

**CITY OF INGLESIDE
REGULAR CITY COUNCIL MEETING
AGENDA
JANUARY 28, 2025
6:30 PM**

Notice is hereby given that the Ingleside City Council will hold a Regular City Council Meeting on January 28, 2025, at 6:30 PM. The Meeting will be held in person at City Hall, 2671 San Angelo Street, Ingleside, Texas. Members of the public can view the meeting via live stream at <https://inglesidetx.gov/>.

With respect to any subject matter set forth below, the City Council may take action, unless otherwise expressly indicated with respect to any particular subject matter.

Opening Agenda

1. Call Meeting to Order.
2. Roll Call.
3. Invocation.
4. Pledge of Allegiance.

5. Citizen Comments and Reports.

Persons wishing to address the Council and who have registered using the Citizen Participation Form will have up to three minutes to speak. In accordance with the Open Meetings Act, Council 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.

6. Staff Comments and Reports.

The Council may discuss any subject which is specifically listed under this item.

- a. Council Comments and Reports.
- b. Announcements of Community Interest and/or upcoming events.
- c. City of Ingleside expenditures paid over \$3,000.00 for the period of December 2024.
- d. City of Ingleside monthly financial report as of December 2024.
- e. Report on State Highway 200.

Presentations

7. Ingleside Volunteer Fire Department Update Presentation.

Consent Agenda

All consent agenda items listed are considered to be routine by the City Council and will be enacted by one

motion. There will be no separate discussion of the items unless a Council Member so requests, in which event the item will be removed from the Consent Agenda and considered in its normal sequence on the agenda.

8. Deliberate and take appropriate action regarding authorization for the Mayor to execute the Contract between the City of Ingleside, Texas and San Patricio County Elections Administrator for Election Services for the May 03, 2025 Municipal Election.
9. Deliberate and take appropriate action on the Regular Meeting Minutes of January 14, 2025.

Public Hearing

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

Regular Agenda

10. Deliberate and take appropriate action on the first reading of an Ordinance of the City of Ingleside calling a General Election and a Special Election to be held jointly with City of Ingleside on the Bay, Texas, and Ingleside Independent School District San Patricio County on May 03, 2025 in the City of Ingleside, Texas to elect Council Member Place 1, Council Member Place 3, and Council Member Place 5, and to submit Propositions on Amendments to the City of Ingleside Home Rule Charter; making provision for the conduct of the Election; including designating the main Early Voting place for such Election; providing for an Order and Notice of such Election; providing for Early Voting, Election Day voting and provisional ballots; resolving other matters incident and related to such Election; providing for severability and setting an effective date.
11. Deliberate and take appropriate action on second and final reading of an Ordinance changing the zoning for the following property from its present zoning of R-1 (Single Family Residential) to I (Industrial), and further providing for effective date, reading, severance, and publication:

approximately 1,743.76 ACRES, bearing the legal description of: Property Tract 1, ID 60762, being 124.3789 acres out of a 524.80-acre tract of land. being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al to Mrs. Jean McCampbell Davis by Partition Deed filed November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 2, ID, 60762 being 88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 3, ID, 67182, being 3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 4, ID 67158, 37.397-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 5, 104.748-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et

al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 6, ID 67177, 40.329-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 7, ID 61476, 848 acres out of a 1181.095 tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 8, ID 67236, 112.818-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 9, ID 114650, 45.5766 acres of a 150.13 acre tract of land out of the heirs of Rosa Teal Survey, Abstract 262, San Patricio County, Texas, the said 150.13 acre tract of land being the same as and all of tract II being 150.12 acres, more or less, described in Special Warranty Deed dated November 1, 2013, recorded in document No. 632533, Official Public Records of San Patricio County, Texas. Property Tract 10, ID 103271, 145.0886 acres out of a 150.77 acre tract of land, being the same land described as 150.694 acres conveyed from Centex Homes. to EFO Land, L.P., by General Warranty Deed dated March 26, 1999, and recorded in Clerk's File No. 472035 of the Real Property Records of San Patricio County, Texas. Property Tract 11, ID 67168, Tract 12, 61499, 167.165 Acre Tract of Land, situated in the Heirs of Rosa Teal Survey A-262, Nicholas Fagan Survey A-124, being out a 6,091.22 Acre Tract of land described in a Partition Deed from W.G. (Will) McCampbell, et al., to John S. McCampbell, recorded in Volume 103, Page 156, Deed Records of San Patricio County Texas; said 167.165 Acre Tract being the same lands as a 166 Acre Tract of land described in a Deed from said W.G. McCampbell, et al. to Mrs. Jean McCampbell Davis, as recorded in Volume 103 Page 151. Property Tract 13, ID 67270, 13.287 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas. Property Tract 14, ID 67091, 12.4199 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.

12. Deliberate and take appropriate action on the second and final reading of an Ordinance changing the zoning for the following property from its present zoning of R-1 (Single Family Residential) to I (Industrial) and further providing for effective date, reading severance, and publication:

approximately 374.31 ACRES, bearing a legal description of: Property Tract 16, ID 69004, Tract 17, ID 65073, Tract 19, ID 69200, Tract 21, Tract 22, Tract 23, Tract 24, A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas. Property Tract 20, A 37. 95-acre tract out of the William McDonough Survey, Abstract A-184 and the Day Land and Cattle Company Survey, Abstract A-387, being the same tract called 38.06 acres recorded in Document No. 534924, Deed Records, San Patricio County, Texas, Save and Except a 2.5 acre drill site recorded in Document No. 379019, Deed Records, San Patricio County, Texas.

13. Deliberate and take appropriate action on the second and final reading of an Ordinance changing the zoning for the following property from its present zoning of R-1 (Single Family Residential) to C-2 (General Commercial) and further providing for effective date, reading, severance, and publication:

82.30 Acres, being 125.00 foot, 200.00 foot and 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas, and a 31.96 acre, 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas.

14. Deliberate and take appropriate action on a Resolution of the City Council of Ingleside, San Patricio County, Texas, approving the waiver of pet adoption fees and microchipping fees at the Ingleside Pet Adoption Events occurring on February 01, 2025.
15. Deliberate and take appropriate action on the first and only reading of an Ordinance amending the Fiscal Year 2024-2025 budget for the City of Ingleside, Texas, for the Ingleside Development Corporation Fund, Ingleside Development Corp. Fund Promotional Sales Tax Fund, and General Fund Capital Improvement Fund for the appropriation of funds for the cost of the basketball pavilion, cost of construction and engineering of Gallion Street, and additional Attorney Fees.
16. Deliberate and take appropriate action on the first and only reading of an Ordinance amending the Fiscal Year 2024-2025 budget for the City of Ingleside, Texas, for the appropriation of the Grant Funds from the Office of Governor, Public Safety Office, Criminal Justice Division for the FY 2025 License Plate Reader Project Grant for the Police department.
17. Deliberate and take appropriate action on the first and only reading of an Ordinance amending the Fiscal Year 2024-2025 Budget for the City of Ingleside, Texas, for the General Fund for the appropriation of the donation funds for the Volunteer Fire Department received from Enbridge for Radios and Plains Marketing for Decontamination Units.
18. Deliberate and take appropriate action on approval of the HOT Fund Post Event Form from

Ingleside Chamber of Commerce for the Ingleside Renaissance Faire Event and authorizing payment in the amount of \$46,120.00.

19. Deliberate and take appropriate action on a Resolution appointing members to the Coastal Bend Council of Governments Board of Directors.
20. Deliberate and take appropriate action on the General Engineering Services Agreement between the City of Ingleside and Hanson Professional Services, Inc.
21. Deliberate and take appropriate action on approving State Highway 200 Joint Use Agreement (JUA) between the City of Ingleside and the Texas Department of Transportation.

Executive Session

22. Closed Session
City Council will meet in Closed Session pursuant to the provisions of Chapter 551 of the Texas Government Code, in accordance with the authority contained in:
 - A. Pursuant to Section 551.071 Consultations with Attorney regarding pending litigation styled Cause No. 20-CV-12256 Ken Baker vs City of Ingleside.
23. Open Session
City Council will reconvene in Open Session at which time action on the matter(s) discussed in Closed Session may be considered.
 - A. Pursuant to Section 551.071 Consultations with Attorney regarding pending litigation styled Cause No. 20-CV-12256 Ken Baker vs City of Ingleside.

Closing Agenda

24. Items to consider for placement on future agendas.
25. Adjourn.

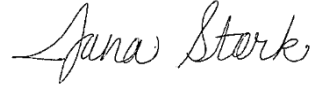
Special Accommodations

This facility is wheelchair accessible and there are special parking spaces near the main entrance. Request for accommodations 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.

With respect to any subject matter listed on this agenda, the City Council may meet in Closed Executive Session, if and to the extent allowed by Chapter 551 of the Texas Government Code, including, but not limited to, any of the following sections of Chapter 551: Section 551.071 Consultations with Attorney, Section 551.072 Deliberation about Real Property, Section 551.073 Deliberation regarding Prospective Gift, Section 551.074 Personnel Matters, Section 551.087 Deliberation regarding Economic Development Negotiations, and Section 551.089 Deliberation regarding Security Devices Or Security Audits.

Certification

I, Jana Stork, certify that the above notice of this Regular Meeting of the City Council was posted on the City Hall bulletin board at 2671 San Angelo Street, Ingleside, Texas on January 31, 2025 by 5:00 p.m.



Jana Stork, City Secretary

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

CITY COUNCIL AGENDA
Regular Meeting: January 28, 2025

AGENDA ITEM: 6.a

Council Comments and Reports.

SUBMITTED BY:

APPROVED FOR AGENDA: Brenton Lewis, City Manager

BACKGROUND:

FISCAL ANALYSIS:

RECOMMENDATION:

ATTACHMENTS:

None

CITY COUNCIL AGENDA
Regular Meeting: January 28, 2025

AGENDA ITEM: 6.b

Announcements of Community Interest and/or upcoming events.

SUBMITTED BY:

APPROVED FOR AGENDA: Brenton Lewis, City Manager

BACKGROUND:

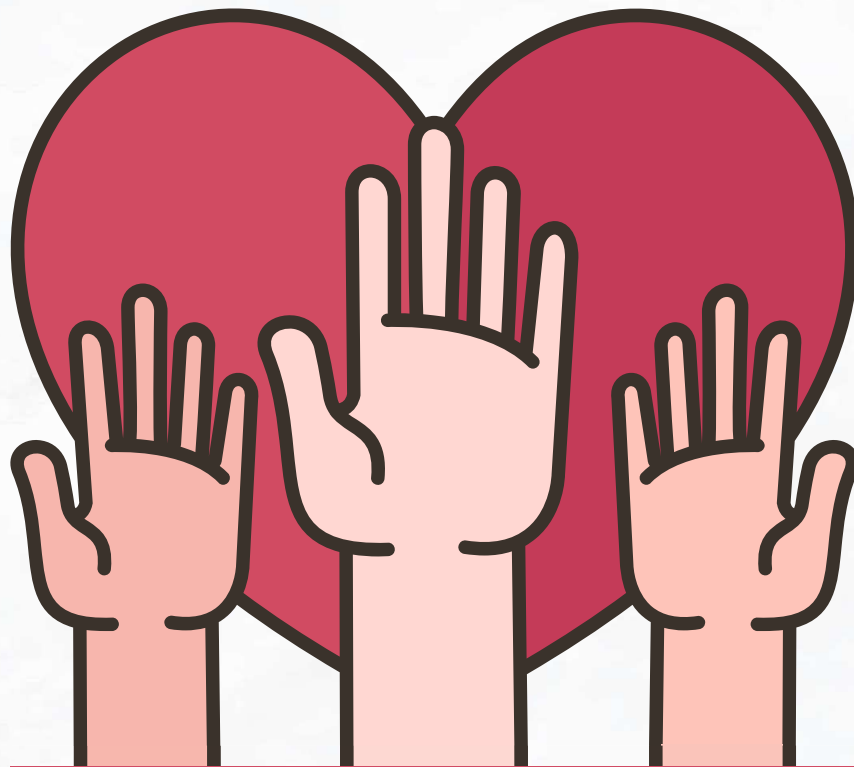
1. City of Ingleside Boards & Commissions Volunteers Needed
 2. Ingleside Public Library, Various Dates
 3. Toddler Time, Various Dates
 4. Wellness Outreach, January 30
 5. Ingleside Library Coat Drive, January 31
 6. Ingleside Parks & Recreation Bark in the Park, February 01
 7. 3rd Annual Trashion Fashion Show, February 27
 8. Ingleside Round Up Days & Music Festival, March 21-23
-

FISCAL ANALYSIS:

RECOMMENDATION:

ATTACHMENTS:

1. 2025, 01-28 Community Events v2



Volunteers NEEDED

CITY OF INGLESIDE BOARDS & COMMISSIONS

We need help with

- Planning & Zoning
- Ingleside Development Corporation (IDC)
- Street Advisory Group
- And many more!

Come join us!

 2671 San Angelo Ave, Ingleside, TX

 361-776-2517

 citysecretary@inglesidetx.gov

Ingleside Public Library

2775 Waco St.

Ingleside, TX 78362

WEBSITE: <https://inglesidetx.gov/226/Library>

Phone: 361-776-5355

After School Program

Tuesdays

3:45p - 5:00p

5 & Under

Arts and Crafts

Fridays

9:30a - 10:30a

Game Day

Monday's

(1st & 3rd of the month)

4:00 - 6:00p

Game Day

Friday's

3:00p - 4:30p

One Page at a Time Book Club

Every 3rd Tuesday

of the Month

1:30p

612 N. Sandpiper, Ingleside on Bay

RSVP: Gelinda: 972-463-0310 or Library

Mr. Kippy Storytime

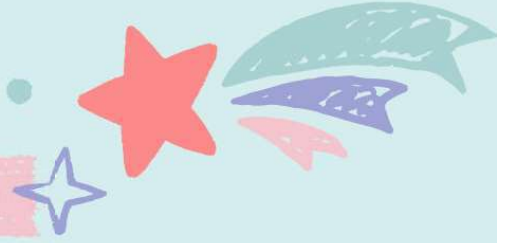
Thursday's

3:30p - 4:30p

Friday's

8:30a - 9:30a

TODDLER TIME



JANUARY 16TH 30TH	FEBRUARY 13TH 27TH	MARCH 6TH 27TH	APRIL 10TH 24TH
MAY 8TH 22ND	JUNE SUMMER BREAK	JULY	

HUMBLE YOUTH CENTER 9-11A

ALL DATES ARE SUBJECT TO CHANGE AT ANYTIME.

INGLESIDE PARKS AND RECREATION





WELLNESS OUTREACH

Sponsored by



WHEN: Thursday, January 30, 2025 - 10:00am to 2:00pm

WHERE: Ingleside Public Library
2775 Waco St., Ingleside, Texas

WHY: For a community Wellness Outreach where we will be offering free health services and resource information:

- Blood Pressure Screenings
- Hemoglobin A1C Screenings
- Health Education Information

In Partnership With





Alcanze de Bienestar

Patrocinado por

CHENIERE



CUÁNDO: CUÁNDO: Jueves 30 de enero de 2025
10:00 a. m. a 2:00 p. m.

DÓNDE: Biblioteca Pública de Ingleside
2775 Waco St., Ingleside, Texas

PARA: Alcanze de Bienestar para la comunidad donde se ofrecen servicios de salud gratuitos e información de recursos:

- *Control de la presión arterial*
- *Información sobre educación para la salud*
- *Pruebas de hemoglobina A1C*

En colaboración con:





WINTER COAT DRIVE FOR INGLESIDE I.S.D.



Help us collect gently used or new
coats, beanies, gloves,
and sweaters
(Men, Women, and Children)



Donations now being accepted!
Till the end of January 2025



Drop Off Location:

INGLESIDE PUBLIC LIBRARY
2775 WACO ST.
INGLESIDE TX, 78362
361-776-5355





Ingleside Parks and Recreation

Bark in the Park

Saturday, February 1, 2025 | 12PM

Location TBD

The Ingleside Chamber of Commerce
Presents

The 3rd Annual **TRASHION FASHION SHOW**

Where "trash" becomes Fashion

3RD ANNUAL FASHION SHOW DINNER AND SILENT AUCTION.
TRASHION FASHION CELEBRATES CREATIVE FASHION DESIGN AND
PROMOTES WASTE REDUCTION AND SUSTAINABILITY. BENEFITING
INGLESIDE CHAMBER FOUNDATION AND COMMUNITY GROUPS.

THURSDAY, FEBRUARY 27TH, 2025
INGLESIDE HIGH SCHOOL CAFETERIA
2807 MUSTANG DRIVE
5:30PM - 8:00PM



HAUTE COUTURE \$1000

- PREFERRED SEATING/TABLE OF 8
- BUSINESS NAME ON TABLE
- LOGO ON ALL SOCIAL MEDIA
- BANNER ON STAGE
- FULL AD IN PROGRAM

VOGUE \$500.00

- TABLE OF 8
- BUSINESS NAME ON TABLE
- LOGO IN PROGRAM

AVANT-GARDE \$750.00

- TABLE OF 8
- BUSINESS NAME ON TABLE
- 1/2 PAGE AD IN PROGRAM
- LOGO ON SOCIAL MEDIA

FASHIONISTA \$250.00

- TABLE OF 8
- BUSINESS NAME ON TABLE

CASH PRIZES

1ST PLACE: \$200

2ND PLACE: \$150

3RD PLACE: \$100

INDIVIDUAL TICKET \$30.00



361-776-2906 | inglesidetxchamber@gmail.com



Sustainability in Action



The Ingleside Chamber of Commerce
Brings to you the 53rd Annual
Ingleside Round Up Days & Music Festival



ADMISSION

\$7.00

Kids 8 and under FREE

Free entry
for Active Military & Veterans

Weekend Pass \$15.00

\$500 VIP TABLES

\$5.00 parking

March 21st, 22nd & 23rd, 2025

2867 Ave J * N.O. Simmons Park, Ingleside

Friday Night - SpazMatics

Saturday Night- Ricky Naranjo

Sunday- Conjunto

Featuring

Kidz Zone

Marketplace Vendors

Food Trucks

Non-Sanctioned Chili Contest

Sausage Eating Contest

FOR MORE INFO CALL 361-776-2906 OR
INGLESIDETXCHAMBER.COM



CITY COUNCIL AGENDA
Regular Meeting: January 28, 2025

AGENDA ITEM: 6.c

City of Ingleside expenditures paid over \$3,000.00 for the period of December 2024.

SUBMITTED BY: Priscilla Solis, Assistant Director of Finance

APPROVED FOR AGENDA: Brenton Lewis, City Manager

BACKGROUND:

Purchases are in compliance with the Procurement Policy and Procedures. Purchase orders have been approved by the appropriate officials.

FISCAL ANALYSIS:

City of Ingleside expenditures paid over \$3,000.00 from 12/01/2024-12/31/2024
Total A/P Checks and Invoices totaling over \$3,000 - Amount: \$1,883,859.07

RECOMMENDATION:

Information only.

ATTACHMENTS:

1. OVER 3K REPORT 12012024-12312024

VENDOR SET: 01 Ingleside

BANK: PCOP POOLED CASH - OPERATING

DATE RANGE:12/01/2024 THRU 12/31/2024

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
05481	I-INV65437							
	SYSTEMSEVEN SERVICES, LLC							
	PHONE/INTERNET/FAX NOV 24	D	12/02/2024	4,226.15		000604		4,226.15
00010	IRS							
	I-T1 202412045404	D	12/06/2024	1,620.12		000605		
	I-T3 202412045404	D	12/06/2024	5,522.00		000605		
	I-T4 202412045404	D	12/06/2024	1,291.46		000605		8,433.58
00159	I-PINGLES02412							
	TML INTERGOVERNMENT							
	TML HEALTH INSURANCE DEC 25	D	12/01/2024	126,355.98		000606		126,355.98
00011	I-TMRS NOV 24							
	TEXAS MUNICIPAL RETIREMENT SYS							
	TMRS NOV 24 EMPLOYER EXPENSE	D	12/12/2024	79,364.29		000607		
	TMRS NOV 24 EMPLOYEE	D	12/12/2024	43,171.81		000607		122,536.10
00010	IRS							
	I-T1 202412125409	D	12/13/2024	20,848.93		000608		
	I-T3 202412125409	D	12/13/2024	31,574.70		000608		
	I-T4 202412125409	D	12/13/2024	7,384.42		000608		59,808.05
05481	I-INV65908							
	SYSTEMSEVEN SERVICES, LLC							
	PHONE/INTERNET/FAX DEC 24	D	12/13/2024	4,564.24		000611		4,564.24
00325	I-20241128 0744							
	CARD SERVICE CENTER							
	MONTHLY CC CHARGES NOV24	D	12/19/2024	30,118.59		000613		30,118.59
00010	I-T1 202412265414							
	IRS							
	FIT W/H	D	12/27/2024	17,792.46		000615		
	I-T3 202412265414	D	12/27/2024	29,203.46		000615		
	I-T4 202412265414	D	12/27/2024	6,829.86		000615		53,825.78
05882	I-110504							
	DEREK WEAVER COMPANY, INC.							
	TIRE CHNGR/BALANCR COMBO	D	12/17/2024	5,909.00		000618		5,909.00
04387	I-47134							
	DAVIDSON TROILO REAM & GARZA							
	ATTORNEY FEES OCT 24	R	12/05/2024	215.73		079727		
	I-47135	R	12/05/2024	13,919.08		079727		14,134.81
05477	I-PAY APP 6							
	GERKE EXCAVATING, INC							
	KENNY LANE IMPROVEMENTS	R	12/05/2024	479,794.66		079729		479,794.66
05910	I-2433092-IN							
	GREAT LAKES PETROLEUM CO							
	FUEL	R	12/05/2024	3,504.78		079730		3,504.78

VENDOR SET: 01 Ingleside

BANK: PCOP POOLED CASH - OPERATING

DATE RANGE:12/01/2024 THRU 12/31/2024

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
00389	GT DISTRIBUTORS, INC.							
I-INV1025094	BVP DAVILA/PERALES/RAMOS	R	12/05/2024	4,624.00		079731		4,624.00
04295	HANSON PROFESSIONAL SERVICES,							
I-ARIV1010776	19L0028 WW TREATMENT	R	12/05/2024	8,900.00		079732		
I-ARIV1010780	19L0026AL ANIMAL SHELTER	R	12/05/2024	4,596.79		079732		13,496.79
05483	PROGRESSIVE COMMERCIAL AQUATIC							
I-145700	ACID	R	12/05/2024	3,914.00		079746		3,914.00
05926	RELIABLE CHEVROLET II (TX) LLC							
I-383641	NEW PATROL UNITS FY25	R	12/05/2024	52,529.55		079749		
I-383642	NEW PATROL UNITS FY25	R	12/05/2024	52,529.55		079749		105,059.10
00054	SAN PATRICIO MUNICIPAL WATER D							
I-03302000 20241126	CALI WATER PURCHASES	R	12/05/2024	29,328.64		079754		
I-03302200 20241126	SUNRAY WATER PURCHASES	R	12/05/2024	59,125.44		079754		88,454.08
00878	SHI-GOVERNMENT SOLUTIONS, INC.							
I-GB00540825	SMARSH RENEWAL	R	12/05/2024	15,293.55		079755		15,293.55
00233	SOUTH TEXAS NEWS, INC.							
I-72463	RFP PERMIT RENEWAL ADD	R	12/05/2024	621.00		079756		
I-72464	P&Z PUBLIC HEARING NOTICE	R	12/05/2024	1,359.30		079756		
I-72688	RFP PERMIT RENEWAL ADD	R	12/05/2024	621.00		079756		
I-72689	ADVERTISEMENT	R	12/05/2024	230.00		079756		
I-72939	ADVERTISEMENT	R	12/05/2024	230.00		079756		
I-72940	RFQ TENNIS AD	R	12/05/2024	1,359.30		079756		4,420.60
05933	TEXAS INFLATABLE RENTALS LLC							
I-16768	BOUNCE HOUSES	R	12/05/2024	3,453.09		079760		3,453.09
02148	TEXAS SLUDGE DISPOSAL, INC.							
I-28993	EQUIP RENTALS	R	12/05/2024	2,290.00		079761		
I-28993A	EQUIPMENT RENTALS	R	12/05/2024	550.00		079761		
I-29019	SLUDGE HAUL	R	12/05/2024	825.00		079761		3,665.00
00432	VULCAN MATERIALS COMPANY							
I-2310523	100 TONS OF ASPHALT	R	12/05/2024	9,571.80		079766		9,571.80
05733	WILLIAMS SCOTSMAN, INC.							
I-9022236652	TRAILER RENTAL	V	12/05/2024	2,696.77		079767		
I-9022466312	TRAILER RENTAL	V	12/05/2024	2,696.77		079767		5,393.54

VENDOR SET: 01 Ingleside

BANK: PCOP POOLED CASH - OPERATING

DATE RANGE:12/01/2024 THRU 12/31/2024

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
05733 M-CHECK	WILLIAMS SCOTSMAN, INC. WILLIAMS SCOTSMAN, INC. VOIDED	V	12/05/2024			079767		5,393.54CR
05321 I-1123035540	BELL'S UNLIMITED SERVICES, INC AC QUARTERLY MAINT	R	12/12/2024	3,030.00		079779		3,030.00
01706 I-408490	CLAYTON, CHRISTOPHER D. CITY HALL A/C REPLACEMENT	R	12/12/2024	13,800.00		079780		13,800.00
03532 I-202410	GEXA ENERGY, LP ELECTRIC BILL OCT 2024	R	12/12/2024	33,699.36		079788		33,699.36
01614 I-20241120	KIEWIT OFFSHORE SERVICES, LTD. SALES TAX ABATEMENT	R	12/12/2024	43,189.21		079798		43,189.21
05858 I-202410	LINEBARGER GOGGAN BLAIR & SAMP FEE COLLECTIONS 2025	R	12/12/2024	3,023.67		079799		3,023.67
05873 I-180776	JORDAN STAFFING, LLC TEMPS	R	12/12/2024	4,604.06		079800		4,604.06
01092 I-44423725	TEXAS INDUSTRIES, INC. 200 TONS LIMESTONE	R	12/12/2024	8,058.90		079803		8,058.90
05820 I-PAY APP 10	PROGRESSIVE STRUCTURES, INC. ANIMAL SHELTER PROJECT	R	12/12/2024	213,782.97		079805		213,782.97
00304 I-1585	SAN PATRICIO CO APPRAISAL DIST QUARTERLY PAYMENTS	R	12/12/2024	42,292.76		079806		42,292.76
01982 I-INV22112	STALINE WATERWORKS, INC WATER MAINTENANCE	R	12/12/2024	4,299.48		079811		4,299.48
05733 I-9022236652A I-9022466312A	WILLIAMS SCOTSMAN, INC. TRAILER RENTAL TRAILER RENTAL	R R	12/12/2024 12/12/2024	2,696.77 2,696.77		079818 079818		5,393.54
03585 I-6142055	ALLEN SAMUELS CDJR OF ARANSAS UNIT 1962 WILL NOT START	R	12/19/2024	3,153.40		079819		3,153.40
05188 I-287299413911120324	AT&T MOBILITY LLC CELL & HOTSPOTS NOV 24	R	12/19/2024	4,028.47		079823		4,028.47

VENDOR SET: 01 Ingleside

BANK: PCOP POOLED CASH - OPERATING

DATE RANGE:12/01/2024 THRU 12/31/2024

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
04572	CR3 DESIGNS,LLC							
I-1394	UNIT DECALS	R	12/19/2024	3,200.00		079830		3,200.00
04840	HERRERA, PAUL							
I-1425	REPAIR 2 DRIVEWAYS	R	12/19/2024	5,000.00		079832		5,000.00
05752	GMT SUPERIOR LUBE							
I-1308	1964 LOF/FUEL LEAK	R	12/19/2024	4,530.27		079838		4,530.27
01999	GRANT WORKS							
I-04 ARPA	ARPA ADMIN SERVICES	R	12/19/2024	24,176.00		079840		
I-05 ARPA	ARPA ADMIN SERVICES	R	12/19/2024	24,176.00		079840		
I-06 ARPA	ARPA ADMIN SERVICES	R	12/19/2024	24,176.00		079840		72,528.00
02377	LARRY D WARD							
I-2101	Crash Repair 2101 IPD	R	12/19/2024	15,323.45		079844		15,323.45
05873	JORDAN STAFFING, LLC							
I-180650	TEMPS	R	12/19/2024	2,179.69		079845		
I-180982	TEMPS	R	12/19/2024	1,080.00		079845		
I-181045	TEMPS	R	12/19/2024	3,071.26		079845		6,330.95
00034	REPUBLIC SERVICES, INC.							
I-0847-001369434	GARBAGE BILL	R	12/19/2024	115,682.23		079857		115,682.23
01936	RICOH USA, INC.							
I-5070603721	COPIER RENTAL/COPIES	R	12/19/2024	4,456.38		079858		4,456.38
05744	VICTORIA COMMUNICATIONS SERVIC							
I-VIC 51273783	REPEATER	R	12/19/2024	14,545.00		079869		14,545.00
02839	WELLS FARGO FINANCIAL LEASING							
I-108731843	COPIER RENTAL NOV 24	R	12/19/2024	1,455.98		079870		
I-108770081	COPIER RENTAL NOV 24	R	12/19/2024	268.86		079870		
I-108810775	COPIER RENTALS DEC 24	R	12/19/2024	1,455.98		079870		3,180.82
05379	WEX BANK							
I-101571438	FUEL PD / AC	R	12/19/2024	6,170.02		079872		6,170.02
05800	BAY AREA DIESEL, LLC							
I-INV-2653	TROUBLESHOOT UNIT 334	R	12/26/2024	2,019.00		079875		
I-INV-2654	FD GENERATOR	R	12/26/2024	1,294.86		079875		3,313.86

VENDOR SET: 01 Ingleside

BANK: PCOP POOLED CASH - OPERATING

DATE RANGE:12/01/2024 THRU 12/31/2024

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
05910	GREAT LAKES PETROLEUM CO							
I-2415410	FUEL	R	12/26/2024	2,759.42		079882		
I-2443351-IN	FUEL	R	12/26/2024	4,088.93		079882		6,848.35
05873	JORDAN STAFFING, LLC							
I-181147	TEMPS	R	12/26/2024	3,616.88		079888		3,616.88
05681	4B RECREATION GROUP, LLC							
I-31982	POOL SHADE STRUCTURES	R	12/26/2024	13,489.28		079897		
I-31983	LIVE OAK TENNIS COURTS	R	12/26/2024	34,401.43		079897		47,890.71
00947	STATE FIREMAN'S/FIRE MARSHAL'S							
I-SFFMA-8135	ALL MEMBERS SFFMA FEES	R	12/26/2024	3,380.00		079901		3,380.00
00169	TRI COUNTY EMERGENCY MEDICAL S							
I-14439	AMBULANCE SUBSIDY	R	12/26/2024	20,292.60		079908		
I-14440	TRAINING	R	12/26/2024	50.00		079908		20,342.60

* * T O T A L S * *	NO	INVOICE AMOUNT	DISCOUNTS	CHECK AMOUNT
REGULAR CHECKS:	43	1,473,475.14	0.00	1,468,081.60
HAND CHECKS:	0	0.00	0.00	0.00
DRAFTS:	9	415,777.47	0.00	415,777.47
EFT:	0	0.00	0.00	0.00
NON CHECKS:	0	0.00	0.00	0.00
VOID CHECKS:	0 VOID DEBITS	0.00		
	VOID CREDITS	5,393.54CR	5,393.54CR	0.00

TOTAL ERRORS: 0

VENDOR SET: 01	BANK: PCOP	TOTALS:	NO	INVOICE AMOUNT	DISCOUNTS	CHECK AMOUNT
			52	1,883,859.07	0.00	1,883,859.07
BANK: PCOP	TOTALS:		52	1,883,859.07	0.00	1,883,859.07
REPORT TOTALS:			52	1,883,859.07	0.00	1,883,859.07

CITY COUNCIL AGENDA
Regular Meeting: January 28, 2025

AGENDA ITEM: 6.d

City of Ingleside monthly financial report as of December 2024.

SUBMITTED BY: Priscilla Solis, Assistant Director of Finance

APPROVED FOR AGENDA: Brenton Lewis, City Manager

BACKGROUND:

Monthly financial report ending December 30, 2024.

FISCAL ANALYSIS:

FY2025 See attachments for the month listed above: A.1; A.2; A.3; B.1; and C.1.

FY2025 The December 2024 Council Discretionary Funds account balance is \$200,000

RECOMMENDATION:

Information only.

ATTACHMENTS:

1. FINANCIALS 12 2024.



**Monthly Financial
Report to City Council
January 28, 2025**

**Finance Department
Submitted by: Priscilla Solis**

	Page
A.) Statement of Revenues and Expenditures through December 2024 (Preliminary)	
1.) Summary By Fund	A.1
2.) General Fund	A.2
3.) Utility Fund	A.3
 C.) Cash Basis Sales Tax Collections through December 2024	 C.1
FYD - Total	\$ 951,441.26 (Gross 3 months 30.20%)
Budgeted - Total	\$ 3,150,000.00
Difference Budget vs. Received	\$ 2,198,558.74 Remaining to Collect: 69.80%
 D.) FY24 General Fund Tax Roll Collection through December 2024	
FYD - Total	\$ 2,958,342.27
Budgeted - Total	\$ 14,119,720.00
Difference Budget vs. Received	\$ 11,161,377.73 Remaining to Collect: 79.05%

CITY OF INGLESIDE
REVENUE & EXPENSE REPORT (UNAUDITED)
AS OF: DECEMBER 31ST, 2024

% OF YEAR COMPLETED: 25.00

	CURRENT BUDGET	CURRENT PERIOD	YEAR TO DATE ACTUAL	TOTAL ENCUMBERED	BUDGET BALANCE	% YTD BUDGET
<u>10 -GENERAL FUND</u>						
TOTAL REVENUES	18,605,220	2,098,950.26	3,880,212.50	0.00	14,725,007.50	20.86
TOTAL EXPENSES	<u>24,420,050</u>	<u>1,471,928.25</u>	<u>4,532,792.93</u>	<u>1,272,332.62</u>	<u>18,614,924.45</u>	<u>23.77</u>
REVENUE OVER/(UNDER) EXPENSES	(5,814,830)	627,022.01	(652,580.43)	(1,272,332.62)	(3,889,916.95)	33.10
<u>14 -HOUGHTON REHABILITATION</u>						
TOTAL REVENUES	<u>0</u>	<u>7,944.21</u>	<u>25,951.31</u>	<u>0.00</u>	<u>(25,951.31)</u>	<u>0.00</u>
REVENUE OVER/(UNDER) EXPENSES	0	7,944.21	25,951.31	0.00	(25,951.31)	0.00
<u>18 -COVE PARK TOURISM FUND</u>						
TOTAL REVENUES	20,000	876.42	4,929.09	0.00	15,070.91	24.65
TOTAL EXPENSES	<u>10,000</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>10,000.00</u>	<u>0.00</u>
REVENUE OVER/(UNDER) EXPENSES	10,000	876.42	4,929.09	0.00	5,070.91	49.29
<u>19 -HURRICANE EMERGENCY</u>						
TOTAL REVENUES	<u>0</u>	<u>(241,777.49)</u>	<u>(241,777.49)</u>	<u>0.00</u>	<u>241,777.49</u>	<u>0.00</u>
REVENUE OVER/(UNDER) EXPENSES	0	(241,777.49)	(241,777.49)	0.00	241,777.49	0.00
<u>20 -WATERWORK FACILITIES FUND</u>						
<u>21 -HOTEL-MOTEL FUND</u>						
TOTAL REVENUES	250,000	14,301.73	66,294.81	0.00	183,705.19	26.52
TOTAL EXPENSES	<u>415,800</u>	<u>4,209.42</u>	<u>97,211.98</u>	<u>20,250.00</u>	<u>298,338.02</u>	<u>28.25</u>
REVENUE OVER/(UNDER) EXPENSES	(165,800)	10,092.31	(30,917.17)	(20,250.00)	(114,632.83)	30.86
<u>23 -INGLESIDE DEVELOPMENT COR</u>						
TOTAL REVENUES	515,453	54,474.88	160,448.54	0.00	355,004.46	31.13
TOTAL EXPENSES	<u>347,545</u>	<u>6,793.88</u>	<u>33,246.26</u>	<u>0.00</u>	<u>314,298.74</u>	<u>9.57</u>
REVENUE OVER/(UNDER) EXPENSES	167,908	47,681.00	127,202.28	0.00	40,705.72	75.76
<u>24 -IDC PROMOTIONAL SALES TAX</u>						
TOTAL REVENUES	51,545	5,447.49	16,044.86	0.00	35,500.14	31.13
TOTAL EXPENSES	<u>250,000</u>	<u>0.00</u>	<u>0.00</u>	<u>41,810.36</u>	<u>208,189.64</u>	<u>16.72</u>
REVENUE OVER/(UNDER) EXPENSES	(198,455)	5,447.49	16,044.86	(41,810.36)	(172,689.50)	12.98
<u>25 -GENERAL FUND GRANTS</u>						
TOTAL REVENUES	0	246,869.88	258,463.60	0.00	(258,463.60)	0.00
TOTAL EXPENSES	<u>0</u>	<u>0.00</u>	<u>107,958.94</u>	<u>454,992.89</u>	<u>(562,951.83)</u>	<u>0.00</u>
REVENUE OVER/(UNDER) EXPENSES	0	246,869.88	150,504.66	(454,992.89)	304,488.23	0.00
<u>28 -INGLESIDE STREET MAINTENA</u>						
TOTAL REVENUES	450,000	50,647.58	148,733.93	0.00	301,266.07	33.05
TOTAL EXPENSES	<u>1,000,000</u>	<u>0.00</u>	<u>0.00</u>	<u>121,847.10</u>	<u>878,152.90</u>	<u>12.18</u>
REVENUE OVER/(UNDER) EXPENSES	(550,000)	50,647.58	148,733.93	(121,847.10)	(576,886.83)	4.89-

CITY OF INGLESIDE
REVENUE & EXPENSE REPORT (UNAUDITED)
AS OF: DECEMBER 31ST, 2024

% OF YEAR COMPLETED: 25.00

	CURRENT BUDGET	CURRENT PERIOD	YEAR TO DATE ACTUAL	TOTAL ENCUMBERED	BUDGET BALANCE	% YTD BUDGET
<u>30 -GF CAPITAL PROJECTS FUND</u>						
TOTAL REVENUES	4,710,000	288,880.19	866,562.41	0.00	3,843,437.59	18.40
TOTAL EXPENSES	<u>7,503,868</u>	<u>73,540.44</u>	<u>104,440.30</u>	<u>1,310,858.67</u>	<u>6,088,569.03</u>	<u>18.86</u>
REVENUE OVER/(UNDER) EXPENSES	(2,793,868)	215,339.75	762,122.11	(1,310,858.67)	(2,245,131.44)	19.64
<u>31 -STREET RECONSTRUCTION</u>						
TOTAL REVENUES	<u>0</u>	<u>9.56</u>	<u>31.76</u>	<u>0.00</u>	<u>(31.76)</u>	<u>0.00</u>
REVENUE OVER/(UNDER) EXPENSES	0	9.56	31.76	0.00	(31.76)	0.00
<u>32 -GF VEHICLES & EQUIP>\$5K</u>						
TOTAL REVENUES	1,615,000	132,669.21	399,776.52	0.00	1,215,223.48	24.75
TOTAL EXPENSES	<u>2,868,313</u>	<u>186,141.07</u>	<u>694,106.08</u>	<u>1,290,034.32</u>	<u>884,172.60</u>	<u>69.17</u>
REVENUE OVER/(UNDER) EXPENSES	(1,253,313)	(53,471.86)	(294,329.56)	(1,290,034.32)	331,050.88	126.41
<u>40 -DEBT SERVICE FUND</u>						
TOTAL REVENUES	4,247,370	599,356.11	781,326.85	0.00	3,466,043.15	18.40
TOTAL EXPENSES	<u>4,627,380</u>	<u>0.00</u>	<u>400.00</u>	<u>0.00</u>	<u>4,626,980.00</u>	<u>0.01</u>
REVENUE OVER/(UNDER) EXPENSES	(380,010)	599,356.11	780,926.85	0.00	(1,160,936.85)	205.50-
<u>50 -UTILITY FUND</u>						
TOTAL REVENUES	7,821,220	616,961.47	1,643,016.84	0.00	6,178,203.16	21.01
TOTAL EXPENSES	<u>7,808,284</u>	<u>442,005.24</u>	<u>1,367,098.72</u>	<u>879,716.81</u>	<u>5,561,468.47</u>	<u>28.77</u>
REVENUE OVER/(UNDER) EXPENSES	12,936	174,956.23	275,918.12	(879,716.81)	616,734.69	4,667.58-
<u>51 -UF CAPITAL PROJECTS FUND</u>						
TOTAL REVENUES	195,000	21,631.04	54,497.84	0.00	140,502.16	27.95
TOTAL EXPENSES	<u>103,140</u>	<u>0.00</u>	<u>18,900.00</u>	<u>0.00</u>	<u>84,240.00</u>	<u>18.32</u>
REVENUE OVER/(UNDER) EXPENSES	91,860	21,631.04	35,597.84	0.00	56,262.16	38.75
<u>52 -UF VEHICLES & EQUIP>\$5K</u>						
TOTAL REVENUES	620,000	29,955.87	90,231.30	0.00	529,768.70	14.55
TOTAL EXPENSES	<u>585,000</u>	<u>125.00</u>	<u>125.00</u>	<u>0.00</u>	<u>584,875.00</u>	<u>0.02</u>
REVENUE OVER/(UNDER) EXPENSES	35,000	29,830.87	90,106.30	0.00	(55,106.30)	257.45
<u>54 -UTILITY IMPACT FEES</u>						
TOTAL REVENUES	<u>110,000</u>	<u>6,575.94</u>	<u>42,770.09</u>	<u>0.00</u>	<u>67,229.91</u>	<u>38.88</u>
REVENUE OVER/(UNDER) EXPENSES	110,000	6,575.94	42,770.09	0.00	67,229.91	38.88
<u>56 -WW TREATMENT PLANT-TWDB</u>						
TOTAL REVENUES	1,000,000	90,704.62	273,320.50	0.00	726,679.50	27.33
TOTAL EXPENSES	<u>4,801,250</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>4,801,250.00</u>	<u>0.00</u>
REVENUE OVER/(UNDER) EXPENSES	(3,801,250)	90,704.62	273,320.50	0.00	(4,074,570.50)	7.19-

