, TX 78237

WAMSLEY NOELLE D & SHEALYN M
ORTIZ
3372 MAIN ST
INGLESIDE, TX 78362

JONES JOSEPH J
2793 AVE I
INGLESIDE, TX 78362

COOK DENISE TRUST
DENISE TRUST COOK TRUSTEE
3352 MAIN ST
INGLESIDE, TX 78362

FRAKICH CONNIE
3346 N MAIN ST
INGLESIDE, TX 78362

ADAME MINERVA
407 N WHITNEY ST
ARANSAS PASS, TX 78336

SHUGART MONTE
2396 KENNEY LN
INGLESIDE, TX 78362

GARZA STEPHEN J
2402 KENNEY LN
INGLESIDE, TX 78362

ENGLEMAN JESSE LEE
2412 KENNEY LN
INGLESIDE, TX 78362

CREEK JAMES E & DARIA K
2347 KENNEY LANE
INGLESIDE, TX 78362

CHAVEZ JIM
314 LONG POINTE DR
PORTLAND, TX 78374

JAMES JOHNSON LLC
410 LANG ROAD
PORTLAND, TX 78374

BARRON RODOLFO
2019 KENNY LANE
INGLESIDE, TX 78362

CONTRERAS DAVID R & ADAME
TINE M
3246 MAIN STREET
INGLESIDE, TX 78362

SHIRLEY ELIZABETH
3236 MAIN
INGLESIDE, TX 78362

BURKE CHRISTOPHER & VERONICA
3241 SUSAN CIRCLE
INGLESIDE, TX 78362

FIGUEROA ROBERT M
3233 SUSAN CIR
INGLESIDE, TX 78362

SOOKANAND DAVE
PO BOX 1352
INGLESIDE, TX 78362

CORONA EFRAIN JR EFRAIN
CORONA SR
3214 MAIN STREET
INGLESIDE, TX 78362

SOUTHERN HILLS CAPITAL LLC
730 E PARK BLVD STE 210
PLANO, TX 75074

MILLS MICHAEL
3242 W SUSAN CIR
INGLESIDE, TX 78362

ADAME JERRY
1816 BAY LANDING DR
PORTLAND, TX 78374

TURNER DONNIE G
3201 REBECCA ST
INGLESIDE, TX 78362

DAY JOHN T & WENDY
3193 REBECCA ST
INGLESIDE, TX 78362

CLOUD DARRELL L
3187 REBECCA ST
INGLESIDE, TX 78362

PERKINS DONALD R & NORMA J
3234 SUSAN CIRCLE
INGLESIDE, TX 78362

VASQUEZ JESSE M
3206 SUSAN CIRCLE
INGLESIDE, TX 78362

ADAMS ANDREW JR & JEWELL A
C/O DEBORAH SUE TAYLOR
3200 SUSAN CIRCLE WEST
INGLESIDE, TX 78362

HOMES WILLIAM A III
3192 SUSAN CIRCLE
INGLESIDE, TX 78362

HAYDEN HOMER GEORGE
2563 MCCULLOUGH
INGLESIDE, TX 78362

TINDALL CHEVROLET LLP
3999 CYPRESS CREEK
COMFORT, TX 78013

PRIDAY ELIZABETH J
PO BOX 610
INGLESIDE, TX 78362

LOVING DONNA & STEVEN
2549 MCCULLOUGH LN
INGLESIDE, TX 78362

ISSITT RAYMOND D & MARGARET P
2535 MCCULLOUGH
INGLESIDE, TX 78362

BOUCHER BRENDA SUE W
504 BARTLETT
VICTORIA, TX 77905

VICKERY SANDRA HALE
PO BOX 16
ARANSAS PASS, TX 78335

SAVAGE L
550 FM 839 N
RELAW, TX 75784

ROBINSON DAVID SCOTT
3082 MAIN ST
INGLESIDE, TX 78362

RAY LOUIS E & CYNTHIA C
3074 MAIN ST
INGLESIDE, TX 78362

ADAMS KIT
2719 BEAUMONT
INGLESIDE, TX 78362

PRIMERA IGLESIA BAUTISTA EL
BUEN PASTOR INGLESIDE
3095 MAIN ST
INGLESIDE, TX 78362

LOYA ALFREDO & CLAUDIA
2046 MOONEY LN
INGLESIDE, TX 78362

GARRETT JO RACHELLE
2656 HAHN ST
INGLESIDE, TX 78362

PRJ COASTAL LLC
3736 BEE CAVE RD I-122
WESTLAKE HILLS, TX 78746

ZUNIGA JESUS & MARIA R MENDEZ
100 5TH ST
PORTLAND, TX 78374

SOLIS DOMINGO & REBECCA
4318 ROLLING RIDGE TRAIL
CORPUS CHRISTI, TX 78410

CARRISALEZ FREDERICO
3065 MAYFIELD AVE
INGLESIDE, TX 78362

SANCHEZ CHRISTINE NICHOLE
MARIE
2816 YORKTOWN CRTS
CORPUS CHRISTI, TX 78404

MILLER CHARLES L
3056 WRIGHT AVE
INGLESIDE, TX 78362

DOWNER GLADYS N
309 CAPE HENRY DR
CORPUS CHRISTI, TX 78412

JUNIPER INGLESIDE LLC
520 POST OAK BLVD STE 575
HOUSTON, TX 77027

PORTSIDE VILLAS LP
PO BOX 295076
KERRVILLE, TX 78029

ROCKLAND DEVELOPMENT LTD
ROCKY J NAVARRO
3501 BEE CREEK RD
SPICEWOOD, TX 78669

PDRAP INC
2920 ROCKLAND BLVD
INGLESIDE, TX 78362

INGLESIDE HOSPITALITY LLC
2810 STATE HWY 361
INGLESIDE, TX 78362

VISHAL RAJU BHAGAT
FOUNDATION
11217 IH 37
CORPUS CHRISTI, TX 78410

AKSHARDHARM LLC
1023 N HARBORTH AVE
THREE RIVERS, TX 78071

DAY INVESTMENTS INC
2800 HWY 361
INGLESIDE, TX 78362

CORNERSTONE NUMBER THREE
ACRE TRUST
812 CRESTMONT WAY
GREENVILLE, SC 29615

CORNERSTONE NUMBER TWO
ACRE TRUST
812 CRESTMONT WAY
GREENVILLE, SC 29615

WMH CORPUS LAND ACQUISITION I
LLC
2950 N HARDWOOD STE 2200
DALLAS, TX 75201

GALLAGHER RAYMOND E
141 SEA BREEZE
ARANSAS PASS, TX 78336

OCCIDENTAL CHEMICAL CORP
OCCIDENTAL PERTROLEUM
PROPERTY TAX DEPARTMENT
PO BOX 27570
HOUSTON, TX 77227

LAZAR ASSET ADVISORS LTD A
TEXAS LIMITED PARTNERSHIP
2549 SHERRY LANE SUITE 111
DALLAS, TX 75225

OHM SURFACE LLC
26935 HUFSMITH CONROE RD
MAGNOLIA, TX 77354

MACCALLIUM PETER S III
PO BOX 30209
LUMBERTON, TX 77657

SAN PATRICIO COUNTY
COURTHOUSE
400 W SINTON ST
SINTON, TX 78387

EXPANSION PROPERTIES INC
PO BOX 4639
CORPUS CHRISTI, TX 78469

MCMAHAN JEFF & DENISE
1410 ZENGERLE RD
CUERO, TX 77954

GUETTLER AUGUST E JR
5778 COUNTY RD 4241
TAFT, TX 78390

AARON MATERIALS INC
PO BOX 26750
AUSTIN, TX 78755

DURAND DANIEL T & BRENDA H
1767 CREEKSIDE DR
SUGARLAND, TX 77478

SUTHERLANDS EXPRESS LLC
3008 W MAIN
JENKS, OK 74037

SCHWENKE VIRGENE
4407 FM 1069
ARANSAS PASS, TX 78336

AEP TEXAS CENTRAL COMPANY
ATTN : PROPERTY TAX
DEPARTMENT
PO BOX 16428
COLUMBUS, OH 43216

ADAME JESUS A & YANETH
404 RED OAK
ARANSAS PASS, TX 78336

ROLAND SHARON
2689 COUNTY RD 1849
ARANSAS PASS, TX 78336

LEE DOYLE E JR & FRANCISCA L
4040 S 129TH WEST AVE
SAND SPRINGS, OK 74063

HARI ANSH LLC
2705 W WHEELER AVE
ARANSAS PASS, TX 78336

PLANNING & ZONING COMMISSION AGENDA
Regular Meeting: September 16, 2024

AGENDA ITEM: 6

Conduct a public hearing regarding an application filed by The Port of Corpus Christi, requesting a special use permit for intensive use for approximately 1,360 acres: Property ID#s 60762, 61476, 67182, 67158, 61499, 67168, 1030271, 67177, 67236, 114650, 67118, 67270, 67091, 69200, 65073, and 69004.

SUBMITTED BY: Gene Delauro, Interim Building Official

APPROVED FOR AGENDA:

BACKGROUND:

Public Hearing

FISCAL ANALYSIS:

N/A

RECOMMENDATION:

Public Hearing

ATTACHMENTS:

1. Port of Corpus Christi SUP Application



PO Drawer 400 • 2665 San Angelo • Ingleside, TX 78362

Phone: 361-776-3815 - building@inglesidetx.gov

REQUEST FOR ZONING CHANGE

Date Filed: July 23, 2024

Receipt #: _____

Applicant Name: Port of Corpus Christi Authority

Address: 400 Harbor Dr. Corpus Christi, TX. 78401

Phone No.: 361-885-6140

Email Address: Sam@pocca.com

Applicant Status: (check one) Individual () Trust () Partnership () Corporation () Other

Property Owner Name (if different): _____

Address: _____

Phone No.: _____

Email Address: _____

Legal description of property to be rezoned: Multiple Tracts - See attached list

Lot: _____ Blk: _____ Subdivision: _____

Lot Size: _____ Ft X _____ Ft Acres: _____

Street Frontage Location: _____

Address of Property: _____

Present Zoning Classification: Various - See attached list for details

Requested Zoning Classification: I - Industrial District

I CERTIFY THAT THE ABOVE ANSWERS ARE TRUE AND CORRECT. I ALSO UNDERSTAND THAT ATTENDANCE IS MANDATORY, EITHER BY MYSELF OR A REPRESENTATIVE, AT ALL HEARINGS, BOTH PLANNING AND ZONING AND THE CITY COUNCIL, FOR THIS REQUEST TO BE CONSIDERED. I ALSO UNDERSTAND THAT FAILURE TO ATTEND WILL RESULT IN TERMINATION OF PROCESS AND RE-APPLICATION WILL BE REQUIRED.

Planning & Zoning Public Hearing: August 19, 2024 Time: 6:00 p.m.

City Council Public Hearing: October 8, 2024 Time: 6:30 p.m.

2nd Reading @ City Council: October 22, 2024 Time: 6:30 p.m.

Signature of Applicant: _____ Date: _____

Signature of Owner: Kent A. Sutton Date: July 23, 2024

Staff Checklist:

Accepted By: Gene Detavro Date Accepted: 7/23/24 Filing Fee: \$100,102.00 Date Paid: 7/18/24



PO Drawer 400 • 2665 San Angelo • Ingleside, TX 78362
Phone: 361-776-3815 - building@inglesidetx.gov

**SPECIAL USE: SECTION 78-267
OBJECTIONABLE USES**

Date Filed: _____

In accordance with the Planning and Zoning Subdivision Ordinance, Chapter 78, Article IV, application for special use Section 78-267 is requested on the property below:

Applicant:

Name: Port of Corpus Christi Authority

Address: 400 Harbor Dr. Corpus Christi, TX. 78401

Phone #: 361-885-6140

Email Address: sam@pocca.com

Property Owner (If different):

Name: _____

Address: _____

Phone #: _____

Email Address: _____

Legal Description of Property:

Multiple Tracts – See attached list.

Description of proposed uses, approval for which the property is sought:

The McCampbell property is located near Ingleside, in San Patricio County, Texas and contains approximately 2,850 acres. Assuming that three acres of optimal solar panel configuration can support 1MW of panels and generate approximately 2,146MWh per year, the proposed site will accommodate 1,866 acres of solar panels to generate approximately 600MW of renewable energy, equivalent to 1,296,184MWh per year.

The purpose of this project is to construct an approximate 600 megawatt (MW) (0.6 gigawatt (GW)) solar photovoltaic (PV) production facility to help meet the emerging demand (need) for over 2,685 MW

(2.685GW) of new, no-carbon (renewable) electricity in the immediate Port of Corpus Christi region by 2030. Two electrical substations are proposed as part of the project for power distribution.

Description of hazards, such as fire, explosion, noise vibration, dust, or the emission of smoke, odor, or toxic substances, accompanying the proposed use:

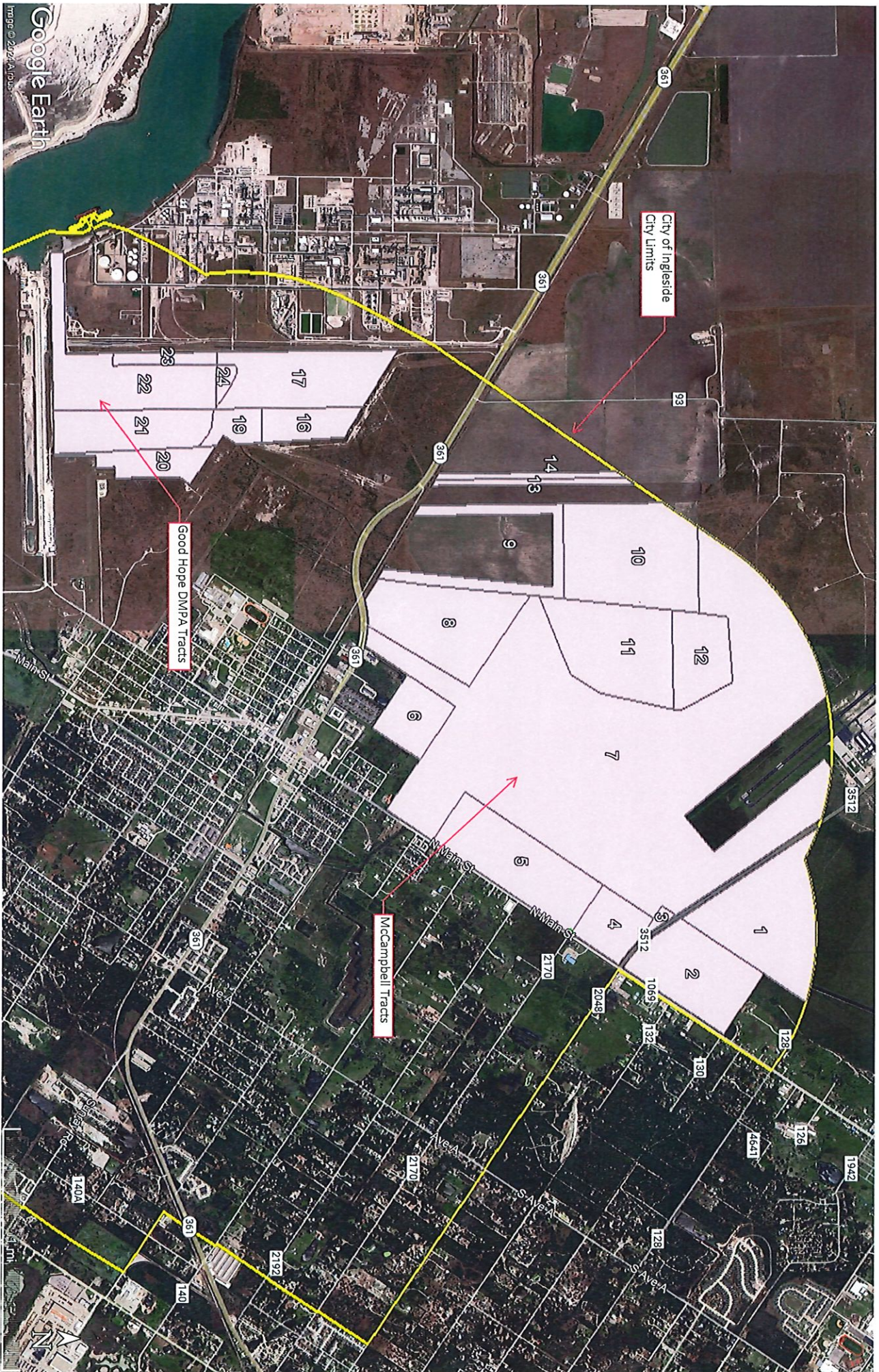
There are no fire, explosion, noise, vibration, dust, smoke, or odor hazards as part of this project.

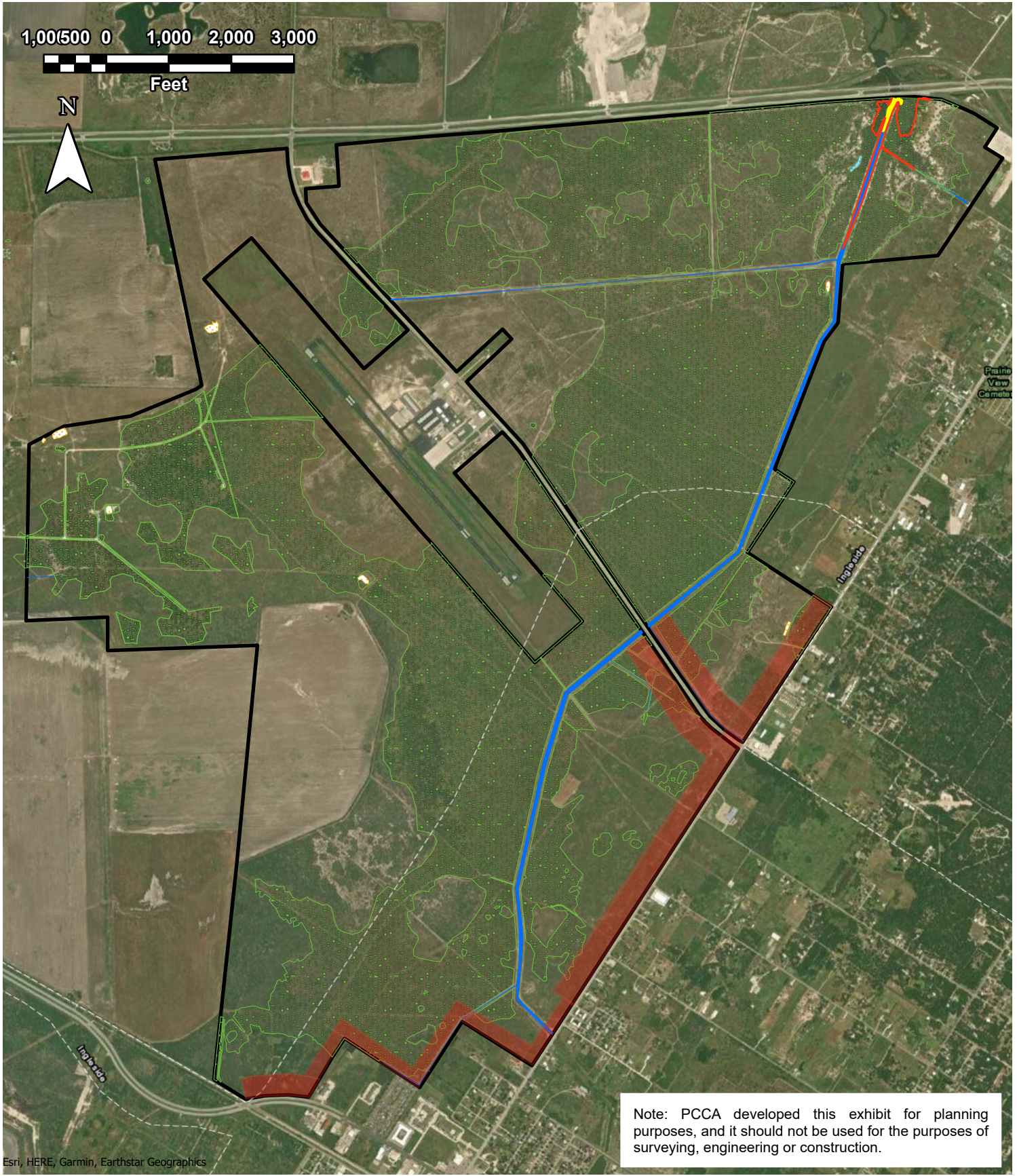
Description of all safeguards proposed to protect the surrounding property and persons from hazards accompanying the proposed use:

A site plan showing the location of all improvements, landscaping, yard areas, sight and/or noise barriers, existing and planned, on the subject property:

Signature: _____ Date: _____

Zone: _____ Reviewed By: _____ Date: _____





Legend

- HTL
- MHWL

Aquatic Features

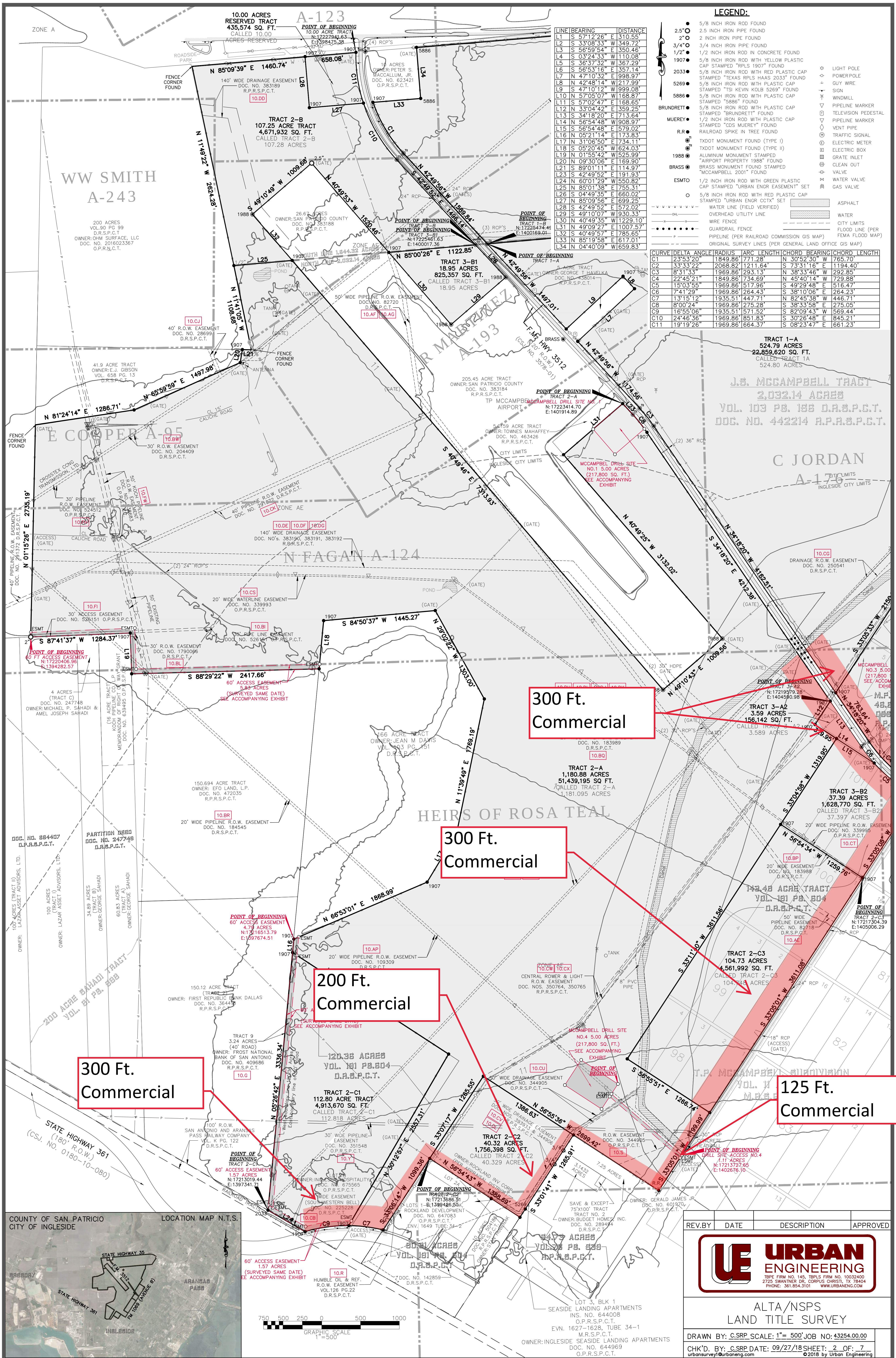
- Drainage Feature (39.3 acres)

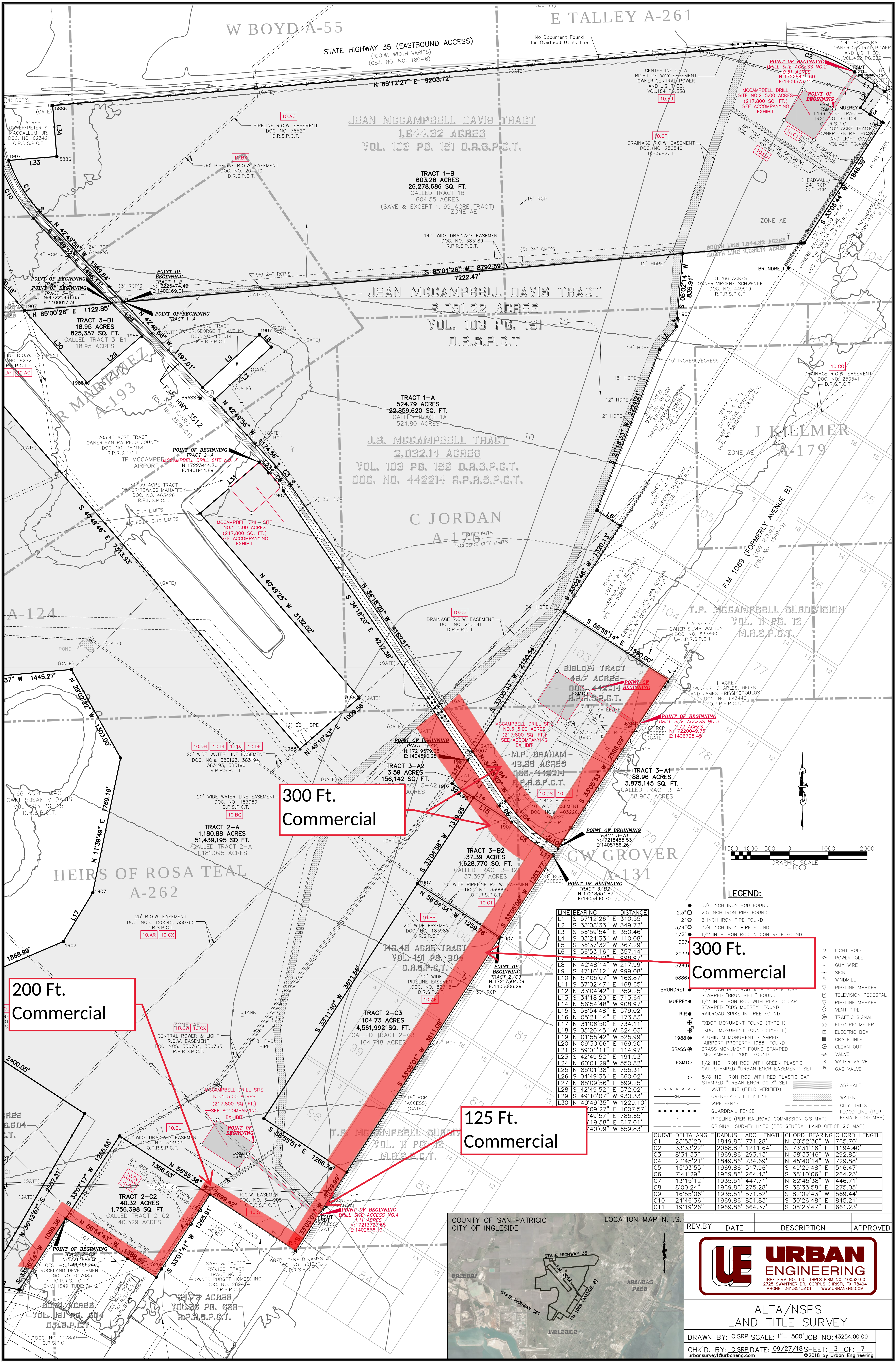
- Open Water (0.34 acres)
- Stock Pond (2.40 acres)
- Wetland (1734.25 acres)
- McCampbell-Davis Tracts



McCampbell Overview Map

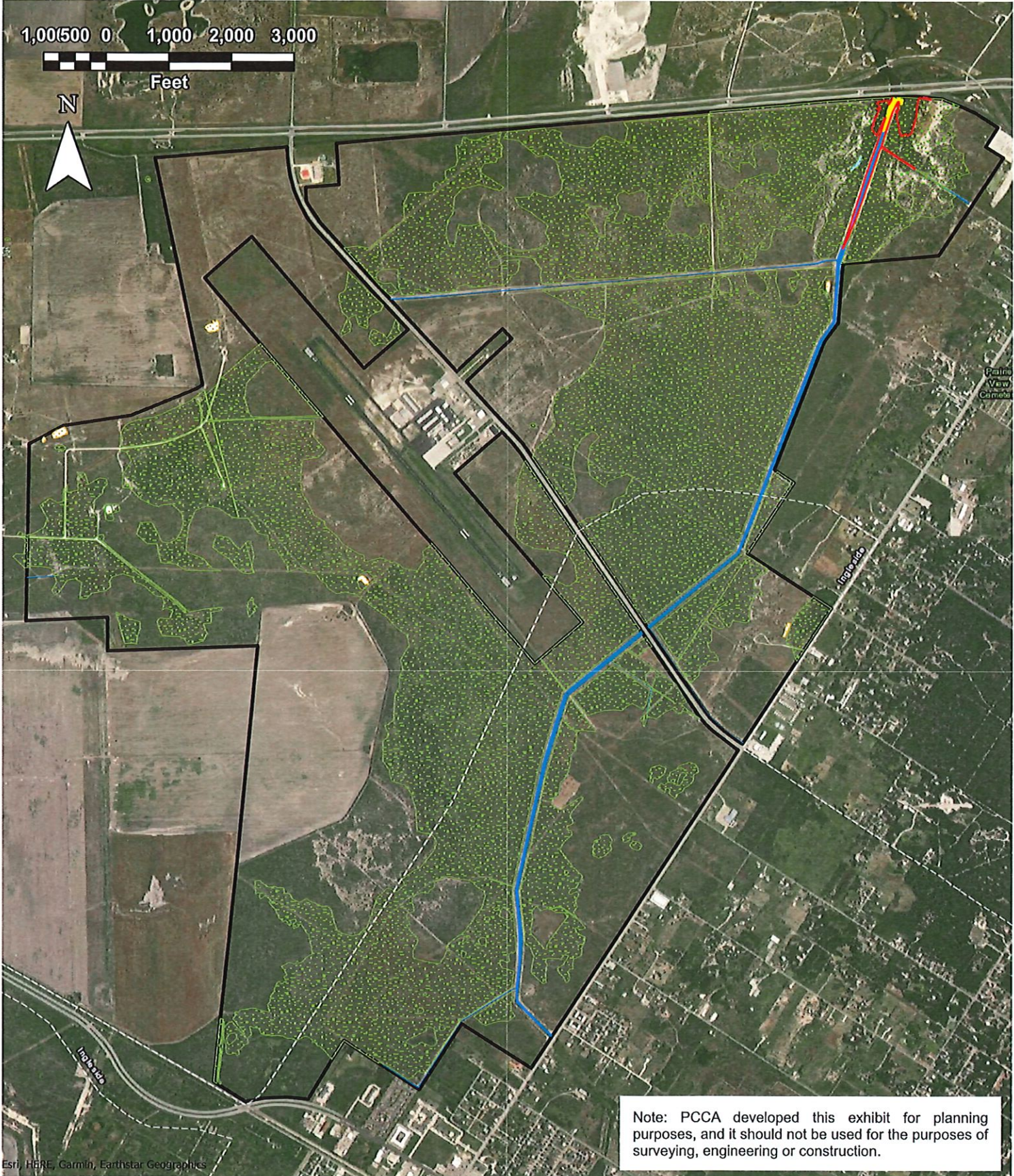
McCampbell Property
San Patricio County, Texas





Map ID	Property ID	Size (Acres)	Existing Zoning	Proposed Zoning	Special Permit	Legal Description
McC Campbell Tracts						
1	60762	124.3789	R-1 Single Family	I-Industrial	Yes	PT ABST 55 WM BOYD SUR 285.03 ACRES
2	60762	89.4085	R-1 Single Family	I-Industrial	Yes	
3	67182	3.5845	R-1 Single Family	I-Industrial	Yes	T P MCCAMPBELL SUBD BLK 102, 103 TRS 1 THRU 5 (95.31 ACRES)
4	67168	37.3905	R-1 Single Family	I-Industrial	Yes	(1/2 UND INT) OUT OF 40 ACRES TRS 1-4 LB 101 MCCAMPBELL S/D
5		106.4371	R-1 Single Family	I-Industrial	Yes	
6	67177	40.0785	R-1 Single Family	I-Industrial	Yes	UND 1/2 INT IN 38.230 ACRES ABST 262 ROSA TEAL
7	61476	848	R-1 Single Family	I-Industrial	Yes	ABST 124 N FAGAN SUR 390.722 ACRES
8	67236	110.9987	R-1 Single Family	I-Industrial	Yes	ABST 262 ROSA TEAL ANNEXED BY CITY PT OF 267.02 AC TR (120.36 ACRES)
			I-Industrial & R-1			
9	114650	45.5766	Single Family	I-Industrial	No	ABST 262 ROSA TEAL J.R. STANLEY PROPERTY
10	1030271	145.0886	R-1 Single Family	I-Industrial	No	ABST 262 ROSA TEAL SUR & N. FAGAN SUR 149.12 ACRES
11	67168	114.394	R-1 Single Family	I-Industrial	No	ABST 262 ROSA TEAL SUR 99 ACRES
12	61499	52.8469		I-Industrial	No	ABST 124 N FAGAN 67 ACRES
13	67270	13.287	R-1 Single Family	I-Industrial	No	AB 262 R TEAL SUR & AB 124 N FAGIN SUR ICL E/PT OF 34.9 ACS TRACT OUT OF (13.287 ACRES)
14	67091	12.4199	R-1 Single Family	I-Industrial	No	ABS 262 R TEAL SUR & ABS 124 N FAGIN SUR ICL W/PT OF 34.9 ACS (13.287 ACRES)
1,743.73 Total Needing Rezoning - McC Campbell						
1,360.12 Total Acres Needing Special Permit						
Good Hope Tracts						
16	69004	31.9087	R-1 Single Family	I-Industrial	No	ABST. 292 T. T. WILLIAMSON J. R. STANLEY PROPERTY EXEMPT DR
17	65073	95.1278	R-1 Single Family	I-Industrial	No	ABST 184 WM MCDONOUGH EXEMPT 22.2256 ACRES
19	69200	19.5279	R-1 Single Family	I-Industrial	No	ABS 293 T WILLIAMSON EXEMPT DREDGE SITE 212.69 ACRES
20		32.8128	R-1 Single Family	I-Industrial	No	
21		67.7651	R-1 Single Family	I-Industrial	No	
22		101.6973	R-1 Single Family	I-Industrial	No	
23		13.6152	R-1 Single Family	I-Industrial	No	
24		5.8585	R-1 Single Family	I-Industrial	No	
368.3133 Total Needing Rezoning - Good Hope						
2,112.04 Total Rezoning						

Path: C:\Users\mmcneil\Desktop\McCampbell\McCampbell.aprx Date Saved: 10/11/2021 4:55 PM User: mmcneil



Legend

- HTL
- MHWL
- Aquatic Features
 - Drainage Feature (39.3 acres)
 - Open Water (0.34 acres)
 - Stock Pond (2.40 acres)
 - Wetland (1734.25 acres)
 - McCampbell-Davis Tracts



McCampbell Overview Map

McCampbell Property
San Patricio County, Texas

LEGEND

[illegible]

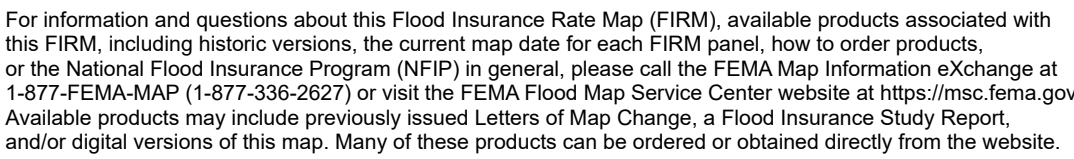
On this map, the color-coded information is derived from the National Oceanic and Atmospheric Administration's (NOAA) National Ocean Service (NOS) Hydrographic Survey (HSD) data. The HSD data is a collection of information on the physical characteristics of the ocean floor, including depth, bottom type, and other features. The HSD data is used to create maps of the ocean floor, which are used for navigation, fishing, and other purposes. The HSD data is also used to create maps of the ocean floor, which are used for navigation, fishing, and other purposes. The HSD data is also used to create maps of the ocean floor, which are used for navigation, fishing, and other purposes.

boundary between Niueas County and San Patricio County is currently being tested. The Boundary shown is from the current effective FPL and may be in the future. Information on Niueas County side of boundary is presented as an illustration purposes only.





SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP
FOR DRAFT FIRM PANEL LAYOUT



Communities annexing land on adjacent FIRM panels must obtain a current copy of the adjacent panel as well as the current FIRM Index. These may be ordered directly from the Flood Map Service Center at the number listed above.

To determine if flood insurance is available in this community, contact your Insurance agent or call the National Flood Insurance Program at 1-800-638-6620.

Basemap information shown on this FIRM was provided in digital format by USDA, Farm Service Agency (FSA). This information was derived from NAIP, dated April 11, 2018.

This map was exported from FEMA's National Flood Hazard Layer (NFHL) on **7/9/2024 12:29 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time. For additional information, please see the Flood Hazard Mapping Updates Overview Fact Sheet at <https://www.fema.gov/media-library/assets/documents/118418>

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The base map shown complies with FEMA's base map accuracy standards. This map image is void if the one or more of the following conditions exist:
• The map area does not have a FEMA-approved base map inventory flood zone labels legend scale bar
• The map area does not have a FEMA-approved base map inventory flood zone labels legend scale bar
• The map area does not have a FEMA-approved base map inventory flood zone labels legend scale bar
The LiMWA represents the approximate landward limit of the 5-foot breaking wave. The effects of wave hazards between Zone VE and the LiMWA (or between the shoreline and the LiMWA for areas where Zone VE is not identified) will be similar to, but less severe than, those in Zone VE.

 Limit of Moderate Wave Action (LiMWA)

Map Projection:
GCS, Geodetic Reference System 1980;
Vertical Datum: NAVD88
For information about the specific vertical datum for elevation features, datum conversions, or vertical monuments used to create this map, please see the Flood Insurance Study (FIS) Report for your community at <https://msc.fema.gov>



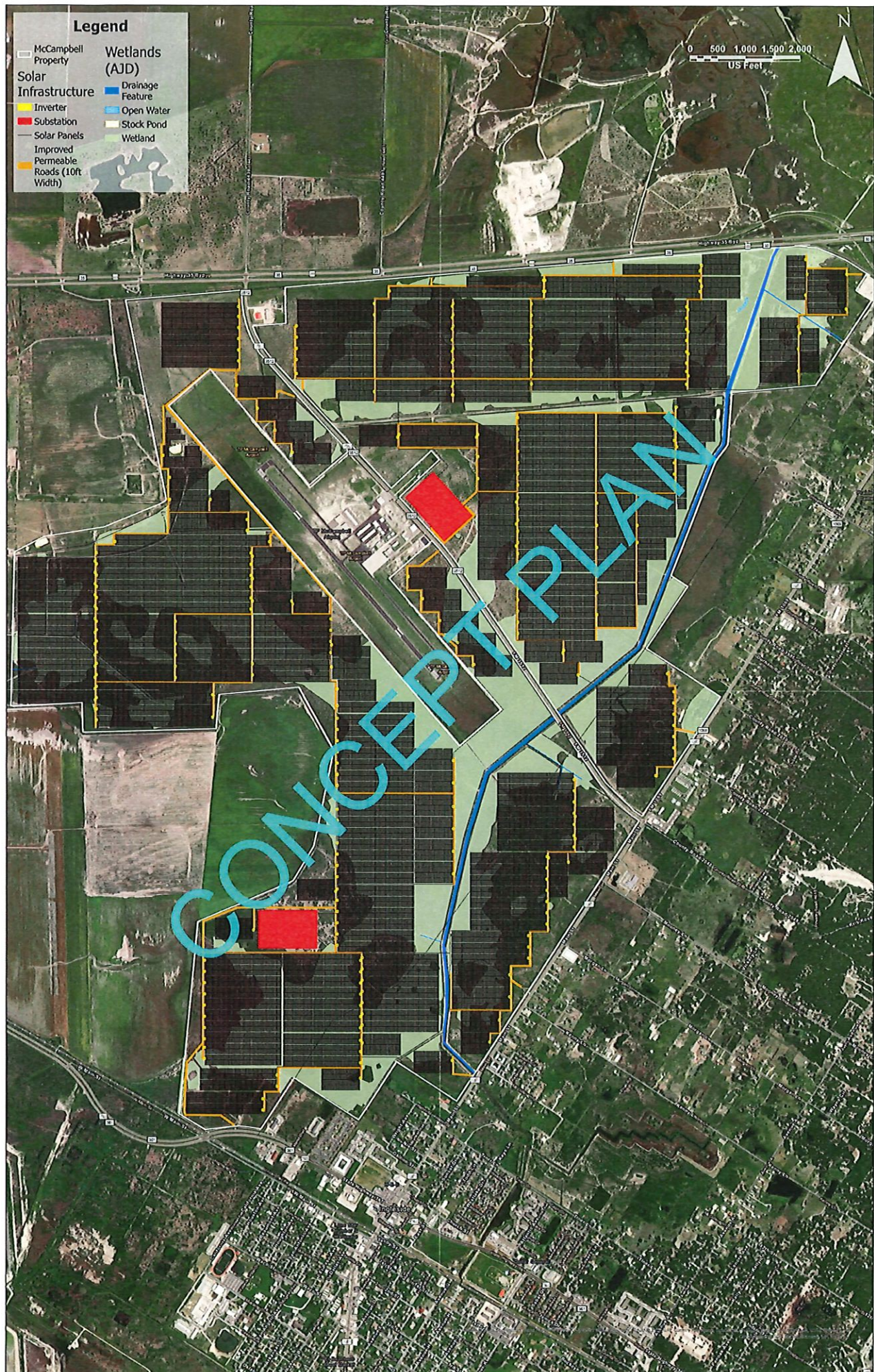
PANEL 465 OF 610

SAN PATRICIO		
COUNTY		
CITY OF	485506	0465
INGLESIDE		
CITY OF CORPUS	485480	0465
CHRISTI		
NUECES COUNTY	485464	0465
UNINCORPORATED		
AREAS	485494	0465

MAP NUMBER
48409C0465E
EFFECTIVE DATE
November 04, 2015

Commercial Zoning

Location	Description	Size
Tract 1	300 Ft. along Hwy. 361	7.5
Tract 2	200 Ft. behind Apartments	22.4
Tract 3	125 Ft. along Hwy. 1069/Drainage	3.44
Tract 4	300 Ft. along Hwy. 1069/3512 (south)	45.2
Tract 5	300 Ft. along Hwy. 1069/3512 (north)	31.5
Total		110.04



No.	Comment	Comment Type	Response	Action Item
USACE				
1.1	The stated purpose is 600 megawatt (MW) solar facility construction and the rationale used references residential power demands. However, the need references existing and new regional industrial off-takers. What are the current and anticipated industrial power needs?	Power Needs	The proposed project is expected to generate renewable electrons for the grid, adding to the existing mix of renewable energy with the potential to serve both residential and industrial demands, including meeting the demands for low-carbon electrons associated with electrolytic hydrogen production. Based on Port Corpus Christi's Hydrogen Hub Application to the Department of Energy, we estimate a potential demand of multiple gigawatts (GW) of demand for renewable energy in phases over the next 10 years.	
1.2	The alternatives analysis incorrectly states that all alternatives have no impacts to special aquatic sites (including wetlands). However, all alternative except for offsite alternative 5 have wetland impacts.	Alternatives Analysis	Port Corpus Christi revised the Alternative Analysis to reflect the correct impacts. See Attachment A.	Updated Alternative Analysis for Wetlands Impacts
1.3	What are the estimated distance related energy transmission efficiency losses? How do they compare based on the alternative sites considered?	Site Selection	The U.S. Energy Information Administration (EIA) estimates approximately 5% of generated electricity is lost through transmission and distribution. Due to the proximity to existing transmission infrastructure, none of the sites evaluated in Port Corpus Christi's alternatives analysis were eliminated based on distance. However, transmission infrastructure currently exists within the McCampbell property, which is fundamentally preferable to offsite transmission, regardless of proximity.	
1.4	The March 31, 2008, wetlands compensatory mitigation rule created a mitigation bank preference to meet mitigation requirements. If the proposed project does not lie within a bank service area please make note of this within the proposed mitigation plan.	Mitigation Banks	No mitigation banks exist within the same watershed as the McCampbell Property. Therefore, Port Corpus Christi developed a Compensatory Mitigation Plan for on-site, in-kind compensatory mitigation to offset unavoidable project impacts as a favorable alternative to offsite mitigation. The mitigation plan has been updated to reflect the absence of a mitigation bank, see Attachment B.	Updated mitigation plan to state lack of mitigation banks
1.5	Compensatory mitigation for unavoidable wetland impacts is based on aquatic resource functional loss. Has the Port conducted a wetland functional assessment pursuant to the Galveston District interim hydrogeomorphic (IHGM) function model? This is the standard procedure to ensure sufficient compensatory mitigation. Additionally, despite the proposed use of timber mats and smaller construction vehicles what consideration has been given to temporal wetland functional loss during project construction? An estimated project construction timeline would facilitate the temporal functional impact assessment.	Mitigation Credits	Port Corpus Christi developed the proposed mitigation plan based on the observed impacts occurring on-site at the time the property was purchased. The proposed restoration will conservatively mitigate unavoidable project impacts on a ratio of approximately 3 to 1. Port Corpus Christi updated this ratio following a detailed classification of the proposed restoration types, which required a more thorough analysis of the potential mitigation potential on-site. The 2.8 to 1 ratio is a more accurate estimate than the originally provided 2.2 to 1. However, the ratio did not incorporate a functional assessment such as the hydrogeomorphic (HGM) model because the methodology is not accepted by the USACE Corpus Christi Regulatory Field Office because it only currently includes the upper Texas Coast. Port Corpus Christi estimates 36 months for total construction, 12 months for road installation, and 24 months for panel installation. Roads will be constructed first to allow panel installation utilizing existing roads, reducing wetland impacts.	Updated for new mitigation ratio

No.	Comment	Comment Type	Response	Action Item
	The permit application references a literature review to determine solar panel wetland shading impacts. What existing benchmark solar facility data was used to make a no wetland effect determination?	Shading	Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousselet et al., 2017) and document increased biodiversity (Udrihan et al., 2021), others note less biomass under panels (Armstrong et al., 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading.	
1.6			Within the U.S., however, ongoing research conducted by the National Renewables Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022). (Solar Power World, 2020). (Invenery, 2022). This implies that species are not adversely affected by shading from the PV panels. From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade-tolerant and shade-intolerant herbaceous species (Abella et al., 2020). This study further noted that shade-intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade-tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and wide-spread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade-tolerant or shade-intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.) Regardless of the destination of the renewable electrons generated from this project, they would serve to supplant power derived from fossil fuels, reducing regional emissions, and edging the Coastal Bend Region toward carbon neutrality, which is unequivocally aligned with the public interest (IPCC, 2022). Likewise, the addition of new, ultra-low carbon electricity generation to the ERCOT grid will bolster grid resilience for all users, clearly serving the public interest. Further, the proposed construction techniques and on-site mitigation will preserve and enhance, respectively, the hydrologic function of the site, thereby upholding and serving the public interest of downstream communities for whom the site provides ecosystem (watershed) services.	
1.7	Be advised that the Corps must also determine whether the proposed activities would be contrary to the public interest and additional information may be requested from the applicant to make this determination, especially regarding, but not limited to, conservation, general environmental concerns, fish and wildlife values, navigation, safety, and/or food and fiber production.	Public Interest		
Michael A. Morgan				
2.1	I do object to the proposed solar panels located directly NW of Main st. (FM-1069). Project Plans panels 12 & 13. Those areas are covered in heavy brush & provide important habitat for many forms of wildlife that will be displaced if these areas are disturbed.	Habitat	Wetlands dominate the McCampbell property, which is devoid of heavy brush. As a factor of the property's history of cattle ranching, both the uplands ("heavy brush") and wetlands were subject to controlled burns.	
John Weber				

No.	Comment	Comment Type	Response	Action Item
3.1	Wetlands are an important part of our ecosystem and any existing ones should always be protected. Wetlands are also not a desired location for solar farms because of the difficulty for installation and for the maintenance and cleaning of the panels over the life of the project.	Wetlands	Port Corpus Christi agrees wetlands are a vital component of the local ecosystem. Therefore, Port Corpus Christi designed this project in a manner that fundamentally preserves site hydrology and avoids/minimizes impacts to aquatic resources. To accomplish the goals of this project, Port Corpus Christi commits to the following: • Restore all temporary construction impacts to existing grades; • Limit access improvement to only that which is necessary to support critical operations; • Elevate infrastructure above the ground via helical pilings that do not constitute fill per (40 CFR 232.2); • Locate inverters outside wetlands where possible; • Eliminate the potential of vegetation shading via elevated, tracking panels; • Restore 29.6ac of existing, degraded de facto access paths to natural elevations; • Use automated panel cleaning mechanisms to minimize the need for vehicular access to the site.	
3.2	An alternative location would be in the area, of the appearing to be defunct 600 MW cryo mining operation, located off of McKinzie Rd and State Highway 44. The main electrical appears to be in place already on a robust part of the electrical transmission system.	Site Selection	Port Corpus Christi evaluated several sites during the alternative analysis and determined the McCampbell property to be best suited for an industrial-size solar development. An updated alternatives analysis is provided as a part of this response to comments (see Attachment A).	
3.3	When will the public meeting be held regarding this application?	Public Meeting	The U.S. Army Corps of Engineers should advise if a public meeting is necessary.	
National Marine Fisheries Service (Charrish Stevens)				
4.1	we do not object to the issuance of this permit for SWG-2022-00561, provided the applicant adheres to the mitigation plans included with the public notice	Adherence to Mitigation Plan	Port Corpus Christi thanks the National Marine Fisheries Service for their timely review of this project.	
Cathy Fulton				
5.1	There is missing information to the application that needs to be included and addressed. The information is attached to this email. The Port of Corpus Christi just approved a lease agreement with Howard Energy and Talos to allow POCCA properties to be used for carbon sequestration. The entire McCampbell property is shown for a possible sequestration site, including the solar panel placement areas.	Howard and Talos Lease	The solar development proposed in this permit application represents a single project with independent utility. The lease agreement referenced related to carbon capture and sequestration (CCS), is also a single project with independent utility. The U.S. Environmental Protection Agency (EPA) is the lead federal agency responsible for reviewing the CCS project in accordance with NEPA. Further, the proposed solar installation occupies approximately 186ac of the 2850ac property, providing an opportunity for additional and independent projects.	
Kenneth Teague				
6.1	I recommend that the USACE, USEPA, USFWS, and TPWD conduct a site visit to determine the quality and environmental significance of the aquatic habitats proposed to be destroyed by the applicant. The USEPA should consider whether these habitats may be Aquatic Resources of National Significance, and if so, elevate review with USACE. In particular, USFWS and TPWD should determine whether these habitats have value to the endangered whooping crane.	Request for Site Visits	The USACE conducted several site visits to the property during the issuance of the approved jurisdictional determination (AJD). It is also anticipated that during the Section 7 consultation, USFWS will also conduct site visits. The Section 7 consultation will ensure that the activities of the proposed project take appropriate measures to conserve and protect Federally listed endangered and threatened species and their habitat.	

No.	Comment	Comment Type	Response	Action Item
	I am very concerned that the applicant may have severely avoided disclosing the true impacts of the proposed project on aquatic habitats. The PN only acknowledges impacts to the PN (and presumably the applicant) acknowledge. The USACE and other agencies must determine the actual extent of likely impacts, including impacts of shading from solar panels, on these wetlands. The proposed project must be evaluated in the context of a full disclosure of potential impacts to aquatic habitats, which is not currently the case.	Aquatic Habitat	Section 2 of the application provides an accurate and complete description of the landscape. Wetlands constitute approximately 1,560ac of the McCampbell Property (See Approved Jurisdictional Determination dated August 12, 2022). Hydrology within the property is dominated by a large ditch that conveys stormwater from the City of Ingleside and the site itself downstream to the McCampbell Slough and Port Bay. Salt meadow cordgrass (<i>Spartina spartinae</i>) dominates the site and is observed in both upland and wetland habitats. Wetlands within the property are highly homogenous with little variation in plant assemblages. The property as a whole demonstrates low topographic relief. Elevations within the wetlands range from 4-8ft NAVD88 whereas uplands average 10ft NAVD88. The wetlands on the property overlap a Federal Emergency Management Agency (FEMA) floodplain, with a base flood elevation (BFE) of +11ft NAVD88. Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousset et al., 2017) and document increased biodiversity (Udrifan et al., 2021), others note less biomass under panels (Armstrong et al., 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading. Within the U.S., however, ongoing research conducted by the National Renewables Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022). (Solar Power World, 2020), (Invenery, 2022). This implies that species are not adversely affected by shading from the PV panels. From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade tolerant and shade intolerant herbaceous species (Abella et al., 2020). This study further noted that shade intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and wide-spread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade tolerant or shade intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.) A more detailed Alternatives Analysis was provided in Attachment D of the application. However, an updated alternatives analysis is provided as a part of this response to comments (see Attachment A) to correct an inadvertent error.	
6.2				
6.3	The PN includes a table labeled as "Alternative Analysis Summary". However, it is not possible to interpret the table without any explanation. The applicant should be required to provide the public with the actual Alternatives Analysis, for review and comment.	Alternatives Analysis		

No.	Comment	Comment Type	Response	Action Item																								
6.4	In the absence of any explanation, review of the Alternative Analysis Summary suggests that the applicant has not properly complied with the Clean Water Act, Section 404(b)(1) Guidelines.	Alternatives Analysis	A detailed Alternatives Analysis is provided in Attachment D of the application and an updated alternatives analysis is provided as a part of this response to comments (see Attachment A). As further detailed in the permit application, wetland impacts were minimized and avoided to the greatest possible extent, aligning the project with the Section 404 (b)(1) guidelines.																									
6.5	The applicant has failed to propose mitigation that meets the requirements of the Mitigation Rule.	Mitigation	A detailed mitigation plan in compliance with April 10, 2008, USACE / USEPA Final Mitigation Rule (2008 Mitigation Rule) and 33 DFR 332.4(c)(2) through (c)(14) is provided as Attachment G of the application. An updated Mitigation Plan has been provided as a part of the response to comments (see Attachment B).																									
Paul Kaspar - US EPA																												
7.1	Under the Guidelines, no discharge of dredged or fill material may be permitted by the Corps if: (1) a practicable alternative exists that is less damaging to the aquatic environment so long as that alternative does not have other significant adverse environmental consequences or (2) the nation's waters would be significantly degraded. Under the Guidelines, a project must incorporate all appropriate and practicable measures to first avoid impacts to wetlands, streams, and other aquatic resources and then minimize unavoidable impacts; after avoidance and minimization measures have been applied, the project must include appropriate and practicable compensatory mitigation for the remaining unavoidable impacts. The Guidelines explicitly require evaluation of all direct, secondary, and cumulative impacts reasonably associated with the proposed discharge in determining compliance with Section 230.10(c). Information has not been included to address whether the applicant has adequately considered the entirety of impacts to the affected and surrounding aquatic resources. The existing wetland functions maintain and improve the chemical, physical, and biological integrity of the adjacent bays and waterways by regulating fresh groundwater levels, storing floodwater, removing pollutants and excess nutrients.	Impacts to Aquatic Resources	Port Corpus Christi designed this project in a manner that fundamentally preserves site hydrology and avoids/minimizes impacts to aquatic resources. To accomplish the goals of this project, Port Corpus Christi commits to the following: • Restore all temporary construction impacts to existing grades; • Limit access improvement to only that which is necessary to support critical operations; • Elevate infrastructure above the ground via helical pilings that do not constitute fill per (40 CFR 232.2); • Locate inverters outside wetlands where possible; • Eliminate the potential of vegetation shading via elevated, tracking panels; • Restore 29.6ac of existing, degraded de facto access paths to natural elevations; • Use automated panel cleaning mechanisms to minimize the need for vehicular access to the site. Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project: <table><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce Potential Wetland Impacts</th><th>Net Impact</th></tr><tr><td>Pilings in Wetlands</td><td>Helical pilings</td><td>None - Avoided</td></tr><tr><td>Shading from Panels</td><td>Elevations above BFE and continuous rotation</td><td>None - Avoided</td></tr><tr><td>Trenching for Cables</td><td>Cable elevated on trays</td><td>None - Avoided</td></tr><tr><td>Inverter</td><td>Sited in uplands where applicable</td><td>None - 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None - 13.4ac - offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None - Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None - Restored</td></tr></table>	Potential Project Impacts	Method to Minimize or Reduce Potential Wetland Impacts	Net Impact	Pilings in Wetlands	Helical pilings	None - Avoided	Shading from Panels	Elevations above BFE and continuous rotation	None - Avoided	Trenching for Cables	Cable elevated on trays	None - Avoided	Inverter	Sited in uplands where applicable	None - 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None - 13.4ac - offset with mitigation	Substations	Sited solely in uplands	None - Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None - Restored	
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No.	Comment	Comment Type	Response	Action Item																								
7.2	Specifically, it does not appear that impacts to McCampbell Slough and Port Bay have been addressed such as, but not limited to, loss of filtration, lower dissolved oxygen concentrations, increases in turbidity or toxicity, or losses to local wildlife habitat. Potential impacts to area hydrology and nearby aquatic resources resulting from fill of impacted wetlands should be considered, and further evaluation upon the watershed given the size of the project area may be appropriate. As noted in the draft mitigation plan, roads (such as those proposed by the project) become barriers to surface hydrology limiting sheet flow from the wetlands into existing swales and channels and, ultimately, limiting hydrologic connectivity between the site and downstream estuaries. The installation of the solar panels will likely impede biological function due to the large percentage of wetlands to be subjected to additional shading as the rotating panels are designed to capture maximum daylight. It is unclear if existing evapotranspiration rates be impacted, the extent impacts due to of mowing and maintenance activities, or the impact associated with future decommissioning activities post-project life expectancy.	Impacts to Aquatic Resources	Port Corpus Christi designed this project in a manner that fundamentally preserves site hydrology and avoids/minimizes impacts to aquatic resources. Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project: <table><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce Potential Wetland Impacts</th><th>Net Impact</th></tr><tr><td>Pilings in Wetlands</td><td>Helical pilings</td><td>None - Avoided</td></tr><tr><td>Shading from Panels</td><td>Elevations above BFE and continuous rotation</td><td>None - Avoided</td></tr><tr><td>Trenching for Cables</td><td>Cable elevated on trays</td><td>None - Avoided</td></tr><tr><td>Inverter</td><td>Sited in uplands where applicable</td><td>None - 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None - 13.4ac - offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None - Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None - Restored</td></tr></table> In constructing the proposed project, Port Corpus Christi will improve both the hydrologic functions of the wetlands and free up capacity for upstream stormwater from the surrounding municipalities. Improving the wetland's hydrologic function as a factor of the project will improves downstream water quality including but not limited to, dissolved oxygen, filtration capacity, turbidity, or toxicity. In 1977 USACE authorized the excavation of a drainage ditch through the McCampbell Property to convey stormwater from the City of Ingleside and surrounding areas into the McCampbell Slough. This ditch not only serves to convey stormwater from the Ingleside area but drains the surrounding wetlands within the McCampbell Property. Additionally, impacts resulting from ongoing agricultural use of the McCampbell Property—the existing roads—serve as auxiliary conveyances to the drainage ditch. Port Corpus Christi developed a conceptual site drainage model, which demonstrates a high correlation to stream features and roads within the property. Wetlands function by retaining water until the existing hydrologic regime of the adjacent waterbody naturally removes the water or it evaporates. The excavated drainage ditch, and the existing roads—which serve as auxiliary conveyances to the ditch—prematurely remove standing water from the wetlands within the property and force it downstream into the McCampbell Slough. The additional stormwater, redirected from the wetlands, feeds into the drainage ditch, reducing potential capacity from the upstream communities. Through the execution of the proposed mitigation plan, Port Corpus Christi will eliminate the roads that function as auxiliary conveyance. Future iterations of construction design (especially proposed site access) will further address site stormwater function, focusing on wetland water retention and preventing additional conveyance to the drainage ditch. As a result of the proposed mitigation and additional stormwater-focused design, Port Corpus Christi will restore the natural retention time of the wetlands, preventing premature runoff into the drainage ditch, which will reserve additional stormwater capacity for the upstream communities. Further, the presence of shade does not equate to a loss of biological function in wetlands. An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade tolerant and shade intolerant herbaceous species (Abella et al., 2020). This study further noted that shade intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense	Potential Project Impacts	Method to Minimize or Reduce Potential Wetland Impacts	Net Impact	Pilings in Wetlands	Helical pilings	None - Avoided	Shading from Panels	Elevations above BFE and continuous rotation	None - Avoided	Trenching for Cables	Cable elevated on trays	None - Avoided	Inverter	Sited in uplands where applicable	None - 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None - 13.4ac - offset with mitigation	Substations	Sited solely in uplands	None - Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None - Restored	
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No.	Comment	Comment Type	Response	Action Item
			the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and wide-spread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade tolerant or shade intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.).	
7.3	The PN indicates the applicant has avoided and minimized the environmental impacts through project design, and an alternatives analysis (AA) has been provided. As presented, it is unclear whether the provided AA is sufficiently robust based on the Summary Table provided in the PN. The basis for 600 MW production requirement has not been provided, nor has a justification for a size/scale requirement that characterizes a cost-effective solar development. There is limited information regarding the basis for the siting criteria that were established. It is also unclear whether the geographic search area constraints and siting criteria may have been too narrowly defined to thoroughly evaluate compliance with the Guidelines for the project purpose, or whether the project purpose could be achieved through a combination of on-site and off-site alternatives. We recommend that the Corps of Engineers take this under consideration as it carefully weighs whether it is in the public's interest to authorize the proposed project. As presented, it would appear the identified criteria were more targeted towards the development of property currently owned by the applicant. We recommend the applicant work with the Corps to provide a robust alternatives analysis to assist the Corps in making its factual determinations for compliance with the Guidelines.	Alternatives Analysis	Port Corpus Christi acknowledged EPA's comments on the scope of the alternatives analysis. An updated alternatives analysis is provided as Attachment A. This alternatives analysis considered site availability, cost, logistical limitations, proximity to potential off-takers, and it compared environmental impacts for a no-action alternative, two on-site alternatives, and three off-site alternatives. Port Corpus Christi eliminated several alternatives due to insufficient parcel size, or the presence of shoreline frontage along an existing ship channel. This analysis determined all evaluated sites to be within a suitable distance to existing utility infrastructure. As such, Port Corpus Christi did not eliminate any alternative based on relative proximity to utilities. The alternative that necessitated new property acquisition was eliminated due to the lack of available contiguous parcels of sufficient size and the logistical/temporal constraints in acquisition negotiations relative to anticipated project deployment.	
7.4	The applicant proposes to compensate for the unavoidable impacts to wetlands via a Permittee Responsible Project (PRM) Plan that includes restoring previously degraded wetlands onsite. Specific to the PRM Plan, it is recommended the 3 types of paths/roads to be restored be clearly identified on the mitigation workplan sheets along with quantities of the 3 types of restoration methods targeted. As soil compaction in roadway	Mitigation Plan	Port Corpus Christi included an additional exhibit and quantifications to estimate the type of restoration detailed in the mitigation plan. See Attachment B. Through this exercise, Port Corpus Christi more thoroughly evaluated the restoration potential on-site and determined the site possesses approximately 38,44c of wetland impact, which will be restored, for a mitigation ratio of approximately 3 to 1.	Revised Mitigation Plan to include an exhibit estimating restoration by type of road. Revised mitigation plan to address soil compaction.