CITY OF INGLESIDE
REVENUE & EXPENSE REPORT (UNAUDITED)
AS OF: DECEMBER 31ST, 2024

% OF YEAR COMPLETED: 25.00

	CURRENT BUDGET	CURRENT PERIOD	YEAR TO DATE ACTUAL	TOTAL ENCUMBERED	BUDGET BALANCE	% YTD BUDGET
<u>57 -CO2024-CAPITAL BOND</u>						
TOTAL REVENUES	9,820,000	39,461.61	9,936,275.85	0.00 (	116,275.85)	101.18
TOTAL EXPENSES	<u>9,820,000</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>9,820,000.00</u>	<u>0.00</u>
REVENUE OVER/(UNDER) EXPENSES	0	39,461.61	9,936,275.85	0.00 (	9,936,275.85)	0.00
<u>60 -ASSET SEIZURES & FORFEIT.</u>						
TOTAL REVENUES	<u>0</u>	<u>191.20</u>	<u>632.53</u>	<u>0.00</u> (	<u>632.53</u>)	<u>0.00</u>
REVENUE OVER/(UNDER) EXPENSES	0	191.20	632.53	0.00 (	632.53)	0.00
<u>80 -GENERAL FIXED ASSETS</u>						
GRAND TOTAL REVENUES	50,030,808	4,064,131.78	18,407,743.64	0.00	31,623,064.36	36.79
GRAND TOTAL EXPENSES	<u>64,560,630</u>	<u>2,184,743.30</u>	<u>6,956,280.21</u>	<u>5,391,842.77</u>	<u>52,212,507.02</u>	<u>19.13</u>
REVENUE OVER/(UNDER) EXPENSES	(14,529,822)	1,879,388.48	11,451,463.43	(5,391,842.77)	(20,589,442.66)	41.70-

*** END OF REPORT ***

CITY OF INGLESIDE
REVENUE & EXPENSE REPORT (UNAUDITED)
AS OF: DECEMBER 31ST, 2024

10 -GENERAL FUND
FINANCIAL SUMMARY

25.00% OF YEAR COMPLETED

ACCT#	ACCOUNT NAME	ANNUAL	CURRENT	Y-T-D ACTUAL	% OF BUDGET	FAVORABLE (UNFAVORABLE)	PRIOR YR Y-T-D
<u>REVENUE SUMMARY</u>							
	TAX REVENUES	12,069,320.00	1,545,389.37	2,394,334.73	19.84	9,674,985.27	3,343,248.97
	FRANCHISE FEES	1,370,900.00	116,929.11	369,260.89	26.94	1,001,639.11	364,096.71
	SERVICES	1,563,900.00	137,987.07	350,512.31	22.41	1,213,387.69	394,051.42
	FINES & FORFEITURES	450,200.00	39,192.07	127,470.82	28.31	322,729.18	113,791.10
	LICENSES & PERMITS	220,250.00	31,324.38	53,826.06	24.44	166,423.94	32,196.38
	OTHER REVENUE	1,940,650.00	149,795.26	337,304.69	17.38	1,603,345.31	296,741.45
	TRANSFERS FROM OTHER FUND	<u>990,000.00</u>	<u>78,333.00</u>	<u>247,503.00</u>	<u>25.00</u>	<u>742,497.00</u>	<u>247,503.00</u>
***	TOTAL REVENUES ***	18,605,220.00	2,098,950.26	3,880,212.50	20.86	14,725,007.50	4,791,629.03
		=====	=====	=====	=====	=====	=====
<u>EXPENDITURE SUMMARY</u>							
	NON-DEPARTMENTAL	3,721,470.00	126,743.96	364,791.75	9.80	3,356,678.25	425,654.17
	MAYOR AND CITY COUNCIL	243,200.00	1,777.43	5,822.61	2.39	237,377.39	2,559.97
	CITY MANAGER	277,990.00	22,134.72	59,145.97	21.28	218,844.03	48,618.86
	CITY SECRETARY	382,200.00	21,156.76	81,837.49	21.41	300,362.51	69,789.15
	FINANCE	437,180.00	43,018.35	108,298.34	24.77	328,881.66	146,285.73
	CITY ATTORNEY	920,000.00	0.00	35,534.22	3.86	884,465.78	12,564.60
	MUNICIPAL COURT	613,880.00	69,337.04	144,741.07	23.58	469,138.93	77,024.19
	LIBRARY	479,460.00	39,843.95	109,089.86	22.75	370,370.14	86,879.04
	FIRE	342,210.00	19,372.82	39,207.92	11.46	303,002.08	44,566.62
	POLICE	4,608,680.00	324,904.97	996,758.08	21.63	3,611,921.92	917,457.70
	PARKS AND RECREATION	2,647,480.00	186,637.37	552,366.55	20.86	2,095,113.45	233,392.22
	STREETS	4,990,680.00	297,449.23	949,112.59	19.02	4,041,567.41	719,300.23
	DEVELOPMENT SERVICES	498,470.00	32,705.66	92,298.79	18.52	406,171.21	109,390.91
	ANIMAL CONTROL	328,950.00	20,325.59	59,380.14	18.05	269,569.86	79,358.08
	RECYCLING CENTER	276,910.00	11,422.26	39,832.97	14.38	237,077.03	14,619.30
	CODE ENFORCEMENT	292,600.00	13,153.37	41,075.52	14.04	251,524.48	43,970.05
	ECONOMIC DEVELOPMENT	242,790.00	18,041.45	56,252.91	23.17	186,537.09	44,639.55
	FACILITIES MAINTENANCE	373,660.00	30,223.73	81,554.38	21.83	292,105.62	40,871.88
	HUMAN RESOURCES	300,120.00	20,875.94	64,145.94	21.37	235,974.06	67,884.98
	EMERGENCY MANAGEMENT	49,790.00	321.40	550.20	1.11	49,239.80	14,610.56
	IT	992,330.00	56,765.69	319,106.61	32.16	673,223.39	204,115.60
	SANITATION	<u>1,400,000.00</u>	<u>115,716.56</u>	<u>331,889.02</u>	<u>23.71</u>	<u>1,068,110.98</u>	<u>331,565.40</u>
***	TOTAL EXPENDITURES ***	24,420,050.00	1,471,928.25	4,532,792.93	18.56	19,887,257.07	3,735,118.79
		=====	=====	=====	=====	=====	=====
***	REVENUES OVER/(UNDER) EXPENDITURES	(5,814,830.00)	627,022.01	(652,580.43)	11.22	(5,162,249.57)	1,056,510.24
		=====	=====	=====	=====	=====	=====

CITY OF INGLESIDE
REVENUE & EXPENSE REPORT (UNAUDITED)
AS OF: DECEMBER 31ST, 2024

50 -UTILITY FUND
FINANCIAL SUMMARY

25.00% OF YEAR COMPLETED

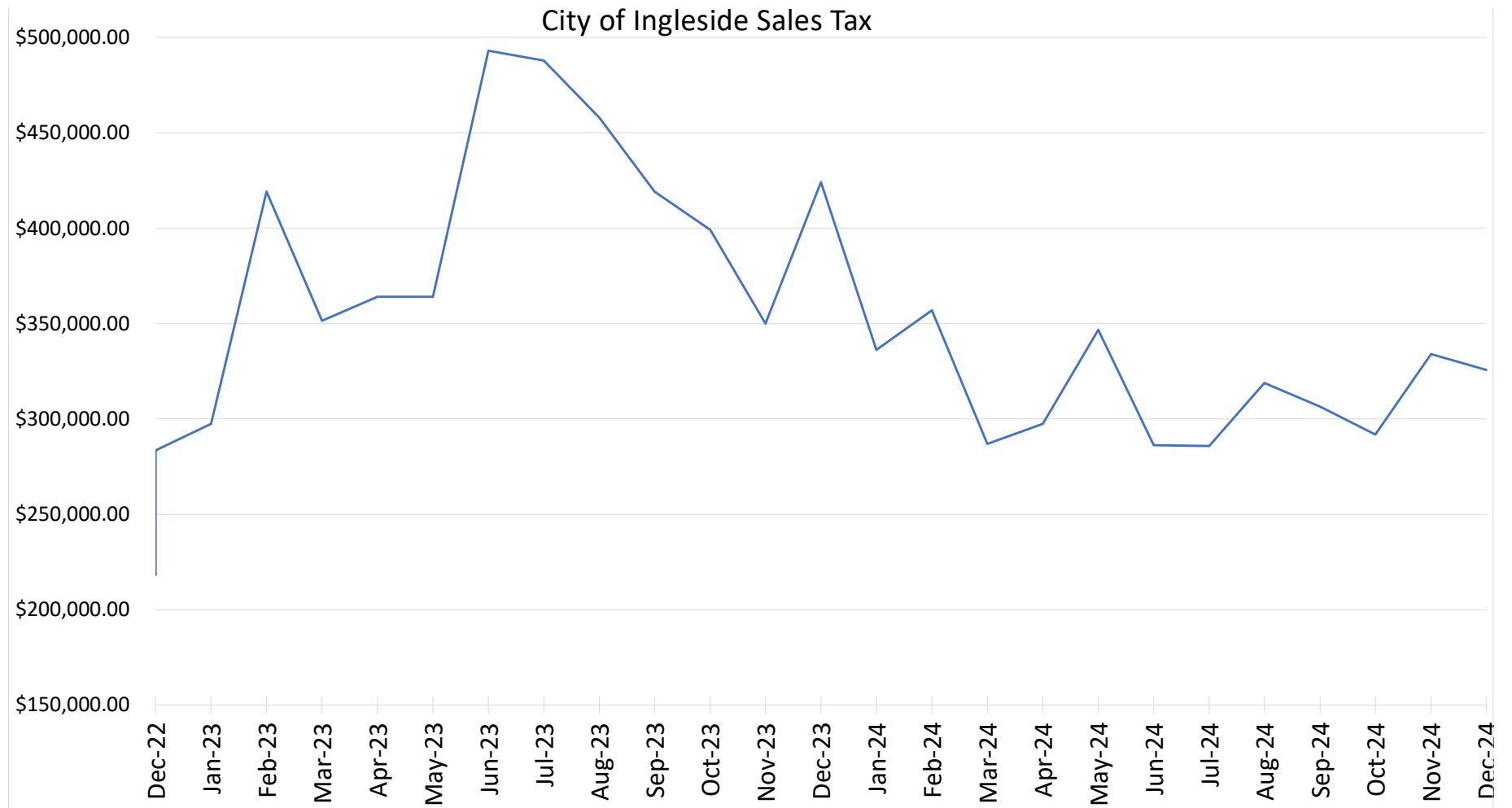
ACCT#	ACCOUNT NAME	ANNUAL	CURRENT	Y-T-D ACTUAL	% OF BUDGET	FAVORABLE (UNFAVORABLE)	PRIOR YR Y-T-D
<u>REVENUE SUMMARY</u>							
	TAX REVENUES	7,423,620.00	575,013.05	1,494,419.25	20.13	5,929,200.75	1,651,587.28
	OTHER REVENUE	392,600.00	41,948.42	148,597.59	37.85	244,002.41	149,897.26
	TRANSFERS FROM OTHER FUND	<u>5,000.00</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>5,000.00</u>	<u>0.00</u>
***	TOTAL REVENUES ***	7,821,220.00	616,961.47	1,643,016.84	21.01	6,178,203.16	1,801,484.54
		=====	=====	=====	=====	=====	=====
<u>EXPENDITURE SUMMARY</u>							
	NON-DEPARTMENTAL	2,098,344.00	76,920.67	243,578.31	11.61	1,854,765.69	243,919.68
	UTILITY BILLING OFFICE	331,870.00	22,379.95	72,946.09	21.98	258,923.91	88,764.38
	WATER	2,751,500.00	167,068.64	513,281.35	18.65	2,238,218.65	534,150.92
	WASTEWATER	<u>2,626,570.00</u>	<u>175,635.98</u>	<u>537,292.97</u>	<u>20.46</u>	<u>2,089,277.03</u>	<u>284,607.94</u>
***	TOTAL EXPENDITURES ***	7,808,284.00	442,005.24	1,367,098.72	17.51	6,441,185.28	1,151,442.92
		=====	=====	=====	=====	=====	=====
***	REVENUES OVER/(UNDER) EXPENDITURES *	12,936.00	174,956.23	275,918.12	132.95	(262,982.12)	650,041.62
		=====	=====	=====	=====	=====	=====

CITY OF INGLESIDE
REVENUE & EXPENSE REPORT (UNAUDITED)
AS OF: DECEMBER 31ST, 2024

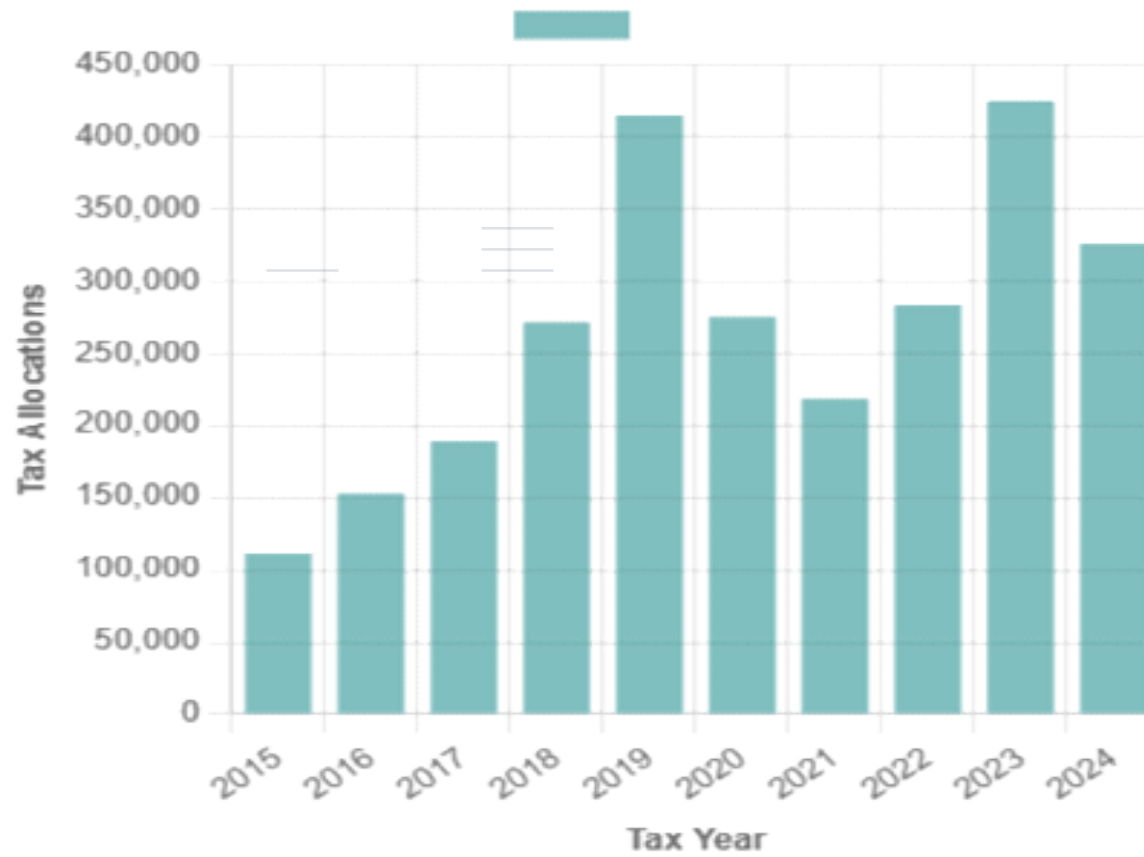
50 -UTILITY FUND
FINANCIAL SUMMARY

25.00% OF YEAR COMPLETED

ACCT#	ACCOUNT NAME	ANNUAL	CURRENT	Y-T-D ACTUAL	% OF BUDGET	FAVORABLE (UNFAVORABLE)	PRIOR YR Y-T-D
<u>REVENUE SUMMARY</u>							
	TAX REVENUES	7,423,620.00	575,013.05	1,494,419.25	20.13	5,929,200.75	1,651,587.28
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	TRANSFERS FROM OTHER FUND	<u>5,000.00</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>5,000.00</u>	<u>0.00</u>
***	TOTAL REVENUES ***	7,821,220.00	616,961.47	1,643,016.84	21.01	6,178,203.16	1,801,484.54
		=====	=====	=====	=====	=====	=====
<u>EXPENDITURE SUMMARY</u>							
	NON-DEPARTMENTAL	2,098,344.00	76,920.67	243,578.31	11.61	1,854,765.69	243,919.68
	UTILITY BILLING OFFICE	331,870.00	22,379.95	72,946.09	21.98	258,923.91	88,764.38
	WATER	2,751,500.00	167,068.64	513,281.35	18.65	2,238,218.65	534,150.92
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***	TOTAL EXPENDITURES ***	7,808,284.00	442,005.24	1,367,098.72	17.51	6,441,185.28	1,151,442.92
		=====	=====	=====	=====	=====	=====
***	REVENUES OVER/(UNDER) EXPENDITURES *	12,936.00	174,956.23	275,918.12	132.95	(262,982.12)	650,041.62
		=====	=====	=====	=====	=====	=====



December - Sales Tax Allocations by Year



CITY COUNCIL AGENDA

Regular Meeting: January 28, 2025

AGENDA ITEM: 6.e

Report on State Highway 200.

SUBMITTED BY: Brenton Lewis, City Manager

APPROVED FOR AGENDA: Brenton Lewis, City Manager

BACKGROUND:

The City of Ingleside has been working with TxDOT since 1985 on the development of SH 200. The development of SH 200 would alleviate a major portion of traffic on SH 1069 as employees report to and return from work from the City industrial partners.

A short review of actions/events since early 2024 are as follows:

2/13/2024 Regular City Council meeting Council Member Julio Salinas asked Staff to reach out to TxDOT about the traffic and highway load, and about SH200.

3/12/2024 Regular City Council meeting agenda Item 20. Deliberate and take appropriate action to send a team to Austin to talk about various City of Ingleside projects including the proposed SH 200 project.

Discussion was held between Council Members and City Manager Lewis about sending a team to Austin to discuss various City projects, having a plan in place before going up there, and giving the Council a good briefing before the team goes to Austin.

Motion: Council Member Diehl made a motion to authorize the City Manager, Mayor and Mayor Pro-Tem to put together a definitive trip with questions and presentations at their discretion and upon completion of the evolution to be brought back to Council. Council Member Pruitt seconded the motion. Motion carried with all present voting in favor.

6/11/2024 Regular City Council meeting agenda Item 6h. Report on TxDOT meeting regarding SH 200 and various other topics.

An excerpt from the background section of Item 6h. states "City staff scheduled a meeting with Senator LaMantia and staff, representatives of TxDOT including Commissioner Meade, District Engineer Olivarez and staff, and City Council representatives and staff. Topics discussed included the SH 200 project including the requested participation cost from the City of \$2,000,000, possible funding sources including the State Infrastructure Bank, the City meeting with industry partners, and a timeline based on the City's participation."

09/16/2024 Mayor-Pro Tem Long and City Manager Lewis met with State Representative J.M. Lozano to discuss SH200.

10/16/2024 Council Member Pruitt, City Manager Lewis, and Director of Infrastructure Services met with TXDOT representatives and discussed several topics including SH200.

FISCAL ANALYSIS:

Project participation \$2,000,000.

RECOMMENDATION:

Report Only

ATTACHMENTS:

None

CITY COUNCIL AGENDA
Regular Meeting: January 28, 2025

AGENDA ITEM: 7

Ingleside Volunteer Fire Department Update Presentation.

SUBMITTED BY: Thomas Miller, Fire Chief

APPROVED FOR AGENDA:

BACKGROUND:

Presentation for Ingleside Volunteer Fire Department Update.

FISCAL ANALYSIS:

RECOMMENDATION:

Presentation Only.

ATTACHMENTS:

1. FD Update for City Council (1)

Fire Department Update 2024

By Fire Chief/Fire Marshal Tom Miller

Organization

- 40 Active Volunteers
 - 5 Volunteers are City Employees
 - 1 Part Time Admin. Asst



Building Maintenance

- New Exterior Paint
- New Roof being installed
- New AC coming soon
- New Sign coming soon



Vehicles

- New Brush Truck Received
- Old Brush Truck Motor Replaced
- New Tanker Coming
- Engine 4 Back in Service



Memorial Events

- 9/11 Ceremony
- Honor Guard
- Funeral/Memorial Services



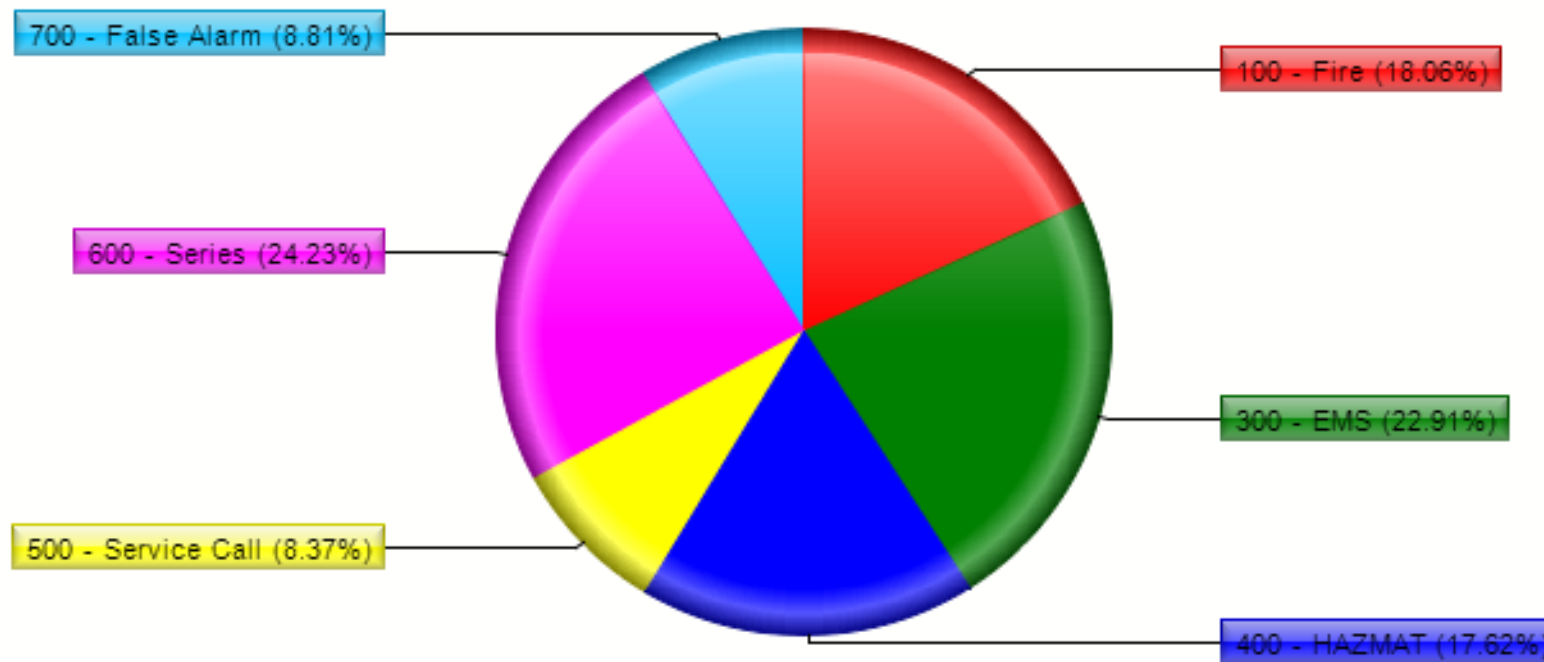


Scholarships



Fire Prevention

- Inspections
- School Education

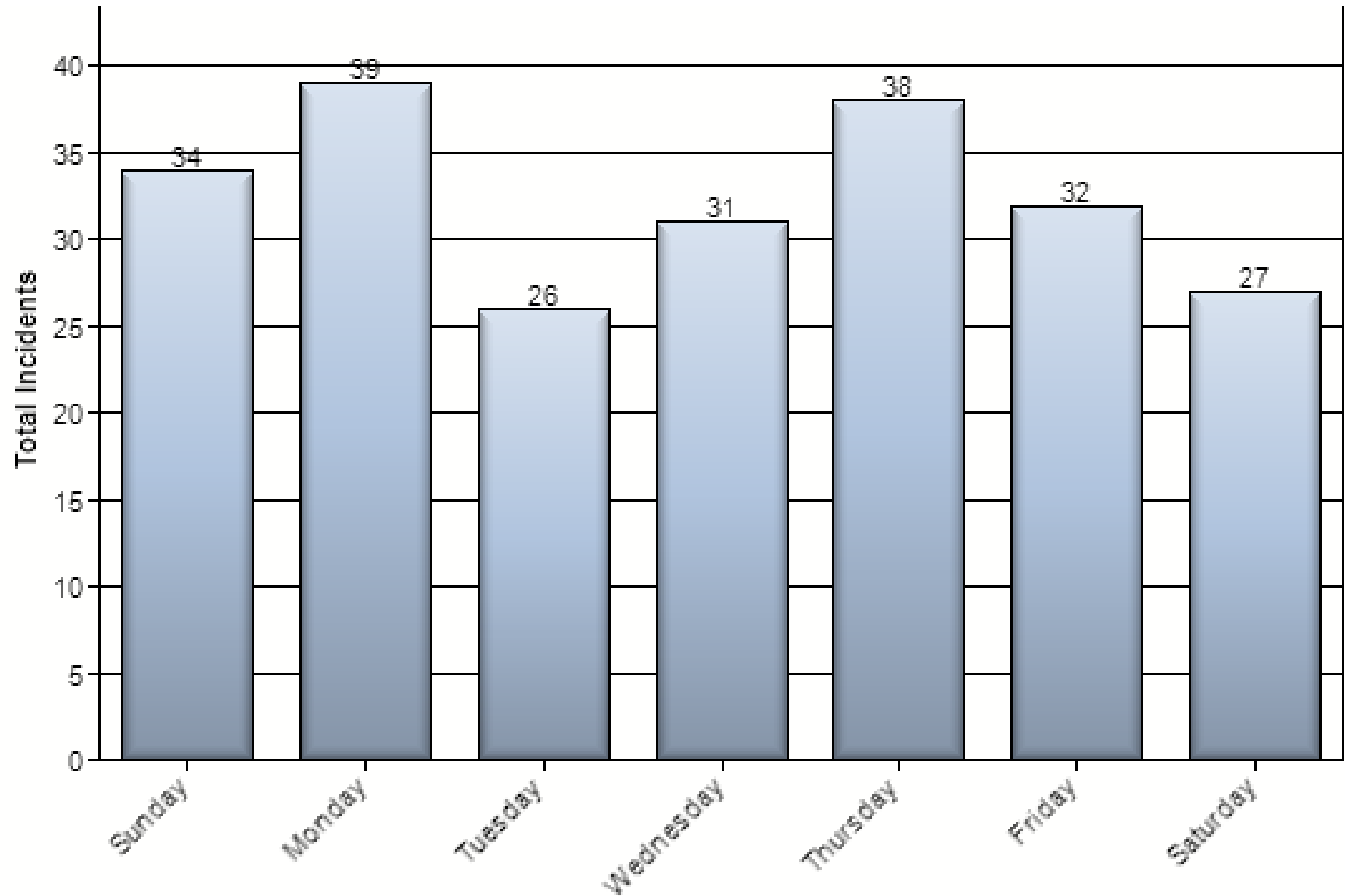


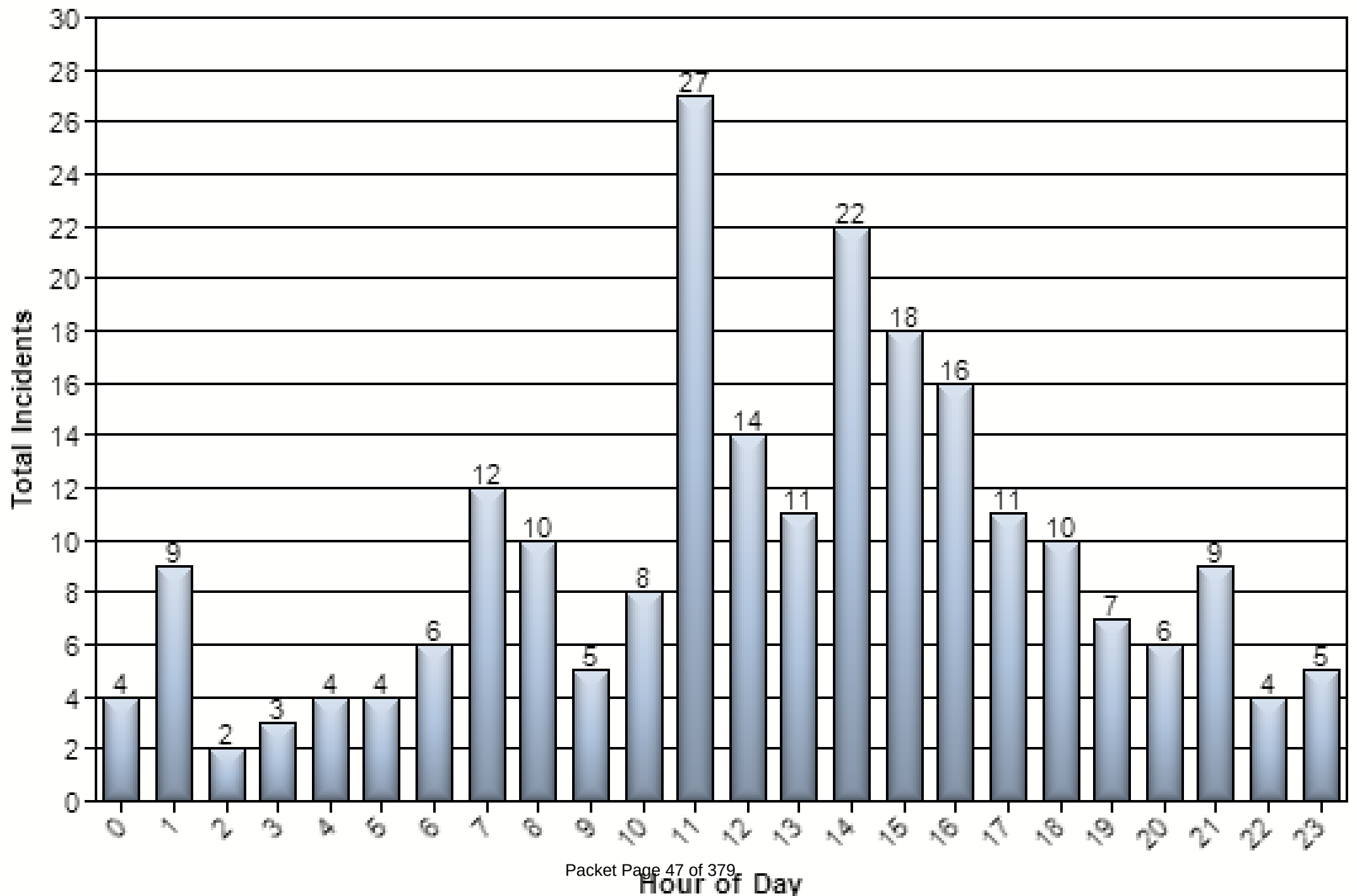
Calls for Service 2024

• 100- Fire	41
• 300-EMS	52
• 300-Hazmat	40
• 500-Service Call	19
• 600-Cancelled/Good Intent	55
• <u>700-False Alarm</u>	<u>20</u>
• Total-	227

Mutual Aid Calls

Aransas Pass FD	13
Gregory VFD	2
Ingleside on the Bay VFD	2
Rockport VFD	2
San Patricio Co FM Office (compensated)	11
Sinton VFD	3
Total	33





Questions?

Thank you for your time

CITY COUNCIL AGENDA
Regular Meeting: January 28, 2025

AGENDA ITEM: 8

Deliberate and take appropriate action regarding authorization for the Mayor to execute the Contract between the City of Ingleside, Texas and San Patricio County Elections Administrator for Election Services for the May 03, 2025 Municipal Election.

SUBMITTED BY: Jana Stork, City Secretary

APPROVED FOR AGENDA: Brenton Lewis, City Manager

BACKGROUND:

Please see the accompanying Contract for Election Services.

FISCAL ANALYSIS:

N/A

RECOMMENDATION:

Staff recommends Council approve the Contract for Election Services for the May 03, 2025 Municipal Election.

ATTACHMENTS:

1. 2025 ELECTION CONTRACT INGLESIDE, ISD, IOB

THE STATE OF TEXAS

§

COMMISSIONERS COURT

COUNTY OF SAN PATRICIO

§

§

CONTRACT FOR ELECTION SERVICES

THIS AGREEMENT FOR ELECTION SERVICES (hereinafter "Contract") is made this 3rd day of January, 2025, by and between San Patricio County, Texas (hereinafter "County"), and City of Ingleside, City of Ingleside on the Bay and Ingleside Independent School District (collectively hereinafter "Political Subdivision"), pursuant to Texas Election Code Sections 31.092 and 271.002 for a May 3, 2025 election to be administered by Pamela Hill, San Patricio County Elections Administrator, (hereinafter "Elections Administrator").

This Contract is subject to the written approval of the County's attorney and shall not be binding on the parties until such written approval is obtained. Upon written approval of the County's attorney and the participating parties, this Contract shall be binding on said parties.

RECITALS

WHEREAS, Political Subdivision, at its sole expense, is holding a general election for the selection of certain elected officers on May 3, 2025.

WHEREAS, County owns an electronic voting system, the Hart Verity Voting System (Version 2.7), which has been duly approved by the Secretary of State pursuant to Texas Election Code Chapter 122, as amended, and is compliant with the accessibility requirements set forth by Texas Election Code Section 61.012. Political Subdivision desires to use the County's electronic voting system and to compensate County for such use and to share in certain other expenses connected with joint elections in accordance with the applicable provisions of Chapters 31 and 271 of the Texas Election Code, as amended.

NOW THEREFORE, in consideration of the mutual covenants, agreements, and benefits to the parties, **IT IS AGREED** as follows:

I. ADMINISTRATION

The parties agree to hold a "Joint Election" in accordance with Chapter 271 of the Texas Election Code and this Contract. The San Patricio County Elections Administrator shall coordinate, supervise, and handle all aspects of administering the Joint Election as provided in this Contract.

Political Subdivision agrees to pay San Patricio County for equipment, supplies, services, and administrative costs as provided in this Contract. The San Patricio County Elections Administrator shall serve as the administrator for the Joint Election; however, Political Subdivision shall remain responsible for the decisions and actions of its officers necessary for the lawful conduct of its election. The Elections Administrator shall provide advisory services in connection with decisions to be made and actions to be taken by the officers of the Political

Subdivision.

It is understood that other political subdivisions may wish to participate in the use of the County's electronic voting system and polling places, and it is agreed that San Patricio County and the Elections Administrator may enter into other joint election agreements and contracts for election services for those purposes on terms and conditions generally similar to those set forth in this Contract. Political Subdivision agrees that San Patricio County may enter into joint election agreements with other political subdivisions that may have territory located partially or wholly within the boundaries of Political Subdivision, and in such case all parties sharing common territory shall share a joint ballot on the County's electronic voting system at the applicable polling places. In such cases, costs shall be pro-rated among the participants according to **Section X** of this Contract.

At each polling location, joint participants shall share voting equipment and supplies to the extent possible. The participating parties shall share a mutual ballot in those precincts where jurisdictions overlap.

However, in no instance shall a voter be permitted to receive a ballot containing an office or proposition stating a measure on which the voter is ineligible to vote. Multiple ballot styles shall be available in those shared polling places where jurisdictions do not overlap.

II. LEGAL DOCUMENTS

Political Subdivision shall be responsible for the preparation, adoption, and publication of all required election orders, resolutions, notices, and any other pertinent documents required by the Texas Election Code and/or Political Subdivision's governing body, charter, or ordinances.

Preparation of the necessary materials for notices and the official ballot shall be the responsibility of each participating authority, including translation to languages other than English. Each participating authority shall provide a copy of their respective election orders and notices to the San Patricio County Elections Administrator.

If necessary, the Political Subdivision shall prepare a submission to the United States Department of Justice for pre-clearance of the joint election procedures and polling places, pursuant to the Voting Rights Act of 1965, as amended.

III. VOTING LOCATIONS

The Elections Administrator shall select and arrange for the use of all election day voting locations. Voting locations will be, whenever possible, the usual voting location for each election precinct in elections conducted by the County. The proposed voting locations are listed in **Attachment B**, as amended, of this Contract. In the event a voting location is not available, the Elections Administrator will arrange for use of an alternate location with the approval of the Political Subdivision. The Elections Administrator shall notify the Political Subdivision in writing of any changes to the locations listed in **Attachment B**.

If polling place(s) for the May 3, 2025 election are different from the polling place(s) used by

Political Subdivision in its most recent election, Election Administrator agrees to post a notice (in English and Spanish) no later than May 2, 2025 at the previous polling places in the jurisdiction stating that the polling location has changed and stating the Political Subdivision's polling place names and addresses in effect for the May 3, 2025 election.

IV. ELECTION JUDGES, CLERKS, AND OTHER ELECTION PERSONNEL

Political Subdivision shall be responsible for the appointment of the presiding judge and alternate judge for each polling location in accordance with Chapter 32 of the Texas Election Code. The Elections Administrator shall make emergency appointments of election officials if necessary.

Upon request by the Political Subdivision, the Elections Administrator agrees to assist in recruiting polling place officials who are bilingual (fluent in both English and Spanish).

The Elections Administrator shall notify all election judges of the eligibility requirements of Subchapter C of Chapter 32 of the Texas Election Code, and will take the necessary steps to insure that all election judges appointed for the Joint Election are eligible to serve.

The Elections Administrator shall arrange for the training of all election judges and clerks. The Elections Administrator shall arrange for the date, time, and place for presiding election judges to pick up their election supplies. Each presiding election judge will be sent a letter from the Elections Administrator notifying him of his appointment, the time and location of training and distribution of election supplies, and the number of election clerks that the presiding judge may appoint. Each election judge and clerk will receive compensation as stated in **Attachment "A" from Political Subdivision** at an hourly rate established by the Political Subdivision pursuant to Texas Election Code Section 32.091. The election judge will receive an additional sum of \$25.00 for picking up the election supplies prior to election day and for returning the supplies and equipment to the central counting station after the polls close.

The Elections Administrator may employ other personnel necessary for the proper administration of the election, including such part-time help as is necessary to prepare for the election, to ensure the timely delivery of supplies during early voting and on election day, and for the efficient tabulation of ballots at the central counting station. Part-time personnel working in support of the Early Voting Ballot Board and/or central counting station on election night will be compensated at the rate set by San Patricio County.

It is agreed by all parties that at all times and for all purposes hereunder, all election judges, clerks, and all other personnel involved in this election are independent contractors and are not employees or agents of the County or Political Subdivision. No statement contained in this Contract shall be construed so as to find any judge, clerk, or any other election personnel an employee or agent of the County or Political Subdivision, and no election personnel shall be entitled to the rights, privileges, or benefits of County or Political Subdivision employees except as otherwise stated herein, nor shall any election personnel hold himself out as an employee or agent of the County or Political Subdivision unless considered a county employee as determined by the San Patricio County Human Resources Department.

V. PREPARATION OF SUPPLIES AND VOTING EQUIPMENT

The Elections Administrator shall arrange for all election supplies and voting equipment including, but not limited to official ballots, sample ballots, voter registration lists, and all forms, signs, maps and other materials used by the election judges at the voting locations. At each polling location, joint participants shall share voting equipment and supplies to the extent possible. The participating parties shall share a mutual ballot in those precincts where jurisdictions overlap. However, in no instance shall a voter be permitted to receive a ballot containing an office or proposition stating a measure on which the voter is ineligible to vote. Multiple ballot styles shall be available in those shared polling places where jurisdictions do not overlap. The Elections Administrator shall provide the necessary voter registration information, maps, instructions, and other information needed to enable the election judges in the voting locations that have more than one ballot style to conduct a proper election.

Political Subdivision shall furnish the Elections Administrator a list of candidates and/or propositions showing the order and the exact manner in which the candidate names and/or proposition(s) are to appear on the official ballot (including titles and text in each language in which the authority's ballot is to be printed). This list shall be delivered to the Elections Administrator as soon as possible after ballot positions have been determined by each of the participating authorities. Each participating authority shall be responsible for proofreading and approving the ballot insofar as it pertains to that authority's candidates and/or propositions.

VI. EARLY VOTING

The participating authorities agree to conduct joint early voting and to appoint the Election Administrator as the Early Voting Clerk in accordance with Sections 31.097 and 271.006 of the Texas Election Code. Political Subdivision agrees to appoint the Elections Administrator's permanent county employees as deputy early voting clerks. The participating authorities further agree that the Elections Administrator may appoint other deputy early voting clerks to assist in the conduct of early voting as necessary, and that these additional deputy early voting clerks shall be compensated at an hourly rate set by San Patricio County pursuant to Section 83.052 of the Texas Election Code. Early Voting by personal appearance will be held at the locations, dates, and times listed in Attachment "B", as amended, of this Contract. Any qualified voter of the Joint Election may vote early by personal appearance at any one of the joint early voting locations.

As Early Voting Clerk, the Elections Administrator shall receive applications for early voting ballots to be voted by mail in accordance with Chapters 31 and 86 of the Texas Election Code. Any requests for early voting ballots to be voted by mail received by the Political Subdivision shall be forwarded immediately by fax or courier to the Elections Administrator for processing.

The Elections Administrator shall, upon request, provide the Political Subdivision a copy of the early voting report on a daily basis and a cumulative final early voting report following the election.

VII. EARLY VOTING BALLOT BOARD

Political Subdivision with the help of the Elections Administrator if requested shall appoint an Early Voting Ballot Board (EVBB) to process early voting results from the Joint Election. The Presiding Judge shall appoint two or more additional members to constitute the EVBB. The Elections Administrator shall determine the number of EVBB members required to efficiently process the early voting ballots.

VIII. CENTRAL COUNTING STATION AND ELECTION RETURNS

The Elections Administrator shall be responsible for establishing and operating the central counting station to receive and tabulate the voted ballots in accordance with the provisions of the Texas Election Code and of this Contract.

The participating authorities hereby, in accordance with sections 127.002, 127.003, and 127.005 of the Texas Election Code, appoint the following central counting station officials:

- Counting Station Manager: Laura Stevens, Assistant Election Administrator
- Tabulation Supervisor: Pamela Hill, Election Administrator
- Presiding Judge: Victoria Pereida, Election Clerk

The Counting Station Manager or his representative shall deliver timely cumulative reports of the election results as precincts report to the central counting station and are tabulated. Said Manager shall be responsible for releasing cumulative totals and precinct returns from the election to the joint participants, by distribution of hard copies transmittals by facsimile and by phone (when so requested).

The Elections Administrator will prepare the unofficial canvass reports after all precincts have been counted, and will deliver a copy of the unofficial canvass to the Political Subdivision as soon as possible after all returns have been tabulated. All participating authorities shall be responsible for the official canvass of their respective elections.

The Elections Administrator shall be responsible for conducting the post-election manual recount required by Section 127.201 of the Texas Election Code unless a waiver is granted by the Secretary of State. Notification and copies of the recount, if waiver is denied, will be provided to each participating authority and the Secretary of State's Office.

IX. RUNOFF ELECTION

Political Subdivision shall have the option of extending the terms of this Contract through its runoff election, if applicable. In the event of such runoff election, the terms of this Contract shall automatically extend unless the Political Subdivision notifies the Elections Administrator in writing within 10 days of the original election.

Political Subdivision shall reserve the right to reduce the number of early voting locations and/or election day voting locations in any runoff election. If necessary, any voting changes made by the Political Subdivision between the original election and the runoff election shall

be submitted by the authority making the change to the United States Department of Justice for the preclearance required by the Federal Voting Rights Act of 1965, as amended.