No.	Comment	Comment Type	Response	Action Item
	areas may inhibit hydrology and vegetative growth, please identify how restoration activities will incorporate measures to address compaction and support vegetative success. If fill material is required, soils should target existing native soils in terms of organic content, classification, and permeability.			
7.5	It is recommended vegetative success criteria include a 75% aerial coverage of native hydrophytic species. Wetland hydrology should also be demonstrated within the restored areas. Monitoring should be conducted every year for a minimum of 5 years, and success criteria should be demonstrated for 2 consecutive years after any adaptive management measures are implemented, before monitoring activities may be ceased. It is unclear if the site protection instrument will sufficiently protect the restored wetlands specifically in regard to whether uses incompatible with mitigation activities such as ranching/grazing activities will be prohibited	Mitigation Plan	The mitigation plan provided with the application represented success criteria greater than 70% coverage and 2 years of monitoring. However, per this comment, Port Corpus Christi updated the mitigation plan to include 75% final success criteria and 2 years of monitoring following the implementation of adaptive management strategies in the mitigation plan. See Attachment B. Port Corpus Christi has yet to determine whether cattle grazing will continue onsite. If USACE deems cattle grazing to be an incompatible land use with the proposed mitigation, the Port will appropriately deed restrict the site.	Revised Mitigation Plan to include 75% final success criteria and 2 years of monitoring following adaptive management implementation.
Lynne Porter				
8.1	I Request a public hearing and Environmental Impact Statement on the Port of Corpus Christi's USACE permit #SWG-2021-00163	Request for Public Hearing and EIS	The U.S. Army Corps of Engineers should advise if a public meeting is necessary. This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement.	
8.2	I am very concerned about the impacts to migratory birds on the Central Flyway	Migratory Birds	Certain types of solar installations, mainly those with thermal concentration towers in the arid west, present a potential risk to migratory birds. The proposed project will not construct a thermal concentration tower. Additionally, while there is very little published research literature indicating that PV panels impact migratory birds in the same way as thermal concentration towers, the state of the practice in the solar industry includes strategies (including alternating the banding of cells within a panel) to help avian species more easily distinguish the presence of solar panels. Port Corpus Christi maintains an open dialog with USFWS specifically on this project to collaborate on both migratory bird and endangered species concerns. Implementation of appropriate measures will occur to mitigate potential impacts on migratory birds. Such measures will be finalized during the Section 7 consultation process.	
8.3	[I am very concerned about] impacts of glare from solar panels on pilots and possible crashes,	Solar Panel Impacts	The Federal Aviation Administration (FAA) recognizes the compatibility between solar PV generation and airport operations (FAA, 2021). "Glare" reflecting from solar panels presents no more risk to pilots than that of passing windows of a building. Additionally, Port Corpus Christi established an open dialog with the San Patricio County Municipal Airport and the respective County Commissioner. To date, neither party has identified a conflict between the two land uses.	
8.4	[I am very concerned about] establishing unlimited solar power to entice new petrochemical companies	Unlimited Solar Power	The proposed project is expected to generate renewable electrons for the grid, adding to the existing mix of renewable energy with the potential to serve both residential and industrial demand. This project will create approximately 600MW of renewable electrons for the grid. This Port Corpus Christi project will: • Diversify regional electricity generation; • Enhance regional energy resilience; • Directly support federal objectives by fostering low carbon hydrogen (H₂) production; • Minimize permanent impacts to aquatic resources;	

No.	Comment	Comment Type	Response	Action Item
			Texas leads the nation in energy consumption across all sectors. The industrial sector, including the state's refineries and petrochemical plants, accounts for more than half of the state's energy consumption and 23% of the nation's total industrial sector energy use. While 1 megawatt (MW) typically produces enough daily power for 1,000 U.S. homes, it is only enough to meet the power needs of 200 Texas homes on a hot summer day. Peak demands reached more than 77,166MW in 2020, breaking the previous record of 74,829MW set in August 2019. The vulnerability of the regional grid and the need for more, and more diverse generation was illustrated at significant economic and social cost by Winter Storm Uri in 2021. Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousselet et al., 2017) and document increased biodiversity (Udriplan et al, 2021), others note less biomass under panels (Armstrong et al, 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading.	
8.5	[I am very concerned about] destruction of habitat beneath the panels	Habitat	Within the U.S., however, ongoing research conducted by the National Renewables Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022). (Solar Power World, 2020), (Invernergy, 2022). This implies that species are not adversely affected by shading from the PV panels. From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade-tolerant and shade-intolerant herbaceous species (Abella et al., 2020). This study further noted that shade-intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade-tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and wide-spread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade-tolerant or shade-intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.)	
8.6	[I am very concerned about] not knowing what this power is going to be used for (possibly experimental projects the Port is pursuing like hydrogen and carbon capture/sequestration)	Power Use	The project is expected to add renewable electrons to the grid, bolstering energy resilience and supplanting power derived from fossil fuels. Renewable electrons generated from this project would be transmitted to potential off-takers through existing infrastructure owned and operated by AEP.	
8.7	[I am very concerned about] inadequate mitigation (wetlands destroyed should be replaced at a 3:1 ratio)	Mitigation Plan	Port Corpus Christi's proposed mitigation plan offsets unavoidable project impacts in a manner consistent with the 2008 Mitigation Rule. The Mitigation Rule stipulates a mitigation plan must ensure no net loss, favoring on-site, in-kind restoration second only to mitigation banks. Since no mitigation banks exist within the project watershed, on-site, in-kind mitigation is the most favorable mitigation strategy. Any ratio exceeding 1 to 1 demonstrates no net loss of wetlands on-site, thus the mitigation as originally proposed, especially as revised in Attachment B, exceeds the criteria for wetland mitigation.	Update for new mitigation ratio

No.	Comment	Comment Type	Response	Action Item
	Why is the Port (a public navigation district) buying up property so far inland - away from navigable waters? How do taxpayers benefit when the Port makes these large swaths of land tax-exempt? Isn't it anti-competitive for the Port to get into the energy business? Is this just a "greenwashing" effort? We won't really know unless the Port and USACE provide answers.	Property Acquisition	Port Corpus Christi developed the proposed mitigation plan based on the observed impacts occurring on-site at the time the property was purchased. The proposed restoration will conservatively mitigate unavoidable project impacts on a ratio of approximately 3 to 1. Port Corpus Christi updated this ratio following a detailed classification of the proposed restoration types, which required a more thorough analysis of the potential mitigation potential on-site. The 2.8 to 1 ratio is a more accurate estimate than the originally provided 2.2 to 1. Port Corpus Christi is a landlord port, meaning that establishing long-term leases with industrial customers is a cornerstone of its operating structure. Waterfront property is at a premium, and thus its highest and best use is for water-dependent functions, such as docks and other maritime infrastructure. Previous Port Commissions determined and affirmed that the acquisition of land, adjacent or accessible by road or rail, to navigable waters of the Port, is necessary for the fundamental operation and development of the navigable waterways. Prior to purchase by the Port in 2018, the Farm/Agriculture Exemption on the McCampbell property yielded \$1,540.22 in annual tax revenue for San Patricio County; in contrast, all built improvements associated with the construction of a solar PV facility on the site will be subject to ad valorem taxation, thereby generating orders of magnitude more tax revenue. Greenwashing is defined as marketing oneself as "environmentally friendly" without taking the commensurate action. Port Corpus Christi has established quantitative environmental performance targets in six areas—including climate action/decarbonization—codified in an environmental policy. This environmental policy creates a framework for implementing creative and innovative solutions and environmental initiatives while facilitating strategic growth. Developing renewable electricity projects to enhance the availability of ultra-low carbon electrons directly contributes to the performance targets defined in the Port's Environmental Policy while directly supporting the decarbonization objectives of our customers and bolstering the overall resilience of the regional electric grid.	
8.8				
Shelia Walton				
	I would like to request a public hearing and an Environmental Impact Study	Public Hearing & EIS request	The U.S. Army Corps of Engineers should advise if a public meeting is necessary. This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement.	
9.1				
	I would like to express concerns about impacts to migratory birds on the Central Flyway ,	Migratory Birds	Certain types of solar installations, mainly those with thermal concentration towers in the arid west, present a potential risk to migratory birds. The proposed project will not construct a thermal concentration tower. Additionally, while there is very little published research literature indicating that PV panels impact migratory birds in the same way as thermal concentration towers, the state of the practice in the solar industry includes strategies (including alternating the banding of cells within a panel) to help avian species more easily distinguish the presence of solar panels. Port Corpus Christi maintains an open dialog with USFWS specifically on this project to collaborate on both migratory bird and endangered species concerns. Implementation of appropriate measures will occur to mitigate potential impacts on migratory birds. Such measures will be finalized during the Section 7 consultation process.	
9.2				
	inadequate mitigation (wetlands destroyed should be replaced at a 3:1 ratio) and the	Mitigation ratio	Port Corpus Christi's proposed mitigation plan offsets unavoidable project impacts in a manner consistent with the 2008 Mitigation Rule. The Mitigation Rule stipulates a mitigation plan must ensure no net loss, favoring on-site, in-kind restoration second only to mitigation banks. Since no mitigation banks exist within the project watershed, on-site, in-kind mitigation is the most favorable mitigation strategy. Any ratio exceeding 1 to 1 demonstrates no net loss of wetlands on-site, thus the mitigation as originally proposed, especially as revised in Attachment B, exceeds the criteria for wetland mitigation.	
9.3			Port Corpus Christi developed the proposed mitigation plan based on the observed impacts occurring on-site at the time the property was purchased. The proposed restoration will conservatively mitigate unavoidable project impacts on a ratio of approximately 3 to 1. Port Corpus Christi updated this ratio following a detailed classification of the proposed restoration types,	

No.	Comment	Comment Type	Response	Action Item
			which required a more thorough analysis of the potential mitigation potential on-site. The 2.8 to 1 ratio is a more accurate estimate than the originally provided 2.2 to 1.	
	destruction of habitat beneath the panels.	Habitat	Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousselet et al., 2017) and document increased biodiversity (Udrijan et al, 2021), others note less biomass under panels (Armstrong et al, 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading. Within the U.S., however, ongoing research conducted by the National Renewables Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022). (Solar Power World, 2020), (Invernergy, 2022). This implies that species are not adversely affected by shading from the PV panels. From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade-tolerant and shade-intolerant herbaceous species (Abella et al., 2020). This study further noted that shade-intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade-tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and wide-spread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade-tolerant or shade-intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.)	
9.4				
9.5	Other important concerns would be glare from solar panels on pilots that could cause possible crashes.		The Federal Aviation Administration (FAA) recognizes the compatible land use between solar and airport (FAA, 2021). "Glare" reflecting from solar panels presents no more risk to pilots than that of passing windows of a building. Additionally, Port Corpus Christi established an open dialog with the San Patricio County Municipal Airport and the respective County Commissioner. To date, neither party has identified a conflict between the two land uses.	
9.6	not knowing what this power is going to be used for.		The project is expected to add renewable electrons to the grid, bolstering energy resilience and supplanting power derived from fossil fuels. Renewable electrons generated from this project would be transmitted to potential off-takers through existing infrastructure owned and operated by AEP. The proposed project will add to the existing mix of renewable energy with the potential to serve both residential and industrial demand.	
9.7	Why is the Port (a public navigation district) buying up property so far inland - away from navigable waters? How do taxpayers benefit when the Port makes these large swaths of land tax-exempt? Isn't it anticompetitive for the Port to get into the energy business? Is this just a "greenwashing" effort?		Port Corpus Christi is a landlocked port, meaning that establishing long-term leases with industrial customers is a cornerstone of its operating structure. Waterfront property is at a premium, and thus its highest and best use is for water-dependent functions, such as docks and other maritime infrastructure. Previous Port Commissions determined and affirmed that the acquisition of land, adjacent or accessible by road or rail, to navigable waters of the Port, is necessary for the fundamental operation and development of the navigable waterways.	

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Norine Farrar																												
	I would like to express my opinion that this isn't a good place to fill in wetlands as projected in SWG-2021-00163. It will have a direct effect on the residential and commercial areas nearby. There are better areas that will not destroy human habitat.		The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project: <table><thead><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce Potential Wetland Impacts</th><th>Net Impact</th></tr></thead><tbody><tr><td>Pillings in Wetlands</td><td>Helical pillings</td><td>None - Avoided</td></tr><tr><td>Shading from Panais</td><td>Elevations above BFE and continuous rotation</td><td>None - Avoided</td></tr><tr><td>Trenching for Cables</td><td>Cable elevated on trays</td><td>None - Avoided</td></tr><tr><td>Inverter</td><td>Sited in uplands where applicable</td><td>None - 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None - 13.4ac - offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None - Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None - Restored</td></tr></tbody></table>	Potential Project Impacts	Method to Minimize or Reduce Potential Wetland Impacts	Net Impact	Pillings in Wetlands	Helical pillings	None - Avoided	Shading from Panais	Elevations above BFE and continuous rotation	None - Avoided	Trenching for Cables	Cable elevated on trays	None - Avoided	Inverter	Sited in uplands where applicable	None - 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None - 13.4ac - offset with mitigation	Substations	Sited solely in uplands	None - Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None - Restored	
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Nancy Allen - San Patricio Aviation Advisory Board																												
	I would like to request a public hearing to discuss the merits of plans proposed by the Port of Corpus Christi Authority. Plans are underway to extend the runway to better serve corporate industry. This should be discussed openly to better serve our needs and San Patricio Communities.		The U.S. Army Corps of Engineers should advise if a public meeting is necessary. Port Corpus Christi staff are fully informed of the Airport's planned expansion and do not consider it incompatible with the proposed solar facility. Port Corpus Christi staff have an active and ongoing dialogue with the Airport Director and County Commissioner representing this district, and the Port has committed to involving them in the detailed design process for the site to ensure consistency with the Airport's Master Plan.																									
11.1																												
Doug G.																												
	My organization the Redford Ranch Foundation are adamantly opposed to the Port of corpus christ proceeding with this permit application, I request a public hearing [and EIS]		The U.S. Army Corps of Engineers should advise if a public meeting will be held regarding this application. This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement.																									
12.1																												

No.	Comment	Comment Type	Response	Action Item
12.2	concerns like impacts to migratory birds on the Central Flyway		Certain types of solar installations, mainly those with thermal concentration towers in the arid west, present a potential risk to migratory birds. The proposed project will not construct a thermal concentration tower. Additionally, while there is very little published research literature indicating that PV panels impact migratory birds in the same way as thermal concentration towers, the state of the practice in the solar industry includes strategies (including alternating the banding of cells within a panel) to help avian species more easily distinguish the presence of solar panels. Port Corpus Christi maintains an open dialog with USFWS specifically on this project, to collaborate on both migratory bird and endangered species concerns. Implementation of appropriate measures will occur to mitigate potential impacts on migratory birds. Such measures will be finalized during the Section 7 consultation process.	
12.3	impacts of glare from solar panels on pilots and possible crashes		The Federal Aviation Administration (FAA) recognizes the compatible land use between solar and airport (FAA, 2021). "Glare" reflecting from solar panels presents no more risk to pilots than that of passing windows on buildings. Additionally, Port Corpus Christi established an open dialog with the San Patricio County Municipal Airport and the respective County Commissioner. To date, neither party has identified a conflict between the two land uses.	
12.4	establishing unlimited solar power to entice new petrochemical companies		This project is expected to create approximately 600MW of renewable electrons for the grid, serving electricity users of all types. This Port Corpus Christi project will: • Diversify regional electricity generation; • Enhance regional energy resilience; • Directly support federal objectives by fostering low carbon hydrogen (H2) production; • Minimize permanent impacts to aquatic resources; • Preserve site hydrology. Texas leads the nation in energy consumption across all sectors. The industrial sector, including the state's refineries and petrochemical plants, accounts for more than half of the state's energy consumption and 23% of the nation's total industrial sector energy use. While 1 megawatt (MW) typically produces enough daily power for 1,000 U.S. homes, it is only enough to meet the power needs of 200 Texas homes on a hot summer day. Peak demands reached more than 77,166MW in 2020, breaking the previous record of 74,829MW set in August 2019. The vulnerability of the regional grid and the need for more, and more diverse generation was illustrated at significant economic and social cost by Winter Storm Uri in 2021.	
12.5	destruction of habitat beneath the panels		Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousselet et al., 2017) and document increased biodiversity (Udrizjan et al, 2021), others note less biomass under panels (Armstrong et al, 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading. Within the U.S. however, ongoing research conducted by the National Renewables Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022). (Solar Power World, 2020). (Invenery, 2022). This implies that species are not adversely affected by shading from the PV panels. From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade-tolerant and shade-	

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			intolerant herbaceous species (Abella et al., 2020). This study further noted that shade-intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade tolerant herbaceous species. Since the spacing, height, and continuous rotation of the panels preclude persistent and wide-spread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade tolerant or shade intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.	
12.6	not knowing what this power is going to be used for (possibly experimental projects the Port is pursuing like hydrogen and carbon capture/sequestration), inadequate mitigation (wetlands destroyed should be replaced at a 3:1 ratio)		The project will add renewable electrons to the grid, bolstering energy resilience and supplanting power derived from fossil fuels. Renewable electrons generated from this project would be transmitted to potential off-takers through existing infrastructure owned and operated by AEP.	
12.7	Why is the Port (a public navigation district) buying up property so far inland - away from navigable waters? How do taxpayers benefit when the Port makes these large swaths of land tax-exempt? Isn't it anti-competitive for the Port to get into the energy business? Is this just a "greenwashing" effort?		Port Corpus Christi's proposed mitigation plan offsets unavoidable project impacts in a manner consistent with the 2008 Mitigation Rule. The Mitigation Rule stipulates a mitigation plan must ensure no net loss, favoring on-site, in-kind restoration second only to mitigation banks. Since no mitigation banks exist within the project watershed, on-site, in-kind mitigation is the most favorable mitigation strategy. Any ratio exceeding 1 to 1 demonstrates no net loss of wetlands on-site, thus the mitigation as originally proposed, especially as revised in Attachment B, exceeds the criteria for wetland mitigation.	
12.8			Port Corpus Christi is a landlord port, meaning that establishing long-term leases with industrial customers is a cornerstone of its operating structure. Waterfront property is at a premium, and thus its highest and best use is for water-dependent functions, such as docks and other maritime infrastructure. Previous Port Commissions determined and affirmed that the acquisition of land, adjacent or accessible by road or rail, to navigable waters of the Port, is necessary for the fundamental operation and development of the navigable waterways.	
			Prior to purchase by the Port in 2016, the Farm/Agriculture Exemption on the McCampbell property yielded \$1,540.22 in annual tax revenue for San Patricio County; in contrast, all built improvements associated with the construction of a solar PV facility on the site will be subject to ad valorem taxation, thereby generating orders of magnitude more tax revenue.	
			Greenwashing is defined as marketing oneself as "environmentally friendly" without taking the commensurate action. Port Corpus Christi has established quantitative environmental performance targets in six areas—including climate action/decarbonization—codified in an environmental policy. This environmental policy creates a framework for implementing creative and innovative solutions and environmental initiatives while facilitating strategic growth. Developing renewable electricity projects to enhance the availability of ultra-low carbon electrons directly contributes to the performance targets defined in the Port's Environmental Policy while directly supporting the decarbonization objectives of our customers and bolstering the overall resilience of the regional electric grid.	
Mark Wolfe - State Historic Preservation Officer				
13.1	An archaeological survey is required. A Texas Antiquities Permit must be obtained from this office prior to initiation of fieldwork. All fieldwork should meet the Archaeological Survey Standards for Texas. A report of investigations is required and should be produced Reports for a Texas Antiquities Permit should also meet the Council of Texas Archeologists Guidelines for Cultural Resources Management Reports and the Texas Administrative Code. In addition, any buildings 45 years old or older that are located on or adjacent to the tract should be documented with photographs and included in the report.		Port Corpus Christi submitted a scope of work for a cultural resource field survey, to USACE on March 31, 2023. USACE approved this survey scope on March 7, 2023, pending comments from SHPO. A Texas Antiquities Permit will be obtained before conducting any field work. Port Corpus Christi acknowledges SHPO's comments regarding the contents of the report.	