X.ELECTION EXPENSES AND ALLOCATION OF COSTS

The participating authorities agree to share the costs of administering the Joint Election. Allocation of costs, unless specifically stated otherwise, is mutually agreed to be shared according to a formula which is based on the average cost per polling place (unit cost) as determined by adding together the overall expenses and dividing the expenses equally among the total number of polling places. Costs for polling places shared shall be pro-rated equally among the participants utilizing that polling place.

It is agreed that the normal rental rate of ten percent (10%) for the County's voting equipment used on election day shall be charged and pro-rated among the participants utilizing each polling location.

Costs for Early Voting by Personal Appearance shall be allocated as shown in Attachment " A" of this Contract.

XI. WITHDRAWAL FROM CONTRACT DUE TO CANCELLATION OF ELECTION

Political Subdivision may withdraw from this Contract and the Joint Election should it cancel its election in accordance with Sections 2.051 - 2.053 of the Texas Election Code. The Political Subdivision is fully liable for any expenses incurred by San Patricio County on behalf of the Political Subdivision. Any monies deposited with the County by the withdrawing authority shall be refunded, minus the aforementioned expenses and administrative fee if applicable.

XII. RECORDS OF THE ELECTION

The Elections Administrator is hereby appointed general custodian of the voted ballots and all records of the Joint Election as authorized by Section 271.010 of the Texas Election Code.

Access to the election records shall be available to each participating authority as well as to the public in accordance with applicable provisions of the Texas Election Code and the Texas Public Information Act. The election records shall be stored at the offices of the Elections Administrator or at an alternate facility used for storage of the County's records. The Elections Administrator shall ensure that the records are maintained in an orderly manner so that the records are clearly identifiable and retrievable.

Records of the election shall be retained and disposed of in accordance with the provisions of Section 66.058 of the Texas Election Code. If records of the election are involved in any pending election contest, investigation, litigation, or open records request, the Elections Administrator shall maintain the records until final resolution or until final judgment, whichever is applicable. It is the responsibility of each participating authority to bring to the attention of the Elections Administrator any notice of pending election contest, investigation, litigation or open records request which may

be filed with the participating authority.

XIII. RECOUNTS

A recount may be obtained as provided by Title 13 of the Texas Election Code. Political Subdivision agrees that any recount shall take place at the offices of the Elections Administrator, and that the Elections Administrator shall serve as Recount Supervisor and the Political Subdivision's official or employee who performs the duties of a secretary under the Texas Election Code shall serve as Recount Coordinator.

The Elections Administrator agrees to provide advisory services to the Political Subdivision as necessary to conduct a proper recount.

XIV. MISCELLANEOUS PROVISIONS

1. Because other districts and political subdivisions may wish to participate in the use of the County's election equipment and voting places, it is agreed that the Elections Administrator may contract with such other districts or political subdivisions for such purposes and that in such event there may be an adjustment of the pro-rata share to be paid to the County by the participating authorities.
2. The Elections Administrator shall file copies of this Contract with the San Patricio County Treasurer and the San Patricio County Auditor in accordance with Section 31.099 of the Texas Election Code.
3. In the event that legal action is filed contesting Political Subdivision's election under Title 14 of the Texas Election Code, Political Subdivision shall choose and provide, at its own expense, legal counsel for the County, the Elections Administrator, and additional election personnel as necessary.
4. Nothing in this Contract prevents any party from taking appropriate legal action against any other party and/or other election personnel for a breach of this Contract or a violation of the Texas Election Code.
5. The parties agree that under the Constitution and laws of the State of Texas, neither San Patricio County nor Political Subdivision can enter into an agreement whereby either party agrees to indemnify or hold harmless another party; therefore, all references of any kind, if any, to indemnifying or holding or saving harmless for any reason are hereby deleted.
6. This Contract shall be construed under and in accord with the laws of the State of Texas, and all obligations of the parties created hereunder are performable in San Patricio County, Texas.
7. In the event one or more of the provisions contained in this Contract shall for any reason be held to be invalid, illegal, or unenforceable in any respect, such invalidity, illegality, or unenforceability shall not affect any other provision hereof and this Contract shall be

construed as if such invalid, illegal, or unenforceable provision had never been contained herein.

8. All parties shall comply with all applicable laws, ordinances, and codes of the State of Texas, all local governments, and any other entities with local jurisdiction.
9. The waiver by any party of a breach of any provision of this Contract shall not operate as or be construed as a waiver of any subsequent breach.
10. Any amendments of this Contract shall be of no effect unless in writing and signed by all parties hereto.

XV. COST ESTIMATES

The exact amount of the Political Subdivision's cost obligation under the terms of this Contract shall be calculated after the May 3, 2025 election (or runoff election, if applicable), and if the amount of the Political Subdivision's cost obligation exceeds the amount deposited, the Political Subdivision shall pay to San Patricio County the balance due within thirty (30) days after receipt of the final invoice from the Elections Administrator.

IN TESTIMONY HEREOF, this Contract, its multiple originals all of equal force, has been executed on behalf of the parties hereto as follows, to-wit:

It has on the _____ day of _____, 2025 been executed on behalf of San Patricio County by the County Judge and the Elections Administrator pursuant to the Texas Election Code so authorizing;

It has on the _____ day of _____, 2025 been executed on behalf of the Political Subdivision by its Presiding Officer or authorized representative, pursuant to an action of the Political Subdivision so authorizing;

ATTEST: SAN PATRICIO COUNTY, TEXAS

David R. Krebs, County Judge

Pamela Hill, Election Administrator

ATTEST: POLITICAL SUBDIVISION

Title: _____

ATTACHMENT A

VOTING EQUIPMENT:

Each represents a per day fee:

- | | |
|--|----------|
| • Verity Controller: | \$465.00 |
| • Verity Touch with Access (disability): | \$525.00 |
| • Vdrive | \$65.00 |
| • Verity Scanner | \$525.00 |

STAFF FOR POLLING LOCATIONS:

- Judges: \$14.00 per hour
- Clerks: \$13.00 per hour
- Judges: \$25.00 fee for Pickup and Delivery to San Patricio County Election Administrator's Office in Sinton, Texas.

PROGRAMMING EQUIPMENT AND BALLAT PRODUCTION:

- \$1,000.00 for programming and testing equipment
- .20 cents for each ballot
- \$3.00 mail ballot kit plus cost of postage
- \$250.00 audio translation
- \$300.00 election night tallying and reports

ADMINISTRATION FEE:

- \$500.00 per election

ATTACHMENT B

Early Voting Location:

Humble Community Center

Dates: April 22 – 29, 2025

Times: April 22 & 28 7:00am – 7:00pm

April 23, 24, 25 & 29 8:00am – 7:00pm

Election Day Location:

Humble Community Center

Date: May 3, 2025

Time: 7:00 a.m. – 7:00 p.m.

CITY COUNCIL AGENDA
Regular Meeting: January 28, 2025

AGENDA ITEM: 9

Deliberate and take appropriate action on the Regular Meeting Minutes of January 14, 2025.

SUBMITTED BY: Jana Stork, City Secretary

APPROVED FOR AGENDA: Brenton Lewis, City Manager

BACKGROUND:

Please see the accompanying Regular City Council Meeting Minutes of January 14, 2025.

FISCAL ANALYSIS:

N/A

RECOMMENDATION:

Staff recommends Council approve the Minutes, as presented.

ATTACHMENTS:

1. 2025, 01-14 Regular Council Meeting Minutes_DRAFT

**CITY OF INGLESIDE
REGULAR CITY COUNCIL MEETING
MINUTES
JANUARY 14, 2025**

Opening Agenda

1. Call Meeting to Order.

The Regular City Council Meeting of the City of Ingleside was called to order by Mayor Pro-Tem Long at 6:30 p.m. on January 14, 2025, at City Hall 2671 San Angelo Ave., Ingleside, TX and live video streaming.

2. Roll Call.

With Council Members present a quorum was established.

Council Members Present: Steve Diehl, Stewart Wilson, David Pruitt, John Salinas, Mayor Pro-Tem Tracy Long, Julio Salinas, and Mayor Adame.

3. Invocation.

Council Member Pruitt led the invocation.

4. Pledge of Allegiance.

Mayor Pro-Tem Long led the Pledge of Allegiance to the U.S. flag.

Mayor Adame and Council Member Julio Salinas arrived at 6:31 p.m.

5. Citizen Comments and Reports.

Citizen comment provided to Council Members before the meeting started.

Michelle Mack, 218 Bayshore Dr., Ingleside on the Bay, addressed the Council about industry in the area, and being against the Port of Corpus Christi's rezone request.

Thomas Mack, 218 Bayshore Dr., Ingleside on the Bay, addressed the Council about money going to industries, Port Arthur example, and being against the Port of Corpus Christi's rezone request.

Lucia Dailey, 619 Ave B, Port Aransas, addressed the Council about being against the Port of Corpus Christi's rezone request, where tax money goes, and not being against industry but needing to know when to say no to more.

Cyndy Valdes, 809 Bayshore Dr., Ingleside on the Bay, addressed the Council about being against the Port of Corpus Christi's rezoning request, Army Corps of Engineers denying the permit for the Port, and about the wetlands in the zoning area.

Debby Ferrell, 132 Sunset, Ingleside on the Bay, addressed the Council about the comment from a Council Member coming across the wrong way to Ingleside on the Bay residents, and being against the Port of Corpus Christi's rezoning request.

Thomas Cerwonka, 601 Starlight, Ingleside on the Bay, addressed the Council about the noise coming from industries around the residents at Ingleside on the Bay, and being against the Port of Corpus Christi's rezoning request.

Courtney Shane, 2181 Capeheart St, addressed the Council about flags needing to back at full staff on January 20, 2025, watch party for the Presidential Inauguration on January 20, 2025, and being against the Port of Corpus Christi's rezoning request.

6. Staff Comments and Reports.

a. Council Comments and Reports.

No discussion was held on this matter.

b. Announcements of Community Interest and/or upcoming events.

No discussion was held on this matter.

c. City of Ingleside monthly financial report as of November 2024.

City Manager Lewis informed Council Members that tax receipts come in during the month of December, and that report would be presented at the next meeting.

d. City of Ingleside expenditures paid over \$3,000.00 for the period of November 2024.

No discussion was held on this matter.

e. Quarterly Report from the Ingleside Development Corporation (IDC).

Discussion between Council Members and Director of Economic Development Carr about the IDC financials being included with the City's financial reports, working with City projects, projects being requested by the Council go through the City Manager, Council approves budget and budget amendments, Council doing the final approval of IDC projects, and IDC receiving money from sales tax.

f. City of Ingleside unaudited financials as of September 30, 2024.

City Manager Lewis informed Council that the year end finances were provided by the deadline given as stated in the City Charter.

g. Report on General Projects.

Discussion was held between Council Members and Director of Infrastructure Services Paredez about the City Projects; the Animal Control Facility that is waiting on final inspections, and the ADA inspection taking place on January 23, 2025 with a possible close out on January 24, 2025.

Presentations

There were no presentations presented for this meeting.

Consent Agenda

Agenda Items 9, 10, and 11 were pulled from the Consent Agenda and moved into the Regular Agenda for separate discussion.

- 7. Deliberate and take appropriate action on the Regular Meeting Minutes of December 10, 2024.**
- 8. Deliberate and take appropriate action on changing the Regular City Council meeting of February 11, 2025 to February 10, 2025 to allow representatives of the City of Ingleside to attend the Coastal Bend Legislative Day in Austin, Texas.**

Motion: Council Member John Salinas made a motion to approve the Consent Agenda excluding Items 9, 10 and 11 which were removed from the Consent Agenda for separate discussion. Council Member Pruitt seconded the motion. Motion carried with all present voting in favor.

Mayor Adame requested that Agenda Items 9, 10, and 11 were discussed before the rest of the Agenda.

Mayor Adame requested that the Public Hearing be moved before the Executive Session.

Public Hearing

- 14. Conduct a public hearing concerning an application filed by the Port of Corpus Christi Authority, requesting to rezone, from R-1 – (Single Family Residential) to I – (Industrial), approximately 1,743.76 ACRES, bearing the legal description of:**

Property Tract 1, ID 60762, being 124.3789 acres out of a 524.80-acre tract of land. Being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al to Mrs. Jean McCampbell Davis by Partition Deed filled November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property

Tract 2, ID, 60762 being 88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 3, ID, 67182, being 3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 4, ID 67158, 37.397-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 5, 104.748- acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 6, ID 67177, 40.329-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 7, ID 61476, 848 acres out of a 1181.095 tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 8, ID 67236, 112.818-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 9, ID 114650, 45.5766 acres of a 150.13 acre tract of land out of the heirs of Rosa Teal Survey, Abstract 262, San Patricio County, Texas, the said 150.13 acre tract of land being the same as and all of tract II being 150.12 acres, more or less, described in Special Warranty Deed dated November 1, 2013, recorded in document No. 632533, Official Public Records of San Patricio County, Texas. Property Tract 10, ID 103271, 145.0886 acres out of a 150.77 acre tract of land, being the same land described as 150.694 acres conveyed from Centex Homes. to EFO Land, L.P., by General Warranty Deed dated March 26, 1999, and recorded in Clerk's File No. 472035 of the Real Property Records of San Patricio County, Texas. Property Tract 11, ID 67168, Tract 12, 61499, 167.165 Acre Tract of Land, situated in the Heirs of Rosa Teal Survey A-262, Nicholas Fagan Survey A- 124, being out a 6,091.22 Acre Tract of land described in a Partition Deed from W.G. (Will) McCampbell, et al., to John S. McCampbell, recorded in Volume 103, Page 156, Deed Records of San Patricio County Texas; said 167.165 Acre Tract being the same lands as a 166 Acre Tract of land described in a Deed from said W.G. McCampbell, et al. to Mrs. Jean McCampbell Davis, as recorded in Volume 103 Page 151. Property Tract 13, ID 67270, 13.287 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres,

actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas. Property Tract 14, ID 67091, 12.4199 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A- 262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.

At 7:37 p.m. Mayor Adame convened the Ingleside City Council into a Public Hearing.

Speaking For: None

Speaking Against: Katherine Hatch 418 Woodhaven, IOB
Charles Boone 468 Sunset, IOB
Lucia Dailey 619 Ave B, Port Aransas
Tom Dailey 914 Sandpiper, IOB
Ken Willis 316 Inglewood, IOB
Courtney Shane 2181 Capeheart St.
Gerard Gutierrez 1614 Mooney Ln
Skip Hatch 418 Woodhaven, IOB
Libby Bryers 3036 Todd Circle

Speaking Neutral: Dylan Davis 2613 Carlow Dr., Austin
Jason Knight 461 S. 11th St., Aransas Pass

At 8:05 p.m. Mayor Adame reconvened the Ingleside City Council into a Regular Meeting.

- 15. Conduct a public hearing concerning an application filed by the Port of Corpus Christi Authority, requesting to rezone, from R-1 – Single Family Residential to I – Industrial, approximately 374.31 ACRES, bearing a legal description of:**

Property Tract 16, ID 69004, Tract 17, ID 65073, Tract 19, ID 69200, Tract 21, Tract 22, Tract 23, Tract 24, A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas. Property Tract 20, A 37.95-acre tract out of the William McDonough Survey, Abstract A-184 and the Day Land and Cattle Company Survey, Abstract A-387, being the same tract called 38.06 acres recorded in Document No. 534924, Deed Records, San Patricio County, Texas, Save and Except a 2.5 acre drill site recorded in Document No. 379019, Deed Records, San Patricio County, Texas.

At 8:07 p.m. Mayor Adame convened the Ingleside City Council into a Public Hearing.

Speaking For: None

Speaking Against: Debby Ferrell 132 Sunset, IOB
Courtney Shane 2181 Capeheart St.

Speaking Neutral: None

At 8:09 p.m. Mayor Adame reconvened the Ingleside City Council into a Regular Meeting.

- 16. Conduct a public hearing concerning an application filed by the Port of Corpus Christi Authority, requesting to rezone, from R-1 – Single Family Residential to C-2 – General Commercial, bearing a legal description of:
82.30 Acres, being 125.00 foot, 200.00 foot and 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas, and a 31.96 acre, 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas.**

At 8:10 p.m. Mayor Adame convened the Ingleside City Council into a Public Hearing.

Speaking For: None

Speaking Against: Debby Ferrell 132 Sunset, IOB
Lucia Dailey 619 Ave B, Port Aransas

Speaking Neutral: None

At 8:12 p.m. Mayor Adame reconvened the Ingleside City Council into a Regular Meeting.

Regular Agenda

- 9. Deliberate and take appropriate action on the second reading of an Ordinance adopting an amendment to the Drainage Master Plan, and element of the Comprehensive Master Plan of the City of Ingleside; amending conflicting provisions of the City Comprehensive Plan, and further providing for effective date, reading, severance, and publication.**

Proposed Ordinance 2025-01.

Discussion was held between Council Members and Director of Infrastructure Services about the changes to the Drainage Master Plan, West Main problem area, and Freese and Nichols model shows a fix to the issue and amend the current Drainage Master Plan.

Motion: Council Member Julio Salinas made a motion to approve Ordinance 2025-01, an Ordinance adopting an amendment to the Drainage Master Plan, and element of the Comprehensive Master Plan of the City of Ingleside; amending conflicting provisions of the City Comprehensive Plan, and further providing for effective date, reading, severance, and publication. Mayor Adame seconded the motion. Motion carried with all present voting in favor.

10. Deliberate and take appropriate action on an agreement between the City of Ingleside and the Ingleside Little League Association for the use of the Bennie Diegel Baseball / Softball Complex.

Discussion was held between Council Members and City Manager Lewis about the Ingleside Little League Association for the use of the Bennie Diegel Baseball / Softball Complex, the agreement being uniform between all leagues and the City, and an email from the League President.

Motion: Council Member Diehl made a motion to approve the Facility Use Agreement with the Ingleside Little League Association, as presented. Mayor Adame seconded the motion. Motion carried with all present voting in favor.

11. Deliberate and take appropriate action on an agreement between the City of Ingleside and the Mustang Infinite Softball Association for the use of the Faith Park Baseball / Softball Complex.

No discussion was held on this item.

Motion: Council Member Diehl made a motion to approve the Facility Use Agreement with the Mustang Infinite Softball Association, as presented. Mayor Adame seconded the motion. Motion carried with all present voting in favor.

Public Hearings took place after Agenda Item 11.

Agenda Item 17 was discussed after Public Hearings.

17. Deliberate and take appropriate action regarding second and final reading of a Resolution of the City of Ingleside, Texas, approving a project of the City of Ingleside Development Corporation; complying with Section 505.158 Texas Local Government Code; and providing for two separate readings and an effective date.

Proposed Resolution 2025-01.

Discussion was held between Council Members, City Manager Lewis, and Director of Economic Development Carr about the second reading of the Resolution.

Motion: Council Member Diehl made a motion to approve Resolution 2025-01, a Resolution of the City of Ingleside, Texas, approving a project of the City of Ingleside

Development Corporation; complying with Section 505.158 Texas Local Government Code; and providing for two separate readings and an effective date. Council Member Wilson seconded the motion. Motion carried with all present voting in favor.

Mayor requested that Items 20, 21, and 22 be moved before Item 18.

- 20. Deliberate and take appropriate action on first reading of an Ordinance changing the zoning for the following property from its present zoning of R-1 (Single Family Residential) to I (Industrial), and further providing for effective date, reading, severance, and publication:**

approximately 1,743.76 ACRES, bearing the legal description of: Property Tract 1, ID 60762, being 124.3789 acres out of a 524.80-acre tract of land. Being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al to Mrs. Jean McCampbell Davis by Partition Deed filled November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 2, ID, 60762 being 88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 3, ID, 67182, being 3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 4, ID 67158, 37.397-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 5, 104.748- acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 6, ID 67177, 40.329-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 7, ID 61476, 848 acres out of a 1181.095 tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 8, ID 67236, 112.818-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 9, ID 114650, 45.5766 acres of a 150.13 acre tract of land out of the heirs of Rosa Teal Survey, Abstract 262, San Patricio County, Texas, the said 150.13 acre tract of land being the same as and all of tract II being 150.12 acres, more or less, described in Special Warranty Deed dated November 1, 2013, recorded in document No. 632533, Official

Public Records of San Patricio County, Texas. Property Tract 10, ID 103271, 145.0886 acres out of a 150.77 acre tract of land, being the same land described as 150.694 acres conveyed from Centex Homes. to EFO Land, L.P., by General Warranty Deed dated March 26, 1999, and recorded in Clerk's File No. 472035 of the Real Property Records of San Patricio County, Texas. Property Tract 11, ID 67168, Tract 12, 61499, 167.165 Acre Tract of Land, situated in the Heirs of Rosa Teal Survey A-262, Nicholas Fagan Survey A- 124, being out a 6,091.22 Acre Tract of land described in a Partition Deed from W.G. (Will) McCampbell, et al., to John S. McCampbell, recorded in Volume 103, Page 156, Deed Records of San Patricio County Texas; said 167.165 Acre Tract being the same lands as a 166 Acre Tract of land described in a Deed from said W.G. McCampbell, et al. to Mrs. Jean McCampbell Davis, as recorded in Volume 103 Page 151. Property Tract 13, ID 67270, 13.287 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas. Property Tract 14, ID 67091, 12.4199 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A- 262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.

Port of Corpus Christi Representative Sam Esquivel gave a presentation about the rezone areas the Port is requesting.

Discussion was held between Council Members, City Manager Lewis, Director of Development Services Rodriguez, and Port of Corpus Christi Representative Sam Esquivel about the Planning and Zoning Commission recommending the rezone request, the location of the rezone, the zoning having limitations, any improvements on top of the land the City gains the tax money, doing the best for the region, the land having to support Port duties, drainage issue, rezoning letters going out to surrounding citizens with one letter for objection coming back, and the minimal impact of land if solar farm goes in the rezone request.

Motion: Mayor Pro-Tem Long made a motion to approve the first reading of an Ordinance changing the zoning for the following property from its present zoning of R-1 (Single Family Residential) to I (Industrial), and further providing for effective date, reading, severance, and publication: approximately 1,743.76 ACRES, bearing the legal description of: Property Tract 1, ID 60762, being 124.3789 acres out of a 524.80-acre tract of land. Being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al to Mrs.

Jean McCampbell Davis by Partition Deed filed November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 2, ID, 60762 being 88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 3, ID, 67182, being 3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 4, ID 67158, 37.397-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 5, 104.748- acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 6, ID 67177, 40.329-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 7, ID 61476, 848 acres out of a 1181.095 tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 8, ID 67236, 112.818-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 9, ID 114650, 45.5766 acres of a 150.13 acre tract of land out of the heirs of Rosa Teal Survey, Abstract 262, San Patricio County, Texas, the said 150.13 acre tract of land being the same as and all of tract II being 150.12 acres, more or less, described in Special Warranty Deed dated November 1, 2013, recorded in document No. 632533, Official Public Records of San Patricio County, Texas. Property Tract 10, ID 103271, 145.0886 acres out of a 150.77 acre tract of land, being the same land described as 150.694 acres conveyed from Centex Homes, to EFO Land, L.P., by General Warranty Deed dated March 26, 1999, and recorded in Clerk's File No. 472035 of the Real Property Records of San Patricio County, Texas. Property Tract 11, ID 67168, Tract 12, 61499, 167.165 Acre Tract of Land, situated in the Heirs of Rosa Teal Survey A-262, Nicholas Fagan Survey A- 124, being out a 6,091.22 Acre Tract of land described in a Partition Deed from W.G. (Will) McCampbell, et al., to John S. McCampbell, recorded in Volume 103, Page 156, Deed Records of San Patricio County Texas; said 167.165 Acre Tract being the same lands as a 166 Acre Tract of land described in a Deed from said W.G. McCampbell, et al. to Mrs. Jean McCampbell Davis, as recorded in Volume 103 Page 151. Property Tract 13, ID 67270, 13.287 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas,

and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas. Property Tract 14, ID 67091, 12.4199 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas. Council Member John Salinas seconded the motion. Motion carried 6:0:1.

For Motion: Council Member Diehl, Council Member Wilson, Council Member Pruitt, Council Member John Salinas, Mayor Pro-Tem Long, Council Member Julio Salinas

Against Motion: None

Abstained: Mayor Adame

- 21. Deliberate and take appropriate action on the first reading of an Ordinance changing the zoning for the following property from its present zoning of R-1 (Single Family Residential) to I (Industrial) and further providing for effective date, reading severance, and publication:**

approximately 374.31 ACRES, bearing a legal description of: Property Tract 16, ID 69004, Tract 17, ID 65073, Tract 19, ID 69200, Tract 21, Tract 22, Tract 23, Tract 24, A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas. Property Tract 20, A 37. 95-acre tract out of the William McDonough Survey, Abstract A-184 and the Day Land and Cattle Company Survey, Abstract A-387, being the same tract called 38.06 acres recorded in Document No. 534924, Deed Records, San Patricio County, Texas, Save and Except a 2.5 acre drill site recorded in Document No. 379019, Deed Records, San Patricio County, Texas.

Discussion was held between Council Members, City Manager Lewis, and Port of Corpus Christi Representative Sam Esquivel about working with the City and surrounding areas in regards to the drainage, and possible public outreach committee.

Motion: Mayor Pro-Tem Long made a motion to approve the first reading of an Ordinance changing the zoning for the following property from its present zoning of R-1 (Single Family Residential) to I (Industrial) and further providing for effective date, reading severance, and publication: approximately 374.31 ACRES, bearing a legal description of: Property Tract 16, ID 69004, Tract 17, ID 65073, Tract 19, ID 69200, Tract 21, Tract 22,

Tract 23, Tract 24, A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas. Property Tract 20, A 37. 95-acre tract out of the William McDonough Survey, Abstract A-184 and the Day Land and Cattle Company Survey, Abstract A-387, being the same tract called 38.06 acres recorded in Document No. 534924, Deed Records, San Patricio County, Texas, Save and Except a 2.5 acre drill site recorded in Document No. 379019, Deed Records, San Patricio County, Texas. Council Member Diehl seconded the motion. Motion carried 6:0:1.

For Motion: Council Member Diehl, Council Member Wilson, Council Member Pruitt, Council Member John Salinas, Mayor Pro-Tem Long, Council Member Julio Salinas

Against Motion: None

Abstained: Mayor Adame

22. Deliberate and take appropriate action on the first reading of an Ordinance changing the zoning for the following property from its present zoning of R-1 (Single Family Residential) to C-2 (General Commercial) and further providing for effective date, reading, severance, and publication:

82.30 Acres, being 125.00 foot, 200.00 foot and 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas, and a 31.96 acre, 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas.

Discussion was held between Council Members, City Manager Lewis, and Port of Corpus Christi Representative Sam Esquivel about the buffer zone.

Motion: Mayor Pro-Tem Long made a motion to approve the first reading of an Ordinance changing the zoning for the following property from its present zoning of R-1 (Single Family Residential) to C-2 (General Commercial) and further providing for effective date, reading, severance, and publication: 82.30 Acres, being 125.00 foot, 200.00 foot and 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas, and a 31.96 acre, 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas. Council Member Diehl seconded the motion. Motion carried 6:0:1.

For Motion: Council Member Diehl, Council Member Wilson, Council Member Pruitt, Council Member John Salinas, Mayor Pro-Tem Long, Council Member Julio Salinas

Against Motion: None

Abstained: Mayor Adame

Mayor Adame requested that Executive Session be moved before Item 18.

Executive Session

12. Closed Session

City Council will meet in Closed Session pursuant to the provisions of Chapter 551 of the Texas Government Code, in accordance with the authority contained in:

- A. Section 551.071 Consultations with Attorney regarding enforcement of previously adopted zoning ordinances and resolutions.**
- B. Pursuant to Section 551.071 Consultations with Attorney regarding Civil Action No. 2:24-CV-267 Port of Texas, LP. vs. City of Ingleside.**

At 9:16 p.m. Mayor Adame convened the Ingleside City Council into a closed session pursuant to provision of Chapter 551 of the Texas Government Code, in accordance with the authority contained in Section 551.071 Consultations with Attorney regarding enforcement of previously adopted zoning ordinances and resolutions and Section 551.071 Consultations with Attorney regarding Civil Action No. 2:24-CV-267 Port of Texas, LP. vs. City of Ingleside.

13. Open Session

City Council will reconvene in Open Session at which time action on the matter(s) discussed in Closed Session may be considered.

- A. Section 551.071 Consultations with Attorney regarding enforcement of previously adopted zoning ordinances and resolutions.**
- B. Pursuant to Section 551.071 Consultations with Attorney regarding Civil Action No. 2:24-CV-267 Port of Texas, LP. vs. City of Ingleside.**

At 10:10 p.m. Mayor Adame reconvened the Ingleside City Council into a open session pursuant to provision of Chapter 551 of the Texas Government Code to take any action necessary related to the executive session noted herein, or regular agenda items, noted above, and/or related items.

Item A: No Action Taken.

Item B: No Action Taken.

Council Member Julio Salinas left the meeting after Executive Session.

- 18. Deliberate and take appropriate action on a Resolution of the City of Ingleside, authorizing acceptance of a grant from the State of Texas, Department of Transportation for the FY2025 STEP Impaired Driving Mobilization program for the Ingleside Police Department in an amount of \$5,986.00 with a city cash match of \$1,496.50 for overtime and fringe benefits.**

Proposed Resolution 2025-02.

Discussion was held between Council Members, City Manager Lewis, and Chief Molina about the grant being done every year.

Motion: Council Member Diehl made a motion to approve Resolution 2025-02, a Resolution of the City of Ingleside, authorizing acceptance of a grant from the State of Texas, Department of Transportation for the FY2025 STEP Impaired Driving Mobilization program for the Ingleside Police Department in an amount of \$5,986.00 with a city cash match of \$1,496.50 for overtime and fringe benefits. Council Member Pruitt seconded the motion. Motion carried with all present voting in favor.

- 19. Deliberate and take appropriate action on a report by the Charter Review Commission for the purpose of submitting amendments to the Ingleside City Charter to the voters on the May 3, 2025 election.**

Discussion was held between Council Members, City Manager Lewis and Attorney McCann about the possible changes to the City Charter, and the stipends proposal being taken out but the rest of the propositions being good to go to the voters.

Motion: Mayor Adame made a motion to send proposed Charter amendments to be drafted as referendums to be submitted to voters, outside of Section 3.04, and be brought back to Council at the next Regular City Council Meeting. Council Member Diehl seconded the motion. Motion carried with all present voting in favor.

- 23. Deliberate and take appropriate action on the possible award of a contract for Request for Qualifications (RFQ) 2024-12-01 City of Ingleside Classification and Compensation Study.**

Discussion was held between Council Members and City Manager Lewis about the recommendation of McGrath Human Resources Group for the RFQ.

Motion: Council Member Diehl made a motion to authorize the City Manager to negotiate terms with McGrath Human Resources Group for the City of Ingleside Classification and Compensation Study. Council Member John Salinas seconded the motion. Motion carried with all present voting in favor.

- 24. Deliberate and take appropriate action on the first and only reading of an Ordinance amending the Fiscal Year 2024-2025 Budget for the City of Ingleside, Texas, for the**

General Fund for appropriation of the donation funds received from OxyChem for Employee Christmas party supplies and from VFW Post #6386 for Blue Santa.

Proposed Ordinance 2025-02.

Discussion was held between Council Members and City Manager Lewis about the ordinance doing housekeeping work for the donations.

Motion: Council Member Diehl made a motion to approve Ordinance 2025-02, an Ordinance amending the Fiscal Year 2024-2025 Budget for the City of Ingleside, Texas, for the General Fund for appropriation of the donation funds received from OxyChem for Employee Christmas party supplies and from VFW Post #6386 for Blue Santa. Council Member Wilson seconded the motion. Motion carried with all present voting in favor.

25. Deliberate and take appropriate action on an Ordinance amending the fiscal year 2024-2025 budget for the City of Ingleside, Texas, of an internal lateral transfer of an Administrative Assistant position from Economic Development to Development Services in the General Fund.

Proposed Ordinance 2025-03.

Discussion was held between Council Members and City Manager Lewis about both the Director of Development Services and Director of Economic Development came together for the suggestion of the Administrative Assistant being under the Development Services department, no elimination of the Economic Development

Motion: Council Member John Salinas made a motion to approve Ordinance 2025-03, an Ordinance amending the fiscal year 2024-2025 budget for the City of Ingleside, Texas, of an internal lateral transfer of an Administrative Assistant position from Economic Development to Development Services in the General Fund. Council Member Diehl seconded the motion. Motion carried with all present voting in favor.

26. Deliberate and take appropriate action on directing City Staff to begin the process of re-zoning tracts or property annexed into the City of Ingleside from temporary residential zoning in accordance with the City of Ingleside Comprehensive Plan.

Discussion was held between Council Members and City Manager Lewis about staff looking at all of the land within the city limits and doing housekeeping work.

Motion: Mayor Pro-Tem Long made a motion to direct City Staff to begin the process of re-zoning tracts or property annexed into the City of Ingleside from temporary residential zoning in accordance with the City of Ingleside Comprehensive Plan. Council Member John Salinas seconded the motion. Motion carried with all present voting in favor.

Closing Agenda

27. Items to consider for placement on future agendas.

Council Member Diehl requested that contract services with engineering be presented.

28. Adjourn.

Mayor Adame adjourned the regular meeting of the City of Ingleside at 10:29 p.m.

APPROVED:

Pedro Oscar Adame, Mayor

ATTEST:

Jana Stork, Interim City Secretary

CITY COUNCIL AGENDA

Regular Meeting: January 28, 2025

AGENDA ITEM: 10

Deliberate and take appropriate action on the first reading of an Ordinance of the City of Ingleside calling a General Election and a Special Election to be held jointly with City of Ingleside on the Bay, Texas, and Ingleside Independent School District San Patricio County on May 03, 2025 in the City of Ingleside, Texas to elect Council Member Place 1, Council Member Place 3, and Council Member Place 5, and to submit Propositions on Amendments to the City of Ingleside Home Rule Charter; making provision for the conduct of the Election; including designating the main Early Voting place for such Election; providing for an Order and Notice of such Election; providing for Early Voting, Election Day voting and provisional ballots; resolving other matters incident and related to such Election; providing for severability and setting an effective date.

SUBMITTED BY: Elisabeth Staton, Administrative Assistant, Jana Stork, City Secretary

APPROVED FOR AGENDA:

BACKGROUND:

Please see the accompanying Ordinance to Order a General Election and Special Election to be held on May 03, 2025.

FISCAL ANALYSIS:

The current budget includes the projected election cost.

RECOMMENDATION:

Staff recommends Council approve the Ordinance to a second reading to Order a General Election and Special Election to be held on May 03, 2025.

ATTACHMENTS:

1. DOCS1-#344634-v1-Ord_Cal_reg_and_spe_(charter)_election

ORDINANCE NO. 2025-_____

AN ORDINANCE OF THE CITY OF INGLESIDE CALLING A GENERAL ELECTION AND A SPECIAL ELECTION TO BE HELD JOINTLY WITH CITY OF INGLESIDE ON THE BAY, TEXAS, AND INGLESIDE INDEPENDENT SCHOOL DISTRICT SAN PATRICIO COUNTY ON MAY 03, 2025 IN THE CITY OF INGLESIDE, TEXAS TO ELECT COUNCIL MEMBER PLACE 1, COUNCIL MEMBER PLACE 3, AND COUNCIL MEMBER PLACE 5, AND TO SUBMIT PROPOSITIONS ON AMENDMENTS TO THE CITY OF INGLESIDE HOME RULE CHARTER; MAKING PROVISION FOR THE CONDUCT OF THE ELECTION; INCLUDING DESIGNATING THE MAIN EARLY VOTING PLACE FOR SUCH ELECTION; PROVIDING FOR AN ORDER AND NOTICE OF SUCH ELECTION; PROVIDING FOR EARLY VOTING, ELECTION DAY VOTING AND PROVISIONAL BALLOTS; RESOLVING OTHER MATTERS INCIDENT AND RELATED TO SUCH ELECTION; PROVIDING FOR SEVERABILITY AND SETTING AN EFFECTIVE DATE.

WHEREAS, the terms for Council Members Place 1, Place 3, and Place 5 are set to expire in May 2025 and there is a need to call for a General Election; and

WHEREAS, the laws of the State of Texas further provide that the Election Code of the State of Texas is applicable to said elections, and in order to comply with said Code, an Ordinance and order should be passed ordering said elections; and

WHEREAS, the City Charter of the City of Ingleside (“City”) was adopted in November 6, 1979 and was last amended on May 01, 2021, and has served the City and its citizens well; and

WHEREAS, the Ingleside Charter Commission, with the assistance of City staff and the City Attorney, have reviewed the Charter and has made recommendations to the City Council for Charter Amendments; and

WHEREAS, on January 14, 2025, the City Council reviewed possible Charter changes proposed by the Ingleside Charter Commission and now wishes to submit certain proposed amendments to the City Charter for submission to the qualified voters of the City on the next uniform election date, May 03, 2025; and

WHEREAS, many of the proposed changes are not substantive in nature and do not require submission to the voters pursuant to Article XI, Section 11.11 of the Charter the City Council may, by ordinance, make non substantive amendments to the City Charter to correct typographical errors, grammatical errors, references to laws which have been changed or which references are, for any reason, incorrect, and to neutralize all gender references; provided, that no such amendment shall change the meaning or substance of the Charter, all remaining proposed changes will be submitted to the qualified voters; and

WHEREAS, per the Texas Local Government Code Section 9.004(e), more than one amendment may be combined in one ballot proposition as long as the amendments contain only one subject; and

WHEREAS, per the Texas Local Government Code Section 9.004 a ballot for proposed charter amendments shall be prepared so that a voter may approve or disapprove any one or more amendments without having to approve or disapprove all the amendments; and

WHEREAS, the City Council hereby finds and determines that propositions to be submitted are in compliance with the Texas Local Government Code and that the holding of this election on the uniform election date set forth below is in conformance with all applicable election laws; and

WHEREAS, the Texas Constitution, the *Texas Election Code* (the “Code”), and the City Charter are applicable to said General and Special Elections (hereinafter collectively referred to as the “election” or “elections”), and in order to comply with applicable laws, an ordinance is required to call the elections and establish procedures consistent with the Constitution, the Code, and the Charter; and

WHEREAS, the election will be held jointly with San Patricio County, Texas, the City of Ingleside, Texas, the City of Ingleside on the Bay, Texas, and Ingleside Independent School District pursuant to Texas Election Code Sections 31.092 and 271.002 for a May 03, 2025 election to be administered by Pamela Hill, San Patricio County Elections Administrator.; and

WHEREAS, San Patricio County and entities desire that a joint election be held in order to provide a convenient, simple, and cost-saving election to the voters in their respective jurisdictions; and

WHEREAS, the City has made provision to contract with San Patricio County to conduct the City's election, pursuant to *Chapter 31, Tex. Elec. Code*, and *Chapter 791, Tex. Gov't Code* (the “Contract for Election Services” or “contract”), and such contract provides for political subdivisions subject to the contract that hold election on the same day in all or part of the same territory to hold a joint election as authorized in *Chapter 271, Tex. Elec. Code*;

NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF INGLESIDE, COUNTY OF SAN PATRICIO, STATE OF TEXAS:

SECTION 1. A General and Special Election shall be held on the 3rd day of May, 2025, a uniform election date, in the City of Ingleside Texas (“City”) which date is not less than thirty (30) days from the date of the adoption of this ordinance (the “Ordinance”), for the purpose of submitting the following propositions to the qualified voters of the City to amend the Charter of the City. Such election is being held jointly with San Patricio County, Texas, the City of Ingleside, Texas, the City of Ingleside on the Bay, Texas, and Ingleside Independent School District pursuant to Texas Election Code Sections 31.092 and 271.002 for a May 03, 2025 election to be administered by Pamela Hill, San Patricio County Elections Administrator.

SECTION 2. The City Council of the City of Ingleside authorizes the Mayor to sign the order calling the General and Special Election and any subsequent orders adjusting the polling locations, dates and times that are subject to change due to agreements with the San Patricio County Elections Department and other joint election agreements up until the final posting deadline of such notice pursuant Texas Election Code (“Code”) § 4.003(a)(b) and (c).

SECTION 3. The San Patricio County Election Officer and his/her employees and appointees, and the election judges, alternate judges and clerks properly appointed for the election, shall hold and conduct the election in the manner provided by the Contract for Election Services, the City Charter, and the law governing the holding of general and special elections; and the official ballots, together with such other election materials as are required by the *Tex. Elec. Code*, shall be prepared in both the English and Spanish languages and shall contain such provisions, markings and language as is required by law.

SECTION 4. Early voting, both by personal appearance and by mail, will be conducted by the San Patricio County Election Officer, who is designated and appointed as the Early Voting Clerk, in accordance with the *Tex. Elec. Code*. Early voting by personal appearance shall be conducted at places and locations authorized by state law and the designated by the San Patricio County Election Officer. Early voting shall commence Tuesday, April 22, 2025, and last day of Early Voting will be April 29, 2025, with dates and times to be determined by the San Patricio County Elections Department and will be posted accordingly.

SECTION 5. Ballot Propositions. The official ballots shall be prepared in accordance with the Texas Election Code, as amended, so as to permit electors to vote “FOR” or “AGAINST” the aforesaid charter proposition. Voters should place an “X” in the square beside the statement indicating the way they wish to vote.

SECTION 6. The following measures will be submitted to the qualified voters of the City at the election to be held on the date specified in the previous section in the form of propositions in accordance with Section 9.004 of the Texas Local Government Code and the City Charter.

I. ELECTION

**COUNCIL MEMBER PLACE 1
VOTE FOR ONE OR NONE**

Council Member Place 1: ☐ _____
☐ _____
☐ _____

**COUNCIL MEMBER PLACE 3
VOTE FOR ONE OR NONE**

Council Member Place 2: ☐ _____
☐ _____

☐ _____

**COUNCIL MEMBER PLACE 5
VOTE FOR ONE OR NONE**

Council Member place 5:

☐ _____

☐ _____

☐ _____

II. CHARTER AMENDMENTS

PROPOSITION ONE

Shall Article XII, Sections 12.01, 12.02, 12.03, 12.04, 12.05, and 12.06 of the City Charter be amended to eliminate the entirety of Article XII which contains transitional provisions that have become inoperative upon the initial adoption of the Ingleside City Charter because they have become obsolete?

FOR ☐ AGAINST ☐

Article XII, Sections 12.01, 12.02, 12.03, 12.04, 12.05, and 12.06 of the City Charter shall be amended to eliminate the entirety of Article XII which contains transitional provisions that have become inoperative upon the initial adoption of the Ingleside City Charter because they have become obsolete, so when amended, shall read as follows:

ARTICLE XII. TRANSITIONAL PROVISIONS

Section 12.01. Schedule.