No.	Comment	Comment Type	Response	Action Item
Lara Weiss				
	Better understanding of changes, impacts, mitigations to: Flood zones surrounding and including the cities of Aransas Pass and Ingleside.		Future iterations of site and facility design will require detailed hydrographic modeling. The Federal Emergency Management Administration (FEMA) requires projects within a floodway, like the McCampbell project, to obtain a "No-rise Certification". This certification will ensure the proposed project does not negatively affect the downstream communities of Aransas Pass and Ingleside. In constructing the proposed project, Port Corpus Christi will improve both the hydrologic functions of the wetlands and free up capacity for upstream stormwater from the surrounding municipalities. Improving the wetland's hydrologic function as a factor of the project will improve downstream water quality including but not limited to, dissolved oxygen, filtration capacity, turbidity, or toxicity. In 1977 USACE authorized the excavation of a drainage ditch through the McCampbell Property to convey stormwater from the City of Ingleside and surrounding areas into the McCampbell Slough. This ditch not only serves to convey stormwater from the Ingleside area but drains the surrounding wetlands within the McCampbell Property. Additionally, impacts resulting from ongoing agricultural use of the McCampbell Property—the existing roads—serve as auxiliary conveyances to the drainage ditch. Port Corpus Christi developed a conceptual site drainage model, which demonstrates a high correlation to stream features and roads within the property. Wetlands function by retaining water until the existing hydrologic regime of the adjacent waterbody naturally removes the water or it evaporates. The excavated drainage ditch, and the existing roads—which serve as auxiliary conveyances to the ditch—prematurely remove standing water from the wetlands within the property and force it downstream into the McCampbell Slough. The additional stormwater, redirected from the wetlands, feeds into the drainage ditch, reducing potential capacity from the upstream communities. Through the execution of the proposed mitigation plan, Port Corpus Christi will eliminate the roads that function as auxiliary conveyance. Future iterations of construction design (especially proposed site access) will further address site stormwater function, focusing on wetland water retention and preventing additional conveyance to the drainage ditch. As a result of the proposed mitigation and additional stormwater-focused design, Port Corpus Christi will restore the natural retention time of the wetlands, preventing premature runoff into the drainage ditch, which will reserve additional stormwater capacity for the upstream communities.	
14.1				
14.2	Better understanding of changes, impacts, mitigations to: Wildlife		Port Corpus Christi designed this project in a manner that fundamentally preserves site hydrology and avoids/minimizes impacts to aquatic resources. In doing so, this effectively avoids and mitigates impacts to wildlife present at the site.	
14.3	Better understanding of changes, impacts, mitigations to: Soil		Port Corpus Christi maintains an open dialog with USFWS specifically on this project, to collaborate on both migratory bird and endangered species concerns. Implementation of appropriate measures will occur to mitigate potential impacts on migratory birds. Such measures will be finalized during the Section 7 consultation process.	
14.4	Better understanding of changes, impacts, mitigations to: Groundwater		Port Corpus Christi acknowledges this comment, however, without additional detail, it is impossible to provide an appropriate response.	
14.5	In summary, I am opposed to this project until a public meeting is held that would help your new solar farm neighbors understand the changes being made as well as what positive or negative impacts there will be to their home and city.		Port Corpus Christi acknowledges this comment, however, without additional detail, it is impossible to provide an appropriate response.	
Glenn Guillory				
			The U.S. Army Corps of Engineers should advise if a public meeting is necessary.	

No.	Comment	Comment Type	Response	Action Item
15.1	I request a public hearing on subject permit request.		The U.S. Army Corps of Engineers should advise if a public meeting is necessary.	
15.2	1000+ acres of heavy panels airborne in a major hurricane event?		The proposed project construction will meet State of Texas Windstorm requirements.	
Wendy Hughes				
16.1	I would like to express concerns like impacts to migratory birds on the Central Flyway.		Certain types of solar installations, mainly those with thermal concentration towers in the arid west, present a potential risk to migratory birds. The proposed project will not construct a thermal concentration tower. Additionally, while little research exists to demonstrate PV panels impact migratory birds in the same way as thermal concentration towers, there are strategies (including alternating the banding of cells within a panel) to help avian species more easily distinguish the presence of solar panels. Port Corpus Christi maintains an open dialog with USFWS specifically on this project, to collaborate on both migratory bird and endangered species concerns. Implementation of appropriate measures will occur to mitigate potential impacts on migratory birds. Such measures will be finalized during the Section 7 consultation process.	
16.2	impacts of glare from solar panels on pilots and possible crashes,		The Federal Aviation Administration (FAA) recognizes the compatible land use between solar and airport (FAA, 2021). "Glare" reflecting from solar panels presents no more risk to pilots than that of passing windows on buildings. Additionally, Port Corpus Christi established an open dialog with the San Patricio County Municipal Airport and the respective County Commissioner. To date, neither party has identified a conflict between the two land uses.	
16.3	establishing unlimited solar power to entice new petrochemical companies		This project is expected to create approximately 600MW of renewable electrons for the grid, serving users of all types. This Port Corpus Christi project will: • Diversify regional electricity generation. • Enhance regional energy resilience. • Directly support federal objectives by fostering low-carbon hydrogen (H2) production. • Minimize permanent impacts to aquatic resources. • Preserve site hydrology. Texas leads the nation in energy consumption across all sectors. The industrial sector, including the state's refineries and petrochemical plants, accounts for more than half of the state's energy consumption and 23% of the nation's total industrial sector energy use. While 1 megawatt (MW) typically produces enough daily power for 1,000 U.S. homes, it is only enough to meet the power needs of 200 Texas homes on a hot summer day. Peak demands reached more than 77,166MW in 2020, breaking the previous record of 74,829MW set in August 2019. The vulnerability of the regional grid and the need for more, and more diverse generation was illustrated at significant economic and social cost by Winter Storm Uri in 2021.	
16.4	destruction of habitat beneath the panels		Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousselet et al., 2017) and document increased biodiversity (Udjtjan et al, 2021), others note less biomass under panels (Armstrong et al, 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading.	Within the U.S, however, ongoing research conducted by the National Renewables Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022). (Solar Power World, 2020), (Invenery, 2022). This implies that species are not adversely affected by shading from the PV panels.

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			From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade-tolerant and shade-intolerant herbaceous species (Abella et al., 2020). This study further noted that shade-intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade-tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and widespread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade-tolerant or shade-intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.	
16.5	not knowing what this power is going to be used for (possibly experimental projects the Port is pursuing like hydrogen and carbon capture/sequestration).		The project will add renewable electrons to the grid, bolstering energy resilience and supplanting power derived from fossil fuels. Renewable electrons generated from this project would be transmitted to potential off-takers through existing infrastructure owned and operated by AEP.	
16.6	inadequate mitigation (wetlands destroyed should be replaced at a 3:1 ratio).		Port Corpus Christi's proposed mitigation plan offsets unavoidable project impacts in a manner consistent with the 2008 Mitigation Rule. The Mitigation Rule stipulates a mitigation plan must ensure no net loss, favoring on-site, in-kind restoration second only to mitigation banks. Since no mitigation banks exist within the project watershed, on-site, in-kind mitigation is the most favorable mitigation strategy. Any ratio exceeding 1 to 1 demonstrates no net loss of wetlands on-site, thus the mitigation as originally proposed, especially as revised in Attachment B, exceeds the criteria for wetland mitigation.	
16.7	Why is the Port (a public navigation district) buying up property so far inland - away from navigable waters? How do taxpayers benefit when the Port makes these large swaths of land tax-exempt? Isn't it anti-competitive for the Port to get into the energy business? Is this just a "greenwashing" effort?		Port Corpus Christi is a landlord port, meaning that establishing long-term leases with industrial customers is a fundamental cornerstone of its operating structure. Waterfront property is at a premium, and thus its highest and best use is for water-dependent functions, such as docks and other maritime infrastructure. Previous Port Commissions have determined and affirmed that the acquisition of land, adjacent or accessible by road or rail, to navigable waters of the Port, is necessary for the fundamental operation and development of the navigable waterways. Prior to purchase by the Port in 2018, the Farm/Agriculture Exemption on the McCampbell property yielded \$1,540.22 in annual tax revenue for San Patricio County. In contrast, all built improvements associated with the construction of a solar PV facility on the site will be subject to ad valorem taxation, thereby generating orders of magnitude more tax revenue. Greenwashing is defined as marketing oneself as "environmentally friendly" without taking the commensurate action. Port Corpus Christi has established quantitative environmental performance targets in six areas—including climate action/decarbonization—codified in an environmental policy. This environmental policy creates a framework for implementing creative and innovative solutions and environmental initiatives while facilitating strategic growth. Developing renewable electricity projects to enhance the availability of ultra-low carbon electrons directly contributes to the performance targets defined in the Port's Environmental Policy while directly supporting the decarbonization objectives of our customers and bolstering the overall resilience of the regional electric grid.	
Julie Nye				
17.1	I request a public hearing and Environmental Impact Statement	Copy and Paste	The U.S. Army Corps of Engineers should advise if a public meeting is necessary. This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement.	

No.	Comment	Comment Type	Response	Action Item
17.2	the impact to migratory birds on the Central Flyway		Certain types of solar installations, mainly those with thermal concentration towers in the arid west, present a potential risk to migratory birds. The proposed project will not construct a thermal concentration tower. Additionally, while there is very little published research literature indicating that PV panels impact migratory birds in the same way as thermal concentration towers, the state of the practice in the solar industry includes strategies (including alternating the banding of cells within a panel) to help avian species more easily distinguish the presence of solar panels. Port Corpus Christi maintains an open dialog with USFWS specifically on this project to collaborate on both migratory bird and endangered species concerns. Implementation of appropriate measures will occur to mitigate potential impacts on migratory birds. Such measures will be finalized during the Section 7 consultation process.	
17.3	impact of glare from solar panels on pilots and possible crashes		The Federal Aviation Administration (FAA) recognizes the compatible land use between solar and airport (FAA, 2021). "Glare" reflecting from solar panels presents no more risk to pilots than that of passing windows on buildings. Additionally, Port Corpus Christi established an open dialog with the San Patricio County Municipal Airport and the respective County Commissioner. To date, neither party has identified a conflict between the two land uses.	
17.4	destruction of habitat beneath the panels		Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousseil et al., 2017) and document increased biodiversity (Udrijan et al., 2021), others note less biomass under panels (Armstrong et al., 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading.	
17.5	inadequate mitigation (wetlands destroyed should be replaced at a 3:1 ratio).		Within the U.S., however, ongoing research conducted by the National Renewables Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022). (Solar Power World, 2020), (Invenery, 2022). This implies that species are not adversely affected by shading from the PV panels. From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade-tolerant and shade-intolerant herbaceous species (Abella et al., 2020). This study further noted that shade-intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade-tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and widespread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade-tolerant or shade-intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels. Port Corpus Christi's proposed mitigation plan offsets unavoidable project impacts in a manner consistent with the 2008 Mitigation Rule. The Mitigation Rule stipulates a mitigation plan must ensure no net loss, favoring on-site, in-kind restoration second only to mitigation banks. Since no mitigation banks exist within the project watershed, on-site, in-kind mitigation is the most favorable mitigation strategy. Any ratio exceeding 1 to 1 demonstrates no net loss of wetlands on-site, thus the mitigation as originally proposed, especially as revised in Attachment B, exceeds the criteria for wetland mitigation.	

No.	Comment	Comment Type	Response	Action Item
Charles Ardizzone - DOI Fish and Wildlife Service				
	The PN states that a wetlands delineation indicated that approximately 1,560 acres of wetlands are present within the proposed project site. The PCCA stated that the project was designed to preserve, protect, and restore jurisdictional wetlands habitat and that the existing hydrology will be preserved throughout the project site and all temporary construction impacts will be restored to preconstruction conditions. According to PCCA, the ratio of restoration to impacts is 2.2:1, however, the long-term effect to the wetlands is unknown as the solar project has been deemed experimental. With over 50 percent of wetlands in the United States destroyed, it is recommended that all the wetlands should be restored fully to the best possible condition for the life of the project instead of only 5 years.		Port Corpus Christi revised the mitigation plan to include a more robust Long-Term Management Section, which includes annual qualitative assessments in perpetuity of the project. Should the mitigation plan fail at any point during the lifespan of the project, Port Corpus Christi will engage with USACE to restore any long-term wetland loss.	
18.1	Following the completion of the PCCA McCampbell Solar Project, the remaining wetlands should be held in conservation easement.		Port Corpus Christi will consider a site protection instrument, such as a deed restriction or conservation easement, on the wetlands on the property. Conservation easements necessitate a 3 rd party, typically a nonprofit/NGO that is willing to maintain the easement in perpetuity. Our experience on similar projects suggests that identifying an organization that is capable/willing to assume administrative responsibility for sites such as this, with historic farm/agricultural use and relatively low habitat diversity/productivity, is challenging. As such, other legal instruments for protecting the site may be more practical. The Port commits to exploring such options.	Revised mitigation plan to improve long-term management strategies
18.2	Bird deaths due to collisions are known to occur due to the reflective nature of solar panels. The recommendation for preventing these deaths is to build solar farms away from water, including wetlands. In the case of the PCCA McCampbell Solar Project this is not possible since the solar farm will extend over 1,560 acres of wetlands. The Service recommends alternating panels to create a noticeable grid and controlling lighting at night to eliminate reflection and reduce night-time bird collisions.		Certain types of solar installations, mainly those with thermal concentration towers in the arid west, present a potential risk to migratory birds. The proposed project will not construct a thermal concentration tower. Additionally, while there is very little published research literature indicating that PV panels impact migratory birds in the same way as thermal concentration towers, the state of the practice in the solar industry includes strategies (including alternating the banding of cells within a panel) to help avian species more easily distinguish the presence of solar panels. Port Corpus Christi maintains an open dialog with USFWS specifically on this project to collaborate on both migratory bird and endangered species concerns. Implementation of appropriate measures will occur to mitigate potential impacts on migratory birds. Such measures will be finalized during the Section 7 consultation process.	
18.3	The Service recommends adding wetland pollinator plants such as milkweed and surveying for the eastern black rail (<i>Laterallus jamaicensis</i> ssp. <i>jamaicensis</i>) as discussed in several meetings or correspondence with PCCA.		Port Corpus Christi takes this recommendation under advisement and recognizes the compatibility between solar installations and monarch butterfly habitats. Port Corpus Christi will evaluate the feasibility of planting milkweed during the detailed site design process.	
18.4			Port Corpus Christi began an Eastern Black Rail Survey in March, which includes both a desktop model and an in-field presence/absence survey, which activity is actively being coordinated with the Corpus Christi Field Services Office. Upon conclusion of the field survey, PCCA will share the results with USFWS as previously discussed.	
Patrick Nye - Ingleside on the Bay Coastal Watch Association				

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19.1	There are numerous unanswered questions about putting a solar farm at the airport		The Federal Aviation Administration (FAA) recognizes the compatible land use between solar and airport (FAA, 2021). "Glare" reflecting from solar panels presents no more risk to pilots than that of passing windows on buildings. Additionally, Port Corpus Christi established an open dialog with the San Patricio County Municipal Airport and the respective County Commissioner. To date, neither party has identified a conflict between the two land uses. Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The project will place fill in 13.9ac of wetlands as stated in both the permit application and the public notice. The project-related impacts can be seen in the summary table below: <table><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce Potential Wetland Impacts</th><th>Net Impact</th></tr><tr><td>Pilings in Wetlands</td><td>Helical pilings</td><td>None - Avoided</td></tr><tr><td>Shading from Panels</td><td>Elevations above BFE and continuous rotation</td><td>None - Avoided</td></tr><tr><td>Trenching for Cables</td><td>Cable elevated on trays</td><td>None - Avoided</td></tr><tr><td>Inverter</td><td>Sited in uplands where applicable</td><td>None - 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None - 13.4ac - offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None - Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None - Restored</td></tr></table>	Potential Project Impacts	Method to Minimize or Reduce Potential Wetland Impacts	Net Impact	Pilings in Wetlands	Helical pilings	None - Avoided	Shading from Panels	Elevations above BFE and continuous rotation	None - Avoided	Trenching for Cables	Cable elevated on trays	None - Avoided	Inverter	Sited in uplands where applicable	None - 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None - 13.4ac - offset with mitigation	Substations	Sited solely in uplands	None - Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None - Restored	
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19.3	The location of wetlands to be filled in not specified.		The project will place fill in wetlands for access paths and inverters, which is denoted in the permit drawings on the Wetland Impacts (FII) Map on page 18 of 22 of the project drawings.																									
	Impacts to wetlands are unclear, underestimated, and improperly mitigated		Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project: <table><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce Potential Wetland Impacts</th><th>Net Impact</th></tr><tr><td>Pilings in Wetlands</td><td>Helical pilings</td><td>None - Avoided</td></tr><tr><td>Shading from Panels</td><td>Elevations above BFE and continuous rotation</td><td>None - Avoided</td></tr><tr><td>Trenching for Cables</td><td>Cable elevated on trays</td><td>None - Avoided</td></tr><tr><td>Inverter</td><td>Sited in uplands where applicable</td><td>None - 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None - 13.4ac - offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None - Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None - Restored</td></tr></table> Port Corpus Christi proposed sufficient mitigation for wetland impacts, which demonstrates "no net loss" per the 2008 Mitigation Rule. The Mitigation Rule stipulates a mitigation plan must ensure no net loss, favoring on-site, in-kind restoration second only to mitigation banks. Since no mitigation banks exist within the project watershed, on-site, in-kind mitigation is the most favorable	Potential Project Impacts	Method to Minimize or Reduce Potential Wetland Impacts	Net Impact	Pilings in Wetlands	Helical pilings	None - Avoided	Shading from Panels	Elevations above BFE and continuous rotation	None - Avoided	Trenching for Cables	Cable elevated on trays	None - Avoided	Inverter	Sited in uplands where applicable	None - 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None - 13.4ac - offset with mitigation	Substations	Sited solely in uplands	None - Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None - Restored	
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			mitigation strategy. Any ratio exceeding 1 to 1 demonstrates no net loss of wetlands on-site, thus the mitigation as originally proposed, especially as revised in Attachment B, exceeds the criteria for wetland mitigation.	
19.5	The purpose for "new and industrial off-takers" is not in the public's interest		The project is expected to add renewable electrons to the grid, bolstering energy resilience and supplanting power derived from fossil fuels. Renewable electrons generated from this project would be transmitted to potential off-takers through existing infrastructure owned and operated by AEP. The proposed project will add to the existing mix of renewable energy with the potential to serve both residential and industrial demand. Regardless of the end-use of the electrons, the addition of emission-free energy generation sources and enhanced resilience of the regional grid is within the public interest.	
	The project is an example of "Greenwashing"		The proposed project will generate renewable electrons for the grid, adding to the existing portfolio of renewable energy, which will be imperative to realize the demands for green hydrogen generation and ultimate carbon neutrality.	
19.6			Greenwashing is defined as marketing oneself as "environmentally friendly" without taking the commensurate action. Port Corpus Christi has established quantitative environmental performance targets in six areas—including climate action/decarbonization—codified in an environmental policy. This environmental policy creates a framework for implementing creative and innovative solutions and environmental initiatives while facilitating strategic growth. Developing renewable electricity projects to enhance the availability of ultra-low carbon electrons directly contributes to the performance targets defined in the Port's Environmental Policy while directly supporting the decarbonization objectives of our customers and bolstering the overall resilience of the regional electric grid.	
19.7	The Port's plans to be an energy supplier are anti-competitive and outside its purview		The project is expected to yield 600 MW of carbon-free electricity to be delivered via interconnect to the regional electric grid. The Port is not proposing to be a transmission provider or seller/distributor of electricity, and thus the project does not compete with regional electricity providers in any way.	
19.8	Alternatives Analysis Inadequate, but Least Environmentally Damaging Alternatives Exist.		See updated Attachment A.	
19.9	The project requires an EIS		This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement	
19.10	This project is not in the public interest.		The proposed project is expected to generate renewable electrons for the grid, adding to the existing mix of renewable energy with the potential to serve both residential and industrial demand, and bolstering energy resilience and supplanting power derived from fossil fuels. Regardless of the destination of the renewable electrons generated from this project, they would serve to supplant power derived from fossil fuels, reducing regional emissions, and edging the Coastal Bend Region toward carbon neutrality, which is unequivocally aligned with the public interest (IPCC, 2022). Likewise, the addition of new, ultra-low carbon electricity generation to the ERCOT grid will bolster grid resilience for all users, clearly serving the public interest. Further, the proposed construction techniques and on-site mitigation will preserve and enhance, respectively, the hydrologic function of the site, thereby upholding and serving the public interest of downstream communities for whom the site provides ecosystem (watershed) services.	
19.11	Public Access to Information by USACE Galveston is Inappropriately Limited.		Port Corpus Christi has no response to this comment.	
Cathy Fulton				
20.1	I am submitting a request for a public meeting/hearing.		The U.S. Army Corps of Engineers should advise if a public meeting is necessary. This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement.	