- A. ~~This Charter shall take effect on the first day following adoption by the voters of the City of Ingleside and shall be fully operative within one year after such adoption.~~
- B. ~~It is contemplated that this Charter will be presented to the voters on the ballot of the special election scheduled for Tuesday, November 6, 1979; it is further contemplated that the same ballot will provide for the election, at large, of one candidate to the City Council office created by adoption of this Charter.~~
- C. ~~The term of the member of the City Council created by adoption of this Charter shall expire at the regular election next following.~~
- D. ~~The limitations prescribed in Article III, Section 3.01C of this Charter shall apply to all persons elected to office in 1979 and thereafter.~~
- E. ~~All Boards, Commissions and Committees in existence on the effective date of this Charter, and not in conflict with the provisions thereof, may continue in existence. Any Board, Commission or Committee in existence on the effective date of this Charter which is in conflict with the provisions thereof is abolished, with such abolition to take effect on the 120th day after the effective date of the Charter.~~

Section 12.02. Appointive officers and employees.

- A. ~~Nothing in this Charter, except as may be specifically provided otherwise, shall affect or impair the rights or privileges of persons who are appointive officers or employees of the City at the same time of its adoption.~~
- B. ~~An employee holding a City position at the time this Charter becomes fully operative, who was serving in that same or a comparable position at the time of its adoption, shall~~

~~not be subject to competitive tests as a condition of continuance in that same position but in all other respects shall be subject to the personnel system provided for in Article IV.~~

~~Section 12.03. Effect of the Charter on existing law.~~

- ~~A. All codes, ordinances, resolutions, rules and regulations in force in the City on the effective date of this Charter, and not in conflict with the provisions thereof, shall remain in force until altered, amended or repealed by the City Council. Emergency ordinances enacted before the adoption of this Charter shall not be affected by the provisions of Article III, Section 3.12, of this Charter. Any code, ordinance, resolution, rule or regulation which conflicts with the provisions of this Charter is repealed to the extent that it is inconsistent or will interfere with the effective operation of this Charter or ordinances enacted pursuant thereto.~~
- ~~B. All taxes, assessments, liens, encumbrances and demands, of or against the City, fixed or established before the effective date of this Charter, or for the fixing or establishing of which proceedings had begun prior to such date, shall be valid when properly fixed or established under the law in force at the time of the beginning of such proceedings or under the law after adoption of this Charter.~~

~~Section 12.04. Pending matters.~~

~~All rights, claims, actions, orders, contracts, franchises and legal or administrative proceedings in existence or pending on the effective date of this Charter shall continue until consummation. All new or renewal rights, claims, actions, orders, contracts, franchises and legal or administrative proceedings initiated after the effective date of this Charter shall conform to the requirements and provisions thereof.~~

~~Section 12.05. Submission of the Charter to the voters.~~

~~The Charter Commission in preparing this Charter concludes that it is impracticable to segregate each subject so as to permit a vote of "yes" or "no" on the same, for the reason that the Charter is so constructed that in order to enable it to work and function it is necessary that it should be adopted in its entirety. For these reasons, the Charter Commission directs that the said Charter be voted upon as a whole and that it shall be submitted to the qualified voters of the City of Ingleside at the special City election to be held on November 6, 1979. Not less than thirty days prior to that election, the City Council shall cause the City Secretary to mail a copy of this Charter to each qualified voter of the City of Ingleside as appears from the latest certified list of registered voters. If a majority of the qualified voters voting in that election shall vote in favor of the adoption of this Charter, it shall become the Charter of the City of Ingleside, and after the returns have been canvassed, the same shall be declared adopted and the City Secretary shall file an official copy of the Charter with the records of the City. The Secretary shall furnish the Mayor a copy of said Charter, which copy of the Charter so adopted, authenticated and certified by his/her signature and Seal of the City, shall be forwarded by the Mayor to the Secretary of State of the State of Texas and shall show the approval of such Charter by majority vote of the qualified voters voting at that election.~~

~~Section 12.06. Public act.~~

~~This act shall be deemed a public act and judicial notice shall be taken thereof in all courts.~~

PROPOSITION TWO

Shall Article III, Section 3.06 B of the City Charter be amended so that the Mayor or members of the City Council forfeit their office if they fail to attend six (6) regular city council meetings in a consecutive twelve (12) month period?

FOR ____ ☐ AGAINST ____ ☐

Article III, Section 3.06 B of the City Charter shall be amended so that the Mayor or members of the City Council forfeit their office if they fail to attend six (6) regular city council meetings in a consecutive twelve (12) month period, so when amended, shall read as follows:

Section 3.06. Vacancies; forfeiture; filling of vacancies.

* * *

B. *Forfeiture of Office:* A Councilmember or the Mayor shall forfeit ~~his/her~~ their office if ~~he/she they~~:

1. Fails to possess the qualifications for the office prescribed by this Charter or by law;
2. Violates any express prohibition of this Charter;
3. Fails to attend six (6) regular City Council meetings in ~~a an election span,~~ consecutive twelve (12) months period;
4. Are~~Is~~ convicted of a crime involving moral turpitude.

* * *

PROPOSITION THREE

Shall Article III Sections 3.11 B and D of the City Charter be amended to allow the adoption of ordinances issuing bonds upon one reading at a city council meeting and allowing the city secretary to provide copies of ordinances upon request as opposed to having an unspecified number of copies of ordinances available at a city council meeting?

FOR ____ ☐ AGAINST ____ ☐

Article III Section 3.11 B and D of the City Charter be amended to allow the adoption of

ordinances issuing bonds upon one reading at a city council meeting and allowing the city secretary to provide copies of ordinances upon request as opposed to having an unspecified number of copies of ordinances available at a city council meeting, so when amended, shall read as follows:

Section 3.11. Passage of ordinances in general.

* * *

A proposed ordinance, except an emergency, issuance of bonds and/or a budget/tax ordinance, shall be read at two (2) City Council meetings, with at least two (2) weeks elapsing between each reading. A proposed ordinance may be amended at any reading, but any ordinance amended in substance shall automatically be placed again on first reading at a subsequent meeting. Amendments involving such items as typographical, grammatical or spelling changes or renumbering of sections shall not be considered substantive. A substantive change is one which changes the general purpose of the ordinance. At any reading of a proposed ordinance persons interested shall have a reasonable opportunity to be heard. Emergency ordinances shall be passed in accordance with Section 3.12 and budget/tax ordinances in accordance with Articles 7 and 8. Only one (1) reading shall be required for emergency, issuance of bonds and budget/tax ordinances.

* * *

- D. *Reading:* The reading aloud of the title and caption of the ordinance shall suffice as a reading, provided ~~printed~~ copies of the ordinance, in the form required for adoption, are in front of all members of City Council and be furnished to citizens, upon request submitted to the City Secretary, a reasonable number of additional copies are available to citizens present at the meeting. If two (2) City Council members request that the ordinance be read in its entirety, it must be read.

PROPOSITION FOUR

Shall Article III, Section 3.13 B of the City Charter be amended to specify that amendments to the City Charter must be codified within 180 days of adoption?

FOR ____ ☐ AGAINST ____ ☐

Article III, Section 3.13 B of the City Charter be amended to specify that amendments to the City Charter must be codified within 180 days of adoption, so when amended, shall read as follows:

Sec. 13.13 Authentication, recording, codification, printing, distribution

* * *

- B. *Codification:* Within one (1) year after the adoption or amendment of this Charter and at least every 180 days thereafter, the City Council shall provide for the preparation of a codification of all general ordinances of the City, provided, however, that if a codification

of all general ordinances of the City has been completed within one (1) year of adoption of this Charter such prior codification shall apply to this Charter.

* * *

PROPOSITION FIVE

Shall Article III, Section 3.13 B and C of the City Charter be amended to specify that a physical copy of the Ingleside Code of Ordinances, as well as any adopted ordinances and City Charter amendments, will be available for purchase at a price determined by the publishing company, rather than by the City Council and that a codified version of the Ingleside Code of Ordinance shall be kept on file in the Public Library for public inspection?

FOR ____ ☐ AGAINST ____ ☐

Article III, Section 3.13 B and C of the City Charter shall be amended to specify that a physical copy of the Ingleside Code of Ordinances, as well as any adopted ordinances and City Charter amendments, will be available for purchase at a price determined by the publishing company, rather than by the City Council and that a codified version of the Ingleside Code of Ordinance shall be kept on file in the Public Library for public inspection, so when amended, shall read as follows:

Sec. 13.13 Authentication, recording, codification, printing, distribution

* * *

The codification shall be adopted by the City Council by ordinance and shall be published promptly together with this Charter and any amendment thereto and with appropriate references to State Statutes and Constitution, and such codes of technical regulations and other rules and regulations as the City Council may specify. This compilation shall be known and cited officially as the Ingleside City Code and shall be in full force and effect without the necessity of such code or any part thereof being published in any newspaper. The caption, descriptive clause, and other formal parts of the ordinances of the City may be omitted without affecting the validity of such ordinances when they are published as a code. Copies of the code shall be furnished to City Officers, placed in City offices and a public library designated by the City Council for free reference and made available for purchase by the public at a reasonable price fixed by the ~~publisher~~City Council.

- C. *Printing of Ordinances and Resolutions:* The City Council shall cause each ordinance and each amendment to this Charter to be printed promptly following its adoption, and the printed ordinances and Charter amendments shall be distributed free or sold to the public at reasonable prices to be fixed by the ~~publisher~~City Council. Following publication of the first Ingleside City Code and at all times thereafter, the ordinances and Charter amendments shall be printed in substantially the same style as the code currently in effect and shall be suitable in form for integration therein. A copy of such ordinance and resolution shall be ~~placed kept on file in the office of the in-City Secretary offices, public library designated by the City Council~~ kept on file in the office of the in-City Secretary offices, public library designated by the City Council and on the City website for free reference. A copy of a codified version of the Ingleside Code of Ordinance shall be kept on file in the Public Library for public inspection.

* * *

PROPOSITION SIX

Shall Article III, Section 3.13 D of the City Charter be amended to specify the Sunset Committee's formation, duties, composition, and authority?

FOR ____ ☐ AGAINST ____ ☐

Article III, Section 3.13 D of the City Charter shall be amended to specify the Sunset Committee's formation, duties, composition, and authority, so when amended, shall read as follows:

* * *

D. In accordance with Section 4.06 of this Charter, the City Council shall appoint, by ordinance, a Sunset Committee every eight (8) years to review the Ingleside Code of Ordinances ordinances for continued relevance and provide recommendations to the City Council on whether any ordinance should continue and remain in effect, be amended, or repealed. Such ordinance shall be adopted on its first reading. The Sunset Committee shall be comprised of five (5) members with two (2) alternates and shall act as an advisory committee to the City Council. The term of the Sunset Committee shall be designated by the City Council upon appointment.

* * *

PROPOSITION SEVEN

Shall Article IV, Section 4.01 E 6 of the City Charter be amended to allow the city manager 180 days from the end of the fiscal year to submit the annual audit report to the city council?

FOR ____ ☐ AGAINST ____ ☐

Article IV, Section 4.01 E 6 of the City Charter shall be amended to allow the city manager 180 days from the end of the fiscal year to submit the annual audit report to the city council, so when amended, shall read as follows:

Section 4.01. City Manager.

E. Duties of the City Manager: The City Manager shall be required to:

* * *

6. Prepare and submit to the City Council, within ninety (90) days of the end of the fiscal year, an Annual Report on the finances and administrative activities of the City, and the an Annual Audit Report within one hundred eighty (180) days of the end of the fiscal year, as of the end of each fiscal year-as of the end of each fiscal year;

* * *

PROPOSITION EIGHT

Shall Article VII, Section 7.05 of the City Charter be amended to remove the requirement for the Planning and Zoning Commission to assist and provide comments on the formation of the five-year capital program, and authorize the City Manager to estimate an initial annual costs of the proposed capital improvements within the program, rather than providing a general estimate of their annual operation and maintenance costs?

FOR ____ ☐ AGAINST ____ ☐

Article VII, Section 7.05 of the City Charter be amended to remove the requirement for the Planning and Zoning Commission to assist and provide comments on the formation of the five-year capital program, and authorize the City Manager to estimate an initial annual costs of the proposed capital improvements within the program, rather than providing a general estimate of their annual operation and maintenance costs, so when amended, shall read as follows:

Section 7.05. Capital pProgram.

The City Manager shall submit a five-year capital program as an attachment to the annual budget. The capital program shall include the proposed program ~~by the planning and zoning commission and comments~~ by the City Manager. The program as submitted shall include:

1. A clear general summary of its contents;
2. A list of all capital improvements which are proposed to be undertaken during the five fiscal years succeeding the budget year, with appropriate supporting information as to the necessity for such improvements;
3. Cost estimates, method of financing and recommended time schedules for each improvement; and
4. The estimated initial annual cost of operating and maintaining the facilities to be constructed or acquired.

The above information may be revised and extended each year with regard to capital improvements still pending or in process of construction or acquisition.

PROPOSITION NINE

Shall Article VII, Section 7.09 of the City Charter be amended to eliminate the round robin method of awarding contracts that do not require bidding, and provide the method of awarding of contracts is in accordance with state law and the City of Ingleside's procurement policy?

FOR ____ ☐ AGAINST ____ ☐

Article VII, Section 7.09 of the City Charter shall be amended to eliminate the round robin method of awarding contracts that do not require bidding, and provide the method of awarding of contracts is in accordance with state law and the City of Ingleside's procurement policy, so when

amended, shall read as follows:

Section 7.09. Purchasing and contracting.

- A. Contracts and purchases are referred to herein as a "contract". A contract is made by the Council if it is approved in advance by the Council, regardless of which city official signs it.
- B. The City shall comply with Chapter 252 Texas Local Government Code, and such other State laws as may govern City contracting and, except in emergency situations which shall be promptly reported to the Council, such contracts must be made by the Council.
 - (1) ~~All requests for emergency or routine services not requiring a bid shall be awarded on a round robin basis to all local vendors.~~
 - (2) ~~Vendor list should be reviewed annually by City staff for workmanship and pricing.~~
 - (3) ~~Any vendor removed from the bid list shall have a right to appeal removal to the City Council at a Regular City Council Meeting within ninety days.~~
- C. As to a contract which is not governed by State law:
 - (1) The Council must make the contract, unless it authorizes the City Manager to make it.
 - (2) The Council must adopt rules governing Council-made and City Manager-made contracts.
 - (3) Council rules must be in compliance with this Charter.
 - (4) Such contracts must be in compliance with this Charter and Council rules.
 - (5) Council rules must provide procedural relaxation in the event of emergencies similar to the manner in which state law addresses emergencies in situations where contracting is governed by state law.
 - (6) Such contracts must be with the vendor who offers the best value to the City, as determined in the reasonable, good faith judgment of the contracting authority, whether Council or City Manager.
 - (7) Council rules must establish a monetary limit which City Manager-made contracts may not, except in emergencies, exceed.
 - (8) All contracts shall be awarded via sealed bids in accordance with state law. All bids shall be opened by Department Head, Director of Finance, and City Secretary if contract is estimated to be under \$25,000.00. Bids shall be opened by City Manager, Director of Finance, and City Secretary if contract is estimated to be \$25,000.00 or more. All purchasing shall be awarded in accordance with the City's procurement policy as established by ordinance.

PROPOSITION TEN

Shall Article X, Sections 10.02 and 10.06 of the City Charter be amended to prohibit members of the Planning and Zoning Commission and members of the Board of Adjustment from being a

city employee, or hold another elected or appointed city office?

FOR ☐ AGAINST ☐

Article X, Sections 10.02 and 10.06 of the City Charter shall be amended to prohibit members of the Planning and Zoning Commission and members of the Board of Adjustment from being a city employee, or hold another elected or appointed city office, so when amended, shall read as follows:

Section 10.02. Organization, selection, and term of office.

The Planning and Zoning Commission shall be composed of seven (7) members appointed by the City Council. Members shall serve for a term of two (2) years with four (4) members being appointed with terms beginning on January 1 of odd-numbered years and three (3) members appointed with terms beginning on January 1 of even-numbered years. Vacancies occurring in the Commission, for whatever reason, shall be filled within sixty (60) days by appointment by the City Council, for the remainder of the unexpired term. Members appointed under this provision of the Charter may be reappointed for a second term. Under no provision shall a person serve over two (2) consecutive terms or a fraction thereof. No member of the Planning and Zoning Commission shall be a city employee or hold another salaried or elected or appointed City office. Three (3) successive unexcused absences from the Commission meetings shall terminate membership on the City Planning and Zoning Commission. Members of the ~~e~~Commission shall serve without compensation but may be reimbursed for necessary expense incurred as a result of their work. The Planning and Zoning Commission shall elect a Chairman and Vice-Chairman from the membership and shall have the power to make rules, regulations and bylaws for its own government, which shall be subject to approval by the City Council.

Section 10.06. Organization, selection and term of office.

The Board of Adjustment shall be composed of five (5) members and four (4) alternate members appointed by the City Council. Members and alternate members shall serve for a term of two (2) years with three (3) members and two (2) alternate members having terms beginning in one (1) year and two (2) members and two (2) alternate members having terms beginning in alternate years. All cases heard by the Board of Adjustment will be heard by a minimum of four (4) members and/or alternate members. Vacancies occurring in the Board of Adjustment for whatever reason shall be filled within sixty (60) days by the City Council for the remainder of the unexpired term. No member of the Board of Adjustment shall be a city employee or hold another salaried or elected or appointed City office. Three (3) successive unexcused absences from the meetings, after a minimum five (5) days' notice served by mail of the time, place and agenda of such meetings, shall constitute cause for termination of membership on the Board of Adjustment. The members of the board shall serve without compensation, but may be reimbursed for necessary expense incurred as a result of their work. The Board shall elect a Chairman and Vice-chairman from its membership and shall have the power to make rules, regulations and bylaws for its own government which shall be subject to approval by the City Council.

Members appointed under this provision of the Charter may be reappointed for a second term. Under no provision shall a person serve over two (2) consecutive terms or a fraction thereof.

PROPOSITION ELEVEN

Shall Article XI, Section 11.12 of the City Charter be amended to include two alternate members in the composition of the Charter Review Commission and to clarify that the term of office for Commission members is 180 days from the date of appointment?

FOR ___☐ AGAINST ___☐

Article XI, Section 11.02 of the City Charter shall be amended to include two alternate members in the composition of the Charter Review Commission and to clarify that the term of office for Commission members is 180 days from the date of appointment, so when amended, shall read as follows:

Section 11.12. Charter review commission.

The City Council shall appoint at its first regular meeting in July of every fourth (4th) year after approval of this Charter, a Charter Review Commission consisting of five (5) members and two (2) alternates who are citizens of the City.

A. *Duties of the Commission:*

1. Inquire into the operation of the City Government under the Charter provisions and determine whether any such provisions require revision. To this end public hearings may be held; and the Commission shall have the power to compel the attendance of any officer or employee of the City and require the submission of any of the City records which it may deem necessary to the conduct of such hearing.
2. Propose any recommendations it may deem desirable to ensure compliance with the provisions of the Charter by ~~the several~~ each department of ~~the~~ City government.
3. Propose, if it deems desirable, amendments to this Charter to improve the effective application of the Charter to current conditions.
4. Report its finding and present its proposed amendments, if any, to the City Council.

B. *Action by the City Council:* The City Council shall receive and have published in the designated official public newspaper of the City any report presented by the Charter Review Commission; shall consider any recommendation made, and if any amendments be presented as part of such report, may order such amendment or amendments to be submitted to the voters of the City in the manner provided by State law.

C. *Term of Office:* The term of office of such Charter Review Commission shall be one hundred eighty (180) days~~six (6) months~~ from the date of appointment, and at the completion of such term a report shall be presented to the City Council, and all records of the proceedings of such commission shall be filed with the City Secretary and shall become a public record.

PROPOSITION TWELVE

Shall Article III, Section 3.09 of the City Charter be amended to allow two members of the City Council, as opposed to requiring three, to call a special meeting of the City Council?

FOR ____ ☐ AGAINST ____ ☐

Article III, Section 3.09 of the City Charter be amended to allow two members of the City Council, as opposed to requiring three, to call a special meeting of the City Council, so when amended, shall read as follows:

Section 3.09. Meetings of city council.

The City Council shall hold at least two regular meetings each month other than November and December during which there must be at least one regular meeting per month and as many additional meetings as it deems necessary to transact the business of the City and its citizens. The City Council shall fix, by ordinance, the date, time and place of regular meetings.

All meetings shall be open to the public, except for those purposes where the law specifically authorizes executive sessions.

Special meetings of the City Council shall be held on the call of the Mayor or ~~three~~ two (2) City Council members and, whenever practicable, upon no less than ~~twelve hours'~~ seventy-two (72) notice to each member.

PROPOSITION THIRTEEN

Should Article IV, Section 4.01 E 11 of the City Charter be amended to require the City Manager to notify the City Council prior to hiring or firing Assistant Directors of city departments, in addition to the current requirement of notifying the Council when hiring or firing Directors of city departments?

FOR ____ ☐ AGAINST ____ ☐

Article IV, Section 4.01 E 11 of the City Charter shall be amended to require the City Manager to notify the City Council prior to hiring or firing Assistant Directors of city departments, in addition to the current requirement of notifying the Council when hiring or firing Directors of city departments, so when amended, shall read as follows:

Section 4.01. City Manager.

* * *

E. Duties of the City Manager: The City Manager shall be required to:

* * *

11. When the hiring or firing of a Director or Assistant Director~~department head~~ is deemed necessary, the City Manager shall inform the City Council prior to the action to be taken.

* * *

III. BALLOT PROPOSITIONS

PROPOSITION ONE

Shall Article XII, Sections 12.01, 12.02, 12.03, 12.04, 12.05, and 12.06 of the City Charter be amended to eliminate the entirety of Article XII which contains transitional provisions that have become inoperative upon the initial adoption of the Ingleside City Charter because they have become obsolete?

FOR ____☐ AGAINST ____☐

PROPOSITION TWO

Shall Article III, Section 3.06 B of the City Charter be amended so that the Mayor or members of the City Council forfeit their office if they fail to attend six (6) regular city council meetings in a consecutive twelve (12) month period?

FOR ____☐ AGAINST ____☐

PROPOSITION THREE

Shall Article III Sections 3.11 B and D of the City Charter be amended to allow the adoption of ordinances issuing bonds upon one reading at a city council meeting and allowing the city secretary to provide copies of ordinances upon request as opposed to having an unspecified number of copies of ordinances available at a city council meeting?

FOR ____☐ AGAINST ____☐

PROPOSITION FOUR

Shall Article III, Section 3.13 B of the City Charter be amended to specify that amendments to the City Charter must be codified within 180 days of adoption?

FOR ____☐ AGAINST ____☐

PROPOSITION FIVE

Shall Article III, Section 3.13 B and C of the City Charter be amended to specify that a physical copy of the Ingleside Code of Ordinances, as well as any adopted ordinances and City Charter amendments, will be available for purchase at a price determined by the publishing company, rather than by the City Council and that a codified version of the Ingleside Code of Ordinance shall be kept on file in the Public Library for public inspection?

FOR ____☐ AGAINST ____☐

PROPOSITION SIX

Shall Article III, Section 3.13 D of the City Charter be amended to specify the Sunset Committee's formation, duties, composition, and authority?

FOR ____☐ AGAINST ____☐

PROPOSITION SEVEN

Shall Article IV, Section 4.01 E 6 of the City Charter be amended to allow the City Manager 180 days from the end of the fiscal year to submit the annual audit report to the city council?

FOR ____☐ AGAINST ____☐

PROPOSITION EIGHT

Shall Article VII, Section 7.05 of the City Charter be amended to remove the requirement for the Planning and Zoning Commission to assist and provide comments on the formation of the five-year capital program, and authorize the City Manager to estimate an initial annual costs of the proposed capital improvements within the program, rather than providing a general estimate of their annual operation and maintenance costs?

FOR ____☐ AGAINST ____☐

PROPOSITION NINE

Shall Article VII, Section 7.09 of the City Charter be amended to eliminate the round robin method of awarding contracts that do not require bidding, and provide the method of awarding of contracts is in accordance with state law and the City of Ingleside's procurement policy?

FOR ____☐ AGAINST ____☐

PROPOSITION TEN

Shall Article X, Sections 10.02 and 10.06 of the City Charter be amended to prohibit members of the Planning and Zoning Commission and members of the Board of Adjustment from being a city employee, or hold another elected or appointed city office?

FOR ____☐ AGAINST ____☐

PROPOSITION ELEVEN

Shall Article XI, Section 11.12 of the City Charter be amended to include two alternate members in the composition of the Charter Review Commission and to clarify that the term of office for Commission members is 180 days from the date of appointment?

FOR ____☐ AGAINST ____☐

PROPOSITION TWELVE

Shall Article III, Section 3.09 of the City Charter be amended to allow two members of the City Council, as opposed to requiring three, to call a special meeting of the City Council?

FOR ____☐ AGAINST ____☐

PROPOSITION THIRTEEN

Should Article IV, Section 4.01 E 11 of the City Charter be amended to require the City Manager to notify the City Council prior to hiring or firing Assistant Directors of city departments, in addition to the current requirement of notifying the Council when hiring or firing Directors of city departments?

FOR ____☐ AGAINST ____☐

SECTION 7. City Council has adopted an Ordinance calling for this General and Special Election and the City has met its legal requirements for calling an election. The Mayor and the City Secretary of the City, in consultation with its City Attorney, are hereby authorized and directed to take any and all actions necessary to comply with the provisions of the Code in carrying out and conducting the General and Special Election, whether or not expressly authorized herein. The City will enter into a contract with San Patricio County Elections Administrator outlining dates and locations for early voting and locations for the May 3, 2025, election day.

SECTION 8. Severability. That should any part, section, subsection, paragraph, sentence, clause or phrase contained in this ordinance be held to be unconstitutional or of no force and effect, such holding shall not affect the validity of the remaining portion of this ordinance, but in all respects said remaining portion shall be and remain in full force and effect.

SECTION 9. Effective Date. This Ordinance shall be in force and effect from and after the date of its adoption, and it is so ordained.

PASSED, ORDAINED, APPROVED AND ADOPTED this ____ day of February, 2025 by _____ (ayes) to _____ (nays) with _____ abstentions by a vote of the City Council of the City of Ingleside.

CITY OF INGLESIDE, TEXAS

Pedro Oscar Adame, Mayor

ATTEST:

Jana Stork, Interim City Secretary

First Reading: January 28, 2025

Second Reading: February 11, 2025

CITY COUNCIL AGENDA

Regular Meeting: January 28, 2025

AGENDA ITEM: 11

Deliberate and take appropriate action on second and final reading of an Ordinance changing the zoning for the following property from its present zoning of R-1 (Single Family Residential) to I (Industrial), and further providing for effective date, reading, severance, and publication:

approximately 1,743.76 ACRES, bearing the legal description of: Property Tract 1, ID 60762, being 124.3789 acres out of a 524.80-acre tract of land. being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al to Mrs. Jean McCampbell Davis by Partition Deed filled November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 2, ID, 60762 being 88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 3, ID, 67182, being 3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 4, ID 67158, 37.397-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 5, 104.748-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 6, ID 67177, 40.329-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 7, ID 61476, 848 acres out of a 1181.095 tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 8, ID 67236, 112.818-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 9, ID 114650, 45.5766 acres of a 150.13 acre tract of land out of the heirs of Rosa Teal Survey, Abstract 262, San Patricio County, Texas, the said 150.13 acre tract of land being the same as and all of tract II being 150.12 acres, more or less, described in Special Warranty Deed dated November 1, 2013, recorded in document No. 632533, Official Public Records of San Patricio County, Texas. Property Tract 10, ID 103271, 145.0886 acres out of a 150.77 acre tract of land, being the same land described as 150.694 acres conveyed from Centex Homes. to EFO Land, L.P., by General Warranty Deed dated March 26, 1999, and recorded in Clerk's File No. 472035 of the Real Property Records of San Patricio County, Texas. Property Tract 11, ID 67168, Tract 12, 61499, 167.165 Acre Tract of Land, situated in the Heirs of Rosa Teal Survey A-262, Nicholas Fagan Survey A-124, being out a

6,091.22 Acre Tract of land described in a Partition Deed from W.G. (Will) McCampbell, et al., to John S. McCampbell, recorded in Volume 103, Page 156, Deed Records of San Patricio County Texas; said 167.165 Acre Tract being the same lands as a 166 Acre Tract of land described in a Deed from said W.G. McCampbell, et al. to Mrs. Jean McCampbell Davis, as recorded in Volume 103 Page 151. Property Tract 13, ID 67270, 13.287 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas. Property Tract 14, ID 67091, 12.4199 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.

SUBMITTED BY: Bernanrd Rodriguez, Director of Development Services, Pamela Hawkins, Administrative Assistant

APPROVED FOR AGENDA: Brenton Lewis, City Manager

BACKGROUND:

The applicant, the Port of Corpus Christi Authority, (POCCA), is requesting a permanent zoning designation from R-1 - Single Family Residential to I - Industrial. Portions of the McCampbell land tracts were annexed by the City of Ingleside in 1993 and in 2009.

A Public Hearing Notice was published in the Ingleside Index on Thursday, November 14, 2024. A total of 115 property owners, within a 400-foot radius of the site location, were notified by U.S. Postal mail dated November 21, 2024. Staff received 9 emails voicing opposition to the rezone request.

By ordinance, an I - Industrial district provides for industrial operations of all types including the manufacture, compounding, processing, packaging, or treatment of products. The project site is currently undeveloped and has multiple development challenges, including designated wetlands, FEMA special flood zone hazard areas, floodway designations, and proximity to the McCampbell airport.

The property is identified in the Ingleside Comprehensive Master Plan - Future Land Use - Land Use Designations as I - Industrial, LI - Light Industrial and GC - General Commercial. Furthermore, the Comprehensive Master Plan states: "INDUSTRIAL – Light and Heavy - The Industrial categories accommodate uses that are intensive in terms of how 'light' and especially 'heavy' industrial activities can affect other nearby properties. This can include factors such as

noise, vibration, light/ glare, odor, truck traffic, and hours of operation. The area of east Ingleside designated on the Future Land Use map for light industrial uses includes several properties that, on the City's official zoning map, have previously been zoned I - Industrial relative to L-1 - Light Industrial." Airport sites and operations are also intensive, which is why McCampbell- Porter Airport is indicated as an industrial use on the Future Land Use map.

FISCAL ANALYSIS:

None

RECOMMENDATION:

Staff recommends approval of the Rezoning Request from Single Family Residential District to I – Industrial District based on adjacent zoning districts, surrounding land uses, Comprehensive Master Plan – Future Land Use, and densities in the area. If approved, the applicant will need to comply with all requirements during the permitting process including compliance with subdivision regulations, building/fire codes, fire protection, accurate and detailed site plan and description of activity and safeguards proposed to protect the surrounding property and the community from hazards, regulations, and industry codes governing minimization of process safety and fire risks, engineering controls and organizational controls and other City requirements as applicable.

ATTACHMENTS:

1. Zoning Change Application
2. Industrial Zoning Change McCampbell Tract Supporting Documents
3. Additional Port of CC Authority Documents
4. #660A1 - Voting Record
5. ORD 2025-XXX #660A1-Ordinance



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: _____ Time: 6:00 p.m.

City Council Public Hearing: _____ Time: 6:30 p.m.

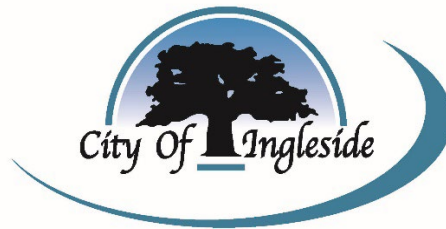
2nd Reading @ City Council: _____ Time: 6:30 p.m.

Signature of Applicant: _____ Date: _____

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

Staff Checklist:

Accepted By: _____ Date Accepted: _____ Filing Fee: _____ Date Paid: _____



NOTICE OF PUBLIC HEARINGS

In accordance with the provisions of the City of Ingleside code and the laws of the state of Texas, all interested parties are hereby notified that the Planning & Zoning Commission will hold public hearings at 6:00 p.m. on Monday, December 2, 2024 at City Hall, 2671 San Angelo Street, Ingleside, Texas.

The Public Hearings will solicit comments from citizens and other interested parties concerning the following:

1. An application filed by the Port of Corpus Christi Authority, requesting to rezone, from R-1 – Single Family Residential to I – Industrial, approximately 1,743.76 ACRES, bearing the legal description of:

Property Tract 1, ID 60762, being 124.3789 acres out of a 524.80-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al to Mrs. Jean McCampbell Davis by Partition Deed filled November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, **Property Tract 2, ID, 60762** being 88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, **Property Tract 3, ID, 67182**, being 3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 4, ID 67158**, 37.397-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 5**, 104.748-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 6, ID 67177**, 40.329-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 7, ID 61476**, 848 acres out of a 1181.095 tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 8, ID 67236**, 112.818-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 9, ID 114650**, 45.5766 acres of a 150.13 acre tract of land out of the heirs of Rosa Teal Survey, Abstract 262, San Patricio County, Texas, the said 150.13 acre tract of land being the same as and all of tract II being 150.12 acres, more or less, described in Special Warranty Deed dated November 1, 2013, recorded in document No. 632533, Official Public Records of San Patricio County, Texas. **Property Tract 10, ID 103271**, 145.0886 acres out of a 150.77 acre tract of land, being the same land described as

150.694 acres conveyed from Centex Homes. to EFO Land, L.P., by General Warranty Deed dated March 26, 1999, and recorded in Clerk's File No. 472035 of the Real Property Records of San Patricio County, Texas. **Property Tract 11, ID 67168, Tract 12, 61499**, 167.165 Acre Tract of Land, situated in the Heirs of Rosa Teal Survey A-262, Nicholas Fagan Survey A-124, being out a 6,091.22 Acre Tract of land described in a Partition Deed from W.G. (Will) McCampbell, et al., to John S. McCampbell, recorded in Volume 103, Page 156, Deed Records of San Patricio County Texas; said 167.165 Acre Tract being the same lands as a 166 Acre Tract of land described in a Deed from said W.G. McCampbell, et al. to Mrs. Jean McCampbell Davis, as recorded in Volume 103 Page 151. **Property Tract 13, ID 67270**, 13.287 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas. **Property Tract 14, ID 67091**, 12.4199 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.

2. An application filed by the Port of Corpus Christi Authority, requesting to rezone, from R-1 – Single Family Residential to I – Industrial, approximately 374.31 ACRES, bearing a legal description of:

Property Tract 16, ID 69004, Tract 17, ID 65073, Tract 19, ID 69200, Tract 21, Tract 22, Tract 23, Tract 24, A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas. **Property Tract 20**, A 37.95-acre tract out of the William McDonough Survey, Abstract A-184 and the Day Land and Cattle Company Survey, Abstract A-387, being the same tract called 38.06 acres recorded in Document No. 534924, Deed Records, San Patricio County, Texas, Save and Except a 2.5 acre drill site recorded in Document No. 379019, Deed Records, San Patricio County, Texas.

3. An application filed by the Port of Corpus Christi Authority, requesting to rezone, from R-1 – Single Family Residential to C-2 – General Commercial, bearing a legal description of:

82.30 Acres, being 125.00 foot, 200.00 foot and 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas, and a 31.96 acre, 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas

4. An application filed by the Port of Corpus Christi Authority for a special permit to allow a solar panel farm on the following property bearing a legal description of:

Property Tract 1, ID 60762, being 124.3789 acres out of a 524.80-acre tract of land. being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al to Mrs. Jean McCampbell

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Information regarding the application is on file at the Development Services Department

and is available for your inspection any time during normal office hours. If you have any questions, please contact our office at (361) 776-3815.

Bernard Rodriguez, Director
Development Services

Published one time in the Ingleside Index on November 14, 2024



NOTICE OF PUBLIC HEARINGS

In accordance with the provisions of the **City of Ingleside** code and the laws of the State of Texas, all interested parties are hereby notified that the Planning & Zoning Commission will hold public hearings at **6:00 p.m. Monday, December 2, 2024, at City Hall, 2671 San Angelo Street, Ingleside, Texas.**

PUBLIC HEARING – REZONING REQUEST: A PUBLIC HEARING TO SOLICIT COMMENTS FROM CITIZENS AND OTHER INTERESTED PARTIES CONCERNING A REQUEST FROM THE PORT OF CORPUS CHRISTI AUTHORITY TO REZONE APPROXIMATELY 1.743.76 ACRES, FROM R-1 – SINGLE FAMILY RESIDENTIAL TO I – INDUSTRIAL, GENERALLY BOUNDED BY SH 361 (HIGHLAND AVE.), ON THE SOUTH, INGLESIDE CITY LIMITS ON THE EAST AND NORTH, AND SH 1069 (NORTH MAIN ST.) ON THE EAST, BEARING A LEGAL DESCRIPTION AS FOLLOWS:

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PUBLIC HEARING – REZONING REQUEST: A PUBLIC HEARING TO SOLICIT COMMENTS FROM CITIZENS AND OTHER INTERESTED PARTIES CONCERNING A REQUEST FROM THE PORT OF CORPUS CHRISTI AUTHORITY TO REZONE APPROXIMATELY 374.31 ACRES, FROM R-1 – SINGLE FAMILY RESIDENTIAL TO I – INDUSTRIAL, GENERALLY LOCATED SOUTH OF SH 361 (HIGHLAND AVE.) WEST OF THE INGLESIDE CITY LIMITS, AND NORTH OF THE SUBSEA 7 FACILITY, BEARING A LEGAL DESCRIPTION AS FOLLOWS:

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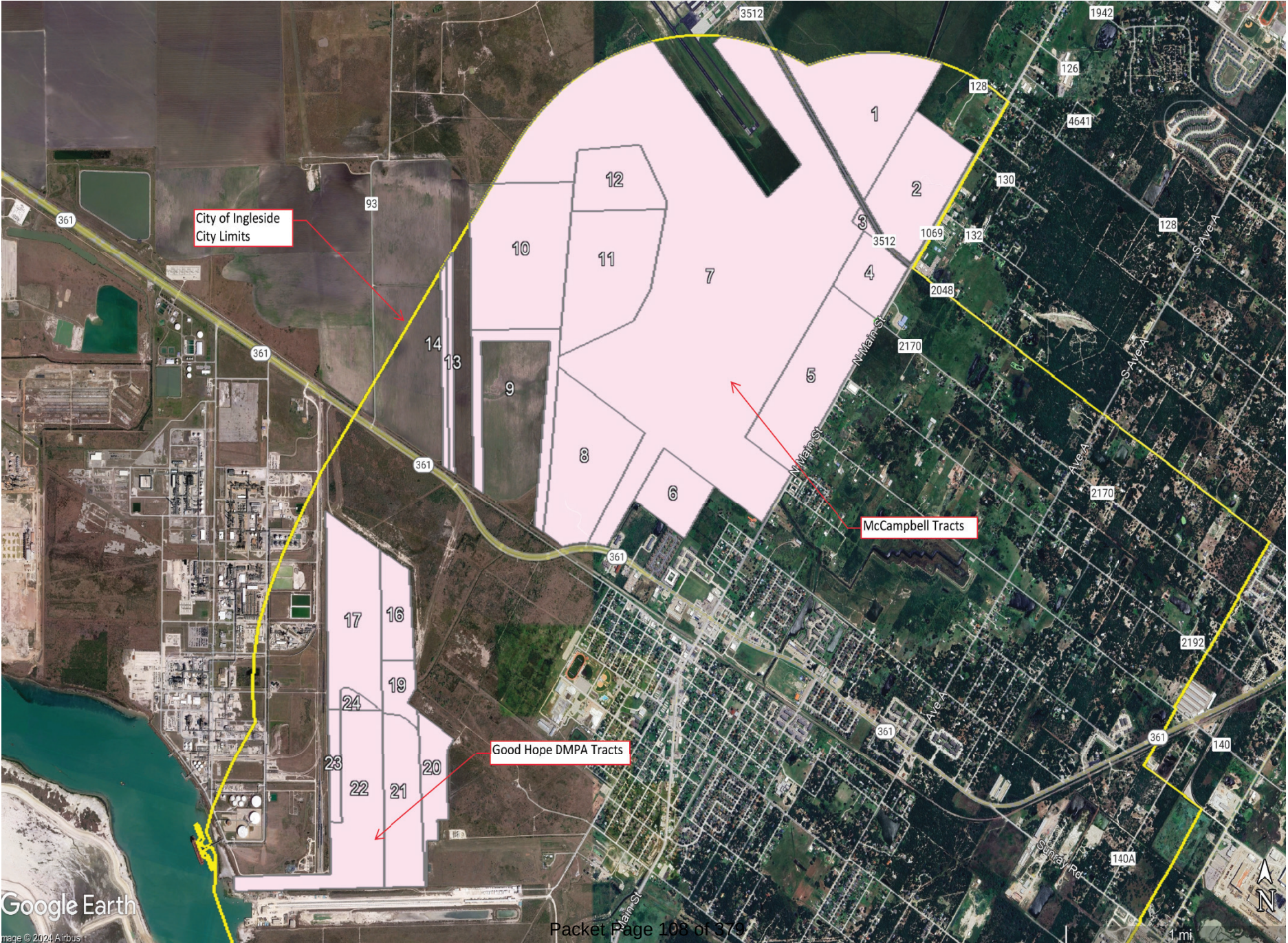
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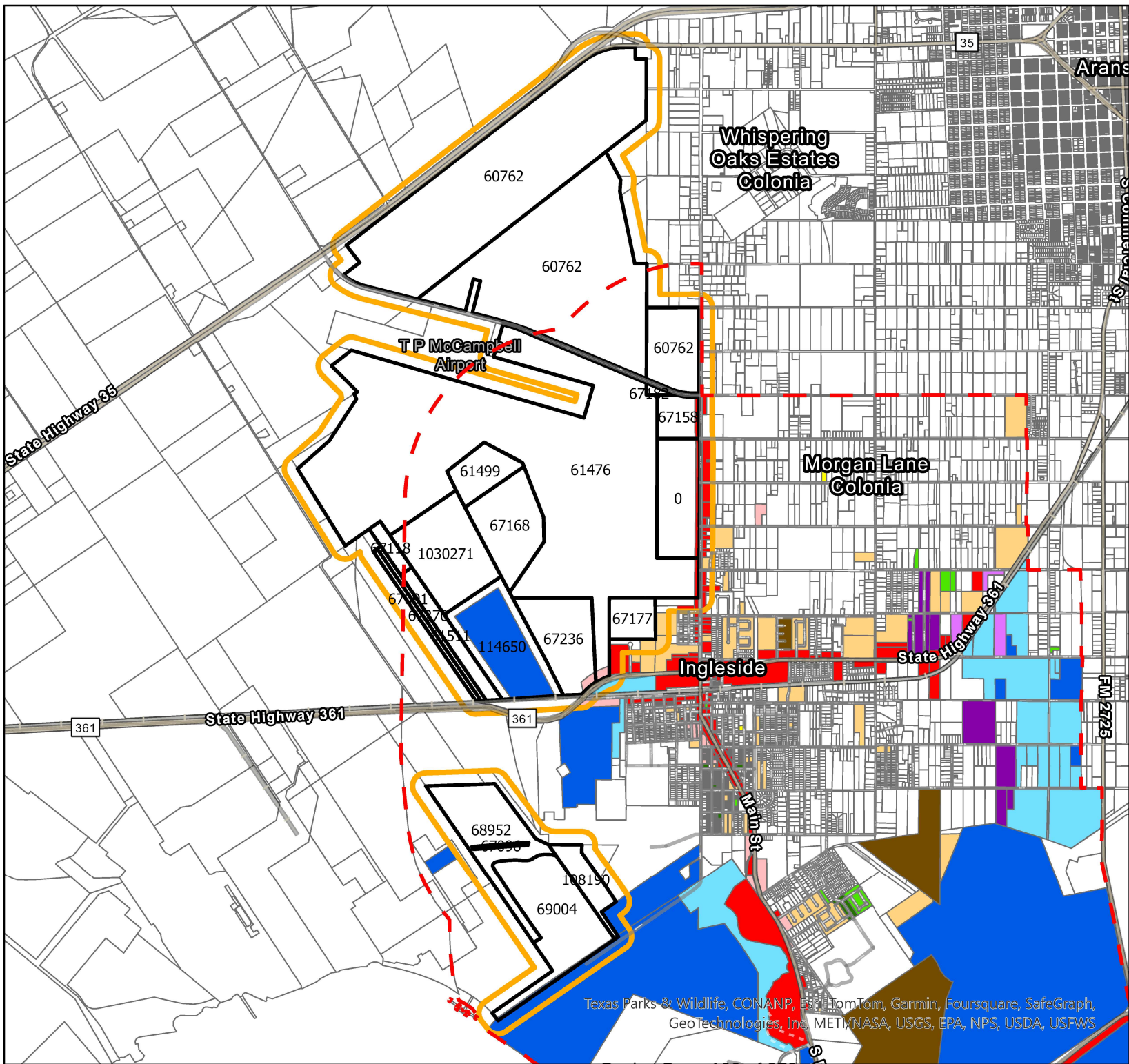
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Bernard Rodriguez
Director
Development Services