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Jessica Hernandez																												
	Why add fill when the panels are to be constructed 5 feet off the ground? Why not raise them higher and avoid filling the herbaceous wetlands altogether?. Why not only utilize the acreage at its highest levels and not disrupt the wetlands of this property?		Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project: <table><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce Potential Wetland Impacts</th><th>Net Impact</th></tr><tr><td>Pilings in Wetlands</td><td>Helical pilings</td><td>None – Avoided</td></tr><tr><td>Shading from Panels</td><td>Elevations above BFE and continuous rotation</td><td>None – Avoided</td></tr><tr><td>Trenching for Cables</td><td>Cable elevated on trays</td><td>None – Avoided</td></tr><tr><td>Inverter</td><td>Sited in uplands where applicable</td><td>None – 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None – 13.4ac – offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None – Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None – Restored</td></tr></table>	Potential Project Impacts	Method to Minimize or Reduce Potential Wetland Impacts	Net Impact	Pilings in Wetlands	Helical pilings	None – Avoided	Shading from Panels	Elevations above BFE and continuous rotation	None – Avoided	Trenching for Cables	Cable elevated on trays	None – Avoided	Inverter	Sited in uplands where applicable	None – 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None – 13.4ac – offset with mitigation	Substations	Sited solely in uplands	None – Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None – Restored	
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	Water takes the path of least resistance.. Will the structures (panels) themselves redirect the storm water and where to if the wetlands have been filled? Is it subject to flow towards the city of AP to make its way to the intercostal or will it 24continue its flow into McCampbell slough where it meets with Copano Bay? The nearby communities due to the area having a large portion of it in a flood zone.																											
22.2																												

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			Port Corpus Christi has taken a systematic approach to site access in order to address site hydrology holistically, ensuring that hydrologic function is preserved/enhanced. The random amalgamation of de facto access paths that currently crisscross the site have created longstanding barriers to hydrology that the Port proposes to alleviate as part of its compensatory mitigation for unavoidable impacts to jurisdictional habitat (see Mitigation Plan, Attachment B). Subsequent phases of design will identify the ideal placement of culverts to promote the unfettered hydrologic exchange between the wetlands and existing drainage ditch (to which no impacts are proposed). In constructing the proposed project, Port Corpus Christi will improve both the hydrologic functions of the wetlands and freeing up capacity for upstream stormwater from the surrounding municipalities. Improving the wetlands hydrologic function as a factor of the project will improve downstream water quality including but not limited to, dissolved oxygen, filtration capacity, turbidity, or toxicity. In 1977 USACE authorized the excavation of a drainage ditch through the McCampbell Property to convey stormwater from the City of Ingleside and surrounding areas into the McCampbell Slough. This ditch not only serves to convey stormwater from the Ingleside area but drains the surrounding wetlands within the McCampbell Property. Additionally, impacts resulting from ongoing agricultural use of the McCampbell Property—the existing roads—serve as auxiliary conveyances to the drainage ditch. Port Corpus Christi developed a conceptual site drainage model, which demonstrates a high correlation to stream features and roads within the property. Wetlands function by retaining water until the existing hydrologic regime of the adjacent waterbody naturally removes the water or it evaporates. The excavated drainage ditch, and the existing roads—which serve as auxiliary conveyances to the ditch—prematurely remove standing water from the wetlands within the property and force it downstream into the McCampbell Slough. The additional stormwater, redirected from the wetlands, feeds into the drainage ditch, reducing potential capacity from the upstream communities. Through the execution of the proposed mitigation plan, Port Corpus Christi will eliminate the roads that function as auxiliary conveyance. Future iterations of construction design (especially proposed site access) will further address site stormwater function, focusing on wetland water retention and preventing additional conveyance to the drainage ditch. As a result of the proposed mitigation and additional stormwater-focused design, Port Corpus Christi will restore the natural retention time of the wetlands, preventing premature runoff into the drainage ditch, which will reserve additional stormwater capacity for the upstream communities.	
22.3	The vegetation. A portion of this land was subjected to a control burn a few years ago, when was the vegetation study and analysis done and recorded to determine if any sensitive plants within the property? This is critical habitat for many species but would most defiantly affect the migratory birds that pass thru this fly zone region.		A wetland delineation report, which documented all vegetation within the McCampbell property at over 181 sample points, was approved by the USACE on August 12, 2022.	
22.4	Will all fill in material be of natural material or might it come from man made reclaimed crushed concrete? These are a few of my initial concerns regarding this project and I would like to request a public hearing.		The detailed site design for the project will specify the exact characteristics of fill material, which a contractor will be required to meet during construction. As a matter of standard practice, Port Corpus Christi requires clean fill, free of contaminants on construction projects. However, the access roads will be constructed with caliche, crushed aggregate, or other similar permeable materials.	
Errol Summerlin – Coastal Alliance to Protect our Environment				
23.1	The Public Notice to fill in 13.9 acres of wetlands does not represent the Project Plans for a 1866-acre solar farm		Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project:	

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23.6	Alternatives Analysis is inadequate		Please see the updated Alternatives Analysis provided as Attachment A.																									
23.7	This project requires an Environmental Impact Statement		This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement.																									
23.8	The project is not in the public interest		Regardless of the destination of the renewable electrons generated from this project, they would serve to supplant power derived from fossil fuels, reducing regional emissions, and edging the Coastal Bend Region toward carbon neutrality, which is unequivocally aligned with the public interest (IPCC, 2022). Likewise, the addition of new, ultra-low carbon electricity generation to the ERCOT grid will bolster grid resilience for all users, clearly serving the public interest. Further, the proposed construction techniques and on-site mitigation will preserve and enhance, respectively, the hydrologic function of the site, thereby upholding and serving the public interest of downstream communities for whom the site provides ecosystem (watershed) services.																									
Cindy Adams-Smith, M.S. - TPWD																												
	Impacts to wetland functions should be avoided and minimized to the extent practicable to support the attainment of water quality standards for the Mission-Aransas Estuary		Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project:																									
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24.2	The applicant should consider exploring additional alternatives to identify the least environmentally damaging practicable alternative.		Please see the updated Alternatives Analysis provided as Attachment A.																									
24.3	If the proposed project is but part of a larger effort, the U.S. Army Corps of Engineers (USACE) should determine the appropriate scope of the proposed project, identify any connected facilities or actions, and evaluate the need to develop an Environmental Impact Statement (EIS).		The solar development proposed in this permit application represents a single project with independent utility. The project will add renewable electrons to the grid, bolstering energy resilience and supplanting power derived from fossil fuels. Renewable electrons generated from this project would be transmitted to potential off-takers through existing infrastructure owned and operated by AEP.																									

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	Once the applicant has sufficiently demonstrated that there are no practicable alternatives to the proposed project site with fewer environmental impacts, the applicant should evaluate onsite alternatives to demonstrate that onsite impacts have been avoided and minimized to the extent practicable.		Port Corpus Christi evaluated several sites during the alternative analysis and determined the McCampbell property to be best suited for an industrial-size solar development. An updated alternatives analysis is provided as a part of this response to comments (see Attachment A). Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project: <table><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce Potential Wetland Impacts</th><th>Net Impact</th></tr><tr><td>Pilings in Wetlands</td><td>Helical pilings</td><td>None - Avoided</td></tr><tr><td>Shading from Panels</td><td>Elevations above BFE and continuous rotation</td><td>None - Avoided</td></tr><tr><td>Trenching for Cables</td><td>Cable elevated on trays</td><td>None - Avoided</td></tr><tr><td>Inverter</td><td>Sited in uplands where applicable</td><td>None - 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None - 13.4ac - offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None - Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None - Restored</td></tr></table>	Potential Project Impacts	Method to Minimize or Reduce Potential Wetland Impacts	Net Impact	Pilings in Wetlands	Helical pilings	None - Avoided	Shading from Panels	Elevations above BFE and continuous rotation	None - Avoided	Trenching for Cables	Cable elevated on trays	None - Avoided	Inverter	Sited in uplands where applicable	None - 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None - 13.4ac - offset with mitigation	Substations	Sited solely in uplands	None - Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None - Restored	
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	The applicant should limit facilities to upland areas of the property to avoid and minimize wetland impacts. The applicant should also consider reducing the number of solar panels and associated infrastructure to lessen the project footprint and/or consider the use of multiple properties to construct a 600 MW PV solar panel development.		Port Corpus Christi proposes several fundamental deviations from the typical concept for solar energy generation to avoid and minimize wetland impacts across the McCampbell Property. The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project: <table><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce Potential Wetland Impacts</th><th>Net Impact</th></tr><tr><td>Pilings in Wetlands</td><td>Helical pilings</td><td>None - Avoided</td></tr><tr><td>Shading from Panels</td><td>Elevations above BFE and continuous rotation</td><td>None - Avoided</td></tr><tr><td>Trenching for Cables</td><td>Cable elevated on trays</td><td>None - Avoided</td></tr><tr><td>Inverter</td><td>Sited in uplands where applicable</td><td>None - 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None - 13.4ac - offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None - Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None - Restored</td></tr></table>	Potential Project Impacts	Method to Minimize or Reduce Potential Wetland Impacts	Net Impact	Pilings in Wetlands	Helical pilings	None - Avoided	Shading from Panels	Elevations above BFE and continuous rotation	None - Avoided	Trenching for Cables	Cable elevated on trays	None - Avoided	Inverter	Sited in uplands where applicable	None - 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None - 13.4ac - offset with mitigation	Substations	Sited solely in uplands	None - Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None - Restored	
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24.6	The applicant should reach out to San Patricio County to determine if the proposed project is compatible with airport operations. A post-construction monitoring plan should be developed to determine whether bird fatalities (or other wildlife impacts) are occurring, and an adaptive management plan should be developed to minimize these potential impacts.		Port Corpus Christi staff are fully informed of the Airport's planned expansion and do not consider it incompatible with the proposed solar facility. Port Corpus Christi staff have an active and ongoing dialogue with the Airport Director and County Commissioner representing this district, and the Port has committed involving them in the detailed design process for the site to ensure consistency with the Airport's Master Plan. Port Corpus Christi is currently coordinating with USFWS and this Section 7 consultation will determine what if any, long-term monitoring is required to address impacts to birds.	
24.7	A hydrologic functional assessment should be completed to identify the directional flow of water at pre-restoration conditions and post-construction surveys to determine if the restoration was successful. The following information should be provided to support the proposed hydrologic design:		Future iterations of design will require detailed hydrographic modeling. The Federal Emergency Management Administration (FEMA) requires projects within a floodway, like the McCampbell project, to obtain a "No-rise Certification". Technical data, approved by a professional engineer, serves as the basis for the certification (FEMA, 2020). In association with this, the Port of Corpus Christi will expand this model to further inform pertinent details to the project, including but not limited to, culvert size, placement and spacing, the height of access paths, and whether low water crossings are more suitable in certain portions of the site.	
24.8	Provide following figures to support the proposed hydrologic design: A figure of existing surface hydrology conditions that shows arrows indicating the directions of surface water flow throughout the entire site including water inflow and outflow of each wetland and water feature (e.g., stormwater ditch, McCampbell Slough, etc.) at the project site.		In late 2019, Port Corpus Christi executed a contract with Hanson Professional Services, Inc. to complete an existing conditions hydrologic and hydraulic analysis of McCampbell Slough. The scope of analysis included the area between State Highway 361, State Highway 35, and Farm-to-Market Road 1069. This information was utilized in planning the proposed solar development. During the design of the solar development, the model will be updated to further evaluate and inform the final design.	
24.9	A figure of proposed surface hydrology conditions that shows arrows indicating the directions of surface water flow throughout the entire site including water inflow and outflow of each wetland and water feature at the project site. TPWD recommends that the USACE not issue a permit for the project as proposed. The applicant should incorporate the above recommendations into revised project plans that fully evaluate practicable alternatives and avoids and minimizes impacts to special aquatic sites		Port Corpus Christi's strategic growth and land use decisions are data-driven, guided by purpose-built Geographic Information Systems (GIS) decision support tools that prioritize compatibility with adjacent/non-industrial land uses and avoidance of sensitive environmental habitats. In Port Corpus Christi's evaluation of the highest and best use of the property, only a project, which minimized wetland impacts is a compatible land use. Pillings to support solar panels do not act as fill, nor impact wetlands; therefore, solar is a compatible land use for the property. Despite the lack of conclusive evidence for shading impacts of wetland vegetation, Port Corpus Christi elected to only use continuously rotating solar panels and added elevation to the panels—several feet above industry standard—to increase light penetration to the ground. Further, the conceptual design focused on minimizing wetland impacts from substations and access roads to the greatest extent. After analyzing several onsite alternatives, Port Corpus Christi successfully developed a holistic use of the property, which limits impacts to 1% of the wetlands onsite.	need exhibits showing hydrology
Brenton B. Lewis - City Manager, City of Ingleside				

No.	Comment	Comment Type	Response	Action Item
25.1	The City of Ingleside is requesting a public hearing and additional information regarding the proposed fill area at the McCampbell-Porter Airport.		The U.S. Army Corps of Engineers should advise if a public meeting is necessary.	
25.2	The airport and surrounding area are located partially in the city limits of the City of Ingleside and the McCampbell Slough is a major drainage area that affects the City of Ingleside.		The Federal Aviation Administration (FAA) recognizes the compatible land use between solar and airport (FAA, 2021). "Glare" reflecting from solar panels presents no more risk to pilots than that of passing windows on buildings. Additionally, Port Corpus Christi established an open dialog with the San Patricio County Municipal Airport and the respective County Commissioner. To date, neither party has identified a conflict between the two land uses.	
26.1	The proposed project is adjacent to the bays and estuaries, and beaches of the Texas Coast. The wooded oak motts are a rare habitat along this heavily used migratory bird flyway. Migrating birds use the wetlands to feed and roost. Also the birds often confuse shiny surfaces, such as solar panels, for water, and are injured when trying to land, or feed.		Future iterations of design will require detailed hydrographic modeling. The Federal Emergency Management Administration (FEMA) requires projects within a floodway, like the McCampbell project, to obtain a "No-rise Certification". Technical data, approved by a professional engineer, will serve as the basis for the certification and demonstrate the proposed project does not impact stormwater offsite.	
26.2	There are thousands of acres of fallow agricultural fields slightly inland, devoid of wetlands or woodlands that would avoid most of the impacts to migratory birds		Based on the wetland delineation and associated AID, no oak mottes exist on the McCampbell Property. However, Port Corpus Christi will incorporate strategies to minimize impacts to migratory birds in future iterations of design as a result of the ongoing coordination with USFWS.	
Tom Shearer				
Jennifer Hilliard - Ingleside on the Bay Coastal Watch Association				
27.1	I am requesting that the U.S. Army Corps of Engineers require a full Environmental Impact Statement for this project and provide a public hearing.		An Environmental Impact Statement is not warranted since this project does not constitute a major federal action.	
27.2	Wetlands are vital and dynamic ecosystems that provide numerous benefits to society, including improved surface water quality, flood control, groundwater recharge, and of course wildlife habitat.		The U.S. Army Corps of Engineers should advise if a public meeting is necessary.	
27.3	The spacing of the panels covers the entire ground area except where roads are installed. The area covered by the panel will not maintain its existing floristic and hydrologic quality and should be considered in mitigation totals.		Port Corpus Christi agrees wetlands are a vital component of the local ecosystem. Port Corpus Christi designed this project in a manner that fundamentally preserves site hydrology and avoids/minimizes impacts to aquatic resources. To accomplish the goals of this project, Port Corpus Christi commits to the following: • Restore all temporary construction impacts to existing grades; • Limit access improvement to only that which is necessary to support critical operations; • Elevate infrastructure above the ground via helical pilings that do not constitute fill per (40 CFR 232.2); • Eliminate the potential of vegetation shading via elevated, tracking panels. • Restore 29 6ac of existing, degraded de facto access paths to natural elevations • Use automated panel cleaning mechanisms Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousset et al., 2017) and document increased biodiversity (Udidi et al., 2021), others note less biomass under panels (Armstrong et al., 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than	

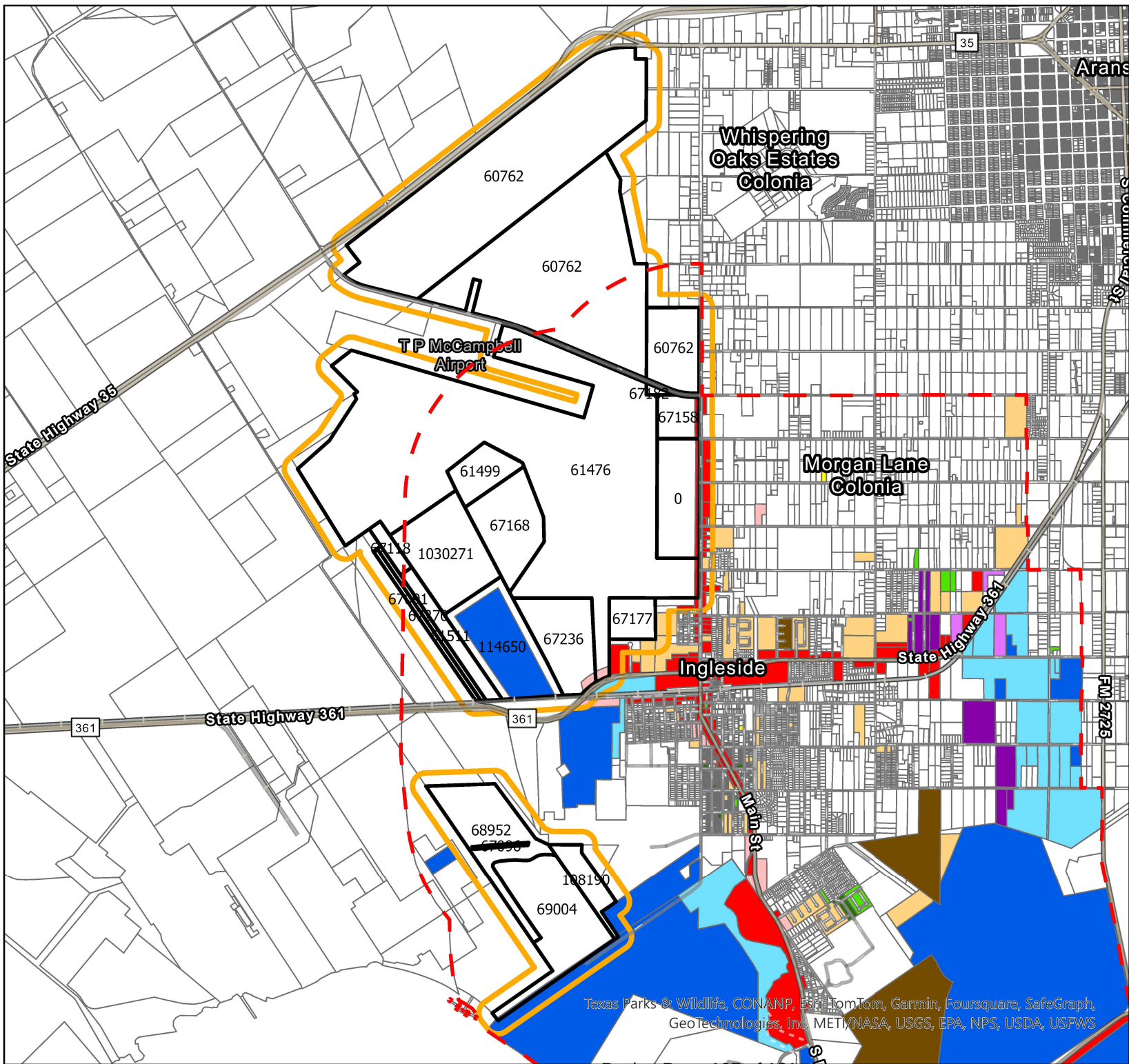
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			in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading. Within the U.S., however, ongoing research conducted by the National Renewables Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022), (Solar Power World, 2020), (Invernergy, 2022). This implies that species are not adversely affected by shading from the PV panels. From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade-tolerant and shade-intolerant herbaceous species (Abella et al., 2020). This study further noted that shade-intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade-tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and widespread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade-tolerant or shade-intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.)	
	They have grossly underestimated the amount of compensatory mitigation to the access roads and inverter footings.		Port Corpus Christi's proposed mitigation plan offsets unavoidable project impacts in a manner consistent with the 2008 Mitigation Rule. The Mitigation Rule stipulates a mitigation plan must ensure no net loss, favoring on-site, in-kind restoration second only to mitigation banks. Since no mitigation banks exist within the project watershed, on-site, in-kind mitigation is the most favorable mitigation strategy. Any ratio exceeding 1 to 1 demonstrates no net loss of wetlands on-site, thus the mitigation as originally proposed, especially as revised in Attachment B, exceeds the criteria for wetland mitigation. Port Corpus Christi developed the proposed mitigation plan based on the observed impacts occurring on-site at the time the property was purchased. The proposed restoration will conservatively mitigate unavoidable project impacts on a ratio of approximately 3 to 1. Port Corpus Christi updated this ratio following a detailed classification of the proposed restoration types, which required a more thorough analysis of the potential mitigation potential on-site. The 2.8 to 1 ratio is a more accurate estimate than the originally provided 2.2 to 1.	
27.4			U.S. Army Corps of Engineers reviewed and approved a wetlands delineation report—which contained 161 sample points documenting on-site vegetation—as part of the issuance of an Approved Jurisdictional Determination (AJD) for the McCampbell Property, which AJD was issued on August 12, 2022. Please see the updated Alternatives Analysis provided as Attachment A.	
27.5	They have not provided an inventory of the wetlands or an inventory of the species.			
27.6	There are previously disturbed sites that are better suited for this project.		Five distinct cover types identified within the property include emergent wetlands; uplands comprised of mesquite mottes/shrubs and grassland mosaic; drainage features; stock ponds, and previously disturbed access paths. The USACE-issued AJD, No. SWG-2021-00163 identified 1558.3ac of jurisdictional wetlands on the site.	
27.7	Maintenance of growth around panels requires chemical or machines that further endanger the function of the wetland and all that are connected hydraulically.		Vegetation within the wetlands has similar characteristics throughout the entire survey area and did not change significantly. Vegetation within the wetland sample areas is dominated by Gulf cordgrass (<i>Spartina spartnae</i>), brushy sea oxeye daisy (<i>Bonrichia frutescens</i>), shoregrass (<i>Distichlis littoralis</i>), sand spike rush (<i>Eleocharis palustris</i>), coastal salt grass (<i>Distichlis</i>	

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			Response <i>spicata</i>), bitter panic grass (<i>Panicum amarum</i>), seaside American aster (<i>Symphoricarum subulatum</i>), chainmakers club-rush (<i>Scheuchnocleus americanus</i>), marsh primrose-willow (<i>Ludwigia palustris</i>), Kleingrass (<i>Panicum coloratum</i>), torpedo grass (<i>Panicum repens</i>), seashore dropseed (<i>Sporobolus virginicus</i>) in the herb stratum. Given the vegetative community present at the site, mechanical maintenance is not anticipated with the use of elevated panels. Additionally, elevated panels will also allow for continued use of the site for grazing by sheep or cattle.																									
	The Port has not provided adequate data on the fill material to be placed in an active hydraulic system.		The table below, from the permit application, summarizes the way in which Port Corpus Christi avoided and minimized wetland impacts for the project: <table><tr><th>Potential Project Impacts</th><th>Method to Minimize or Reduce</th><th>Net Impact</th></tr><tr><td>Pilings in Wetlands</td><td>Helical pilings</td><td>None - Avoided</td></tr><tr><td>Shading from Panels</td><td>Elevations above BFE and continuous rotation</td><td>None - Avoided</td></tr><tr><td>Trenching for Cables</td><td>Cable elevated on trays</td><td>None - Avoided</td></tr><tr><td>Inverter</td><td>Sited in uplands where applicable</td><td>None - 0.3ac offset with mitigation)</td></tr><tr><td>Site Access</td><td>Configured site to minimize total length of access paths</td><td>None - 13.4ac - offset with mitigation</td></tr><tr><td>Substations</td><td>Sited solely in uplands</td><td>None - Avoided</td></tr><tr><td>Temporary Construction</td><td>Minimized by construction sequencing, BMPs, and restorations</td><td>None - Restored</td></tr></table>	Potential Project Impacts	Method to Minimize or Reduce	Net Impact	Pilings in Wetlands	Helical pilings	None - Avoided	Shading from Panels	Elevations above BFE and continuous rotation	None - Avoided	Trenching for Cables	Cable elevated on trays	None - Avoided	Inverter	Sited in uplands where applicable	None - 0.3ac offset with mitigation)	Site Access	Configured site to minimize total length of access paths	None - 13.4ac - offset with mitigation	Substations	Sited solely in uplands	None - Avoided	Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None - Restored	
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27.8			The final design of the development will stipulate ideal characteristics of fill material, which a contractor will be required to meet during construction. As a matter of standard practice, Port Corpus Christi requires clean fill, free of contaminants on construction projects. However, the access roads will be constructed with caliche, crushed aggregate or other similar permeable materials.																									
	The Port of Corpus Christi as a public entity is not approved to develop assets to provide energy for its clients.		The project is expected to add renewable electrons to the grid, bolstering energy resilience and supplanting power derived from fossil fuels. Renewable electrons generated from this project would be transmitted to potential offtakers through existing infrastructure owned and operated by AEP. The proposed project will add to the existing mix of renewable energy with the potential to serve both residential and industrial demand. Regardless of the end-use of the electrons, the addition of emission-free energy generation sources, and enhanced resilience of the regional grid are within the public interest. The project is expected to yield 600 MW of carbon-free electricity to be delivered via interconnect to the regional electric grid. The Port is not proposing to be a transmission provider or seller/distributor of electricity, and thus the project does not compete with regional electricity providers in any way.																									
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27.10	Providing power to polluting fossil fuel industries is not in the public interest.		Regardless of the destination of the renewable electrons generated from this project, they would serve to supplant power derived from fossil fuels, reducing regional emissions, and edging the Coastal Bend Region toward carbon neutrality, which is unequivocally aligned with the public interest (IPCC, 2022). Likewise, the addition of new, ultra-low carbon electricity generation to the ERCOT grid will bolster grid resilience for all users, clearly serving the public interest. Further, the proposed construction techniques and on-site mitigation will preserve and enhance, respectively, the hydrologic function of the site, thereby upholding and serving the public interest of downstream communities for whom the site provides ecosystem (watershed) services.																									

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			The project is expected to yield 600 MW of carbon-free electricity to be delivered via interconnect to the regional electric grid. The Port is not proposing to be a transmission provider or seller/distributor of electricity, and thus the project does not compete with regional electricity providers in any way. Per standard lease agreement language, all constructed infrastructure becomes the property of the Port of Corpus Christi, unless the Port otherwise notifies the lessee. Port Corpus Christi maintains existing disposition requirements (per our Procurement Policy) that will be followed for any infrastructure on Port property.	
27.11	A plan should be approved for the decommission restoration of the site to prior or improved condition.			
27.12	The Port of Corpus Christi's proposal does not show how providing solar powered electricity to polluting industries is in the Public. The immediate suggestion of increased employment at the sacrifice of our most precious marine resources is being used repeatedly by industry to create a stranglehold on our economy by placing all our resources at the feet of the fossil fuel industry while destroying the natural resources that sustain thousands of jobs in the commercial fishing and tourism industry.		Regardless of the destination of the renewable electrons generated from this project, they would serve to supplant power derived from fossil fuels, reducing regional emissions, and edging the Coastal Bend Region toward carbon neutrality, which is unequivocally aligned with the public interest (IPCC, 2022). Likewise, the addition of new, ultra-low carbon electricity generation to the ERCOT grid will bolster grid resilience for all users, clearly serving the public interest. Further, the proposed construction techniques and on-site mitigation will preserve and enhance, respectively, the hydrologic function of the site, thereby upholding and serving the public interest of downstream communities for whom the site provides ecosystem (watershed) services.	
Robyn Cobb				
28.1	I would like to request that the Corps hold a public hearing in order to fully describe this project and answer questions from concerned citizens. The project location is adjacent to a slough that drains to Copano Bay. The entire drainage area is well known for its habitat value to waterfowl, wading birds, and many other species. According to the National Audubon Society, it is especially important to carefully select sites for large solar installations. Careful siting of a solar farm entails avoiding disruption of existing bird habitat and doing all things possible to minimize the chances that birds would collide with the panels and all associated infrastructure such as transmission lines and substations.		The U.S. Army Corps of Engineers should advise if a public meeting is necessary. Port Corpus Christi designed this project in a manner that fundamentally preserves site hydrology and avoids/minimizes impacts to aquatic resources, thereby protecting existing habitats. To accomplish the goals of this project, Port Corpus Christi commits to the following: • Restore all temporary construction impacts to existing grades; • Limit access improvement to only that which is necessary to support critical operations; • Elevate infrastructure above the ground via helical pilings that do not constitute fill per (40 CFR 232.2); • Locate inverters outside wetlands where possible; • Eliminate the potential of vegetation shading via elevated, tracking panels; • Restore 29.6ac of existing, degraded de facto access paths to natural elevations • Use automated panel cleaning mechanisms Certain types of solar installations, mainly those with thermal concentration towers in the arid west, present a potential risk to migratory birds. The proposed project will not construct a thermal concentration tower. Additionally, while little research exists to demonstrate PV panels impact migratory birds in the same way as thermal concentration towers, there are strategies (including alternating the banding of cells within a panel) to help avian species more easily distinguish the presence of solar panels. Port Corpus Christi maintains an open dialog with USFWS specifically on this project, to collaborate on both migratory bird and endangered species concerns. Implementation of appropriate measures will occur to mitigate potential impacts on migratory birds. Such measures will be finalized during the Section 7 consultation process. No overhead power lines are proposed for the McCampbell property as all renewable electrons generated from this project would be transmitted to potential off-takers through existing infrastructure owned and operated by AEP.	

No.	Comment	Comment Type	Response	Action Item
28.2	The project design will cover large swaths of ground, shading areas that are naturally exposed to sunlight leading to alteration of the vegetation and habitat value. The project also appears to have potential to impact sheet flow from the area being built over into the wetlands into the natural drainage system, thereby altering the function of the existing wetlands as well. Due to the potential negative impacts on habitat and birds, I do think a public hearing is in order.		Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousseilat et al., 2017) and document increased biodiversity (Udrian et al., 2021), others note less biomass under panels (Armstrong et al., 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading. Within the U.S., however, ongoing research conducted by the National Renewables Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022). (Solar Power World, 2020), (Invenery, 2022). This implies that species are not adversely affected by shading from the PV panels. From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade-tolerant and shade-intolerant herbaceous species (Abella et al., 2020). This study further noted that shade-intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade-tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and widespread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade-tolerant or shade-intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.)	
28.1	I am requesting a Public Hearing. The project location is adjacent to a slough that drains to Copano Bay. The entire drainage area is known for its habitat value to waterfowl, wading birds, and many other species. According to the National Audubon Society, it is especially important to carefully select sites for large solar installations. Careful siting of a solar farm entails avoiding disruption of existing bird habitat and doing all things possible to minimize the chances that birds would collide with the panels and all associated infrastructure such as transmission lines and substations.		The U.S. Army Corps of Engineers should advise if a public meeting is necessary. Port Corpus Christi designed this project in a manner that fundamentally preserves site hydrology and avoids/minimizes impacts to aquatic resources, thereby protecting existing habitat. To accomplish the goals of this project, Port Corpus Christi commits to the following: • Restore all temporary construction impacts to existing grades; • Limit access improvement to only that which is necessary to support critical operations; • Elevate infrastructure above the ground via helical pilings that do not constitute fill per (40 CFR 232.2); • Locate inverters outside wetlands where possible; • Eliminate the potential of vegetation shading via elevated, tracking panels. • Restore 29.6ac of existing, degraded de facto access paths to natural elevations • Use automated panel cleaning mechanisms Certain types of solar installations, mainly those with thermal concentration towers in the arid west, present a potential risk to migratory birds. The proposed project will not construct a thermal concentration tower. Additionally, while little research exists to demonstrate PV panels impact migratory birds in the same way as thermal concentration towers, there are strategies (including alternating the banding of cells within a panel) to help avian species more easily distinguish the presence of solar panels. Port	
Linda Fuiman				

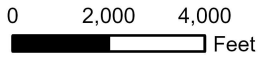
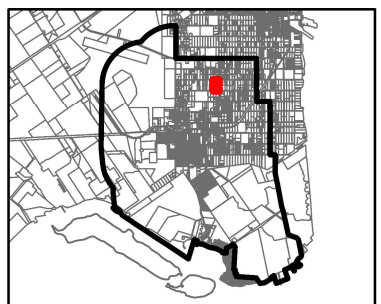
No.	Comment	Comment Type	Response	Action Item
			Corpus Christi maintains an open dialog with USFWS specifically on this project, to collaborate on both migratory bird and endangered species concerns. Implementation of appropriate measures will occur to mitigate potential impacts on migratory birds. Such measures will be finalized during the Section 7 consultation process. No overhead power lines are proposed for the McCampbell property as all renewable electrons generated from this project would be transmitted to potential off-takers through existing infrastructure owned and operated by AEP.	
29.2	The project design looks as though it will cover large swaths of ground, shading areas that are naturally exposed to sunlight leading to alteration of the vegetation and habitat value		Scientific research regarding the effects of photovoltaic (PV) panel shading on plant species is mixed, primarily as a function of geography. While some studies demonstrate increased biomass (Bousselet et al., 2017) and document increased biodiversity (Udrihan et al., 2021), others note less biomass under panels (Armstrong et al., 2016). These papers and others reviewed by Port Corpus Christi are based on research conducted in differing climate regimes (mainly Europe) and focus only on upland plant communities. The studies in which a decrease in biomass was documented were conducted in regions with vastly different climatic regimes in terms of daily temperature variability and duration of the growing season. Comparatively, the Coastal Bend Region's year-round growing season and lower daily temperature variability represent considerably more favorable growing conditions than in these reference studies. Likewise, the proposed panel height, and thus the distance between the panels and the ground, is 5ft higher greater in the Port's proposed design than the industry standard. These studies that document decreases biomass, do not consider increasing panel height, which will inherently translate into increased sunlight penetration/reduced shading. Within the U.S. however, ongoing research conducted by the National Renewable Energy Lab (NREL) suggests that the shade under panels would improve soil health, retain water, nurture native species, produce food, and provide even lower-cost energy (NREL, 2019). While there is no conclusive scientific research indicating that PV panels prevent wetland species from growing, professional articles from the solar industry reveal that vegetation management is paramount in solar installations to prevent vegetation overgrowth, yielding diminishing absorption for the panels themselves (Lawrence, 2022). (Solar Power World, 2020). (Invenery, 2022). This implies that species are not adversely affected by shading from the PV panels. From the perspective of wetland science, however, it is worth noting that USACE's own Wetland Determination Data Forms support the concept of herbaceous vegetation growing in the presence of shade. This is evident in the structure of the Hydrophytic Vegetation section of the form, which categorizes vegetation by strata. The coexistence of both a tree and herb strata in an individual sample point indicates herbaceous wetland vegetation persists in the presence of shade (USACE, 2010). An Ohio-based study evaluated the variety of strata density in forested wetlands, noting both shade-tolerant and shade-intolerant herbaceous species (Abella et al., 2020). This study further noted that shade-intolerant herbaceous cover is inversely related to canopy density (i.e. the less dense the canopy, the greater the density of herbaceous cover). The study also noted little correlation between canopy density and shade-tolerant herbaceous wetland species. Since the spacing, height, and continuous rotation of the panels preclude persistent and widespread shading equivalent to that in a dense canopy, the project is unlikely to impact either shade-tolerant or shade-intolerant wetland species. (The bottom of the panels will be at least 5ft above the ground, and the rotation of the panel throughout the day is estimated to reduce shading on the panels themselves by 30-40%, which also mitigates the effects of persistent shading below the panels.)	



660 Rezoning
 McCampbell Tract & Good Hope DMPA
 File Date: 07/23/2024
 P&Z Date: 08/19/24
 Council Date: 10/22/2024

- Legend**
- COI City Limits
 - RoadCenterLine_20190827
 - Subject Parcels
 - 400 ft Buffer
 - General Commercial
 - Industrial
 - Light Industrial
 - Single Family Residential

This product is for informational purposes only and may not have been prepared for or be suitable for use in legal, engineering, or surveying products. It does not represent an on-the-ground survey and only represents the relative location of property boundaries.



Texas Parks & Wildlife, CONANP, Esri, TomTom, Garmin, Foursquare, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS