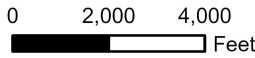
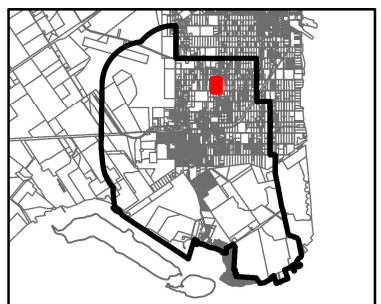




660 Rezoning
McCampbell Tract & Good Hope DMPA
File Date: 07/23/2024
P&Z Date: 08/19/24
Council Date: 10/22/2024

- 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

POCCA
Rezone to I-Industrial / C-2 General Commercial
Notice of Objection to Rezone Request
October 2024

Jose Molina
joe.molina@ryan.com
107 Lost Creek
Portland, Texas 78374

Shirley Saltarelli
shirleysaltarelli@gmail.com
717 S Sandpiper
Ingleside , Texas 78326

Taree Kotalik
harleybpink@gmail.com
333 bayshore Dr
Ingleside, Texas 78362

Charles Kotalik
harleybpink@gmail.com
333 bayshore Dr
Ingleside, Texas 78362

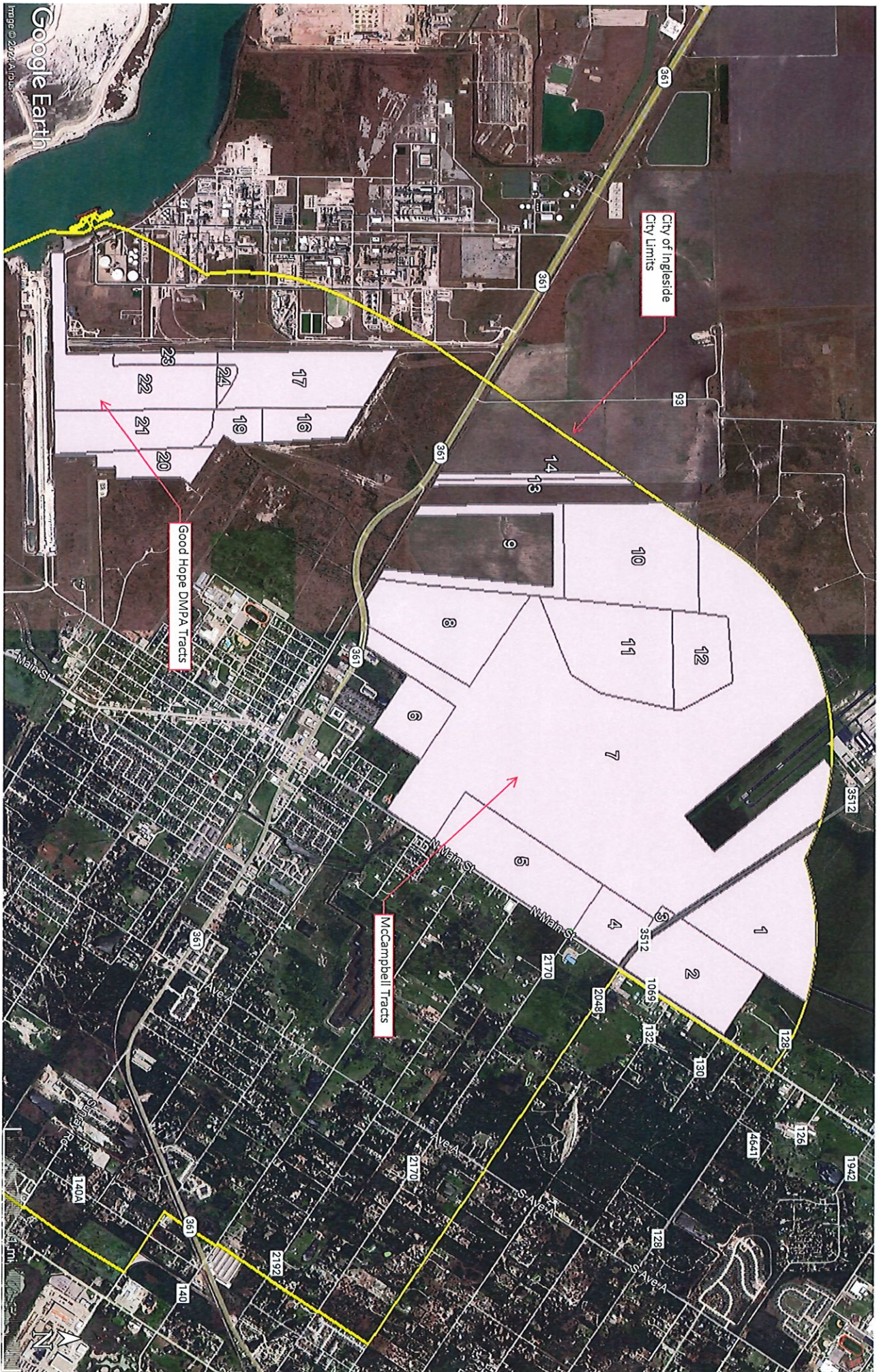
William Porter
butchporter511@gmail.com
511 Bayshore Drive
Ingleside, Texas 78362

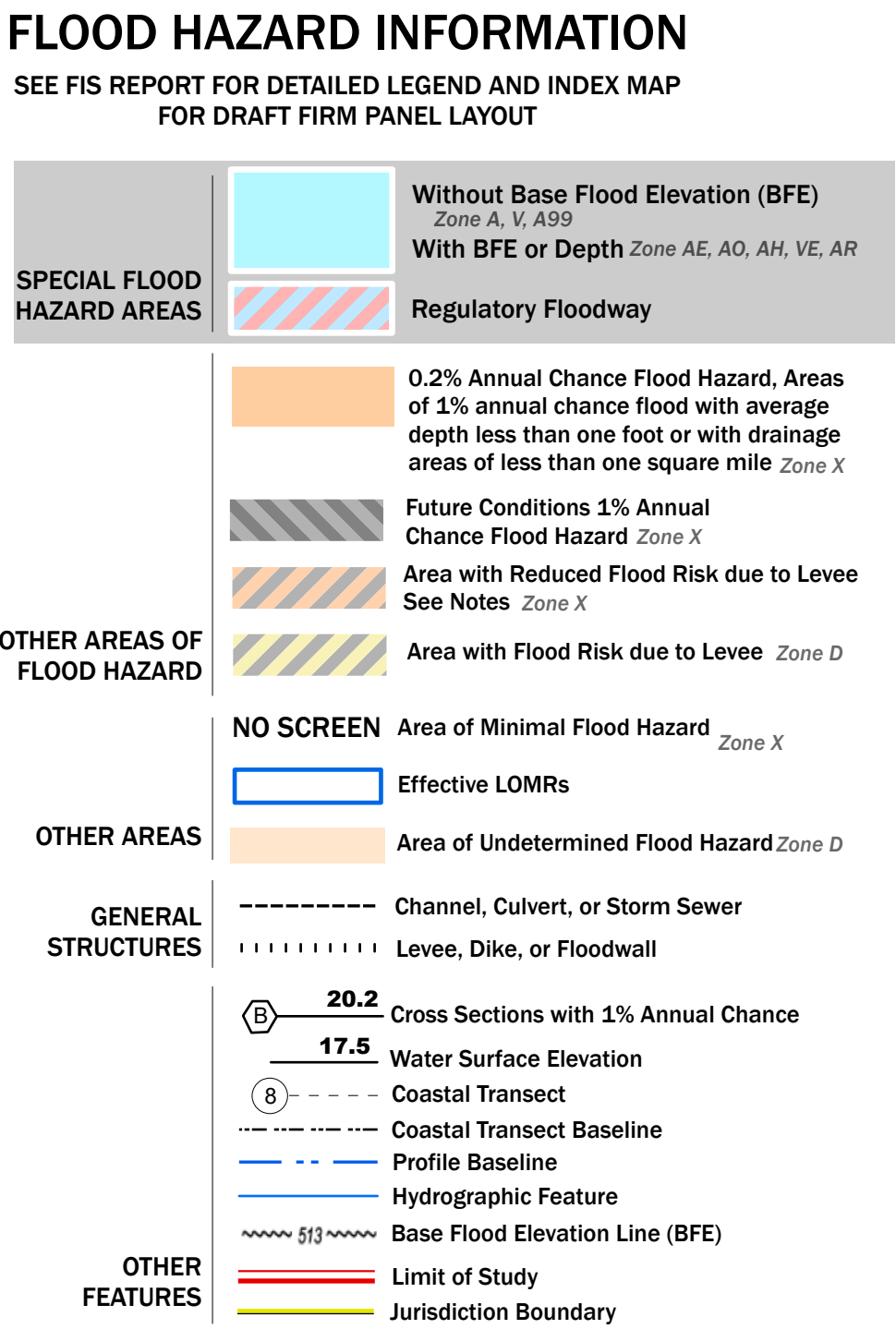
Lynne Porter
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511 Bayshore Drive
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pegduran1@gmail.com
4022 Congressional Drive
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Andrea Julian
andreajulian28@gmail.com
11820 Hartley Cove
Austin, Texas 78748

Kelley and Skipper Burnett
kelleyburnett@hotmail.com
410 n sandpiper
Ingleside, Texas 78362





For information and questions about this Flood Insurance Rate Map (FIRM), available products associated with this FIRM, including historic versions, the current map date for this FIRM, panel, how to order products, or how to request a Flood Insurance Study (FIS) or Flood Insurance Study Panel, please visit www.fema.gov/1-877-FEMA-MAP (1-877-336-2622) or visit the FEMA Flood Map Service Center website at <http://www/fmsc.fema.gov>. Communities may provide previously issued Letters of Map Change, a Flood Insurance Study Report, and/or digital versions of this map. Many of these products can be ordered or obtained directly from the website.

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

For community and countywide map dates, refer to the Flood Insurance Study Report for this jurisdiction.

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 in this FIRM was provided in digital format by USDA, Farm Service Agency (FSA). This information was derived from NAIIP, dated April 11, 2016.

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

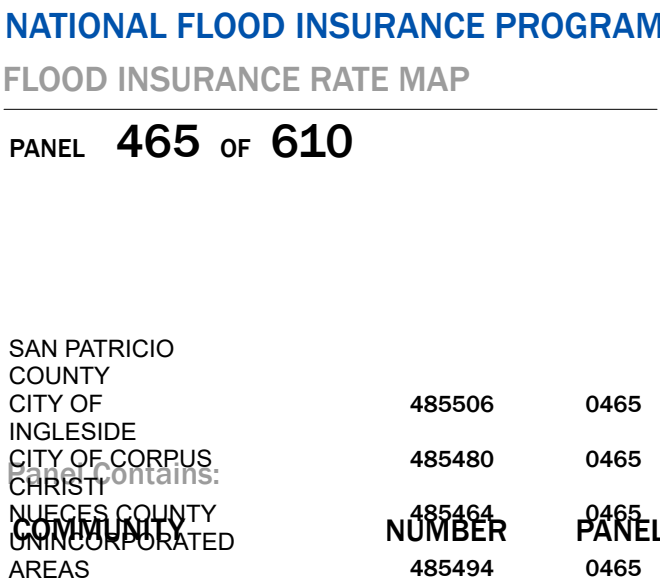
Map Projection:
GCS, Geodetic Reference System 1980;
Vertical Datum: NAVD88

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>

1 inch = 1,000 feet **1:12,000**

0 500 1,000 2,000 3,000 4,000 Feet

0 105 210 420 630 840 Meters



Packet Page 116 of 379

Map ID	Property ID	Size (Acres)	Existing Zoning	Proposed Zoning	Special Permit	Legal Descriptions
McC Campbell Tracts						
1	60762	124.3789	R-1 Single Family	I- Industrial	Yes	124.3789 acres out of a 524.80 acre tract of land. being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al to Mrs. Jean McC Campbell Davis by Partition Deed filled November 4, 1933, recorded in Volume 103, Page I 51 of the Deed Records of San Patricio County, Texas.
2	60762	88.963	R-1 Single Family	I-Industrial	Yes	88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas.
3	67182	3.589	R-1 Single Family	I-Industrial	Yes	3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas
4	67158	37.397	R-1 Single Family	I-Industrial	Yes	37.397 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas
5		104.748	R-1 Single Family	I-Industrial	Yes	104.748 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas
6	67177	40.329	R-1 Single Family	I-Industrial	Yes	40.329 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas
7	61476	848	R-1 Single Family	I- Industrial	Yes	848 acres out of a 1181.095 tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas
8	67236	112.818	R-1 Single Family	I-Industrial	Yes	112.818 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas
9	114650	45.5766	ustrial & R-1 Single F	I-Industrial	No	45.5766 acres of a 150.13 acre tract of land out of the heirs of Rosa Teal Survey, Abstract 262, San Patricio County, Texas, the said 150.13 acre tract of land being the same as and all of tract II being 150.12 acres, more or less, described in Special Warrenty Deed dated November 1, 2013, recorded in document No. 632533, Official Public Recrods of San Patricio County, Texas.
10	1030271	145.0886	R-1 Single Family	I- Industrial	No	145.0886 acres out of a 150.77 acre tract of land, being the same land described as 150.694 acres conveyed from Centex Homes. to EFO Land, L.P., by General Warranty Deed dated March 26, 1999, and recordtlo in Clerk's File No. 472035 of the Real Property Rec.ords of San Patricio County, Texas
11	67168	167.165	R-1 Single Family	I-Industrial	No	167.165 Acre Tract of Land, situated in the Heirs of Rosa Teal Survey A-262, Nicholas Fagan Survey A-124, being out a 6,091.22 Acre Tract of land described in a Partition Deed from W.G. (Will) McC Campbell, et al., to John S. McC Campbell, recorded in Volume 103, Page 156, Deed Records of San Patricio County Texas; said 167.165 Acre Tract being the same lands as a 166 Acre Tract of land described in a Deed from said W.G. McC Campbell, et al. to Mrs. Jean McC Campbell Davis, as recorded in Volume 103 Page 151.
12	61499			I-Industrial	No	
13	67270	13.287	R-1 Single Family	I- Industrial	No	13.287 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.

14	67091	12.4199	R-1 Single Family	I-Industrial	No	12.4199 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.
1,743.76 Total Needing Rezoning - McCampbell						
1,360.22 Total Acres Needing Special Permit						
Good Hope Tracts						
16	69004	336.36	R-1 Single Family	I-Industrial	No	*** A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
17	65073		R-1 Single Family	I-Industrial	No	A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
19	69200		R-1 Single Family	I-Industrial	No	A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
20		37.95	R-1 Single Family	I-Industrial	No	*** A 37.95 acre tract out of the William McDonough Survey, Abstract A-184 and the Day Land and Cattle Company Survey, Abstract A-387, being the same tract called 38.06 acres recorded in Document No. 534924, Deed Records, San Patricio County, Texas, Save and Except a 2.5 acre drill site recorded in Document No. 379019, Deed Records, San Patricio County, Texas.
21			R-1 Single Family	I-Industrial	No	A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
22			R-1 Single Family	I-Industrial	No	A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
23			R-1 Single Family	I-Industrial	No	A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
24			R-1 Single Family	I-Industrial	No	A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
374.31 Total Needing Rezoning - Good Hope						
*** Only these two legal descriptions are needed for the Good Hope Property						
2,118.07 Total Rezoning						

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 offtakers. 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
1.6	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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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.)	
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	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.	
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				

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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 crypto 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 McCampell 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 1886ac 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
6.2	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 he 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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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.)	
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	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.	

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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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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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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 offtakers, 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 38.4ac 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.

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	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
			• 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.	
8.5	[I am very concerned about] 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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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 offtakers 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
			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.	
8.8	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 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.	
Sheila Walton				
9.1	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.	
9.2	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.	
9.3	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. 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.	
9.4	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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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 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.	
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 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.	

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Norine Farrar																												
10.1	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><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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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 chrisit 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.																									

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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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 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.	
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),		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 offtakers through existing infrastructure owned and operated by AEP.	
12.7	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.	
12.8	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 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.	
Mark Wolfe - State Historic Preservation Officer				
13.1	An archeological survey is required. A Texas Antiquities Permit must be obtained from this office prior to initiation of fieldwork. All fieldwork should meet the Archeological 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				
14.1	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.	
14.2	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. 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.	
14.3	Better understanding of changes, impacts, mitigations to: Soil		Port Corpus Christi acknowledges this comment, however, without additional detail, it is impossible to provide an appropriate response.	
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.		The U.S. Army Corps of Engineers should advise if a public meeting is necessary.	
Glenn Guillory				

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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 2022). This implies that species are not adversely affected by shading from the PV panels.	

No.	Comment	Comment Type	Response	Action Item
			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 offtakers 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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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.	
17.5	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.	

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. 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				

No.	Comment	Comment Type	Response	Action Item																								
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.																									
19.2	Public notice is to fill 13.9 acres of wetlands, but the project is 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 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 (Fill) Map on page 18 of 22 of the project drawings.																									
19.4	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 offtakers" 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 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 is within the public interest.	
19.6	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. 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.	

No.	Comment	Comment Type	Response	Action Item
20.2	Application Completeness. I emailed USACE on February 14, 2023 about a lease agreement the Port of Corpus Christi has with Howard Energy for use of Port owned land for carbon sequestration. One of the POCC properties subject to the lease is the McCambell property as noted on the attached map from lease agreement. There is no mention in the application about carbon sequestration and those possible site locations in relation to the proposed solar panel farm. This application must incorporate carbon sequestration site locations and proposed access. These are two major proposed projects for the McCambell property, with both affecting wetlands and water quality of McCambell Slough, the application needs to reflect both projects for completeness of review. It is because of these two projects an Environmental Impact Statement must be considered.		Port Corpus Christi submitted a complete application to the U.S. Army Corps of Engineers on December 27, 2022. 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 Department of Energy (DOE) is the lead federal agency, responsible for reviewing the CCS project in accordance with NEPA. Further, the proposed solar installation occupies approximately 1886ac of the 2850ac property, providing an opportunity for additional and independent projects. This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement.	
20.3	Deficient Information for site locations, material and placement. “The applicant proposes to discharge approximately 111,100 cubic yards of fill material into 13.9 acres of herbaceous wetlands adjacent to McCampbell Slough, a tidal water of the United States.” The PN with project plans and mitigation plans fail to identify the site location of wetlands to be filled along the McCambell Slough. In fact, not one schematic identifies the slough by name, only a few pages identify the “drainage ditch”. Will this be several site locations to be filled that total 13.9 acres or just one connected wetland site? What is the composition of the “fill” material? Is the fill material comprised of native soil or introduced soil/base material? Will the material include various non-mulched wooded plants? Will the material include invasive plant species that could spread further downstream from placement location(s)? How will placement of material be conducted? Depending on the method of placement, more wetlands could be directly impacted.		The project will place fill in wetlands for access paths and inverters, which is denoted in the permit drawings on the Wetland Impacts (Fill) Map on page 18 of 22 of the project drawings. The final design of the development will stipulate ideal characteristics of fill material and detail the construction methodology including all conditions of the permit, 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.	
20.4	Fill Material – Testing Requirement. There is no mention about testing “fill” material for placement in wetlands that are considered connected to WOTUS. Interval testing for bacterial and chemical contaminants must be required for fill material before placement. No placement of fill material with contaminants can be permitted on this waterway. Further, fill material is likely to have soils with cattle manure which can contain invasive plant seeds and importantly, bacterial contamination. High levels of bacteria could leach into McCambell slough and further downstream. What will be the required standard for bacterial contamination in addition to chemical contamination standards?		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. Port Corpus Christi purchased the McCampbell Property in 2018. Historically, farming and ranching dominated the property and continue today.	
20.5	Habitat – Flora – Fauna Impacts. The PN again states 13.9 acres of wetlands be filled, with .3 acres impacted for inverter placement, but approximately 1800 acres of wetlands will be covered with solar panels. What about the impacts to these wetlands? The PN indicates the solar panels will be elevated and therefore shading of wetlands will be minimal and there are no claimed impacts. Are they kidding? Look at the total solar panel arrays and it is easy to see how much wetland will be severely impacted by shading. I am surprised USACE did not tell the applicant to further assess wetland impacts from shading, heat and overall construction of solar farm. The PN fails to address or provide a general survey of aquatic, amphibious, or reptilian life in/or around the full length of what is essentially a canal (slough). There is no mention of terrestrial wildlife or bird populations such as whooping cranes. This is another reason to require an EIS, especially to assess threatened and endangered species. All of the mentioned categories of fauna will be directly impacted with obvious loss of habitat on 1800+ acres, which must be factored into the permit application.		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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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 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.) Section 2 of the application provides a description of the landscape: Wetlands constitute approximately 1,560ac of the McCampbell Property (See Approved Jurisdictional Determination dated August 12, 2022). The 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.	
20.6	Port Authority as Navigation District. The Port of Corpus Christi is a political subdivision navigation district of the State of Texas. The POCC receives both Federal and State money for various projects associated with maintaining or improving navigation district. However, according to the PN, the proposed solar farm will be owned and possibly operated under the POCC, which isn't an authorized electrical utility distributor. The PN deliberately avoids stating what entity will be supplied electrical power. The electrical power is not about adding to the Texas grid, but this solar farm is for future heavy industry the POCC wants to attract. This is a public entity using public money for creation of power to supply private industry. Democratizing expenses while privatizing profits has been the Port of Corpus Christi's operations motto for past few years.		The project is expected to yield 600 MW of carbon-free electricity to be delivered via interconnect to the regional electric grid, with the potential to serve both residential and industrial demand. 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.	
20.7	Proposed Mitigation. I support the POCC's proposed onsite mitigation to remove unneeded roads and restore wetland areas on the McCambell property. However, the PN does not come close to recognizing the full impacts to all wetlands in the project area. The proposed mitigation is based on 13.9 acres of wetland to be filled, yet the total area of wetland impacts could be as much as 1800+ acres. Therefore, the proposed mitigation is well short of the claimed 2:1 and short of any minimal 1:1 mitigation.		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.	
20.8	Because of unaccounted wetland impacts with aquatic and terrestrial habitat impacts, an Environmental Impact Statement must be required		This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement.	
Kathyrn Masten – Ingleside of the Bay Coastal Watch Association				
21.1	The Port has not even spoken to Gary Davis, the McCampbell-Porter Airport manager. This shows the level of disrespect the Port shows when dealing with San Patricio County residents and public officials, which includes efforts to block Senate Bill 2235 (attached) to give San Patricio another seat on the Port Commission.		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.	
21.2	The Port does not intend to operate the solar farm. This helps explain why attached Senate Bill 818 is making its way through the Legislature during this		Port Corpus Christi did not request any legislator file any legislation during the 88th legislature. SB 818 (and its companion HB 1511) was filed by legislators from Houston and the Texas Ports Association (TPA) to support their efforts. The TPA is a state trade association that represents twenty seaports in Texas.	

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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																												
22.1	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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22.2	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 24ontinue 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.		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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			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 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.	
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 (Fill) Map on page 18 of 22 of the project drawings.				
23.3	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:				
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			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.				
23.4	The purpose for “new and industrial offtakers” is not in the publics 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 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.				

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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																												
24.1	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: <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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24.2	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 offtakers through existing infrastructure owned and operated by AEP.																									

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24.4	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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24.5	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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Temporary Construction	Minimized by construction sequencing, BMPs, and restorations	None - Restored																										

No.	Comment	Comment Type	Response	Action Item
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. 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.		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.	need exhibits showing hydrology
24.9	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. Pilings 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.	
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. 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.	
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.		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.	
Tom Shearer				
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.		Based on the wetland delineation and associated AJD, 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.	
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		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).	
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. The U.S. Army Corps of Engineers should advise if a public meeting is necessary.	
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.		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); • 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	
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.		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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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.)	
27.4	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.	
27.5	They have not provided an inventory of the wetlands or an inventory of the species.		U.S. Army Corps of Engineers reviewed and approved a wetlands delineation report—which contained 181 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.	
27.6	There are previously disturbed sites that are better suited for this project.		Please see the updated Alternatives Analysis provided as Attachment A.	
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.		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. 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>Borrchia frutescens</i>), shoregrass (<i>Distichlis littoralis</i>), sand spike rush (<i>Eleocharis palustris</i>), coastal salt grass (<i>Distichlis</i>	

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			<i>spicata</i>), bitter panic grass (<i>Panicum amarum</i>), seaside American aster (<i>Symphotrichum subulatum</i>), chairmakers club-rush (<i>Scheonoplectus 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.																									
27.8	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> 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.	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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27.9	The Port of Corpus Christi as a public entity is not approved to develop assets to provide energy for it’s 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.																									
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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27.11	A plan should be approved for the decommission restoration of the site to prior or improved condition.		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.	
27.12	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 offtakers through existing infrastructure owned and operated by AEP.	

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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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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.)	
Linda Fuiman				
29.1	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	

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			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 offtakers 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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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.)	



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Lee M. Bass
Chairman-Emeritus
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T. Dan Friedkin
Chairman-Emeritus
Houston

David Yoskowitz, Ph.D.
Executive Director

March 13, 2023

Mr. Kevin Mannie
U.S. Army Corps of Engineers
Galveston District, Regulatory Branch
2000 Fort Point Road
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swg_public_notice@usace.army.mil

401 Coordinator
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P.O. Box 13087
Austin, TX 78711-3087
401certs@tceq.texas.gov

Re: Permit Application Number SWG-2021-00163
Port of Corpus Christi Authority

Dear Mr. Mannie and 401 Coordinator:

Texas Parks and Wildlife Department (TPWD) has reviewed the Public Notice (PN) dated February 9, 2023, for permit application number SWG-2021-00163. The applicant requests authorization to construct a 600 megawatt (MW) photovoltaic (PV) solar panel development in emergent wetlands adjacent to McCampbell Slough within a 1,866-acre portion of a 2,850-acre tract of land, completely surrounding the McCampbell-Porter Airport located at 3141 Farm to Market Road (FM) 3512, in Aransas Pass, San Patricio County, Texas.

According to the PN, the applicant proposes to fill approximately 13.9 acres of emergent wetlands for the construction of 11.1 miles of access roads, rotating solar panels mounted on helical piles (dimensions and quantities of PV panels and helical piles are not described), 295 power inverters, and two electric substations in an approximate 1,866-acre area.

Project documents describe the proposed project site as 1,866 acres of the 2,850-acre McCampbell Property, 55% of which supports 1,558.3 acres of palustrine and estuarine wetlands and other jurisdictional waterbodies. The separate tracts that make up the proposed project site are separated by FM 3512 and the McCampbell-Porter Airport that is owned and operated by San Patricio County. Hydrology within the property is dominated by a large ditch that conveys stormwater from the City of Ingleside and from the site itself into McCampbell Slough and Port Bay. The proposed permittee-responsible compensatory mitigation plan (PRCMP) states that this feature provides "a substantial freshwater influx to the downstream estuaries of Port and Copano Bays".

Wetlands within the project area are described as dominated by salt meadow cordgrass (*Spartina spartinae*). These wetlands function to attenuate flood waters from stormwaters associated with both rainfall and storm surge, remove pollutants (including sediment, debris, excess nutrients, pesticides, etc.) associated with

runoff from neighboring communities as well as onsite activities, store and re-cycle nutrients, and support water quality functions for fish and wildlife habitats onsite as well as those located down gradient (i.e., McCampbell Slough and Port Bay).

The 2022 303d List of Impaired Waters indicates that Port Bay was first listed as impaired in 1998 due to bacteria in oyster waters. The Texas Department of State Health Services currently classifies Port Bay as a restricted area that is closed to the taking of shellfish, including take associated with commercial oyster mariculture facilities. Currently, at least one commercial oyster mariculture facility has been authorized just outside the restricted waters of Port Bay. Any expansion of water quality degradation has the potential also expand the restricted shellfish harvest area.

Recommendation: 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.

Alternatives Analysis

TPWD has reviewed the information provided in the Alternatives Analysis (AA) Summary provided with the PN. Because this activity is not water dependent, practicable alternatives that do not involve special aquatic sites are presumed available unless clearly demonstrated otherwise. The complete AA was not provided for resource agency or public review and Table 1 of the AA Summary does not provide sufficient information to fully evaluate the alternatives considered or the criteria used to support the alternatives in light of the project purpose and need. However, information provided in Table 1 raises the following concerns for the AA.

Table 1 indicates that the only alternative not owned by the applicant is not feasible in terms of acquisition. There is no explanation provided for this conclusion. Table 1 also states that acquisition of this tract would be required but does not indicate if it (or other tracts not identified in the table) are available for acquisition.

In addition, Table 1 indicates that only two alternatives will avoid impacts to waters of the U.S. (WOUS) and wetlands, but it also states that none of the alternatives will impact special aquatic sites. The applicant should note that wetlands are a type of special aquatic site (defined at 40 CFR 230.41). As such, Table 1 indicates that all the proposed alternatives will impact special aquatic sites except for those which do not contain wetlands.

It is uncertain if the AA provides sufficient justification for being unable to split the project among two or more sites (such as those which avoid wetlands/special aquatic sites), especially considering that two substations are proposed, one on each tract within the project boundary.

Recommendation: The applicant should consider exploring additional alternatives to identify the least environmentally damaging practicable alternative (LEDPA).

Table 1 states: “Delay of acquisition restricts the ability to support economic development in the clean hydrogen sector at the place in which projects would be developed”. The applicant should clarify what is meant by this statement and provide additional information about any interdependent or connected activities associated with the proposed project.

Recommendation: 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).

Avoidance and minimization

With respect to avoidance and minimization, the PN states:

The applicant has stated that they have avoided and minimized environmental impacts by designing the proposed project in a manner that preserves site hydrology and avoids/minimizes impacts to aquatic resources including installing solar panels on helical pilings without concrete footings to avoid wetland impacts, elevating the rotating solar panels 5 feet above the ground level to avoid shading effects, elevating cabling on trays to avoid temporary trenching through wetlands, siting the two substations entirely within uplands, placing approximately 60% of power inverters in uplands reducing wetland impacts to 0.3 acre, configuring site access routes to the minimum necessary to reduce wetland impacts to 13.4 acres, and minimizing constructions sequencing, utilizing construction best management practices (BMPs), and restoring temporary impacts to pre-project conditions.

As proposed, the 1,866-acre project area only contains 308 acres of uplands. Wetlands account for the remaining 1,558.3 acres, or 83% of the total proposed project area. Because the 2850-acre McCampbell Property supports approximately 1,292 acres of uplands, additional impact avoidance and minimization may be feasible onsite.

Recommendation: 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.

Other potential effects

Page 17 of 22 of the proposed project plans notes that solar panels will rotate continuously throughout the day via a linear actuator to maximize solar absorption and minimize vegetation shading. Based on this information, the applicant has not provided an adequate rationale to support these competing ideas and the extent to which the PV panels will act as fill is not clear.

Limited research indicates that PV panels can alter the microclimate underneath them and result in changes to plant composition, soil moisture, and other variables. TPWD is concerned that there is a paucity of research available on the direct and indirect effects of PV panels on wetland ecosystems. Any adverse effects that may result from the installation, operation and decommissioning of the PV solar panel development at the project site have the potential to adversely affect up to 1,558.3 acres of wetlands.

The applicant has stated that temporary impacts will be restored to pre-construction conditions, but these temporary impacts have not been adequately described in terms of location, extent, or habitat types affected.

Recommendation: 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.

TPWD and the applicant's neighbor, McCampbell-Porter Airport, may have mutual concerns for the increased potential for bird strikes. These could result from birds mistaking the reflective surface of PV solar panels for water or from alterations to site hydrology, such as the construction of access roads, that results in greater frequency and/or duration of seasonal ponding events. Project documents describe the proposed permeable access roads as being comprised of caliche, limestone, or similar material. However, it is not clear if the hydraulic conductivity of these materials will continue to support current site conditions. Further, the applicant has not described any operational activities, such as washing the PV panels, that may also have secondary effects.

Recommendation: 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.

Mitigation Plan

Based on the information provided, TPWD lacks confidence that the applicant has adequately demonstrated that there are no practicable alternatives to the proposed fill which would have fewer adverse impacts on the aquatic ecosystem. In addition, the applicant has not demonstrated that impacts have been avoided and minimized to the extent practicable. Therefore, TPWD considers the proposed PRCMP to be premature.

Because the PN does not provide information which demonstrates that impacts have been avoided and minimized to the extent practicable, the PRCMP seems premature. Once the AA identifies the LEDPA and impacts are avoided and minimized to the extent practicable, the PRCMP should be revised to fully compensate for unavoidable impacts. The PRCMP proposes to restore 29.6 acres of disturbed vehicle paths to adjacent wetland elevations. In general, TPWD does not consider the proposed restoration project suitable for providing compensatory mitigation as proposed. The applicant has not provided sufficient information to inform or evaluate the PRCMP. For example, no hydrological assessments have been conducted to demonstrate that the proposed restoration project will result in a net gain in aquatic resource function that fully offsets functional losses.

Recommendation: 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.

As previously described above, it is not clear how the proposed access roads will affect existing hydrology. The combined effects of potential hydrological changes (project impacts and onsite restorations) have the potential to make the site wetter and increase the frequency and duration of inundation. TPWD is concerned that excessive inundation could result in limited plant survival and growth.

The following information should be provided 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.
- 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.

Mr. Mannie and 401 Coordinator
SWG-2021-00163
March 13, 2023
Page 6 of 6

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. TPWD requests that any revised project documents or draft compensatory mitigation plans be made available for public review and comment. Questions can be directed to Cindy Adams-Smith or Jackie Robinson (361-431-6003) in Corpus Christi.

Sincerely,



so Emma Clarkson, PhD
Regional Director, Ecosystem Resources Program
Coastal Fisheries Division
Science and Policy Branch

EC:JR:CAS

**PLANNING & ZONING VOTING RECORD
& ATTENDANCE RECORD**

DATE: 12/02/2024

RECORD NO. 660A1

ITEMS NO. 5 & 10

			DESCRIPTION
THIS APPLICATION ___ REQUIRES <u>X</u> DOES NOT REQUIRE A SUPER MAJORITY VOTE BY CITY COUNCIL.	P R E S E N T O R A B S E N T	V O T E	DELIBERATE AND TAKE APPROPRIATE ACTION ON AN APPLICATION FILED BY THE PORT OF CORPUS CHRISTI, REQUESTING TO REZONE, FROM R-1 – SINGLE FAMILY RESIDENTIAL TO I – INDUSTRIAL, APPROXIMATELY 1,743.76 ACRES, BEARING THE LEGAL DESCRIPTION OF: Property Tract 1, ID 60762, being 124.3789 acres out of a 524.80-acre tract of land. being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al to Mrs. Jean McCampbell Davis by Partition Deed filled November 4, 1933, recorded in Volume 103, Page I 51 of the Deed Records of San Patricio County, Texas, Property Tract 2, ID, 60762 being 88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 3, ID, 67182, being 3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 4, ID 67158, 37.397-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 5, 104.748-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 6, ID 67177, 40.329-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 7, ID 61476, 848 acres out of a 1181.095 tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis

by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 8, ID 67236, 112.818-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 9, ID 114650, 45.5766 acres of a 150.13 acre tract of land out of the heirs of Rosa Teal Survey, Abstract 262, San Patricio County, Texas, the said 150.13 acre tract of land being the same as and all of tract II being 150.12 acres, more or less, described in Special Warranty Deed dated November 1, 2013, recorded in document No. 632533, Official Public Records of San Patricio County, Texas. Property Tract 10, ID 103271, 145.0886 acres out of a 150.77 acre tract of land, being the same land described as 150.694 acres conveyed from Centex Homes. to EFO Land, L.P., by General Warranty Deed dated March 26, 1999, and recorded in Clerk's File No. 472035 of the Real Property Records of San Patricio County, Texas. Property Tract 11, ID 67168, Tract 12, 61499, 167.165 Acre Tract of Land, situated in the Heirs of Rosa Teal Survey A-262, Nicholas Fagan Survey A-124, being out a 6,091.22 Acre Tract of land described in a Partition Deed from W.G. (Will) McCampbell, et al., to John S. McCampbell, recorded in Volume 103, Page 156, Deed Records of San Patricio County Texas; said 167.165 Acre Tract being the same lands as a 166 Acre Tract of land described in a Deed from said W.G. McCampbell, et al. to Mrs. Jean McCampbell Davis, as recorded in Volume 103 Page 151. Property Tract 13, ID 67270, 13.287 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas. Property Tract 14, ID 67091, 12.4199 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin

			Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.
ALAN BEAUBIEN (Place #1 - 12/31/25) 1 ST Term	P	Y	<u>PUBLIC HEARING NOTES</u> Speaking For: None Speaking Against: None There were 10 letters of objection. Commission Member Beaubien made a motion to recommend approval of the request to City Council. Commission Member Gutierrez seconded the motion. Motion carried 3:2.  Chairman <u>12-2-2024</u> Date
JACOB LOPEZ (Place #1 - 12/31/25) 1 ST Term	A	-	
CONNOR BROWN (Place # 3 - 12/31/25) 1 ST Term	P	Y	
(Place #4 - 12/31/24)	-	-	
BRENDA RICHARDSON (Place # 5 - 12/31/24) 2 ND Term (Chairman)	P	Y	
GERARD GUTIERREZ (Place #6 - 12/31/24) 1 ST Term	P	N	
CYNTHIA WILSON (Place #7 - 12/31/24) 1 ST Term	P	N	

ORDINANCE NO. 2025-_____

AN ORDINANCE CHANGING THE ZONING FOR THE FOLLOWING PROPERTY FROM ITS PRESENT ZONING OF R-1 (SINGLE FAMILY RESIDENTIAL) TO I (INDUSTRIAL) AND FURTHER PROVIDING FOR EFFECTIVE DATE, READING, SEVERANCE AND PUBLICATION:

APPROXIMATELY 1,743.76 ACRES, BEARING THE LEGAL DESCRIPTION OF: PROPERTY TRACT 1, ID 60762, BEING 124.3789 ACRES OUT OF A 524.80-ACRE TRACT OF LAND. BEING PART OF A 6091.22-ACRE TRACT OF LAND CONVEYED FROM W. G. MCCAMPBELL, ET AL TO MRS. JEAN MCCAMPBELL DAVIS BY PARTITION DEED FILLED NOVEMBER 4, 1933, RECORDED IN VOLUME 103, PAGE 151 OF THE DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS, PROPERTY TRACT 2, ID, 60762 BEING 88.963 ACRE TRACT OF LAND, BEING PART OF A 6091.22 ACRE TRACT OF LAND CONVEYED FROM W. G. MCCAMPBELL, ET AL, TO MRS. JEAN MCCAMPBELL DAVIS BY PARTITION DEED DATED NOVEMBER 4, 1933, RECORDED IN VOLUME 103, PAGE 151 OF THE DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS, PROPERTY TRACT 3, ID, 67182, BEING 3.589 ACRE TRACT OF LAND, BEING PART OF A 6091.22 ACRE TRACT OF LAND CONVEYED FROM W. G. MCCAMPBELL, ET AL, TO MRS. JEAN MCCAMPBELL DAVIS BY PARTITION DEED DATED NOVEMBER 4, 1933, RECORDED IN VOLUME 103, PAGE 151 OF THE DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS. PROPERTY TRACT 4, ID 67158, 37.397-ACRE TRACT OF LAND, BEING PART OF A 6091.22-ACRE TRACT OF LAND CONVEYED FROM W. G. MCCAMPBELL, ET AL, TO MRS. JEAN MCCAMPBELL DAVIS BY PARTITION DEED DATED NOVEMBER 4, 1933, RECORDED IN VOLUME 103, PAGE 151 OF THE DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS. PROPERTY TRACT 5, 104.748-ACRE TRACT OF LAND, BEING PART OF A 6091.22-ACRE TRACT OF LAND CONVEYED FROM W. G. MCCAMPBELL, ET AL, TO MRS. JEAN MCCAMPBELL DAVIS BY PARTITION DEED DATED NOVEMBER 4, 1933, RECORDED IN VOLUME 103, PAGE 151 OF THE DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS. PROPERTY TRACT 6, ID 67177, 40.329-ACRE TRACT OF LAND, BEING PART OF A 6091.22-ACRE TRACT OF LAND CONVEYED FROM W. G. MCCAMPBELL, ET AL, TO MRS. JEAN MCCAMPBELL DAVIS BY PARTITION DEED DATED NOVEMBER 4, 1933, RECORDED IN VOLUME 103, PAGE 151 OF THE DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS. PROPERTY TRACT 7, ID 61476, 848 ACRES OUT OF A 1181.095 TRACT OF LAND, BEING PART OF A 6091.22-ACRE TRACT OF LAND CONVEYED FROM W. G. MCCAMPBELL, ET AL, TO MRS. JEAN MCCAMPBELL DAVIS BY PARTITION DEED DATED NOVEMBER 4, 1933, RECORDED IN VOLUME 103, PAGE 151 OF THE DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS. PROPERTY TRACT 8, ID 67236, 112.818-ACRE TRACT OF LAND, BEING PART OF A 6091.22-ACRE TRACT OF LAND

CONVEYED FROM W. G. MCCAMPBELL, ET AL, TO MRS. JEAN MCCAMPBELL DAVIS BY PARTITION DEED DATED NOVEMBER 4, 1933, RECORDED IN VOLUME 103, PAGE 151 OF THE DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS. PROPERTY TRACT 9, ID 114650, 45.5766 ACRES OF A 150.13 ACRE TRACT OF LAND OUT OF THE HEIRS OF ROSA TEAL SURVEY, ABSTRACT 262, SAN PATRICIO COUNTY, TEXAS, THE SAID 150.13 ACRE TRACT OF LAND BEING THE SAME AS AND ALL OF TRACT II BEING 150.12 ACRES, MORE OR LESS, DESCRIBED IN SPECIAL WARRANTY DEED DATED NOVEMBER 1, 2013, RECORDED IN DOCUMENT NO. 632533, OFFICIAL PUBLIC RECORDS OF SAN PATRICIO COUNTY, TEXAS. PROPERTY TRACT 10, ID 103271, 145.0886 ACRES OUT OF A 150.77 ACRE TRACT OF LAND, BEING THE SAME LAND DESCRIBED AS 150.694 ACRES CONVEYED FROM CENTEX HOMES. TO EFO LAND, L.P., BY GENERAL WARRANTY DEED DATED MARCH 26, 1999, AND RECORDED IN CLERK'S FILE NO. 472035 OF THE REAL PROPERTY RECORDS OF SAN PATRICIO COUNTY, TEXAS. PROPERTY TRACT 11, ID 67168, TRACT 12, 61499, 167.165 ACRE TRACT OF LAND, SITUATED IN THE HEIRS OF ROSA TEAL SURVEY A-262, NICHOLAS FAGAN SURVEY A-124, BEING OUT A 6,091.22 ACRE TRACT OF LAND DESCRIBED IN A PARTITION DEED FROM W.G. (WILL) MCCAMPBELL, ET AL., TO JOHN S. MCCAMPBELL, RECORDED IN VOLUME 103, PAGE 156, DEED RECORDS OF SAN PATRICIO COUNTY TEXAS; SAID 167.165 ACRE TRACT BEING THE SAME LANDS AS A 166 ACRE TRACT OF LAND DESCRIBED IN A DEED FROM SAID W.G. MCCAMPBELL, ET AL. TO MRS. JEAN MCCAMPBELL DAVIS, AS RECORDED IN VOLUME 103 PAGE 151. PROPERTY TRACT 13, ID 67270, 13.287 ACRES OUT OF 17.456 ACRES OF LAND OUT OF A CALLED 34.9 ACRE TRACT OF LAND OUT OF THE CALLED EAST 100 ACRES OUT OF THE 200 ACRE SAHADI TRACT, OUT OF THE ROSA TEAL SURVEY, A-262, AND THE N. FAGIN SURVEY, A-124, SAN PATRICIO COUNTY, TEXAS, WITH SAID 34.9 ACRES BEING CALLED TRACT "B" IN A PARTITION DEED OF CALLED EAST 100 ACRES, ACTUAL 99.72 ACRES, BEING DESCRIBED IN A DEED RECORDED UNDER CLERKS FILE NUMBER 247749, DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS, AND SAID 200 ACRE SAHADI TRACT DESCRIBED IN A DEED OF RECORD UNDER VOLUME 81, PAGES 597-598, DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS. PROPERTY TRACT 14, ID 67091, 12.4199 ACRES OUT OF 17.456 ACRES OF LAND OUT OF A CALLED 34.9 ACRE TRACT OF LAND OUT OF THE CALLED EAST 100 ACRES OUT OF THE 200 ACRE SAHADI TRACT, OUT OF THE ROSA TEAL SURVEY, A-262, AND THE N. FAGIN SURVEY, A-124, SAN PATRICIO COUNTY, TEXAS, WITH SAID 34.9 ACRES BEING CALLED TRACT "B" IN A PARTITION DEED OF CALLED EAST 100 ACRES, ACTUAL 99.72 ACRES, BEING DESCRIBED IN A DEED RECORDED UNDER CLERKS FILE NUMBER 247749, DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS, AND SAID 200 ACRE SAHADI TRACT DESCRIBED IN A DEED OF RECORD UNDER VOLUME 81,

PAGES 597-598, DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS.