SCHWENKE ERIC
4407 S FM 1069
ARANSAS PASS, TX 78336

SCHWENKE ERIC & DIANE
SCHWENKE
2665 W HIGHLAND
INGLESIDE, TX 78362

GRANADOS ALEJANDRO & ELISA
1591 4TH STREET
INGLESIDE, TX 78362

SMITH RONALD GENE
3821 FM 1069
ARANSAS PASS, TX 78336

WALTON SILVIA
3933 FM 1069
ARANSAS PASS, TX 78336

GONZALES JENNY
HRISSIKOPOULOS
4055 JOHNSTONVILLE
SUSANVILLE, CA 96130

HRISSIKOPOULOS PAUL
7428 HOLLYWOOD BLVD APT 309
LOS ANGELES, CA 90046

HRISSIKOPOULOS CHARLES P
PALADIN TAX CONSULTANTS LLC
405 CHASE DRIVE
CORPUS CHRISTI, TX 78412

POOL HELEN HRISSIKOPOULOS
PALADIN TAX CONSULTANTS LLC
301 CAPE ARON DRIVE
CORPUS CHRISTI, TX 78412

HRISSIKOPOULOS HOMER P JAMES
PALADIN TAX CONSULTANTS LLC
310 BAYCLIFF DRIVE
CORPUS CHRISTI, TX 78412

HRISSIKOPOULOS PAT K FAMILY
TRUST GUARDIAN PROPERTY TAX
CONSULTANTS LLC
301 CAPE ARON DRIVE
CORPUS CHRISTI, TX 78412

RODRIGUEZ NOE & LUISA PRO
2587 CR 1996
ARANSAS PASS, TX 78336

AYON ENRIQUE AND LUZ M
DIOSDADO
3934 FM 1069
ARANSAS PASS, TX 78336

RUGGIERO LUISE & RAYMOND
2574 CR 2010
ARANSAS PASS, TX 78336

DIOSDADO JUAN R & LUIZ M
3924 FM 1069
ARANSAS PASS, TX 78336

DAVIDSON JOHN MASON
PO BOX 4639
CORPUS CHRISTI, TX 78469

J M DAVIDSON INC
2564 CR 1960
ARANSAS PASS, TX 78336

DAVIDSON JOHN
PO BOX 1304
PORTLAND, TX 78374

REYNOLDS PEARL E & JAMES LEE
3844 FM 1069
ARANSAS PASS, TX 78336

LIBERT DAVID
2570 CR 2028
ARANSAS PASS, TX 78336

TUGGLE GARRY & BONNIE
PO BOX 738
ARANSAS PASS, TX 78335

NESTOR ANGEL REAL ESTATE LLC
2532 WILLIAMS
ARANSAS PASS, TX 78336

PRITCHETT ROGER D & GLINDA A
3780 FM 1069 UNIT 8
ARANSAS PASS, TX 78336

MR W FIREWORKS INC
PO BOX 114
SOMERSET, TX 78069

ARANSAS WW R LLC
5924 BEAR CREEK DR E
FT WORTH, TX 76126

EDWARDS GARY ARTHUR KAREN
GAY E WO AND LEAH REE
EDWARDS LOCKHART
253 CARMEL DR
SANDIA, TX 78383

NORTH BAY FELLOWSHIP
3530 MAIN ST
INGLESIDE, TX 78362

SNP HOLDINGS LLC
PO BOX 272000
CORPUS CHRISTI, TX 78427

GULF SOUTH PIPELINE COMPANY
ATTN: PROPERTY TAX DEPT
PO BOX 829
HOUSTON, TX 77001

MORGAN MICHAEL A
2378 MORGAN LANE
INGLESIDE, TX 78362

SMALLEY CLAUDETTE & MICHAEL
SMALLEY
2923 LOVERS LANE
INGLESIDE, TX 78362

LATTIERE MACKESON K & NICOLE
R
2372 KENNEY LN
INGLESIDE, TX 78362

HERNANDEZ JESSICA BARRON
2019 KENNEY LN
INGLESIDE, TX 78362

COBERN JOSHUA S & JANETZY
2390 KENNEY LN
INGLESIDE, TX 78362

ARROW SELF STORAGE LLC
21 S 3818 W
REXBURG, ID 83440

FLORES JUVENAL M
2516 AVE E
INGLESIDE, TX 78362

FULTON TERESA AND JACK E
FULTON
429 CORONADO AVE
SAN ANTONIO, TX 78237

WAMSLEY NOELLE D & SHEALYN M
ORTIZ
3372 MAIN ST
INGLESIDE, TX 78362

JONES JOSEPH J
2793 AVE I
INGLESIDE, TX 78362

COOK DENISE TRUST
DENISE TRUST COOK TRUSTEE
3352 MAIN ST
INGLESIDE, TX 78362

FRAKICH CONNIE
3346 N MAIN ST
INGLESIDE, TX 78362

ADAME MINERVA
407 N WHITNEY ST
ARANSAS PASS, TX 78336

SHUGART MONTE
2396 KENNEY LN
INGLESIDE, TX 78362

GARZA STEPHEN J
2402 KENNEY LN
INGLESIDE, TX 78362

ENGLEMAN JESSE LEE
2412 KENNEY LN
INGLESIDE, TX 78362

CREEK JAMES E & DARIA K
2347 KENNEY LANE
INGLESIDE, TX 78362

CHAVEZ JIM
314 LONG POINTE DR
PORTLAND, TX 78374

JAMES JOHNSON LLC
410 LANG ROAD
PORTLAND, TX 78374

BARRON RODOLFO
2019 KENNY LANE
INGLESIDE, TX 78362

CONTRERAS DAVID R & ADAME
TINE M
3246 MAIN STREET
INGLESIDE, TX 78362

SHIRLEY ELIZABETH
3236 MAIN
INGLESIDE, TX 78362

BURKE CHRISTOPHER & VERONICA
3241 SUSAN CIRCLE
INGLESIDE, TX 78362

FIGUEROA ROBERT M
3233 SUSAN CIR
INGLESIDE, TX 78362

SOOKANAND DAVE
PO BOX 1352
INGLESIDE, TX 78362

CORONA EFRAIN JR EFRAIN
CORONA SR
3214 MAIN STREET
INGLESIDE, TX 78362

SOUTHERN HILLS CAPITAL LLC
730 E PARK BLVD STE 210
PLANO, TX 75074

MILLS MICHAEL
3242 W SUSAN CIR
INGLESIDE, TX 78362

ADAME JERRY
1816 BAY LANDING DR
PORTLAND, TX 78374

TURNER DONNIE G
3201 REBECCA ST
INGLESIDE, TX 78362

DAY JOHN T & WENDY
3193 REBECCA ST
INGLESIDE, TX 78362

CLOUD DARRELL L
3187 REBECCA ST
INGLESIDE, TX 78362

PERKINS DONALD R & NORMA J
3234 SUSAN CIRCLE
INGLESIDE, TX 78362

VASQUEZ JESSE M
3206 SUSAN CIRCLE
INGLESIDE, TX 78362

ADAMS ANDREW JR & JEWELL A
C/O DEBORAH SUE TAYLOR
3200 SUSAN CIRCLE WEST
INGLESIDE, TX 78362

HOMES WILLIAM A III
3192 SUSAN CIRCLE
INGLESIDE, TX 78362

HAYDEN HOMER GEORGE
2563 MCCULLOUGH
INGLESIDE, TX 78362

TINDALL CHEVROLET LLP
3999 CYPRESS CREEK
COMFORT, TX 78013

PRIDAY ELIZABETH J
PO BOX 610
INGLESIDE, TX 78362

LOVING DONNA & STEVEN
2549 MCCULLOUGH LN
INGLESIDE, TX 78362

ISSITT RAYMOND D & MARGARET P
2535 MCCULLOUGH
INGLESIDE, TX 78362

BOUCHER BRENDA SUE W
504 BARTLETT
VICTORIA, TX 77905

VICKERY SANDRA HALE
PO BOX 16
ARANSAS PASS, TX 78335

SAVAGE L
550 FM 839 N
RELAW, TX 75784

ROBINSON DAVID SCOTT
3082 MAIN ST
INGLESIDE, TX 78362

RAY LOUIS E & CYNTHIA C
3074 MAIN ST
INGLESIDE, TX 78362

ADAMS KIT
2719 BEAUMONT
INGLESIDE, TX 78362

PRIMERA IGLESIA BAUTISTA EL
BUEN PASTOR INGLESIDE
3095 MAIN ST
INGLESIDE, TX 78362

LOYA ALFREDO & CLAUDIA
2046 MOONEY LN
INGLESIDE, TX 78362

GARRETT JO RACHELLE
2656 HAHN ST
INGLESIDE, TX 78362

PRJ COASTAL LLC
3736 BEE CAVE RD I-122
WESTLAKE HILLS, TX 78746

ZUNIGA JESUS & MARIA R MENDEZ
100 5TH ST
PORTLAND, TX 78374

SOLIS DOMINGO & REBECCA
4318 ROLLING RIDGE TRAIL
CORPUS CHRISTI, TX 78410

CARRISALEZ FREDERICO
3065 MAYFIELD AVE
INGLESIDE, TX 78362

SANCHEZ CHRISTINE NICHOLE
MARIE
2816 YORKTOWN CRTS
CORPUS CHRISTI, TX 78404

MILLER CHARLES L
3056 WRIGHT AVE
INGLESIDE, TX 78362

DOWNER GLADYS N
309 CAPE HENRY DR
CORPUS CHRISTI, TX 78412

JUNIPER INGLESIDE LLC
520 POST OAK BLVD STE 575
HOUSTON, TX 77027

PORTSIDE VILLAS LP
PO BOX 295076
KERRVILLE, TX 78029

ROCKLAND DEVELOPMENT LTD
ROCKY J NAVARRO
3501 BEE CREEK RD
SPICEWOOD, TX 78669

PDRAP INC
2920 ROCKLAND BLVD
INGLESIDE, TX 78362

INGLESIDE HOSPITALITY LLC
2810 STATE HWY 361
INGLESIDE, TX 78362

VISHAL RAJU BHAGAT
FOUNDATION
11217 IH 37
CORPUS CHRISTI, TX 78410

AKSHARDHARM LLC
1023 N HARBORTH AVE
THREE RIVERS, TX 78071

DAY INVESTMENTS INC
2800 HWY 361
INGLESIDE, TX 78362

CORNERSTONE NUMBER THREE
ACRE TRUST
812 CRESTMONT WAY
GREENVILLE, SC 29615

CORNERSTONE NUMBER TWO
ACRE TRUST
812 CRESTMONT WAY
GREENVILLE, SC 29615

WMH CORPUS LAND ACQUISITION I
LLC
2950 N HARDWOOD STE 2200
DALLAS, TX 75201

GALLAGHER RAYMOND E
141 SEA BREEZE
ARANSAS PASS, TX 78336

OCCIDENTAL CHEMICAL CORP
OCCIDENTAL PERTROLEUM
PROPERTY TAX DEPARTMENT
PO BOX 27570
HOUSTON, TX 77227

LAZAR ASSET ADVISORS LTD A
TEXAS LIMITED PARTNERSHIP
2549 SHERRY LANE SUITE 111
DALLAS, TX 75225

OHM SURFACE LLC
26935 HUFSMITH CONROE RD
MAGNOLIA, TX 77354

MACCALLIUM PETER S III
PO BOX 30209
LUMBERTON, TX 77657

SAN PATRICIO COUNTY
COURTHOUSE
400 W SINTON ST
SINTON, TX 78387

EXPANSION PROPERTIES INC
PO BOX 4639
CORPUS CHRISTI, TX 78469

MCMAHAN JEFF & DENISE
1410 ZENGERLE RD
CUERO, TX 77954

GUETTLER AUGUST E JR
5778 COUNTY RD 4241
TAFT, TX 78390

AARON MATERIALS INC
PO BOX 26750
AUSTIN, TX 78755

DURAND DANIEL T & BRENDA H
1767 CREEKSIDE DR
SUGARLAND, TX 77478

SUTHERLANDS EXPRESS LLC
3008 W MAIN
JENKS, OK 74037

SCHWENKE VIRGENE
4407 FM 1069
ARANSAS PASS, TX 78336

AEP TEXAS CENTRAL COMPANY
ATTN : PROPERTY TAX
DEPARTMENT
PO BOX 16428
COLUMBUS, OH 43216

ADAME JESUS A & YANETH
404 RED OAK
ARANSAS PASS, TX 78336

ROLAND SHARON
2689 COUNTY RD 1849
ARANSAS PASS, TX 78336

LEE DOYLE E JR & FRANCISCA L
4040 S 129TH WEST AVE
SAND SPRINGS, OK 74063

HARI ANSH LLC
2705 W WHEELER AVE
ARANSAS PASS, TX 78336

PLANNING & ZONING COMMISSION AGENDA

Regular Meeting: September 16, 2024

AGENDA ITEM: 7

Deliberate and take appropriate action on an application filed by The Port of Corpus Christi requesting a rezoning for approximately 2,112 acres: Property ID#s 60762, 61476, 67182, 67158, 61499, 67168, 1030271, 67177, 67236, 114650, 67118, 67270, 67091, 69200, 65073, and 69004.

SUBMITTED BY: Gene Delauro, Interim Building Official

APPROVED FOR AGENDA:

BACKGROUND:

The applicant is requesting permanent zoning designation of I-Industrial and C-2 General Commercial on the McCampbell land tract, portions of which were annexed by the City of Ingleside in 1993 and in 2009. The request includes permanent zoning designation of I-Industrial for the Good Hope tract which was annexed by the City in 1998 and in 2016.

The applicant is the owner of all the lands described above in the McCampbell and Good Hope tracts. The owner intends to lease the McCampbell tract to a developer who would construct and operate a 600-megawatt solar photovoltaic production facility to generate new, non-carbon (renewable) electricity and include two electrical substations to distribute the power. The applicant further proposes a dredge material placement area (DMPA) within the boundary of the Good Hope tract.

The McCampbell tract is currently undeveloped and has several development challenges, including designated wetlands, FEMA special flood zone hazard areas and floodway designations and proximity of McCampbell airport. The Good Hope tract is currently undeveloped and does not include designated wetlands or FEMA designated flood zones.

The McCampbell and Good Hope tracts are identified in the City's adopted Future Land Use Plan as future I-Industrial, L1-Light Industrial, and GC-General Commercial. The owner further requests to designate portions of the McCampbell tract as C-2 General Commercial along portions of State Highways 3512, 1069 and 361 to provide for future commercial activities along major thoroughfares.

A total of 115 notices were mailed out to property owners within 400' buffer and no letters or calls of objection were received.

FISCAL ANALYSIS:

N/A

RECOMMENDATION:

Based on our review of the property history, existing zoning map, future land use map and the proposed nature of development on the site, staff recommends the Ingleside Planning & Zoning Commission recommend approval of the rezoning request to the Ingleside City Council.

ATTACHMENTS:

None

PLANNING & ZONING COMMISSION AGENDA

Regular Meeting: September 16, 2024

AGENDA ITEM: 8

Deliberate and take appropriate action on an application filed by The Port of Corpus Christi, requesting a special use permit for intensive use for approximately 1,360 acres: Property ID#s 60762, 61476, 67182, 67158, 61499, 67168, 1030271, 67177, 67236, 114650, 67118, 67270, 67091, 69200, 65073, and 69004.

SUBMITTED BY: Gene Delauro, Interim Building Official

APPROVED FOR AGENDA:

BACKGROUND:

The applicant is requesting a special use permit for intensive use on portions of the McCampbell land tract, portions of which were annexed by the city in 1993 and in 2009. The applicant is the owner of all the land described above in the McCampbell tract. The owner intends to lease the McCampbell tract to a developer who would construct and operate a 600-megawatt solar photovoltaic production facility to generate new, non-carbon (renewable) electricity and includes two electrical substations to distribute the power.

The McCampbell tract is currently undeveloped and has several development challenges, including designated wetlands, FEMA special flood zone hazard areas and floodway designations and the presence of McCampbell airport. The application contains a description of hazards, such as fire, explosion, noise, vibration, dust or the emission of smoke, odor or toxic substances. However, a more developed site plan and description of all safeguards proposed to protect the surrounding property and persons from hazards, regulations and industry codes governing minimization of process safety and fire risk, engineering controls and organizational controls will be required from the developer / operator of the facility.

A total of 115 notices were mailed out to property owners within 400' buffer and no letters or calls of objection were received.

FISCAL ANALYSIS:

N/A

RECOMMENDATION:

Staff recommends the Planning & Zoning Commission recommend conditional approval of the special use permit request to the Ingleside City Council at this time.

ATTACHMENTS:

None

PLANNING & ZONING COMMISSION AGENDA
Regular Meeting: September 16, 2024

AGENDA ITEM: 9

Deliberate and take appropriate action on the acceptance of the Regular Planning & Zoning Commission Minutes of August 19, 2024.

SUBMITTED BY:

APPROVED FOR AGENDA:

BACKGROUND:

FISCAL ANALYSIS:

RECOMMENDATION:

ATTACHMENTS:

1. 2024, 08-19 P&Z Minutes_DRAFT

**CITY OF INGLESIDE
REGULAR PLANNING & ZONING COMMISSION MEETING
MINUTES
AUGUST 19, 2024**

Opening Agenda

1. Call Meeting to Order.

The Regular Planning & Zoning Commission Meeting of the City of Ingleside was called to order by Chairman Richardson at 6:00 p.m. on August 19, 2024, at City Hall, 2671 San Angelo Ave, Ingleside, TX and live video streaming.

2. Roll Call.

With Commission Members present a quorum was established.

Commission Members Present: Alan Beaubien, Jacob Lopez, Connor Brown, Chairman Brenda Richardson, Gerard Gutierrez, and Cindy Wilson.

Commission Members Absent: Bobby Dendy

3. Pledge of Allegiance.

Chairman Richardson led the Pledge of Allegiance to the U.S. flag.

4. Citizen Comments and Reports.

No Citizen Comments presented for this meeting.

Public Hearing

5. Public Hearing regarding an application filed by Dennis Knippa, requesting a replat for the following property: Property ID#41772 Part of Lots 1 & 2 Block 82 T.P. MCCAMPBELL to Lots 1-A, 1-B, 2-A, & 2-b Block 82 T.P. MCCAMPBELL.

At 6:02 p.m. Chairman Richardson convened the Planning and Zoning into a Public Hearing.

Speaking For: Elizabeth Brundrett 1053 N Allen St, Rockport, TX

Speaking Against: None

At 6:03 p.m. Chairman Richardson closed the Public Hearing and reconvened into Planning and Zoning Meeting.

Chairman Richardson requested that Item 8 be discussed before Item 6.

City Secretary Beaven stated that Public Hearing Item 6 was still open from the previous meeting on August 05, 2024.

- 6. Public Hearing regarding an application filed by The Port of Texas LP, requesting a special permit for intensive use for the following property: Property ID#s 115773, 67221, 78729, & 65108, an approximately 288.13 acre tract comprising of 45.67 ACS OUT OF A-262 ROSA TEAL SURVEY, ABST 262 ROSA TEAL 36.198 ACRES, 44.08 ACS OUT OF A-262 ROSA TEAL SURVEY, and ABST 184 WM MCDONOUGH LAND OWNED NOT IN USE 162.182 ACRES.**

At 6:06 p.m. Chairman Richardson resumed the Planning and Zoning into a Public Hearing.

Speaking For: None

Speaking Against:	Bonnie Hodge	2829 Houston
	Karen Bridges	2972 Lovers Lane
	Michael Houghton	FM 1069
	George Havelka	2570 Henrietta

At 6:19 p.m. Chairman Richardson closed the Public Hearing and reconvened into Planning and Zoning Meeting.

Regular Agenda

- 7. Deliberate and take appropriate action on the acceptance of the Regular Planning & Zoning Commission Minutes of August 05, 2024.**

Motion: Commission Member Beauben made a motion to approve the Regular Planning & Zoning Commission Minutes of August 05, 2024. Commission Member Wilson seconded the motion. Motion carries with all present voting in favor.

- 8. Deliberate and take appropriate action on an application filed by Dennis Knippa, requesting a replat for the following property: Property ID#41772 Part of Lots 1 & 2 Block 82 T.P. MCCAMPBELL to Lots 1-A, 1-B, 2-A, & 2-b Block 82 T.P. MCCAMPBELL.**

Discussion was held between Commission Members and Interim Building Official Delauro about the land being divided into four (4) lots, and that there would be no flat lots.

Motion: Commission Member Gutierrez made a motion to recommend approval of the request to City Council, an application filed by Dennis Knippa, requesting a replat for the following property: Property ID#41772 Part of Lots 1 & 2 Block 82 T.P.

MCCAMPBELL to Lots 1-A, 1-B, 2-A, & 2-b Block 82 T.P. MCCAMPBELL. Commission Member Brown seconded the motion. Motion carries with all present voting in favor.

9. Deliberate and take appropriate action on an application filed by The Port of Texas LP, requesting a rezoning for the following property: Property ID#s 115773, 67221, 78729, & 65108, an approximately 288.13 acre tract comprising of 45.67 ACS OUT OF A-262 ROSA TEAL SURVEY, ABST 262 ROSA TEAL 36.198 ACRES, 44.08 ACS OUT OF A-262 ROSA TEAL SURVEY, and ABST 184 WM MCDONOUGH LAND OWNED NOT IN USE 162.182 ACRES.

Killen, Griffith, and Farrimond (KGF) Law firm Representative Mikayla Rodriguez gave a presentation about the properties in the rezoning request: portion of the former Humble Oil Refinery; buffer zones: 300 feet to the west of the school property line, 175 feet south of the school property line, 400 feet from residential, and 400 feet along Avenue B then drops to 175 once there are no more houses; tank farm being there prior to old high school being built; non-conforming use rights; pipeline easements; TCEQ Voluntary Cleanup Program; Texas Supreme Court Rulings; and the County Appraisal District.

Discussion held between Commission Members, Interim Building Official Delauro, and Port of Texas LP applicant Kenneth Berry about the contamination over the past 75 years, the pipelines flowing through the land for years, 200 million barrels of crude oil coming from the Flint Hills Pump Station every day, the property site now being clean, TCEQ and the Railroad Commission wanting to see the land back at original use, buffer zones, berms, natural disaster damages, and the future annexation being considered agricultural.

The applicant is requesting a permanent zoning designation of I-Industrial for a 24.54-acre tract, I – Industrial with a Special Use Permit for Intensive Use for a 258.34-acre tract and C-2 General Commercial for a 6.82-acre tract as indicated on Exhibit B of the application. Full development of the property will include a twenty (20) million-barrel tank farm and associated industrial infrastructure.

Motion: Commission Member Beaubien made a motion to recommend approval of the request to City Council, to rezone from Temporary R-1 Single Family Residential to 282.88 acres for Industrial and 6.82 acres for C-2 General Commercial, for an application filed by The Port of Texas LP, requesting a rezoning for the following property: Property ID#s 115773, 67221, 78729, & 65108, an approximately 288.13 acre tract comprising of 45.67 ACS OUT OF A-262 ROSA TEAL SURVEY, ABST 262 ROSA TEAL 36.198 ACRES, 44.08 ACS OUT OF A-262 ROSA TEAL SURVEY, and ABST 184 WM MCDONOUGH LAND OWNED NOT IN USE 162.182 ACRES. Commission Member Gutierrez seconded the motion. Motion carries with all present voting in favor.

10. Deliberate and take appropriate action on an application filed by The Port off Texas LP, requesting a special permit for intensive use for the following property: Property ID#s 115773, 67221, 78729, & 65108, an approximately 288.13 acre tract

comprising of 45.67 ACS OUT OF 1-262 ROSA TEAL SURVEY, ABST 262 ROSE TEAL 36.198 ACRES, 44.08 ACS OUT OF A-262 ROSA TEAL SURVEY, and ABST 184 WM MCDONOUGH LAND OWNED NOT IN USE 162.182 ACRES.

Discussion held between Commission Members and Interim Building Official Delauro about the permit, safety being an issue but making it as safe as possible, buffer zones, restrictions from the state to build anything, needing the ability to use the land, and the applicant contributing to the Volunteer Fire Department to better equip what the department needs.

Motion: Commission Member Gutierrez made a motion to recommend to City Council not to recommend, an application filed by The Port off Texas LP, requesting a special permit for intensive use for the following property: Property ID#s 115773, 67221, 78729, & 65108, an approximately 288.13 acre tract comprising of 45.67 ACS OUT OF 1-262 ROSA TEAL SURVEY, ABST 262 ROSE TEAL 36.198 ACRES, 44.08 ACS OUT OF A-262 ROSA TEAL SURVEY, and ABST 184 WM MCDONOUGH LAND OWNED NOT IN USE 162.182 ACRES. Commission Member Beaubien seconded the motion. Motion carries 4:2.

For Motion:	Commission Member Beaubien, Chairman Richardson, Commission Member Gutierrez, and Commission Member Wilson
Against Motion:	Commission Member Lopez and Commission Member Brown
Abstained:	None
Absent:	Commission Member Dendy

Kenneth Berry addressed the Commission to express his concerns of the Commission's decision to not recommend approval. He stated by rezoning the land it will put the property back on the tax rolls, however, by not allowing the Special Use Permit it does not give him the ability to use the land because of state restrictions. He read Local Government Code Sec. 43.002 Continuation of Land Use. (a) A municipality may not, after annexing an area, prohibit a person from: (1) continuing to use land in the area in the manner in which the land was being used on the date the annexation proceeding were instituted if the land use was legal at that time. Kenneth Berry provided a copy of the Local Government Code to the City Manager and the City Secretary.

8. Reports from Planning and Zoning Members.

There were no reports from Planning and Zoning Members.

9. Discussion on Agenda for Next Meeting.

Interim Building Official Delauro stated there will be no meeting on September 2, 2024, due to Labor Day, and that the next schedule meeting will take place on September 16, 2024

10. Adjournment

Chairman Richardson adjourned the regular meeting of the Planning and Zoning Commission at 7:26 p.m.

APPROVED:

Brenda Richardson, Commission Chairman

ATTEST:

Ruby Beaven, City Secretary