WHEREAS, the City Council of the City Ingleside (“City Council”) has previously approved and adopted a Comprehensive Zoning Ordinance and Zoning Map of the City of Ingleside; and

WHEREAS, the City Council has previously created and appointed a Planning and Zoning Commission as authorized by the Texas Local Government Code; and,

WHEREAS, the Texas Local Government Code authorizes a municipality to adopt zoning districts after compliance with statutory notice provisions; and,

WHEREAS, application was made to rezone the real property approximately 1,743.76 ACRES, bearing the legal description of: Property Tract 1, ID 60762, being 124.3789 acres out of a 524.80-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al to Mrs. Jean McCampbell Davis by Partition Deed filed November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 2, ID, 60762 being 88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 3, ID, 67182, being 3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 4, ID 67158, 37.397-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 5, 104.748-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 6, ID 67177, 40.329-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 7, ID 61476, 848 acres out of a 1181.095 tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 8, ID 67236, 112.818-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 9, ID 114650, 45.5766 acres of a 150.13 acre tract of land out of the heirs of Rosa Teal Survey, Abstract 262, San Patricio County, Texas, the said 150.13 acre tract of land being the same as and all of tract II being 150.12 acres, more or less, described in Special Warranty Deed dated November 1, 2013, recorded in document No. 632533, Official Public Records of San Patricio County, Texas. Property Tract 10, ID 103271, 145.0886 acres out of a 150.77 acre tract of land, being the same land described as 150.694 acres conveyed from Centex Homes. to EFO Land, L.P., by General Warranty Deed dated March 26, 1999, and recorded in Clerk's File No. 472035 of the Real Property Records of San Patricio County, Texas. Property Tract 11, ID 67168, Tract 12, 61499, 167.165 Acre Tract of Land, situated in the Heirs of Rosa Teal Survey A-262, Nicholas Fagan Survey A-124, being out a 6,091.22 Acre Tract of land described in a Partition Deed from W.G.

(Will) McCampbell, et al., to John S. McCampbell, recorded in Volume 103, Page 156, Deed Records of San Patricio County Texas; said 167.165 Acre Tract being the same lands as a 166 Acre Tract of land described in a Deed from said W.G. McCampbell, et al. to Mrs. Jean McCampbell Davis, as recorded in Volume 103 Page 151. Property Tract 13, ID 67270, 13.287 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas. Property Tract 14, ID 67091, 12.4199 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas in the San Patricio County property records; and

WHEREAS, after complying with the statutory publication and notification requirements, on December 2, 2024, the Ingleside Planning and Zoning Commission ("Commission") conducted a public hearing on the potential rezoning application and after considering the testimony and evidence, has provided a recommendation to the City Council on the rezoning of said lots; and,

WHEREAS, after hearing and considering the application, the recommendation of the Commission, the present zoning and use of each of the properties in the surrounding area, the comprehensive master plan of the city, the future development of the city as a whole, and other relevant factors, the City Council is of the opinion and finds that it is in the best interest of the public health, safety, and welfare of the city to rezone this property, that the rezoning effected by this ordinance is in compliance with the Comprehensive Master Plan, that changing the zoning of the aforesaid property would not be detrimental to the public health, safety, or general welfare, and will, in fact, promote the best and most orderly development of the properties affected thereby, and to be affected thereby, in the City of Ingleside, and as well, the owners and occupants of the property, and the City generally.

BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF INGLESIDE, COUNTY OF SAN PATRICIO, STATE OF TEXAS:

Section 1. Zoning Change. The Zoning of the property hereinafter described is hereby changed from R-1 (Single Family Residential) to I (INDUSTRIAL)

APPROXIMATELY 1,743.76 ACRES, BEARING THE LEGAL DESCRIPTION OF: PROPERTY TRACT 1, ID 60762, BEING 124.3789 ACRES OUT OF A 524.80-ACRE TRACT OF LAND. BEING PART OF A 6091.22-ACRE TRACT OF LAND CONVEYED FROM W. G. MCCAMPBELL, ET AL TO MRS. JEAN MCCAMPBELL DAVIS BY PARTITION DEED FILLED NOVEMBER 4, 1933, RECORDED IN VOLUME 103, PAGE 151 OF THE DEED RECORDS OF SAN PATRICIO

COUNTY, TEXAS, PROPERTY TRACT 2, ID, 60762 BEING 88.963 ACRE TRACT OF LAND, BEING PART OF A 6091.22 ACRE TRACT OF LAND CONVEYED FROM W. G. MCCAMPBELL, ET AL, TO MRS. JEAN MCCAMPBELL DAVIS BY PARTITION DEED DATED NOVEMBER 4, 1933, RECORDED IN VOLUME 103, PAGE 151 OF THE DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS, PROPERTY TRACT 3, ID, 67182, BEING 3.589 ACRE TRACT OF LAND, BEING PART OF A 6091.22 ACRE TRACT OF LAND CONVEYED FROM W. G. MCCAMPBELL, ET AL, TO MRS. JEAN MCCAMPBELL DAVIS BY PARTITION DEED DATED NOVEMBER 4, 1933, RECORDED IN VOLUME 103, PAGE 151 OF THE DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS. PROPERTY TRACT 4, ID 67158, 37.397-ACRE TRACT OF LAND, BEING PART OF A 6091.22-ACRE TRACT OF LAND CONVEYED FROM W. G. MCCAMPBELL, ET AL, TO MRS. JEAN MCCAMPBELL DAVIS BY PARTITION DEED DATED NOVEMBER 4, 1933, RECORDED IN VOLUME 103, PAGE 151 OF THE DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS. PROPERTY TRACT 5, 104.748-ACRE TRACT OF LAND, BEING PART OF A 6091.22-ACRE TRACT OF LAND CONVEYED FROM W. G. MCCAMPBELL, ET AL, TO MRS. JEAN MCCAMPBELL DAVIS BY PARTITION DEED DATED NOVEMBER 4, 1933, RECORDED IN VOLUME 103, PAGE 151 OF THE DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS. PROPERTY TRACT 6, ID 67177, 40.329-ACRE TRACT OF LAND, BEING PART OF A 6091.22-ACRE TRACT OF LAND CONVEYED FROM W. G. MCCAMPBELL, ET AL, TO MRS. JEAN MCCAMPBELL DAVIS BY PARTITION DEED DATED NOVEMBER 4, 1933, RECORDED IN VOLUME 103, PAGE 151 OF THE DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS. PROPERTY TRACT 7, ID 61476, 848 ACRES OUT OF A 1181.095 TRACT OF LAND, BEING PART OF A 6091.22-ACRE TRACT OF LAND CONVEYED FROM W. G. MCCAMPBELL, ET AL, TO MRS. JEAN MCCAMPBELL DAVIS BY PARTITION DEED DATED NOVEMBER 4, 1933, RECORDED IN VOLUME 103, PAGE 151 OF THE DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS. PROPERTY TRACT 8, ID 67236, 112.818-ACRE TRACT OF LAND, BEING PART OF A 6091.22-ACRE TRACT OF LAND CONVEYED FROM W. G. MCCAMPBELL, ET AL, TO MRS. JEAN MCCAMPBELL DAVIS BY PARTITION DEED DATED NOVEMBER 4, 1933, RECORDED IN VOLUME 103, PAGE 151 OF THE DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS. PROPERTY TRACT 9, ID 114650, 45.5766 ACRES OF A 150.13 ACRE TRACT OF LAND OUT OF THE HEIRS OF ROSA TEAL SURVEY, ABSTRACT 262, SAN PATRICIO COUNTY, TEXAS, THE SAID 150.13 ACRE TRACT OF LAND BEING THE SAME AS AND ALL OF TRACT II BEING 150.12 ACRES, MORE OR LESS, DESCRIBED IN SPECIAL WARRANTY DEED DATED NOVEMBER 1, 2013, RECORDED IN DOCUMENT NO. 632533, OFFICIAL PUBLIC RECORDS OF SAN PATRICIO COUNTY, TEXAS. PROPERTY TRACT 10, ID 103271, 145.0886 ACRES OUT OF A 150.77 ACRE TRACT OF LAND, BEING THE SAME LAND DESCRIBED AS 150.694 ACRES CONVEYED FROM CENTEX HOMES. TO EFO LAND,

L.P., BY GENERAL WARRANTY DEED DATED MARCH 26, 1999, AND RECORDED IN CLERK'S FILE NO. 472035 OF THE REAL PROPERTY RECORDS OF SAN PATRICIO COUNTY, TEXAS. PROPERTY TRACT 11, ID 67168, TRACT 12, 61499, 167.165 ACRE TRACT OF LAND, SITUATED IN THE HEIRS OF ROSA TEAL SURVEY A-262, NICHOLAS FAGAN SURVEY A-124, BEING OUT A 6,091.22 ACRE TRACT OF LAND DESCRIBED IN A PARTITION DEED FROM W.G. (WILL) MCCAMPBELL, ET AL., TO JOHN S. MCCAMPBELL, RECORDED IN VOLUME 103, PAGE 156, DEED RECORDS OF SAN PATRICIO COUNTY TEXAS; SAID 167.165 ACRE TRACT BEING THE SAME LANDS AS A 166 ACRE TRACT OF LAND DESCRIBED IN A DEED FROM SAID W.G. MCCAMPBELL, ET AL. TO MRS. JEAN MCCAMPBELL DAVIS, AS RECORDED IN VOLUME 103 PAGE 151. PROPERTY TRACT 13, ID 67270, 13.287 ACRES OUT OF 17.456 ACRES OF LAND OUT OF A CALLED 34.9 ACRE TRACT OF LAND OUT OF THE CALLED EAST 100 ACRES OUT OF THE 200 ACRE SAHADI TRACT, OUT OF THE ROSA TEAL SURVEY, A-262, AND THE N. FAGIN SURVEY, A-124, SAN PATRICIO COUNTY, TEXAS, WITH SAID 34.9 ACRES BEING CALLED TRACT "B" IN A PARTITION DEED OF CALLED EAST 100 ACRES, ACTUAL 99.72 ACRES, BEING DESCRIBED IN A DEED RECORDED UNDER CLERKS FILE NUMBER 247749, DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS, AND SAID 200 ACRE SAHADI TRACT DESCRIBED IN A DEED OF RECORD UNDER VOLUME 81, PAGES 597-598, DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS. PROPERTY TRACT 14, ID 67091, 12.4199 ACRES OUT OF 17.456 ACRES OF LAND OUT OF A CALLED 34.9 ACRE TRACT OF LAND OUT OF THE CALLED EAST 100 ACRES OUT OF THE 200 ACRE SAHADI TRACT, OUT OF THE ROSA TEAL SURVEY, A-262, AND THE N. FAGIN SURVEY, A-124, SAN PATRICIO COUNTY, TEXAS, WITH SAID 34.9 ACRES BEING CALLED TRACT "B" IN A PARTITION DEED OF CALLED EAST 100 ACRES, ACTUAL 99.72 ACRES, BEING DESCRIBED IN A DEED RECORDED UNDER CLERKS FILE NUMBER 247749, DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS, AND SAID 200 ACRE SAHADI TRACT DESCRIBED IN A DEED OF RECORD UNDER VOLUME 81, PAGES 597-598, DEED RECORDS OF SAN PATRICIO COUNTY, TEXAS.

Section 2. Zoning Map. It is directed that the official zoning map of the city be changed to reflect the zoning classification change, rezoning, effected by this ordinance.

Section 3. Effective Date. As provided by Article III, Section 3.11C of the Charter of the City of Ingleside, this ordinance shall be effective upon adoption and, in addition, if any penalty, fine or forfeiture is imposed by this ordinance, then this ordinance shall be effective only after publication of this ordinance in its entirety or in summary form once in the official newspaper of the City of Ingleside.

Section 4. Reading. As provided by Article III, Section 3.11.B of the Charter of the City of Ingleside, this ordinance, or the caption of it shall be read at two City Council meetings with at

least two weeks elapsing between each reading.

Section 5. Severance. If any part of this ordinance is invalid or void or is declared to be so, then said part shall be severed from the balance of this ordinance and said invalidity shall not affect the balance of this ordinance, the balance of the ordinance to be read as if said invalid or void portion thereof were not included.

Section 6. Publication. As provided by Article III, Section 3.11C, this ordinance shall be published one time in the official newspaper of the City of Ingleside, San Patricio County, Texas, which publication shall contain the caption of this ordinance stating in substance the purposes of same.

PASSED, ORDAINED, APPROVED AND ADOPTED this ____ day of January 2025.

CITY OF INGLESIDE, TEXAS

Pedro Oscar Adame, Mayor

ATTEST:

Jana Stork, City Secretary

First Reading: January 14, 2024

Second Reading: _____

CITY COUNCIL AGENDA

Regular Meeting: January 28, 2025

AGENDA ITEM: 12

Deliberate and take appropriate action on the second and final reading of an Ordinance changing the zoning for the following property from its present zoning of R-1 (Single Family Residential) to I (Industrial) and further providing for effective date, reading severance, and publication:

approximately 374.31 ACRES, bearing a legal description of: Property Tract 16, ID 69004, Tract 17, ID 65073, Tract 19, ID 69200, Tract 21, Tract 22, Tract 23, Tract 24, A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas. Property Tract 20, A 37. 95-acre tract out of the William McDonough Survey, Abstract A-184 and the Day Land and Cattle Company Survey, Abstract A-387, being the same tract called 38.06 acres recorded in Document No. 534924, Deed Records, San Patricio County, Texas, Save and Except a 2.5 acre drill site recorded in Document No. 379019, Deed Records, San Patricio County, Texas.

SUBMITTED BY: Bernanrd Rodriguez, Director of Development Services, Pamela Hawkins, Administrative Assistant

APPROVED FOR AGENDA: Brenton Lewis, City Manager

BACKGROUND:

The applicant, the Port of Corpus Christi Authority, (POCCA), is requesting a permanent zoning designation from a R-1 - Single Family Residential to I - Industrial. The property, known as the Good Hope Tracts, was annexed by the City of Ingleside in 1998 and 2016 respectively.

A Public Hearing Notice was published in the Ingleside Index on Thursday, November 14, 2024. A total of 115 property owners, within a 400-foot radius of the site location, were notified by U.S. Postal mail dated November 21, 2024. Staff received 9 emails voicing opposition to the rezone request.

The POCCA is the owner of all the land tracts within the property and tentatively proposes a dredge material placement area within the boundary of the property. The Good Hope tract is currently undeveloped and does not include designated wetlands or FEMA designated flood zones.

The property is identified in the Ingleside Comprehensive Master Plan - Future Land Use - Land Use Designations as Heavy Industrial. Furthermore, the Comprehensive Master Plan states: "INDUSTRIAL – Light and Heavy - The Industrial categories accommodate uses that are

intensive in terms of how "light" and especially "heavy" industrial activities can affect other nearby properties. This can include factors such as noise, vibration, light/ glare, odor, truck traffic, and hours of operation. Heavy Industrial Development Types - Heavy manufacturing - Oil and gas operations - Port/ shipping activities and water- oriented industrial facilities - Recreational vehicle (RV) parks, subject to zoning standards for these uses - Manufactured home parks and subdivisions, subject to zoning standards for these uses. Characteristics Outdoor activity and large visible structures and storage facilities, which are difficult to screen from neighboring properties aside from fencing, landscaping and/ or berms along site perimeters."

FISCAL ANALYSIS:

None.

RECOMMENDATION:

Staff recommends approval of the Rezoning Request from Single Family Residential to I - Industrial based on adjacent zoning districts, surrounding land uses, Comprehensive Master Plan - Future Land Use, and densities in the area. If approved, the applicant will need to comply with all requirements during the permitting process including compliance with subdivision regulations, building/fire codes, fire protection, accurate and detailed site plan, and description of activity and safeguards proposed to protect the surrounding property and the community from hazards, regulations, and industry codes governing minimization of process safety and fire risks, engineering controls and organizational controls, and other City requirements as applicable.

ATTACHMENTS:

1. Zoning Change Application
2. Industrial Zoning Change Good Hope Tract Supporting Documents
3. Additional Port of CC Authority Documents
4. #660A2 - Voting Record
5. ORD 2025-XXX #660A2-Ordinance



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: _____ Time: 6:00 p.m.

City Council Public Hearing: _____ Time: 6:30 p.m.

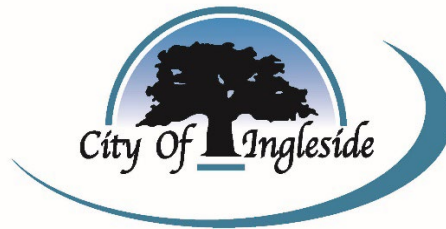
2nd Reading @ City Council: _____ Time: 6:30 p.m.

Signature of Applicant: _____ Date: _____

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

Staff Checklist:

Accepted By: _____ Date Accepted: _____ Filing Fee: _____ Date Paid: _____



NOTICE OF PUBLIC HEARINGS

In accordance with the provisions of the City of Ingleside code and the laws of the state of Texas, all interested parties are hereby notified that the Planning & Zoning Commission will hold public hearings at 6:00 p.m. on Monday, December 2, 2024 at City Hall, 2671 San Angelo Street, Ingleside, Texas.

The Public Hearings will solicit comments from citizens and other interested parties concerning the following:

1. An application filed by the Port of Corpus Christi Authority, requesting to rezone, from R-1 – Single Family Residential to I – Industrial, approximately 1,743.76 ACRES, bearing the legal description of:

Property Tract 1, ID 60762, being 124.3789 acres out of a 524.80-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al to Mrs. Jean McCampbell Davis by Partition Deed filled November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, **Property Tract 2, ID, 60762** being 88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, **Property Tract 3, ID, 67182**, being 3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 4, ID 67158**, 37.397-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 5**, 104.748-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 6, ID 67177**, 40.329-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 7, ID 61476**, 848 acres out of a 1181.095 tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 8, ID 67236**, 112.818-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 9, ID 114650**, 45.5766 acres of a 150.13 acre tract of land out of the heirs of Rosa Teal Survey, Abstract 262, San Patricio County, Texas, the said 150.13 acre tract of land being the same as and all of tract II being 150.12 acres, more or less, described in Special Warranty Deed dated November 1, 2013, recorded in document No. 632533, Official Public Records of San Patricio County, Texas. **Property Tract 10, ID 103271**, 145.0886 acres out of a 150.77 acre tract of land, being the same land described as

150.694 acres conveyed from Centex Homes. to EFO Land, L.P., by General Warranty Deed dated March 26, 1999, and recorded in Clerk's File No. 472035 of the Real Property Records of San Patricio County, Texas. **Property Tract 11, ID 67168, Tract 12, 61499**, 167.165 Acre Tract of Land, situated in the Heirs of Rosa Teal Survey A-262, Nicholas Fagan Survey A-124, being out a 6,091.22 Acre Tract of land described in a Partition Deed from W.G. (Will) McCampbell, et al., to John S. McCampbell, recorded in Volume 103, Page 156, Deed Records of San Patricio County Texas; said 167.165 Acre Tract being the same lands as a 166 Acre Tract of land described in a Deed from said W.G. McCampbell, et al. to Mrs. Jean McCampbell Davis, as recorded in Volume 103 Page 151. **Property Tract 13, ID 67270**, 13.287 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas. **Property Tract 14, ID 67091**, 12.4199 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.

2. An application filed by the Port of Corpus Christi Authority, requesting to rezone, from R-1 – Single Family Residential to I – Industrial, approximately 374.31 ACRES, bearing a legal description of:

Property Tract 16, ID 69004, Tract 17, ID 65073, Tract 19, ID 69200, Tract 21, Tract 22, Tract 23, Tract 24, A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas. **Property Tract 20**, A 37.95-acre tract out of the William McDonough Survey, Abstract A-184 and the Day Land and Cattle Company Survey, Abstract A-387, being the same tract called 38.06 acres recorded in Document No. 534924, Deed Records, San Patricio County, Texas, Save and Except a 2.5 acre drill site recorded in Document No. 379019, Deed Records, San Patricio County, Texas.

3. An application filed by the Port of Corpus Christi Authority, requesting to rezone, from R-1 – Single Family Residential to C-2 – General Commercial, bearing a legal description of:

82.30 Acres, being 125.00 foot, 200.00 foot and 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas, and a 31.96 acre, 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas

4. An application filed by the Port of Corpus Christi Authority for a special permit to allow a solar panel farm on the following property bearing a legal description of:

Property Tract 1, ID 60762, being 124.3789 acres out of a 524.80-acre tract of land. being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al to Mrs. Jean McCampbell

Davis by Partition Deed filled November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, **Property Tract 2, ID, 60762** being 88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, **Property Tract 3, ID, 67182**, being 3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas.

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Property Tract 8, ID 67236, 112.818-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 9, ID 114650**, 45.5766 acres of a 150.13 acre tract of land out of the heirs of Rosa Teal Survey, Abstract 262, San Patricio County, Texas, the said 150.13 acre tract of land being the same as and all of tract II being 150.12 acres, more or less, described in Special Warranty Deed dated November 1, 2013, recorded in document No. 632533, Official Public Records of San Patricio County, Texas. **Property Tract 10, ID 103271**, 145.0886 acres out of a 150.77 acre tract of land, being the same land described as 150.694 acres conveyed from Centex Homes. to EFO Land, L.P., by General Warranty Deed dated March 26, 1999, and recorded in Clerk's File No. 472035 of the Real Property Records of San Patricio County, Texas. **Property Tract 11, ID 67168, Tract 12, 61499**, 167.165 Acre Tract of Land, situated in the Heirs of Rosa Teal Survey A-262, Nicholas Fagan Survey A-124, being out a 6,091.22 Acre Tract of land described in a Partition Deed from W.G. (Will) McCampbell, et al., to John S. McCampbell, recorded in Volume 103, Page 156, Deed Records of San Patricio County Texas; said 167.165 Acre Tract being the same lands as a 166 Acre Tract of land described in a Deed from said W.G. McCampbell, et al. to Mrs. Jean McCampbell Davis, as recorded in Volume 103 Page 151. **Property Tract 13, ID 67270**, 13.287 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas. **Property Tract 14, ID 67091**, 12.4199 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.

Information regarding the application is on file at the Development Services Department

and is available for your inspection any time during normal office hours. If you have any questions, please contact our office at (361) 776-3815.

Bernard Rodriguez, Director
Development Services

Published one time in the Ingleside Index on November 14, 2024



NOTICE OF PUBLIC HEARINGS

In accordance with the provisions of the **City of Ingleside** code and the laws of the State of Texas, all interested parties are hereby notified that the Planning & Zoning Commission will hold public hearings at **6:00 p.m. Monday, December 2, 2024, at City Hall, 2671 San Angelo Street, Ingleside, Texas.**

PUBLIC HEARING – REZONING REQUEST: A PUBLIC HEARING TO SOLICIT COMMENTS FROM CITIZENS AND OTHER INTERESTED PARTIES CONCERNING A REQUEST FROM THE PORT OF CORPUS CHRISTI AUTHORITY TO REZONE APPROXIMATELY 1.743.76 ACRES, FROM R-1 – SINGLE FAMILY RESIDENTIAL TO I – INDUSTRIAL, GENERALLY BOUNDED BY SH 361 (HIGHLAND AVE.), ON THE SOUTH, INGLESIDE CITY LIMITS ON THE EAST AND NORTH, AND SH 1069 (NORTH MAIN ST.) ON THE EAST, BEARING A LEGAL DESCRIPTION AS FOLLOWS:

Property Tract 1, ID 60762, being 124.3789 acres out of a 524.80–acre tract of land. being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al to Mrs. Jean McCampbell Davis by Partition Deed filled November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 2, ID, 60762 being 88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 3, ID, 67182, being 3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 4, ID 67158, 37.397-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 5, 104.748-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 6, ID 67177, 40.329-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 7, ID 61476, 848 acres out of a 1181.095 tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 8, ID 67236, 112.818-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 9, ID 114650, 45.5766 acres of a 150.13 acre tract of land out of the heirs of Rosa Teal Survey, Abstract 262, San Patricio County, Texas, the said 150.13 acre tract of land being the same as and all of tract II being 150.12 acres, more or less, described in Special Warranty Deed dated November 1, 2013, recorded in document No. 632533, Official Public Records of San Patricio County, Texas. Property Tract 10, ID 103271, 145.0886 acres out of a 150.77 acre tract of land, being the same land described as 150.694 acres conveyed from Centex Homes. to EFO Land, L.P., by General Warranty Deed dated March 26, 1999, and recorded in Clerk's File No. 472035 of the Real Property Records of San Patricio County, Texas. Property Tract 11, ID 67168, Tract 12, 61499, 167.165 Acre Tract of Land, situated in the Heirs of Rosa Teal Survey A-262, Nicholas Fagan Survey A-124, being out a 6,091.22 Acre Tract of land described in a Partition Deed from W.G. (Will) McCampbell, et al., to John S. McCampbell, recorded in Volume 103, Page 156, Deed Records of San Patricio County Texas; said 167.165 Acre Tract being the same lands as a 166 Acre Tract of land described in a Deed from said W.G. McCampbell, et al. to Mrs. Jean McCampbell Davis, as recorded in Volume 103 Page 151. Property Tract 13, ID 67270, 13.287 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.

PUBLIC HEARING – REZONING REQUEST: A PUBLIC HEARING TO SOLICIT COMMENTS FROM CITIZENS AND OTHER INTERESTED PARTIES CONCERNING A REQUEST FROM THE PORT OF CORPUS CHRISTI AUTHORITY TO REZONE APPROXIMATELY 374.31 ACRES, FROM R-1 – SINGLE FAMILY RESIDENTIAL TO I – INDUSTRIAL, GENERALLY LOCATED SOUTH OF SH 361 (HIGHLAND AVE.) WEST OF THE INGLESIDE CITY LIMITS, AND NORTH OF THE SUBSEA 7 FACILITY, BEARING A LEGAL DESCRIPTION AS FOLLOWS:

Property Tract 16, ID 69004, Tract 17, ID 65073, Tract 19, ID 69200, Tract 21, Tract 22, Tract 23, Tract 24, A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas. Property Tract 20, A 37.95-acre tract out of the William McDonough Survey, Abstract A-184 and the Day Land and Cattle Company Survey, Abstract A-387, being the same tract called 38.06 acres recorded in Document No. 534924, Deed Records, San Patricio County, Texas, Save and Except a 2.5 acre drill site recorded in Document No. 379019, Deed Records, San Patricio County, Texas.

PUBLIC HEARING – REZONING REQUEST: A PUBLIC HEARING TO SOLICIT COMMENTS FROM CITIZENS AND OTHER INTERESTED PARTIES CONCERNING A REQUEST FROM THE PORT OF CORPUS CHRISTI AUTHORITY TO REZONE APPROXIMATELY 114.26 ACRES, FROM R-1 – SINGLE FAMILY RESIDENTIAL TO C-2 GENERAL COMMERCIAL, BEARING A LEGAL DESCRIPTION AS FOLLOWS:

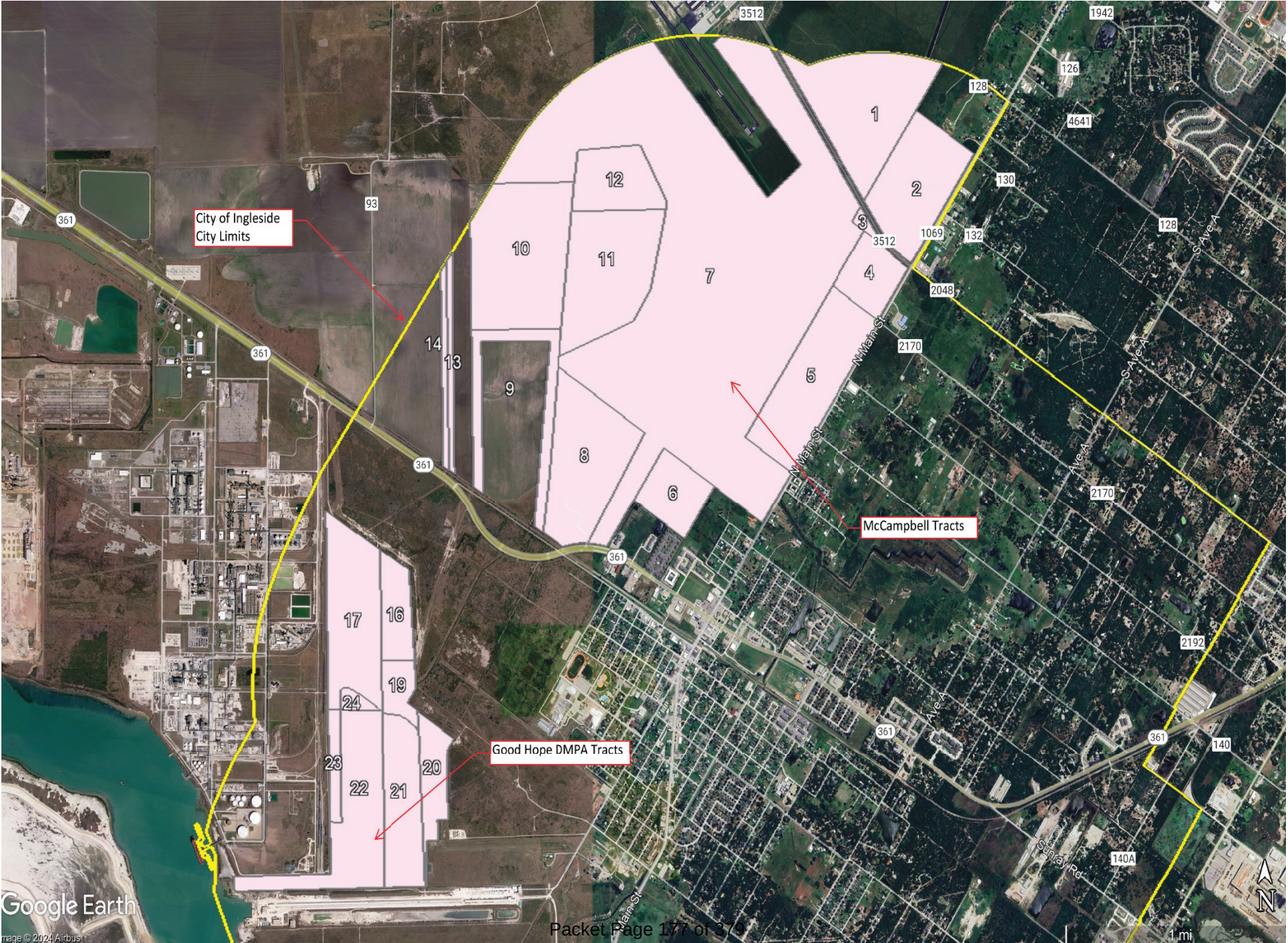
82.30 Acres, being 125.00 foot, 200.00 foot and 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas, and a 31.96 acre, 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas

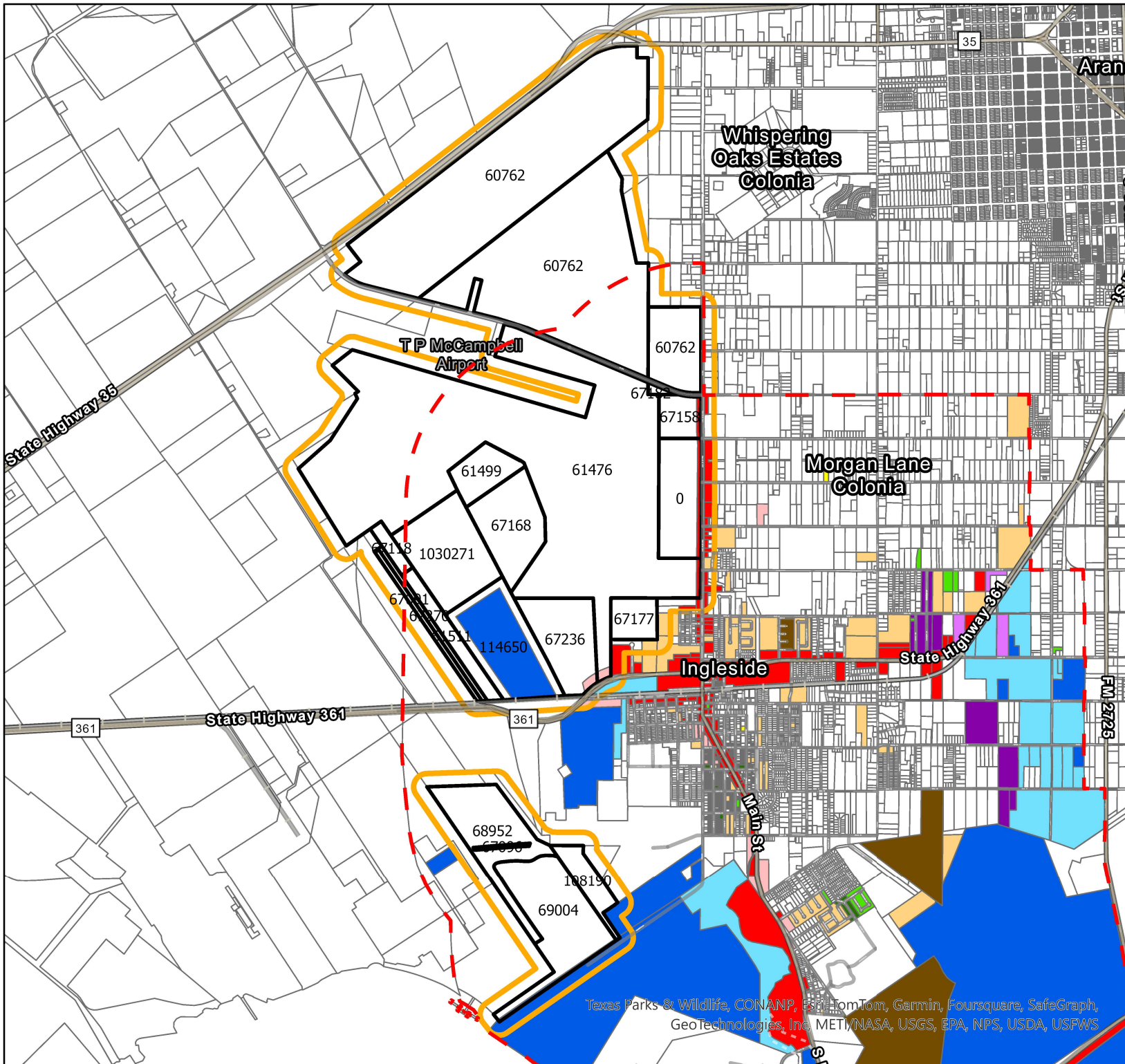
PUBLIC HEARING – SPECIAL USE PERMIT: A PUBLIC HEARING TO SOLICIT COMMENTS FROM CITIZENS AND OTHER INTERESTED PARTIES CONCERNING A REQUEST FROM THE PORT OF CORPUS CHRISTI AUTHORITY FOR A SPECIAL USE PERMIT TO ALLOW A SOLAR PANEL FARM ON APPROXIMATELY 1.743.76 ACRES, GENERALLY BOUNDED BY SH 361 (HIGHLAND AVE.), ON THE SOUTH, INGLESIDE CITY LIMITS ON THE EAST AND NORTH, AND SH 1069 (NORTH MAIN ST.) ON THE EAST, BEARING A LEGAL DESCRIPTION AS FOLLOWS:

Property Tract 1, ID 60762, being 124.3789 acres out of a 524.80–acre tract of land. being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al to Mrs. Jean McCampbell Davis by Partition Deed filled November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 2, ID, 60762 being 88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 3, ID, 67182, being 3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 4, ID 67158, 37.397-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 5, 104.748-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 6, ID 67177, 40.329-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 7, ID 61476, 848 acres out of a 1181.095 tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 8, ID 67236, 112.818-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 9, ID 114650, 45.5766 acres of a 150.13 acre tract of land out of the heirs of Rosa Teal Survey, Abstract 262, San Patricio County, Texas, the said 150.13 acre tract of land being the same as and all of tract II being 150.12 acres, more or less, described in Special Warranty Deed dated November 1, 2013, recorded in document No. 632533, Official Public Records of San Patricio County, Texas. Property Tract 10, ID 103271, 145.0886 acres out of a 150.77 acre tract of land, being the same land described as 150.694 acres conveyed from Centex Homes. to EFO Land, L.P., by General Warranty Deed dated March 26, 1999, and recorded in Clerk's File No. 472035 of the Real Property Records of San Patricio County, Texas. Property Tract 11, ID 67168, Tract 12, 61499, 167.165 Acre Tract of Land, situated in the Heirs of Rosa Teal Survey A-262, Nicholas Fagan Survey A-124, being out a 6,091.22 Acre Tract of land described in a Partition Deed from W.G. (Will) McCampbell, et al., to John S. McCampbell, recorded in Volume 103, Page 156, Deed Records of San Patricio County Texas; said 167.165 Acre Tract being the same lands as a 166 Acre Tract of land described in a Deed from said W.G. McCampbell, et al. to Mrs. Jean McCampbell Davis, as recorded in Volume 103 Page 151. Property Tract 13, ID 67270, 13.287 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.

Information regarding the application is on file at the **Development Services Department** and is available for your inspection any time during normal office hours. If you have any questions, please contact our office at **(361) 776-3815.**

Bernard Rodriguez
Director
Development Services





660 Rezoning

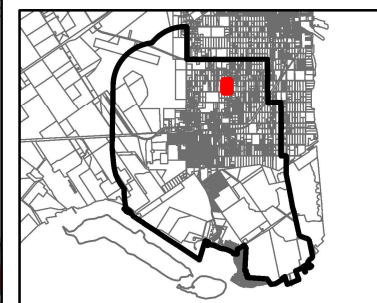
McCampbell Tract & Good Hope DMPA
File Date: 07/23/2024

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

POCCA
Rezone to I-Industrial / C-2 General Commercial
Notice of Objection to Rezone Request
October 2024

Jose Molina
joe.molina@ryan.com
107 Lost Creek
Portland, Texas 78374

Shirley Saltarelli
shirleysaltarelli@gmail.com
717 S Sandpiper
Ingleside , Texas 78326

Taree Kotalik
harleybpink@gmail.com
333 bayshore Dr
Ingleside, Texas 78362

Charles Kotalik
harleybpink@gmail.com
333 bayshore Dr
Ingleside, Texas 78362

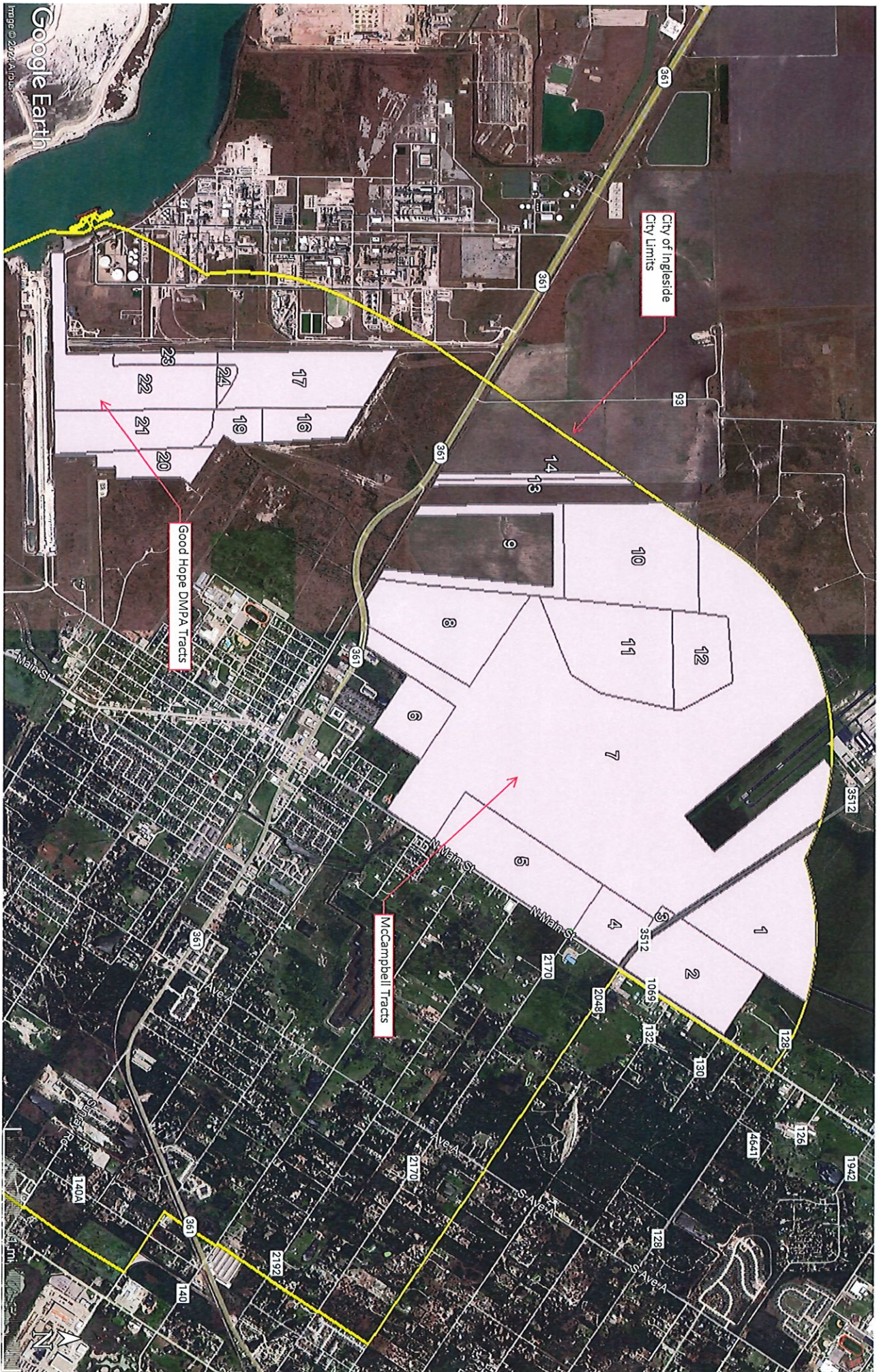
William Porter
butchporter511@gmail.com
511 Bayshore Drive
Ingleside, Texas 78362

Lynne Porter
drlgporter511@gmail.com
511 Bayshore Drive
Ingleside, Texas 78362

Margaret Duran
pegduran1@gmail.com
4022 Congressional Drive
Corpus Christi, Texas 78413

Andrea Julian
andreajulian28@gmail.com
11820 Hartley Cove
Austin, Texas 78748

Kelley and Skipper Burnett
kelleyburnett@hotmail.com
410 n sandpiper
Ingleside, Texas 78362

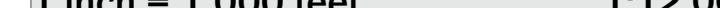




 Limit of Moderate Wave Action (LiMWA)




1 inch = 1,000 feet **1:12,000**
 0 500 1,000 2,000 3,000 4,000 Feet

N
 0 105 210 420 630 840 Meters




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

Map ID	Property ID	Size (Acres)	Existing Zoning	Proposed Zoning	Special Permit	Legal Descriptions
McC Campbell Tracts						
1	60762	124.3789	R-1 Single Family	I- Industrial	Yes	124.3789 acres out of a 524.80 acre tract of land. being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al to Mrs. Jean McC Campbell Davis by Partition Deed filled November 4, 1933, recorded in Volume 103, Page I 51 of the Deed Records of San Patricio County, Texas.
2	60762	88.963	R-1 Single Family	I-Industrial	Yes	88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas.
3	67182	3.589	R-1 Single Family	I-Industrial	Yes	3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas
4	67158	37.397	R-1 Single Family	I-Industrial	Yes	37.397 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas
5		104.748	R-1 Single Family	I-Industrial	Yes	104.748 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas
6	67177	40.329	R-1 Single Family	I-Industrial	Yes	40.329 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas
7	61476	848	R-1 Single Family	I- Industrial	Yes	848 acres out of a 1181.095 tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas
8	67236	112.818	R-1 Single Family	I-Industrial	Yes	112.818 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas
9	114650	45.5766	ustrial & R-1 Single F	I-Industrial	No	45.5766 acres of a 150.13 acre tract of land out of the heirs of Rosa Teal Survey, Abstract 262, San Patricio County, Texas, the said 150.13 acre tract of land being the same as and all of tract II being 150.12 acres, more or less, described in Special Warrenty Deed dated November 1, 2013, recorded in document No. 632533, Official Public Recrods of San Patricio County, Texas.
10	1030271	145.0886	R-1 Single Family	I- Industrial	No	145.0886 acres out of a 150.77 acre tract of land, being the same land described as 150.694 acres conveyed from Centex Homes. to EFO Land, L.P., by General Warranty Deed dated March 26, 1999, and recordtlo in Clerk's File No. 472035 of the Real Property Rec.ords of San Patricio County, Texas
11	67168	167.165	R-1 Single Family	I-Industrial	No	167.165 Acre Tract of Land, situated in the Heirs of Rosa Teal Survey A-262, Nicholas Fagan Survey A-124, being out a 6,091.22 Acre Tract of land described in a Partition Deed from W.G. (Will) McC Campbell, et al., to John S. McC Campbell, recorded in Volume 103, Page 156, Deed Records of San Patricio County Texas; said 167.165 Acre Tract being the same lands as a 166 Acre Tract of land described in a Deed from said W.G. McC Campbell, et al. to Mrs. Jean McC Campbell Davis, as recorded in Volume 103 Page 151.
12	61499			I-Industrial	No	
13	67270	13.287	R-1 Single Family	I- Industrial	No	13.287 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.

14	67091	12.4199	R-1 Single Family	I-Industrial	No	12.4199 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.
1,743.76 Total Needing Rezoning - McCampbell						
1,360.22 Total Acres Needing Special Permit						
Good Hope Tracts						
16	69004	336.36	R-1 Single Family	I-Industrial	No	*** A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
17	65073		R-1 Single Family	I-Industrial	No	A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
19	69200		R-1 Single Family	I-Industrial	No	A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
20		37.95	R-1 Single Family	I-Industrial	No	*** A 37.95 acre tract out of the William McDonough Survey, Abstract A-184 and the Day Land and Cattle Company Survey, Abstract A-387, being the same tract called 38.06 acres recorded in Document No. 534924, Deed Records, San Patricio County, Texas, Save and Except a 2.5 acre drill site recorded in Document No. 379019, Deed Records, San Patricio County, Texas.
21			R-1 Single Family	I-Industrial	No	A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
22			R-1 Single Family	I-Industrial	No	A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
23			R-1 Single Family	I-Industrial	No	A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
24			R-1 Single Family	I-Industrial	No	A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
374.31 Total Needing Rezoning - Good Hope						
*** Only these two legal descriptions are needed for the Good Hope Property						
2,118.07 Total Rezoning						

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 offtakers. 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
1.6	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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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.)	
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	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.	
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 crypto 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 1886ac 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
6.2	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 he 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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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.)	
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	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.	

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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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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			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 offtakers, 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 38.4ac 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.

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	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;	

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			• 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.	
8.5	[I am very concerned about] 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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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 offtakers 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

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			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.	
8.8	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 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.	
Sheila Walton				
9.1	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.	
9.2	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.	
9.3	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. 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,	

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			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.	
9.4	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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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 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.	
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 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.	

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			Prior to purchase by the Port, the Farm/Agriculture Exemption on the McCampbell property yielded \$1,540.22 in 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.																									
Norine Farrar																												
10.1	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><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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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 chrisit 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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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 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.	
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),		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 offtakers through existing infrastructure owned and operated by AEP.	
12.7	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.	
12.8	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 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.	
Mark Wolfe - State Historic Preservation Officer				
13.1	An archeological survey is required. A Texas Antiquities Permit must be obtained from this office prior to initiation of fieldwork. All fieldwork should meet the Archeological 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				
14.1	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.	
14.2	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. 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.	
14.3	Better understanding of changes, impacts, mitigations to: Soil		Port Corpus Christi acknowledges this comment, however, without additional detail, it is impossible to provide an appropriate response.	
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.		The U.S. Army Corps of Engineers should advise if a public meeting is necessary.	
Glenn Guillory				

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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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 offtakers 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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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.	
17.5	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.	

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. 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				

No.	Comment	Comment Type	Response	Action Item																								
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.																									
19.2	Public notice is to fill 13.9 acres of wetlands, but the project is 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 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 (Fill) Map on page 18 of 22 of the project drawings.																									
19.4	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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No.	Comment	Comment Type	Response	Action Item
			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 offtakers" 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 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 is within the public interest.	
19.6	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. 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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20.2	Application Completeness. I emailed USACE on February 14, 2023 about a lease agreement the Port of Corpus Christi has with Howard Energy for use of Port owned land for carbon sequestration. One of the POCC properties subject to the lease is the McCambell property as noted on the attached map from lease agreement. There is no mention in the application about carbon sequestration and those possible site locations in relation to the proposed solar panel farm. This application must incorporate carbon sequestration site locations and proposed access. These are two major proposed projects for the McCambell property, with both affecting wetlands and water quality of McCambell Slough, the application needs to reflect both projects for completeness of review. It is because of these two projects an Environmental Impact Statement must be considered.		Port Corpus Christi submitted a complete application to the U.S. Army Corps of Engineers on December 27, 2022. 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 Department of Energy (DOE) is the lead federal agency, responsible for reviewing the CCS project in accordance with NEPA. Further, the proposed solar installation occupies approximately 1886ac of the 2850ac property, providing an opportunity for additional and independent projects. This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement.	
20.3	Deficient Information for site locations, material and placement. “The applicant proposes to discharge approximately 111,100 cubic yards of fill material into 13.9 acres of herbaceous wetlands adjacent to McCampbell Slough, a tidal water of the United States.” The PN with project plans and mitigation plans fail to identify the site location of wetlands to be filled along the McCambell Slough. In fact, not one schematic identifies the slough by name, only a few pages identify the “drainage ditch”. Will this be several site locations to be filled that total 13.9 acres or just one connected wetland site? What is the composition of the “fill” material? Is the fill material comprised of native soil or introduced soil/base material? Will the material include various non-mulched wooded plants? Will the material include invasive plant species that could spread further downstream from placement location(s)? How will placement of material be conducted? Depending on the method of placement, more wetlands could be directly impacted.		The project will place fill in wetlands for access paths and inverters, which is denoted in the permit drawings on the Wetland Impacts (Fill) Map on page 18 of 22 of the project drawings. The final design of the development will stipulate ideal characteristics of fill material and detail the construction methodology including all conditions of the permit, 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.	
20.4	Fill Material – Testing Requirement. There is no mention about testing “fill” material for placement in wetlands that are considered connected to WOTUS. Interval testing for bacterial and chemical contaminants must be required for fill material before placement. No placement of fill material with contaminants can be permitted on this waterway. Further, fill material is likely to have soils with cattle manure which can contain invasive plant seeds and importantly, bacterial contamination. High levels of bacteria could leach into McCambell slough and further downstream. What will be the required standard for bacterial contamination in addition to chemical contamination standards?		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. Port Corpus Christi purchased the McCampbell Property in 2018. Historically, farming and ranching dominated the property and continue today.	
20.5	Habitat – Flora – Fauna Impacts. The PN again states 13.9 acres of wetlands be filled, with .3 acres impacted for inverter placement, but approximately 1800 acres of wetlands will be covered with solar panels. What about the impacts to these wetlands? The PN indicates the solar panels will be elevated and therefore shading of wetlands will be minimal and there are no claimed impacts. Are they kidding? Look at the total solar panel arrays and it is easy to see how much wetland will be severely impacted by shading. I am surprised USACE did not tell the applicant to further assess wetland impacts from shading, heat and overall construction of solar farm. The PN fails to address or provide a general survey of aquatic, amphibious, or reptilian life in/or around the full length of what is essentially a canal (slough). There is no mention of terrestrial wildlife or bird populations such as whooping cranes. This is another reason to require an EIS, especially to assess threatened and endangered species. All of the mentioned categories of fauna will be directly impacted with obvious loss of habitat on 1800+ acres, which must be factored into the permit application.		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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 2022). This implies that species are not adversely affected by shading from the PV panels.	

No.	Comment	Comment Type	Response	Action Item
			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.) Section 2 of the application provides a description of the landscape: Wetlands constitute approximately 1,560ac of the McCampbell Property (See Approved Jurisdictional Determination dated August 12, 2022). The 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.	
20.6	Port Authority as Navigation District. The Port of Corpus Christi is a political subdivision navigation district of the State of Texas. The POCC receives both Federal and State money for various projects associated with maintaining or improving navigation district. However, according to the PN, the proposed solar farm will be owned and possibly operated under the POCC, which isn't an authorized electrical utility distributor. The PN deliberately avoids stating what entity will be supplied electrical power. The electrical power is not about adding to the Texas grid, but this solar farm is for future heavy industry the POCC wants to attract. This is a public entity using public money for creation of power to supply private industry. Democratizing expenses while privatizing profits has been the Port of Corpus Christi's operations motto for past few years.		The project is expected to yield 600 MW of carbon-free electricity to be delivered via interconnect to the regional electric grid, with the potential to serve both residential and industrial demand. 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.	
20.7	Proposed Mitigation. I support the POCC's proposed onsite mitigation to remove unneeded roads and restore wetland areas on the McCambell property. However, the PN does not come close to recognizing the full impacts to all wetlands in the project area. The proposed mitigation is based on 13.9 acres of wetland to be filled, yet the total area of wetland impacts could be as much as 1800+ acres. Therefore, the proposed mitigation is well short of the claimed 2:1 and short of any minimal 1:1 mitigation.		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.	
20.8	Because of unaccounted wetland impacts with aquatic and terrestrial habitat impacts, an Environmental Impact Statement must be required		This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement.	
Kathyrn Masten – Ingleside of the Bay Coastal Watch Association				
21.1	The Port has not even spoken to Gary Davis, the McCampbell-Porter Airport manager. This shows the level of disrespect the Port shows when dealing with San Patricio County residents and public officials, which includes efforts to block Senate Bill 2235 (attached) to give San Patricio another seat on the Port Commission.		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.	
21.2	The Port does not intend to operate the solar farm. This helps explain why attached Senate Bill 818 is making its way through the Legislature during this		Port Corpus Christi did not request any legislator file any legislation during the 88th legislature. SB 818 (and its companion HB 1511) was filed by legislators from Houston and the Texas Ports Association (TPA) to support their efforts. The TPA is a state trade association that represents twenty seaports in Texas.	

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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																												
22.1	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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22.2	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 24ontinue 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.		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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			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 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.	
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 (Fill) Map on page 18 of 22 of the project drawings.				
23.3	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:				
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			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.				
23.4	The purpose for “new and industrial offtakers” is not in the publics 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 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.				

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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																												
24.1	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: <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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24.2	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 offtakers through existing infrastructure owned and operated by AEP.																									

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24.4	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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24.5	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. 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.		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.	need exhibits showing hydrology
24.9	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. Pilings 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.	
Brenton B. Lewis - City Manager, City of Ingleside				

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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. 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.	
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.		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.	
Tom Shearer				
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.		Based on the wetland delineation and associated AJD, 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.	
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		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).	
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. The U.S. Army Corps of Engineers should advise if a public meeting is necessary.	
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.		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); • 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	
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.		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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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.)	
27.4	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.	
27.5	They have not provided an inventory of the wetlands or an inventory of the species.		U.S. Army Corps of Engineers reviewed and approved a wetlands delineation report—which contained 181 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.	
27.6	There are previously disturbed sites that are better suited for this project.		Please see the updated Alternatives Analysis provided as Attachment A.	
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.		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. 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>Borrchia frutescens</i>), shoregrass (<i>Distichlis littoralis</i>), sand spike rush (<i>Eleocharis palustris</i>), coastal salt grass (<i>Distichlis</i>	

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			<i>spicata</i>), bitter panic grass (<i>Panicum amarum</i>), seaside American aster (<i>Symphytotrichum subulatum</i>), chairmakers club-rush (<i>Scheonoplectus 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.																									
27.8	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> 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.	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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27.9	The Port of Corpus Christi as a public entity is not approved to develop assets to provide energy for it’s 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.																									
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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27.11	A plan should be approved for the decommission restoration of the site to prior or improved condition.		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.	
27.12	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 offtakers 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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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.)	
Linda Fuiman				
29.1	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	

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 offtakers 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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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.)	



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T. Dan Friedkin
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Houston

David Yoskowitz, Ph.D.
Executive Director

March 13, 2023

Mr. Kevin Mannie
U.S. Army Corps of Engineers
Galveston District, Regulatory Branch
2000 Fort Point Road
Galveston, TX 77550
swg_public_notice@usace.army.mil

401 Coordinator
TCEQ, Mail Code 150
P.O. Box 13087
Austin, TX 78711-3087
401certs@tceq.texas.gov

Re: Permit Application Number SWG-2021-00163
Port of Corpus Christi Authority

Dear Mr. Mannie and 401 Coordinator:

Texas Parks and Wildlife Department (TPWD) has reviewed the Public Notice (PN) dated February 9, 2023, for permit application number SWG-2021-00163. The applicant requests authorization to construct a 600 megawatt (MW) photovoltaic (PV) solar panel development in emergent wetlands adjacent to McCampbell Slough within a 1,866-acre portion of a 2,850-acre tract of land, completely surrounding the McCampbell-Porter Airport located at 3141 Farm to Market Road (FM) 3512, in Aransas Pass, San Patricio County, Texas.

According to the PN, the applicant proposes to fill approximately 13.9 acres of emergent wetlands for the construction of 11.1 miles of access roads, rotating solar panels mounted on helical piles (dimensions and quantities of PV panels and helical piles are not described), 295 power inverters, and two electric substations in an approximate 1,866-acre area.

Project documents describe the proposed project site as 1,866 acres of the 2,850-acre McCampbell Property, 55% of which supports 1,558.3 acres of palustrine and estuarine wetlands and other jurisdictional waterbodies. The separate tracts that make up the proposed project site are separated by FM 3512 and the McCampbell-Porter Airport that is owned and operated by San Patricio County. Hydrology within the property is dominated by a large ditch that conveys stormwater from the City of Ingleside and from the site itself into McCampbell Slough and Port Bay. The proposed permittee-responsible compensatory mitigation plan (PRCMP) states that this feature provides "a substantial freshwater influx to the downstream estuaries of Port and Copano Bays".

Wetlands within the project area are described as dominated by salt meadow cordgrass (*Spartina spartinae*). These wetlands function to attenuate flood waters from stormwaters associated with both rainfall and storm surge, remove pollutants (including sediment, debris, excess nutrients, pesticides, etc.) associated with

runoff from neighboring communities as well as onsite activities, store and re-cycle nutrients, and support water quality functions for fish and wildlife habitats onsite as well as those located down gradient (i.e., McCampbell Slough and Port Bay).

The 2022 303d List of Impaired Waters indicates that Port Bay was first listed as impaired in 1998 due to bacteria in oyster waters. The Texas Department of State Health Services currently classifies Port Bay as a restricted area that is closed to the taking of shellfish, including take associated with commercial oyster mariculture facilities. Currently, at least one commercial oyster mariculture facility has been authorized just outside the restricted waters of Port Bay. Any expansion of water quality degradation has the potential also expand the restricted shellfish harvest area.

Recommendation: 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.

Alternatives Analysis

TPWD has reviewed the information provided in the Alternatives Analysis (AA) Summary provided with the PN. Because this activity is not water dependent, practicable alternatives that do not involve special aquatic sites are presumed available unless clearly demonstrated otherwise. The complete AA was not provided for resource agency or public review and Table 1 of the AA Summary does not provide sufficient information to fully evaluate the alternatives considered or the criteria used to support the alternatives in light of the project purpose and need. However, information provided in Table 1 raises the following concerns for the AA.

Table 1 indicates that the only alternative not owned by the applicant is not feasible in terms of acquisition. There is no explanation provided for this conclusion. Table 1 also states that acquisition of this tract would be required but does not indicate if it (or other tracts not identified in the table) are available for acquisition.

In addition, Table 1 indicates that only two alternatives will avoid impacts to waters of the U.S. (WOUS) and wetlands, but it also states that none of the alternatives will impact special aquatic sites. The applicant should note that wetlands are a type of special aquatic site (defined at 40 CFR 230.41). As such, Table 1 indicates that all the proposed alternatives will impact special aquatic sites except for those which do not contain wetlands.

It is uncertain if the AA provides sufficient justification for being unable to split the project among two or more sites (such as those which avoid wetlands/special aquatic sites), especially considering that two substations are proposed, one on each tract within the project boundary.

Recommendation: The applicant should consider exploring additional alternatives to identify the least environmentally damaging practicable alternative (LEDPA).

Table 1 states: “Delay of acquisition restricts the ability to support economic development in the clean hydrogen sector at the place in which projects would be developed”. The applicant should clarify what is meant by this statement and provide additional information about any interdependent or connected activities associated with the proposed project.

Recommendation: 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).

Avoidance and minimization

With respect to avoidance and minimization, the PN states:

The applicant has stated that they have avoided and minimized environmental impacts by designing the proposed project in a manner that preserves site hydrology and avoids/minimizes impacts to aquatic resources including installing solar panels on helical pilings without concrete footings to avoid wetland impacts, elevating the rotating solar panels 5 feet above the ground level to avoid shading effects, elevating cabling on trays to avoid temporary trenching through wetlands, siting the two substations entirely within uplands, placing approximately 60% of power inverters in uplands reducing wetland impacts to 0.3 acre, configuring site access routes to the minimum necessary to reduce wetland impacts to 13.4 acres, and minimizing constructions sequencing, utilizing construction best management practices (BMPs), and restoring temporary impacts to pre-project conditions.

As proposed, the 1,866-acre project area only contains 308 acres of uplands. Wetlands account for the remaining 1,558.3 acres, or 83% of the total proposed project area. Because the 2850-acre McCampbell Property supports approximately 1,292 acres of uplands, additional impact avoidance and minimization may be feasible onsite.

Recommendation: 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.

Other potential effects

Page 17 of 22 of the proposed project plans notes that solar panels will rotate continuously throughout the day via a linear actuator to maximize solar absorption and minimize vegetation shading. Based on this information, the applicant has not provided an adequate rationale to support these competing ideas and the extent to which the PV panels will act as fill is not clear.

Limited research indicates that PV panels can alter the microclimate underneath them and result in changes to plant composition, soil moisture, and other variables. TPWD is concerned that there is a paucity of research available on the direct and indirect effects of PV panels on wetland ecosystems. Any adverse effects that may result from the installation, operation and decommissioning of the PV solar panel development at the project site have the potential to adversely affect up to 1,558.3 acres of wetlands.

The applicant has stated that temporary impacts will be restored to pre-construction conditions, but these temporary impacts have not been adequately described in terms of location, extent, or habitat types affected.

Recommendation: 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.

TPWD and the applicant's neighbor, McCampbell-Porter Airport, may have mutual concerns for the increased potential for bird strikes. These could result from birds mistaking the reflective surface of PV solar panels for water or from alterations to site hydrology, such as the construction of access roads, that results in greater frequency and/or duration of seasonal ponding events. Project documents describe the proposed permeable access roads as being comprised of caliche, limestone, or similar material. However, it is not clear if the hydraulic conductivity of these materials will continue to support current site conditions. Further, the applicant has not described any operational activities, such as washing the PV panels, that may also have secondary effects.

Recommendation: 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.

Mitigation Plan

Based on the information provided, TPWD lacks confidence that the applicant has adequately demonstrated that there are no practicable alternatives to the proposed fill which would have fewer adverse impacts on the aquatic ecosystem. In addition, the applicant has not demonstrated that impacts have been avoided and minimized to the extent practicable. Therefore, TPWD considers the proposed PRCMP to be premature.

Because the PN does not provide information which demonstrates that impacts have been avoided and minimized to the extent practicable, the PRCMP seems premature. Once the AA identifies the LEDPA and impacts are avoided and minimized to the extent practicable, the PRCMP should be revised to fully compensate for unavoidable impacts. The PRCMP proposes to restore 29.6 acres of disturbed vehicle paths to adjacent wetland elevations. In general, TPWD does not consider the proposed restoration project suitable for providing compensatory mitigation as proposed. The applicant has not provided sufficient information to inform or evaluate the PRCMP. For example, no hydrological assessments have been conducted to demonstrate that the proposed restoration project will result in a net gain in aquatic resource function that fully offsets functional losses.

Recommendation: 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.

As previously described above, it is not clear how the proposed access roads will affect existing hydrology. The combined effects of potential hydrological changes (project impacts and onsite restorations) have the potential to make the site wetter and increase the frequency and duration of inundation. TPWD is concerned that excessive inundation could result in limited plant survival and growth.

The following information should be provided 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.
- 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.

Mr. Mannie and 401 Coordinator
SWG-2021-00163
March 13, 2023
Page 6 of 6

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. TPWD requests that any revised project documents or draft compensatory mitigation plans be made available for public review and comment. Questions can be directed to Cindy Adams-Smith or Jackie Robinson (361-431-6003) in Corpus Christi.

Sincerely,



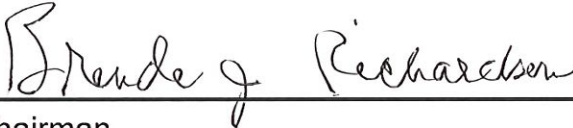
sof Emma Clarkson, PhD
Regional Director, Ecosystem Resources Program
Coastal Fisheries Division
Science and Policy Branch

EC:JR:CAS

**PLANNING & ZONING VOTING RECORD
& ATTENDANCE RECORD**

DATE: 12/02/2024 **RECORD NO.** 660A2 **ITEMS NO.** 6 & 11

			DESCRIPTION
THIS APPLICATION <u> </u> REQUIRES <u>X</u> DOES NOT REQUIRE A SUPER MAJORITY VOTE BY CITY COUNCIL.	P R E S E N T O R A B S E N T	V O T E	DELIBERATE AND TAKE APPROPRIATE ACTION ON AN APPLICATION FILED BY THE PORT OF CORPUS CHRISTI, REQUESTING TO REZONE, REQUESTING TO REZONE, FROM R-1 – SINGLE FAMILY RESIDENTIAL TO I – INDUSTRIAL, APPROXIMATELY 374.31 ACRES, BEARING A LEGAL DESCRIPTION OF: Property Tract 16, ID 69004, Tract 17, ID 65073, Tract 19, ID 69200, Tract 21, Tract 22, Tract 23, Tract 24, A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas. Property Tract 20, A 37.95-acre tract out of the William McDonough Survey, Abstract A-184 and the Day Land and Cattle Company Survey, Abstract A-387, being the same tract called 38.06 acres recorded in Document No. 534924, Deed Records, San Patricio County, Texas, Save and Except a 2.5 acre drill site recorded in Document No. 379019, Deed Records, San Patricio County, Texas.
ALAN BEAUBIEN <i>(Place #1 - 12/31/25)</i> 1ST Term	P	N	<u>PUBLIC HEARING NOTES</u> Speaking For: None
JACOB LOPEZ <i>(Place #1 - 12/31/25)</i> 1ST Term	A	-	Speaking Against: None There were 10 letters of objection.
CONNOR BROWN <i>(Place # 3 - 12/31/25)</i> 1ST Term	P	Y	Commission Member Gutierrez made a motion to recommend approval of the request to City Council. Commission Member Beaubien seconded the motion. Motion failed 2:3.
<i>(Place #4 - 12/31/24)</i>	-	-	

BRENDA RICHARDSON <i>(Place # 5 - 12/31/24)</i> 2ND Term (Chairman)	P	Y	 Chairman
GERARD GUTIERREZ <i>(Place #6 - 12/31/24)</i> 1ST Term	P	N	12-2-24 Date
CYNTHIA WILSON <i>(Place #7 - 12/31/24)</i> 1ST Term	P	N	

ORDINANCE NO. 2025-_____

AN ORDINANCE CHANGING THE ZONING FOR THE FOLLOWING PROPERTY FROM ITS PRESENT ZONING OF R-1 (SINGLE FAMILY RESIDENTIAL) TO I – (INDUSTRIAL) AND FURTHER PROVIDING FOR EFFECTIVE DATE, READING, SEVERANCE AND PUBLICATION:

APPROXIMATELY 374.31 ACRES BEARING THE LEGAL DESCRIPTION: PROPERTY TRACT 16, ID 69004, TRACT 17, ID 65073, TRACT 19, ID 69200, TRACT 21, TRACT 22, TRACT 23, TRACT 24, A 336.36 ACRE TRACT OF LAND OUT OF THE T.T. WILLIAMSON SURVEY, ABSTRACT 292, THE T.T. WILLIAMSON SURVEY, ABSTRACT 293, THE HEIRS OF ROSA TEAL SURVEY, ABSTRACT 262, THE WILLIAM MCDONOUGH SURVEY, ABSTRACT 184, DAY LAND AND CATTLE COMPANY SURVEY, ABSTRACT 387, SAN PATRICIO COUNTY, TEXAS AND A PORTION OF THE STATE OF TEXAS SUBMERGED TRACT NO. 3 IN CORPUS CHRISTI BAY, NUECES COUNTY, TEXAS. PROPERTY TRACT 20, A 37. 95-ACRE TRACT OUT OF THE WILLIAM MCDONOUGH SURVEY, ABSTRACT A-184 AND THE DAY LAND AND CATTLE COMPANY SURVEY, ABSTRACT A-387, BEING THE SAME TRACT CALLED 38.06 ACRES RECORDED IN DOCUMENT NO. 534924, DEED RECORDS, SAN PATRICIO COUNTY, TEXAS, SAVE AND EXCEPT A 2.5 ACRE DRILL SITE RECORDED IN DOCUMENT NO. 379019, DEED RECORDS, SAN PATRICIO COUNTY, TEXAS.

WHEREAS, the City Council of the City Ingleside (“City Council”) has previously approved and adopted a Comprehensive Zoning Ordinance and Zoning Map of the City of Ingleside; and

WHEREAS, the City Council has previously created and appointed a Planning and Zoning Commission as authorized by the Texas Local Government Code; and,

WHEREAS, the Texas Local Government Code authorizes a municipality to adopt zoning districts after compliance with statutory notice provisions; and,

WHEREAS, application was made to rezone the real property approximately 374.31 ACRES, bearing the legal description of: Property Tract 16, ID 69004, Tract 17, ID 65073, Tract 19, ID 69200, Tract 21, Tract 22, Tract 23, Tract 24, A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas. Property Tract 20, A 37. 95-acre tract out of the William McDonough Survey, Abstract A-184 and the Day Land and Cattle Company Survey, Abstract A-387, being the same tract called 38.06 acres recorded in Document No. 534924, Deed Records, San Patricio County, Texas, Save and Except a 2.5 acre drill site recorded in Document No. 379019, Deed Records, San Patricio County, Texas in the San Patricio County property records; and

WHEREAS, after complying with the statutory publication and notification requirements, on December 2, 2024, the Ingleside Planning and Zoning Commission (“Commission”) conducted a public hearing on the potential rezoning application and after considering the testimony and evidence, has provided a recommendation to the City Council on the rezoning of said lots; and,

WHEREAS, after hearing and considering the application, the recommendation of the Commission, the present zoning and use of each of the properties in the surrounding area, the comprehensive master plan of the city, the future development of the city as a whole, and other relevant factors, the City Council is of the opinion and finds that it is in the best interest of the public health, safety, and welfare of the city to rezone this property, that the rezoning effected by this ordinance is in compliance with the Comprehensive Master Plan, that changing the zoning of the aforesaid property would not be detrimental to the public health, safety, or general welfare, and will, in fact, promote the best and most orderly development of the properties affected thereby, and to be affected thereby, in the City of Ingleside, and as well, the owners and occupants of the property, and the City generally.

BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF INGLESIDE, COUNTY OF SAN PATRICIO, STATE OF TEXAS:

Section 1. Zoning Change. The Zoning of the property hereinafter described is hereby changed from R-1 (Single Family Residential) to I (INDUSTRIAL)

APPROXIAMATELY 374.31 ACRES BEARING THE LEAGAL DESCRIPTION: PROPERTY TRACT 16, ID 69004, TRACT 17, ID 65073, TRACT 19, ID 69200, TRACT 21, TRACT 22, TRACT 23, TRACT 24, A 336.36 ACRE TRACT OF LAND OUT OF THE T.T. WILLIAMSON SURVEY, ABSTRACT 292, THE T.T. WILLIAMSON SURVEY, ABSTRACT 293, THE HEIRS OF ROSA TEAL SURVEY, ABSTRACT 262, THE WILLIAM MCDONOUGH SURVEY, ABSTRACT 184, DAY LAND AND CATTLE COMPANY SURVEY, ABSTRACT 387, SAN PATRICIO COUNTY, TEXAS AND A PORTION OF THE STATE OF TEXAS SUBMERGED TRACT NO. 3 IN CORPUS CHRISTI BAY, NUECES COUNTY, TEXAS. PROPERTY TRACT 20, A 37. 95-ACRE TRACT OUT OF THE WILLIAM MCDONOUGH SURVEY, ABSTRACT A-184 AND THE DAY LAND AND CATTLE COMPANY SURVEY, ABSTRACT A-387, BEING THE SAME TRACT CALLED 38.06 ACRES RECORDED IN DOCUMENT NO. 534924, DEED RECORDS, SAN PATRICIO COUNTY, TEXAS, SAVE AND EXCEPT A 2.5 ACRE DRILL SITE RECORDED IN DOCUMENT NO. 379019, DEED RECORDS, SAN PATRICIO COUNTY, TEXAS.

Section 2. Zoning Map. It is directed that the official zoning map of the city be changed to reflect the zoning classification change, rezoning, effected by this ordinance.

Section 3. Effective Date. As provided by Article III, Section 3.11C of the Charter of the City of Ingleside, this ordinance shall be effective upon adoption and, in addition, if any penalty, fine or forfeiture is imposed by this ordinance, then this ordinance shall be effective only after publication of this ordinance in its entirety or in summary form once in the official newspaper of the City of

Ingleside.

Section 4. Reading. As provided by Article III, Section 3.11.B of the Charter of the City of Ingleside, this ordinance, or the caption of it shall be read at two City Council meetings with at least two weeks elapsing between each reading.

Section 5. Severance. If any part of this ordinance is invalid or void or is declared to be so, then said part shall be severed from the balance of this ordinance and said invalidity shall not affect the balance of this ordinance, the balance of the ordinance to be read as if said invalid or void portion thereof were not included.

Section 6. Publication. As provided by Article III, Section 3.11C, this ordinance shall be published one time in the official newspaper of the City of Ingleside, San Patricio County, Texas, which publication shall contain the caption of this ordinance stating in substance the purposes of same.

PASSED, ORDAINED, APPROVED AND ADOPTED this ____ day of January 2025.

CITY OF INGLESIDE, TEXAS

Pedro Oscar Adame, Mayor

ATTEST:

Jana Stork, City Secretary

First Reading: January 14, 2024

Second Reading: _____

CITY COUNCIL AGENDA

Regular Meeting: January 28, 2025

AGENDA ITEM: 13

Deliberate and take appropriate action on the second and final reading of an Ordinance changing the zoning for the following property from its present zoning of R-1 (Single Family Residential) to C-2 (General Commercial) and further providing for effective date, reading, severance, and publication:

82.30 Acres, being 125.00 foot, 200.00 foot and 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas, and a 31.96 acre, 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas.

SUBMITTED BY: Bernanrd Rodriguez, Director of Development Services, Pamela Hawkins, Administrative Assistant

APPROVED FOR AGENDA: Brenton Lewis, City Manager

BACKGROUND:

The applicant, the Port of Corpus Christi Authority, (POCCA), is requesting a permanent zoning designation from R-1 - Single Family Residential to C-2 - General Commercial. The property is generally bounded by State Highway 361 on the south and State Highway 1069, North Main Street, on the east and the entrance of FM 3512. The property use is intended as a buffer zone and provides for future commercial activities along major thoroughfares.

A Public Hearing Notice was published in the Ingleside Index on Thursday, November 14, 2024. A total of 115 property owners, within a 400-foot radius of the site location, were notified by U.S. Postal mail dated November 21, 2024. Staff received 9 emails voicing opposition to the rezone request.

The property is identified in the Ingleside Comprehensive Master Plan – Future Land Use – Land Use Designations as General Commercial. Furthermore, the Comprehensive Master Plan states: “GENERAL COMMERCIAL This designation is for properties in commercial retail, office and service uses, primarily along portions of major roadway corridors within the city for high visibility and accessibility, but also in other locations to accommodate neighborhood-focused businesses. Ingleside’s General Commercial areas are indicated on the Future Land Use map along State Highway 361, FM 1069, and West Main Street.”

FISCAL ANALYSIS:

None.

RECOMMENDATION:

Staff recommends approval of the Rezoning Request from R-1 -Single Family Residential to C-2 - General Commercial based on adjacent zoning districts, surrounding land uses, Comprehensive Master Plan – Future Land Use, and densities in the area. If approved, the applicant will need to comply with all requirements during the permitting process including compliance with subdivision regulations, building/fire codes, fire protection, parking, landscape buffer-yards, solid waste services, utility, and other City requirements as applicable.

ATTACHMENTS:

1. Zoning Change Application
2. Commercial Zoning Change Supporting Documents
3. Additional Port of CC Authority Documents
4. #660A3 - Voting Record
5. ORD 2025-XXX #660A3-Ordinance



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: _____ Time: 6:00 p.m.

City Council Public Hearing: _____ Time: 6:30 p.m.

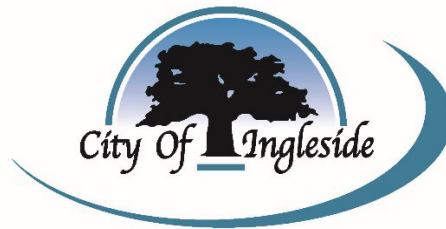
2nd Reading @ City Council: _____ Time: 6:30 p.m.

Signature of Applicant: _____ Date: _____

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

Staff Checklist:

Accepted By: _____ Date Accepted: _____ Filing Fee: _____ Date Paid: _____



NOTICE OF PUBLIC HEARINGS

In accordance with the provisions of the City of Ingleside code and the laws of the state of Texas, all interested parties are hereby notified that the Planning & Zoning Commission will hold public hearings at 6:00 p.m. on Monday, December 2, 2024 at City Hall, 2671 San Angelo Street, Ingleside, Texas.

The Public Hearings will solicit comments from citizens and other interested parties concerning the following:

1. An application filed by the Port of Corpus Christi Authority, requesting to rezone, from R-1 – Single Family Residential to I – Industrial, approximately 1,743.76 ACRES, bearing the legal description of:

Property Tract 1, ID 60762, being 124.3789 acres out of a 524.80-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al to Mrs. Jean McCampbell Davis by Partition Deed filled November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, **Property Tract 2, ID, 60762** being 88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, **Property Tract 3, ID, 67182**, being 3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 4, ID 67158**, 37.397-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 5**, 104.748-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 6, ID 67177**, 40.329-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 7, ID 61476**, 848 acres out of a 1181.095 tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 8, ID 67236**, 112.818-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. **Property Tract 9, ID 114650**, 45.5766 acres of a 150.13 acre tract of land out of the heirs of Rosa Teal Survey, Abstract 262, San Patricio County, Texas, the said 150.13 acre tract of land being the same as and all of tract II being 150.12 acres, more or less, described in Special Warranty Deed dated November 1, 2013, recorded in document No. 632533, Official Public Records of San Patricio County, Texas. **Property Tract 10, ID 103271**, 145.0886 acres out of a 150.77 acre tract of land, being the same land described as

150.694 acres conveyed from Centex Homes. to EFO Land, L.P., by General Warranty Deed dated March 26, 1999, and recorded in Clerk's File No. 472035 of the Real Property Records of San Patricio County, Texas. **Property Tract 11, ID 67168, Tract 12, 61499**, 167.165 Acre Tract of Land, situated in the Heirs of Rosa Teal Survey A-262, Nicholas Fagan Survey A-124, being out a 6,091.22 Acre Tract of land described in a Partition Deed from W.G. (Will) McCampbell, et al., to John S. McCampbell, recorded in Volume 103, Page 156, Deed Records of San Patricio County Texas; said 167.165 Acre Tract being the same lands as a 166 Acre Tract of land described in a Deed from said W.G. McCampbell, et al. to Mrs. Jean McCampbell Davis, as recorded in Volume 103 Page 151. **Property Tract 13, ID 67270**, 13.287 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas. **Property Tract 14, ID 67091**, 12.4199 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.

2. An application filed by the Port of Corpus Christi Authority, requesting to rezone, from R-1 – Single Family Residential to I – Industrial, approximately 374.31 ACRES, bearing a legal description of:

Property Tract 16, ID 69004, Tract 17, ID 65073, Tract 19, ID 69200, Tract 21, Tract 22, Tract 23, Tract 24, A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas. **Property Tract 20**, A 37. 95-acre tract out of the William McDonough Survey, Abstract A-184 and the Day Land and Cattle Company Survey, Abstract A-387, being the same tract called 38.06 acres recorded in Document No. 534924, Deed Records, San Patricio County, Texas, Save and Except a 2.5 acre drill site recorded in Document No. 379019, Deed Records, San Patricio County, Texas.

3. An application filed by the Port of Corpus Christi Authority, requesting to rezone, from R-1 – Single Family Residential to C-2 – General Commercial, bearing a legal description of:

82.30 Acres, being 125.00 foot, 200.00 foot and 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas, and a 31.96 acre, 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas

4. An application filed by the Port of Corpus Christi Authority for a special permit to allow a solar panel farm on the following property bearing a legal description of:

Property Tract 1, ID 60762, being 124.3789 acres out of a 524.80-acre tract of land. being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al to Mrs. Jean McCampbell

Davis by Partition Deed filled November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, **Property Tract 2, ID, 60762** being 88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, **Property Tract 3, ID, 67182**, being 3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas.

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Information regarding the application is on file at the Development Services Department

and is available for your inspection any time during normal office hours. If you have any questions, please contact our office at (361) 776-3815.

Bernard Rodriguez, Director
Development Services

Published one time in the Ingleside Index on November 14, 2024



NOTICE OF PUBLIC HEARINGS

In accordance with the provisions of the **City of Ingleside** code and the laws of the State of Texas, all interested parties are hereby notified that the Planning & Zoning Commission will hold public hearings at **6:00 p.m. Monday, December 2, 2024, at City Hall, 2671 San Angelo Street, Ingleside, Texas.**

PUBLIC HEARING – REZONING REQUEST: A PUBLIC HEARING TO SOLICIT COMMENTS FROM CITIZENS AND OTHER INTERESTED PARTIES CONCERNING A REQUEST FROM THE PORT OF CORPUS CHRISTI AUTHORITY TO REZONE APPROXIMATELY 1.743.76 ACRES, FROM R-1 – SINGLE FAMILY RESIDENTIAL TO I – INDUSTRIAL, GENERALLY BOUNDED BY SH 361 (HIGHLAND AVE.), ON THE SOUTH, INGLESIDE CITY LIMITS ON THE EAST AND NORTH, AND SH 1069 (NORTH MAIN ST.) ON THE EAST, BEARING A LEGAL DESCRIPTION AS FOLLOWS:

Property Tract 1, ID 60762, being 124.3789 acres out of a 524.80–acre tract of land. being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al to Mrs. Jean McCampbell Davis by Partition Deed filled November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 2, ID, 60762 being 88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 3, ID, 67182, being 3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 4, ID 67158, 37.397-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 5, 104.748-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 6, ID 67177, 40.329-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 7, ID 61476, 848 acres out of a 1181.095 tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 8, ID 67236, 112.818-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 9, ID 114650, 45.5766 acres of a 150.13 acre tract of land out of the heirs of Rosa Teal Survey, Abstract 262, San Patricio County, Texas, the said 150.13 acre tract of land being the same as and all of tract II being 150.12 acres, more or less, described in Special Warranty Deed dated November 1, 2013, recorded in document No. 632533, Official Public Records of San Patricio County, Texas. Property Tract 10, ID 103271, 145.0886 acres out of a 150.77 acre tract of land, being the same land described as 150.694 acres conveyed from Centex Homes. to EFO Land, L.P., by General Warranty Deed dated March 26, 1999, and recorded in Clerk's File No. 472035 of the Real Property Records of San Patricio County, Texas. Property Tract 11, ID 67168, Tract 12, 61499, 167.165 Acre Tract of Land, situated in the Heirs of Rosa Teal Survey A-262, Nicholas Fagan Survey A-124, being out a 6,091.22 Acre Tract of land described in a Partition Deed from W.G. (Will) McCampbell, et al., to John S. McCampbell, recorded in Volume 103, Page 156, Deed Records of San Patricio County Texas; said 167.165 Acre Tract being the same lands as a 166 Acre Tract of land described in a Deed from said W.G. McCampbell, et al. to Mrs. Jean McCampbell Davis, as recorded in Volume 103 Page 151. Property Tract 13, ID 67270, 13.287 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.

PUBLIC HEARING – REZONING REQUEST: A PUBLIC HEARING TO SOLICIT COMMENTS FROM CITIZENS AND OTHER INTERESTED PARTIES CONCERNING A REQUEST FROM THE PORT OF CORPUS CHRISTI AUTHORITY TO REZONE APPROXIMATELY 374.31 ACRES, FROM R-1 – SINGLE FAMILY RESIDENTIAL TO I – INDUSTRIAL, GENERALLY LOCATED SOUTH OF SH 361 (HIGHLAND AVE.) WEST OF THE INGLESIDE CITY LIMITS, AND NORTH OF THE SUBSEA 7 FACILITY, BEARING A LEGAL DESCRIPTION AS FOLLOWS:

Property Tract 16, ID 69004, Tract 17, ID 65073, Tract 19, ID 69200, Tract 21, Tract 22, Tract 23, Tract 24, A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas. Property Tract 20, A 37.95-acre tract out of the William McDonough Survey, Abstract A-184 and the Day Land and Cattle Company Survey, Abstract A-387, being the same tract called 38.06 acres recorded in Document No. 534924, Deed Records, San Patricio County, Texas, Save and Except a 2.5 acre drill site recorded in Document No. 379019, Deed Records, San Patricio County, Texas.

PUBLIC HEARING – REZONING REQUEST: A PUBLIC HEARING TO SOLICIT COMMENTS FROM CITIZENS AND OTHER INTERESTED PARTIES CONCERNING A REQUEST FROM THE PORT OF CORPUS CHRISTI AUTHORITY TO REZONE APPROXIMATELY 114.26 ACRES, FROM R-1 – SINGLE FAMILY RESIDENTIAL TO C-2 GENERAL COMMERCIAL, BEARING A LEGAL DESCRIPTION AS FOLLOWS:

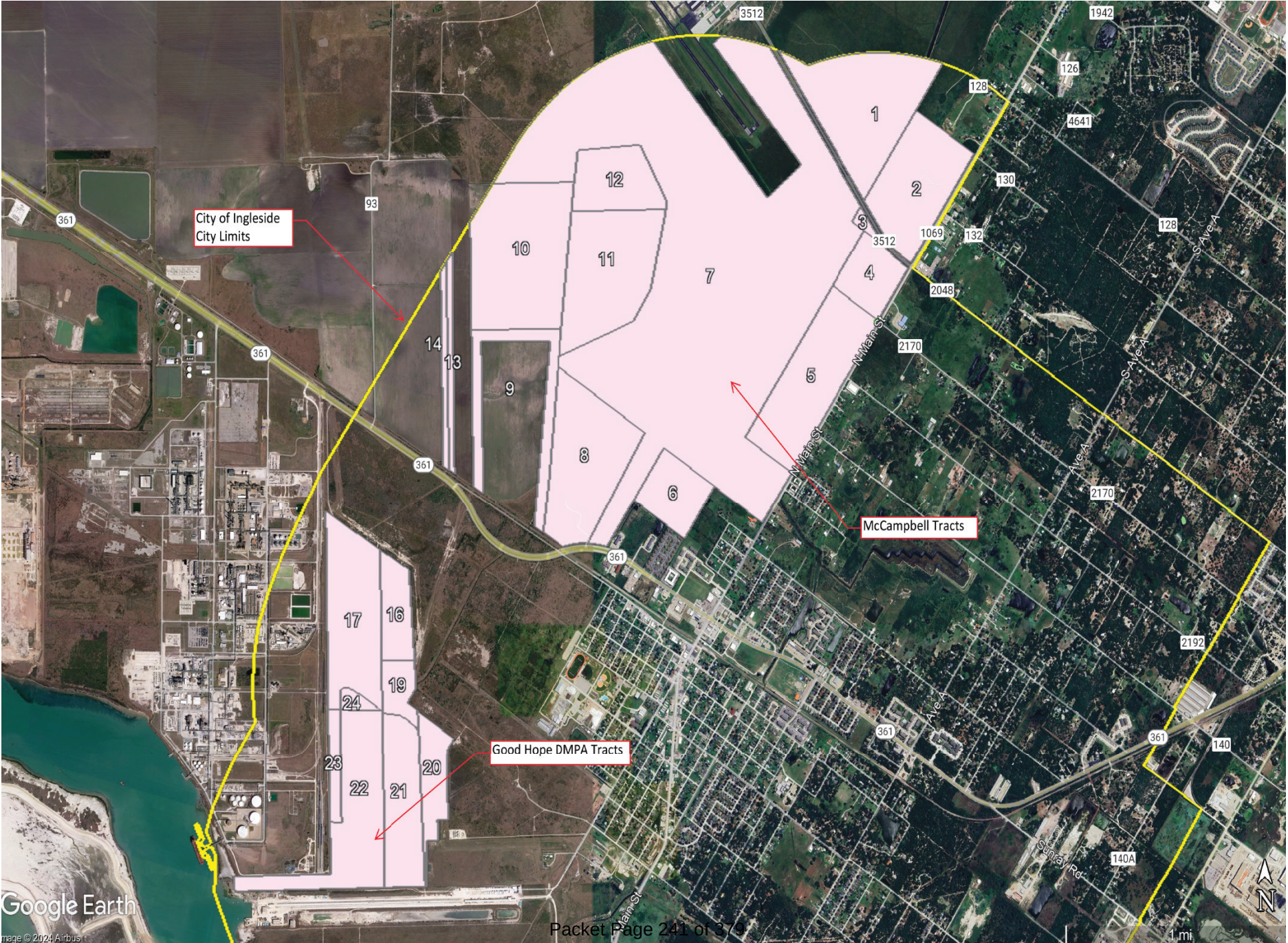
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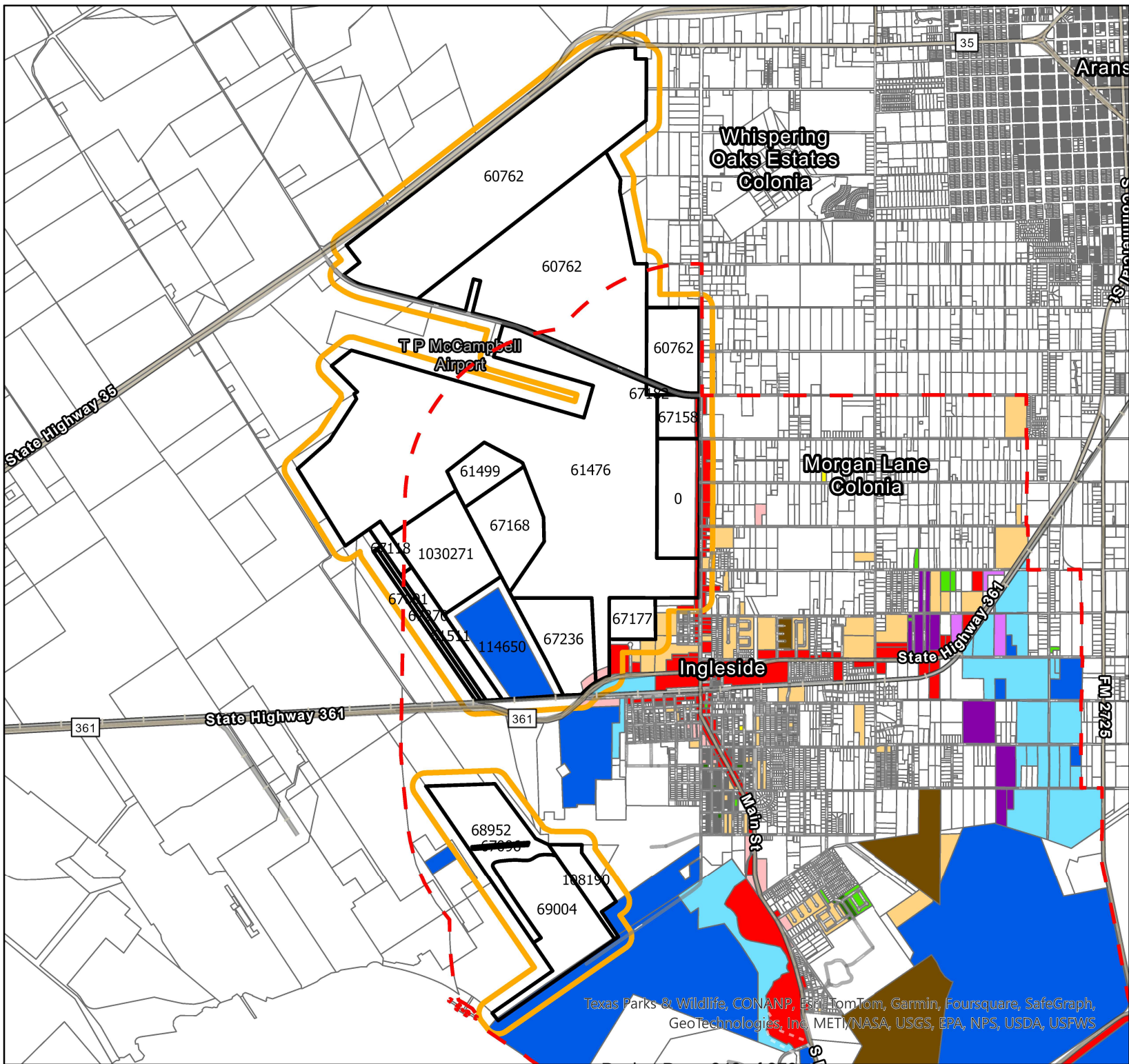
PUBLIC HEARING – SPECIAL USE PERMIT: A PUBLIC HEARING TO SOLICIT COMMENTS FROM CITIZENS AND OTHER INTERESTED PARTIES CONCERNING A REQUEST FROM THE PORT OF CORPUS CHRISTI AUTHORITY FOR A SPECIAL USE PERMIT TO ALLOW A SOLAR PANEL FARM ON APPROXIMATELY 1.743.76 ACRES, GENERALLY BOUNDED BY SH 361 (HIGHLAND AVE.), ON THE SOUTH, INGLESIDE CITY LIMITS ON THE EAST AND NORTH, AND SH 1069 (NORTH MAIN ST.) ON THE EAST, BEARING A LEGAL DESCRIPTION AS FOLLOWS:

Property Tract 1, ID 60762, being 124.3789 acres out of a 524.80–acre tract of land. being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al to Mrs. Jean McCampbell Davis by Partition Deed filled November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 2, ID, 60762 being 88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas, Property Tract 3, ID, 67182, being 3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 4, ID 67158, 37.397-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 5, 104.748-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 6, ID 67177, 40.329-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 7, ID 61476, 848 acres out of a 1181.095 tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 8, ID 67236, 112.818-acre tract of land, being part of a 6091.22-acre tract of land conveyed from W. G. McCampbell, et al, to Mrs. Jean McCampbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas. Property Tract 9, ID 114650, 45.5766 acres of a 150.13 acre tract of land out of the heirs of Rosa Teal Survey, Abstract 262, San Patricio County, Texas, the said 150.13 acre tract of land being the same as and all of tract II being 150.12 acres, more or less, described in Special Warranty Deed dated November 1, 2013, recorded in document No. 632533, Official Public Records of San Patricio County, Texas. Property Tract 10, ID 103271, 145.0886 acres out of a 150.77 acre tract of land, being the same land described as 150.694 acres conveyed from Centex Homes. to EFO Land, L.P., by General Warranty Deed dated March 26, 1999, and recorded in Clerk's File No. 472035 of the Real Property Records of San Patricio County, Texas. Property Tract 11, ID 67168, Tract 12, 61499, 167.165 Acre Tract of Land, situated in the Heirs of Rosa Teal Survey A-262, Nicholas Fagan Survey A-124, being out a 6,091.22 Acre Tract of land described in a Partition Deed from W.G. (Will) McCampbell, et al., to John S. McCampbell, recorded in Volume 103, Page 156, Deed Records of San Patricio County Texas; said 167.165 Acre Tract being the same lands as a 166 Acre Tract of land described in a Deed from said W.G. McCampbell, et al. to Mrs. Jean McCampbell Davis, as recorded in Volume 103 Page 151. Property Tract 13, ID 67270, 13.287 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.

Information regarding the application is on file at the **Development Services Department** and is available for your inspection any time during normal office hours. If you have any questions, please contact our office at **(361) 776-3815.**

Bernard Rodriguez
Director
Development Services

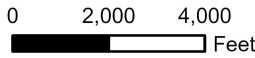
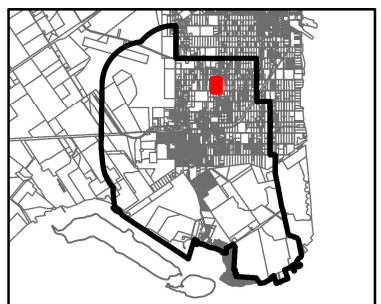




660 Rezoning
McCampbell Tract & Good Hope DMPA
File Date: 07/23/2024
P&Z Date: 08/19/24
Council Date: 10/22/2024

- 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

POCCA
Rezone to I-Industrial / C-2 General Commercial
Notice of Objection to Rezone Request
October 2024

Jose Molina
joe.molina@ryan.com
107 Lost Creek
Portland, Texas 78374

Shirley Saltarelli
shirleysaltarelli@gmail.com
717 S Sandpiper
Ingleside , Texas 78326

Taree Kotalik
harleybpink@gmail.com
333 bayshore Dr
Ingleside, Texas 78362

Charles Kotalik
harleybpink@gmail.com
333 bayshore Dr
Ingleside, Texas 78362

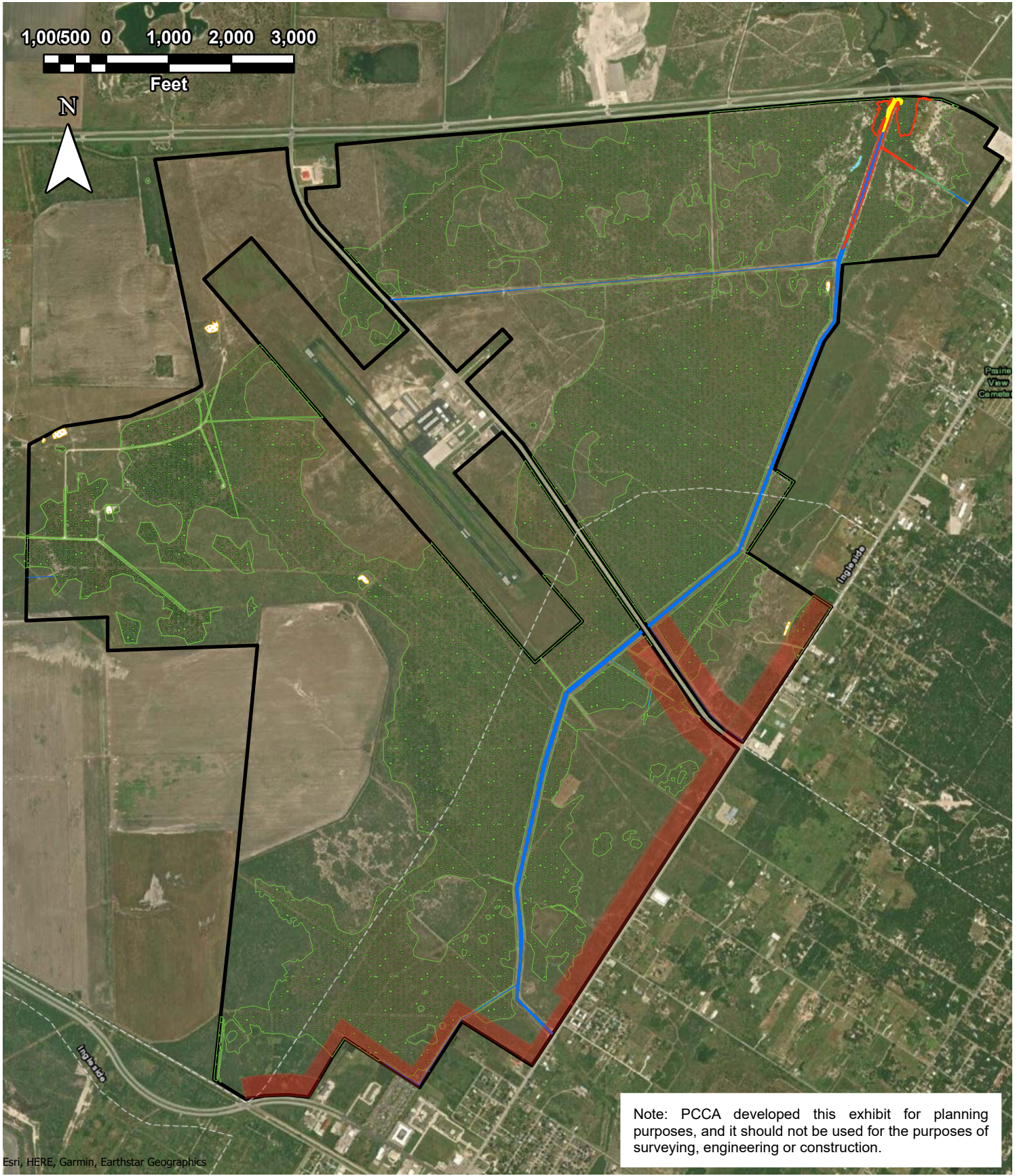
William Porter
butchporter511@gmail.com
511 Bayshore Drive
Ingleside, Texas 78362

Lynne Porter
drlgporter511@gmail.com
511 Bayshore Drive
Ingleside, Texas 78362

Margaret Duran
pegduran1@gmail.com
4022 Congressional Drive
Corpus Christi, Texas 78413

Andrea Julian
andreajulian28@gmail.com
11820 Hartley Cove
Austin, Texas 78748

Kelley and Skipper Burnett
kelleyburnett@hotmail.com
410 n sandpiper
Ingleside, Texas 78362



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

\\pccms01\Data\Eng\Robert_Cavanaugh\...[MSR's 2021]\Temp MSR folder for Sharing\Sam - Buffer Zone\Location Map Exhibit.dwg 11/5/2024 11:47 AM



THIS DOCUMENT WAS PREPARED
AS A DRAFT EXHIBIT
UNDER THE AUTHORITY OF
THE PORT OF CORPUS CHRISTI
ON 11/05/2024.
IT IS NOT TO BE USED FOR
CONSTRUCTION, BIDDING, OR
PERMITTING PURPOSES.



PORT OF CORPUS CHRISTI AUTHORITY

LOCATION MAP INGLESIDE TEXAS

SCALE: 1"=2,000'
DWN. BY: JV

EXHIBIT

DATE: 11/5/2024
TIME: 11:46:58 AM

Map ID	Property ID	Size (Acres)	Existing Zoning	Proposed Zoning	Special Permit	Legal Descriptions
McC Campbell Tracts						
1	60762	124.3789	R-1 Single Family	I- Industrial	Yes	124.3789 acres out of a 524.80 acre tract of land. being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al to Mrs. Jean McC Campbell Davis by Partition Deed filled November 4, 1933, recorded in Volume 103, Page I 51 of the Deed Records of San Patricio County, Texas.
2	60762	88.963	R-1 Single Family	I-Industrial	Yes	88.963 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas.
3	67182	3.589	R-1 Single Family	I-Industrial	Yes	3.589 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas
4	67158	37.397	R-1 Single Family	I-Industrial	Yes	37.397 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas
5		104.748	R-1 Single Family	I-Industrial	Yes	104.748 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas
6	67177	40.329	R-1 Single Family	I-Industrial	Yes	40.329 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas
7	61476	848	R-1 Single Family	I- Industrial	Yes	848 acres out of a 1181.095 tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas
8	67236	112.818	R-1 Single Family	I-Industrial	Yes	112.818 acre tract of land, being part of a 6091.22 acre tract of land conveyed from W. G. McC Campbell, et al, to Mrs. Jean McC Campbell Davis by Partition Deed dated November 4, 1933, recorded in Volume 103, Page 151 of the Deed Records of San Patricio County, Texas
9	114650	45.5766	ustrial & R-1 Single F	I-Industrial	No	45.5766 acres of a 150.13 acre tract of land out of the heirs of Rosa Teal Survey, Abstract 262, San Patricio County, Texas, the said 150.13 acre tract of land being the same as and all of tract II being 150.12 acres, more or less, described in Special Warrenty Deed dated November 1, 2013, recorded in document No. 632533, Official Public Recrods of San Patricio County, Texas.
10	1030271	145.0886	R-1 Single Family	I- Industrial	No	145.0886 acres out of a 150.77 acre tract of land, being the same land described as 150.694 acres conveyed from Centex Homes. to EFO Land, L.P., by General Warranty Deed dated March 26, 1999, and recordtlo in Clerk's File No. 472035 of the Real Property Rec.ords of San Patricio County, Texas
11	67168	167.165	R-1 Single Family	I-Industrial	No	167.165 Acre Tract of Land, situated in the Heirs of Rosa Teal Survey A-262, Nicholas Fagan Survey A-124, being out a 6,091.22 Acre Tract of land described in a Partition Deed from W.G. (Will) McC Campbell, et al., to John S. McC Campbell, recorded in Volume 103, Page 156, Deed Records of San Patricio County Texas; said 167.165 Acre Tract being the same lands as a 166 Acre Tract of land described in a Deed from said W.G. McC Campbell, et al. to Mrs. Jean McC Campbell Davis, as recorded in Volume 103 Page 151.
12	61499			I-Industrial	No	
13	67270	13.287	R-1 Single Family	I- Industrial	No	13.287 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.

14	67091	12.4199	R-1 Single Family	I-Industrial	No	12.4199 acres out of 17.456 acres of land out of a called 34.9 acre tract of land out of the called East 100 acres out of the 200 acre Sahadi Tract, out of the Rosa Teal Survey, A-262, and the N. Fagin Survey, A-124, San Patricio County, Texas, with said 34.9 acres being called Tract "B" in a Partition Deed of called East 100 Acres, actual 99.72 acres, being described in a Deed recorded under Clerks file number 247749, Deed Records of San Patricio County, Texas, and said 200 acre Sahadi Tract described in a Deed of Record under Volume 81, Pages 597-598, Deed Records of San Patricio County, Texas.
1,743.76 Total Needing Rezoning - McCampbell						
1,360.22 Total Acres Needing Special Permit						
Good Hope Tracts						
16	69004	336.36	R-1 Single Family	I-Industrial	No	*** A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
17	65073		R-1 Single Family	I-Industrial	No	A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
19	69200		R-1 Single Family	I-Industrial	No	A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
20		37.95	R-1 Single Family	I-Industrial	No	*** A 37.95 acre tract out of the William McDonough Survey, Abstract A-184 and the Day Land and Cattle Company Survey, Abstract A-387, being the same tract called 38.06 acres recorded in Document No. 534924, Deed Records, San Patricio County, Texas, Save and Except a 2.5 acre drill site recorded in Document No. 379019, Deed Records, San Patricio County, Texas.
21			R-1 Single Family	I-Industrial	No	A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
22			R-1 Single Family	I-Industrial	No	A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
23			R-1 Single Family	I-Industrial	No	A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
24			R-1 Single Family	I-Industrial	No	A 336.36 acre tract of land out of the T.T. Williamson Survey, Abstract 292, the T.T. Williamson Survey, Abstract 293, the Heirs of Rosa Teal Survey, Abstract 262, the William McDonough Survey, Abstract 184, Day Land and Cattle Company Survey, Abstract 387, San Patricio County, Texas and a portion of the State of Texas Submerged Tract No. 3 in Corpus Christi Bay, Nueces County, Texas.
374.31 Total Needing Rezoning - Good Hope						
*** Only these two legal descriptions are needed for the Good Hope Property						
2,118.07 Total Rezoning						

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 offtakers. 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
1.6	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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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.)	
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	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.	
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 crypto 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 McCampell 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 1886ac 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
6.2	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 he 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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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.)	
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	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.	

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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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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			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 offtakers, 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 38.4ac 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.

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	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;	

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			• 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.	
8.5	[I am very concerned about] 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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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 offtakers 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

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			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.	
8.8	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 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.	
Sheila Walton				
9.1	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.	
9.2	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.	
9.3	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. 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,	

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			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.	
9.4	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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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 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.	
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 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.	

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			Prior to purchase by the Port, the Farm/Agriculture Exemption on the McCampbell property yielded \$1,540.22 in 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.																									
Norine Farrar																												
10.1	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><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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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 chrisit 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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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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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),		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 offtakers through existing infrastructure owned and operated by AEP.	
12.7	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.	
12.8	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 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.	
Mark Wolfe - State Historic Preservation Officer				
13.1	An archeological survey is required. A Texas Antiquities Permit must be obtained from this office prior to initiation of fieldwork. All fieldwork should meet the Archeological 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				
14.1	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.	
14.2	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. 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.	
14.3	Better understanding of changes, impacts, mitigations to: Soil		Port Corpus Christi acknowledges this comment, however, without additional detail, it is impossible to provide an appropriate response.	
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.		The U.S. Army Corps of Engineers should advise if a public meeting is necessary.	
Glenn Guillory				

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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 2022). This implies that species are not adversely affected by shading from the PV panels.	

No.	Comment	Comment Type	Response	Action Item
			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 offtakers 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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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.	
17.5	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.	

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. 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				

No.	Comment	Comment Type	Response	Action Item																								
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.																									
19.2	Public notice is to fill 13.9 acres of wetlands, but the project is 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 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 (Fill) Map on page 18 of 22 of the project drawings.																									
19.4	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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No.	Comment	Comment Type	Response	Action Item
			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 offtakers" 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 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 is within the public interest.	
19.6	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. 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.	

No.	Comment	Comment Type	Response	Action Item
20.2	Application Completeness. I emailed USACE on February 14, 2023 about a lease agreement the Port of Corpus Christi has with Howard Energy for use of Port owned land for carbon sequestration. One of the POCC properties subject to the lease is the McCambell property as noted on the attached map from lease agreement. There is no mention in the application about carbon sequestration and those possible site locations in relation to the proposed solar panel farm. This application must incorporate carbon sequestration site locations and proposed access. These are two major proposed projects for the McCambell property, with both affecting wetlands and water quality of McCambell Slough, the application needs to reflect both projects for completeness of review. It is because of these two projects an Environmental Impact Statement must be considered.		Port Corpus Christi submitted a complete application to the U.S. Army Corps of Engineers on December 27, 2022. 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 Department of Energy (DOE) is the lead federal agency, responsible for reviewing the CCS project in accordance with NEPA. Further, the proposed solar installation occupies approximately 1886ac of the 2850ac property, providing an opportunity for additional and independent projects. This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement.	
20.3	Deficient Information for site locations, material and placement. “The applicant proposes to discharge approximately 111,100 cubic yards of fill material into 13.9 acres of herbaceous wetlands adjacent to McCampbell Slough, a tidal water of the United States.” The PN with project plans and mitigation plans fail to identify the site location of wetlands to be filled along the McCambell Slough. In fact, not one schematic identifies the slough by name, only a few pages identify the “drainage ditch”. Will this be several site locations to be filled that total 13.9 acres or just one connected wetland site? What is the composition of the “fill” material? Is the fill material comprised of native soil or introduced soil/base material? Will the material include various non-mulched wooded plants? Will the material include invasive plant species that could spread further downstream from placement location(s)? How will placement of material be conducted? Depending on the method of placement, more wetlands could be directly impacted.		The project will place fill in wetlands for access paths and inverters, which is denoted in the permit drawings on the Wetland Impacts (Fill) Map on page 18 of 22 of the project drawings. The final design of the development will stipulate ideal characteristics of fill material and detail the construction methodology including all conditions of the permit, 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.	
20.4	Fill Material – Testing Requirement. There is no mention about testing “fill” material for placement in wetlands that are considered connected to WOTUS. Interval testing for bacterial and chemical contaminants must be required for fill material before placement. No placement of fill material with contaminants can be permitted on this waterway. Further, fill material is likely to have soils with cattle manure which can contain invasive plant seeds and importantly, bacterial contamination. High levels of bacteria could leach into McCambell slough and further downstream. What will be the required standard for bacterial contamination in addition to chemical contamination standards?		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. Port Corpus Christi purchased the McCampbell Property in 2018. Historically, farming and ranching dominated the property and continue today.	
20.5	Habitat – Flora – Fauna Impacts. The PN again states 13.9 acres of wetlands be filled, with .3 acres impacted for inverter placement, but approximately 1800 acres of wetlands will be covered with solar panels. What about the impacts to these wetlands? The PN indicates the solar panels will be elevated and therefore shading of wetlands will be minimal and there are no claimed impacts. Are they kidding? Look at the total solar panel arrays and it is easy to see how much wetland will be severely impacted by shading. I am surprised USACE did not tell the applicant to further assess wetland impacts from shading, heat and overall construction of solar farm. The PN fails to address or provide a general survey of aquatic, amphibious, or reptilian life in/or around the full length of what is essentially a canal (slough). There is no mention of terrestrial wildlife or bird populations such as whooping cranes. This is another reason to require an EIS, especially to assess threatened and endangered species. All of the mentioned categories of fauna will be directly impacted with obvious loss of habitat on 1800+ acres, which must be factored into the permit application.		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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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 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.) Section 2 of the application provides a description of the landscape: Wetlands constitute approximately 1,560ac of the McCampbell Property (See Approved Jurisdictional Determination dated August 12, 2022). The 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.	
20.6	Port Authority as Navigation District. The Port of Corpus Christi is a political subdivision navigation district of the State of Texas. The POCC receives both Federal and State money for various projects associated with maintaining or improving navigation district. However, according to the PN, the proposed solar farm will be owned and possibly operated under the POCC, which isn't an authorized electrical utility distributor. The PN deliberately avoids stating what entity will be supplied electrical power. The electrical power is not about adding to the Texas grid, but this solar farm is for future heavy industry the POCC wants to attract. This is a public entity using public money for creation of power to supply private industry. Democratizing expenses while privatizing profits has been the Port of Corpus Christi's operations motto for past few years.		The project is expected to yield 600 MW of carbon-free electricity to be delivered via interconnect to the regional electric grid, with the potential to serve both residential and industrial demand. 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.	
20.7	Proposed Mitigation. I support the POCC's proposed onsite mitigation to remove unneeded roads and restore wetland areas on the McCambell property. However, the PN does not come close to recognizing the full impacts to all wetlands in the project area. The proposed mitigation is based on 13.9 acres of wetland to be filled, yet the total area of wetland impacts could be as much as 1800+ acres. Therefore, the proposed mitigation is well short of the claimed 2:1 and short of any minimal 1:1 mitigation.		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.	
20.8	Because of unaccounted wetland impacts with aquatic and terrestrial habitat impacts, an Environmental Impact Statement must be required		This project does not constitute a major federal action and therefore does not warrant an Environmental Impact Statement.	
Kathyrn Masten – Ingleside of the Bay Coastal Watch Association				
21.1	The Port has not even spoken to Gary Davis, the McCampbell-Porter Airport manager. This shows the level of disrespect the Port shows when dealing with San Patricio County residents and public officials, which includes efforts to block Senate Bill 2235 (attached) to give San Patricio another seat on the Port Commission.		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.	
21.2	The Port does not intend to operate the solar farm. This helps explain why attached Senate Bill 818 is making its way through the Legislature during this		Port Corpus Christi did not request any legislator file any legislation during the 88th legislature. SB 818 (and its companion HB 1511) was filed by legislators from Houston and the Texas Ports Association (TPA) to support their efforts. The TPA is a state trade association that represents twenty seaports in Texas.	

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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																												
22.1	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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22.2	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 24ontinue 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.		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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			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 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.	
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 (Fill) Map on page 18 of 22 of the project drawings.				
23.3	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:				
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			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.				
23.4	The purpose for “new and industrial offtakers” is not in the publics 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 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.				

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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																												
24.1	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: <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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24.2	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 offtakers through existing infrastructure owned and operated by AEP.																									

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24.4	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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24.5	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. 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.		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.	need exhibits showing hydrology
24.9	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. Pilings 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.	
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. 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.	
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.		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.	
Tom Shearer				
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.		Based on the wetland delineation and associated AJD, 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.	
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		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).	
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. The U.S. Army Corps of Engineers should advise if a public meeting is necessary.	
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.		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); • 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	
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.		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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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.)	
27.4	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.	
27.5	They have not provided an inventory of the wetlands or an inventory of the species.		U.S. Army Corps of Engineers reviewed and approved a wetlands delineation report—which contained 181 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.	
27.6	There are previously disturbed sites that are better suited for this project.		Please see the updated Alternatives Analysis provided as Attachment A.	
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.		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. 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>Borrchia frutescens</i>), shoregrass (<i>Distichlis littoralis</i>), sand spike rush (<i>Eleocharis palustris</i>), coastal salt grass (<i>Distichlis</i>	

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			<i>spicata</i>), bitter panic grass (<i>Panicum amarum</i>), seaside American aster (<i>Symphotrichum subulatum</i>), chairmakers club-rush (<i>Scheonoplectus 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.																									
27.8	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> 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.	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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27.9	The Port of Corpus Christi as a public entity is not approved to develop assets to provide energy for it’s 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.																									
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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27.11	A plan should be approved for the decommission restoration of the site to prior or improved condition.		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.	
27.12	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 offtakers through existing infrastructure owned and operated by AEP.	

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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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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.)	
Linda Fuiman				
29.1	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	

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 offtakers 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 (Bousselot et al., 2017) and document increased biodiversity (Uldrijan 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), (Invenergy, 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.)	



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David Yoskowitz, Ph.D.
Executive Director

March 13, 2023

Mr. Kevin Mannie
U.S. Army Corps of Engineers
Galveston District, Regulatory Branch
2000 Fort Point Road
Galveston, TX 77550
swg_public_notice@usace.army.mil

401 Coordinator
TCEQ, Mail Code 150
P.O. Box 13087
Austin, TX 78711-3087
401certs@tceq.texas.gov

Re: Permit Application Number SWG-2021-00163
Port of Corpus Christi Authority

Dear Mr. Mannie and 401 Coordinator:

Texas Parks and Wildlife Department (TPWD) has reviewed the Public Notice (PN) dated February 9, 2023, for permit application number SWG-2021-00163. The applicant requests authorization to construct a 600 megawatt (MW) photovoltaic (PV) solar panel development in emergent wetlands adjacent to McCampbell Slough within a 1,866-acre portion of a 2,850-acre tract of land, completely surrounding the McCampbell-Porter Airport located at 3141 Farm to Market Road (FM) 3512, in Aransas Pass, San Patricio County, Texas.

According to the PN, the applicant proposes to fill approximately 13.9 acres of emergent wetlands for the construction of 11.1 miles of access roads, rotating solar panels mounted on helical piles (dimensions and quantities of PV panels and helical piles are not described), 295 power inverters, and two electric substations in an approximate 1,866-acre area.

Project documents describe the proposed project site as 1,866 acres of the 2,850-acre McCampbell Property, 55% of which supports 1,558.3 acres of palustrine and estuarine wetlands and other jurisdictional waterbodies. The separate tracts that make up the proposed project site are separated by FM 3512 and the McCampbell-Porter Airport that is owned and operated by San Patricio County. Hydrology within the property is dominated by a large ditch that conveys stormwater from the City of Ingleside and from the site itself into McCampbell Slough and Port Bay. The proposed permittee-responsible compensatory mitigation plan (PRCMP) states that this feature provides "a substantial freshwater influx to the downstream estuaries of Port and Copano Bays".

Wetlands within the project area are described as dominated by salt meadow cordgrass (*Spartina spartinae*). These wetlands function to attenuate flood waters from stormwaters associated with both rainfall and storm surge, remove pollutants (including sediment, debris, excess nutrients, pesticides, etc.) associated with

runoff from neighboring communities as well as onsite activities, store and re-cycle nutrients, and support water quality functions for fish and wildlife habitats onsite as well as those located down gradient (i.e., McCampbell Slough and Port Bay).

The 2022 303d List of Impaired Waters indicates that Port Bay was first listed as impaired in 1998 due to bacteria in oyster waters. The Texas Department of State Health Services currently classifies Port Bay as a restricted area that is closed to the taking of shellfish, including take associated with commercial oyster mariculture facilities. Currently, at least one commercial oyster mariculture facility has been authorized just outside the restricted waters of Port Bay. Any expansion of water quality degradation has the potential also expand the restricted shellfish harvest area.

Recommendation: 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.

Alternatives Analysis

TPWD has reviewed the information provided in the Alternatives Analysis (AA) Summary provided with the PN. Because this activity is not water dependent, practicable alternatives that do not involve special aquatic sites are presumed available unless clearly demonstrated otherwise. The complete AA was not provided for resource agency or public review and Table 1 of the AA Summary does not provide sufficient information to fully evaluate the alternatives considered or the criteria used to support the alternatives in light of the project purpose and need. However, information provided in Table 1 raises the following concerns for the AA.

Table 1 indicates that the only alternative not owned by the applicant is not feasible in terms of acquisition. There is no explanation provided for this conclusion. Table 1 also states that acquisition of this tract would be required but does not indicate if it (or other tracts not identified in the table) are available for acquisition.

In addition, Table 1 indicates that only two alternatives will avoid impacts to waters of the U.S. (WOUS) and wetlands, but it also states that none of the alternatives will impact special aquatic sites. The applicant should note that wetlands are a type of special aquatic site (defined at 40 CFR 230.41). As such, Table 1 indicates that all the proposed alternatives will impact special aquatic sites except for those which do not contain wetlands.

It is uncertain if the AA provides sufficient justification for being unable to split the project among two or more sites (such as those which avoid wetlands/special aquatic sites), especially considering that two substations are proposed, one on each tract within the project boundary.

Recommendation: The applicant should consider exploring additional alternatives to identify the least environmentally damaging practicable alternative (LEDPA).

Table 1 states: “Delay of acquisition restricts the ability to support economic development in the clean hydrogen sector at the place in which projects would be developed”. The applicant should clarify what is meant by this statement and provide additional information about any interdependent or connected activities associated with the proposed project.

Recommendation: 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).

Avoidance and minimization

With respect to avoidance and minimization, the PN states:

The applicant has stated that they have avoided and minimized environmental impacts by designing the proposed project in a manner that preserves site hydrology and avoids/minimizes impacts to aquatic resources including installing solar panels on helical pilings without concrete footings to avoid wetland impacts, elevating the rotating solar panels 5 feet above the ground level to avoid shading effects, elevating cabling on trays to avoid temporary trenching through wetlands, siting the two substations entirely within uplands, placing approximately 60% of power inverters in uplands reducing wetland impacts to 0.3 acre, configuring site access routes to the minimum necessary to reduce wetland impacts to 13.4 acres, and minimizing constructions sequencing, utilizing construction best management practices (BMPs), and restoring temporary impacts to pre-project conditions.

As proposed, the 1,866-acre project area only contains 308 acres of uplands. Wetlands account for the remaining 1,558.3 acres, or 83% of the total proposed project area. Because the 2850-acre McCampbell Property supports approximately 1,292 acres of uplands, additional impact avoidance and minimization may be feasible onsite.

Recommendation: 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.

Other potential effects

Page 17 of 22 of the proposed project plans notes that solar panels will rotate continuously throughout the day via a linear actuator to maximize solar absorption and minimize vegetation shading. Based on this information, the applicant has not provided an adequate rationale to support these competing ideas and the extent to which the PV panels will act as fill is not clear.

Limited research indicates that PV panels can alter the microclimate underneath them and result in changes to plant composition, soil moisture, and other variables. TPWD is concerned that there is a paucity of research available on the direct and indirect effects of PV panels on wetland ecosystems. Any adverse effects that may result from the installation, operation and decommissioning of the PV solar panel development at the project site have the potential to adversely affect up to 1,558.3 acres of wetlands.

The applicant has stated that temporary impacts will be restored to pre-construction conditions, but these temporary impacts have not been adequately described in terms of location, extent, or habitat types affected.

Recommendation: 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.

TPWD and the applicant's neighbor, McCampbell-Porter Airport, may have mutual concerns for the increased potential for bird strikes. These could result from birds mistaking the reflective surface of PV solar panels for water or from alterations to site hydrology, such as the construction of access roads, that results in greater frequency and/or duration of seasonal ponding events. Project documents describe the proposed permeable access roads as being comprised of caliche, limestone, or similar material. However, it is not clear if the hydraulic conductivity of these materials will continue to support current site conditions. Further, the applicant has not described any operational activities, such as washing the PV panels, that may also have secondary effects.

Recommendation: 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.

Mitigation Plan

Based on the information provided, TPWD lacks confidence that the applicant has adequately demonstrated that there are no practicable alternatives to the proposed fill which would have fewer adverse impacts on the aquatic ecosystem. In addition, the applicant has not demonstrated that impacts have been avoided and minimized to the extent practicable. Therefore, TPWD considers the proposed PRCMP to be premature.

Because the PN does not provide information which demonstrates that impacts have been avoided and minimized to the extent practicable, the PRCMP seems premature. Once the AA identifies the LEDPA and impacts are avoided and minimized to the extent practicable, the PRCMP should be revised to fully compensate for unavoidable impacts. The PRCMP proposes to restore 29.6 acres of disturbed vehicle paths to adjacent wetland elevations. In general, TPWD does not consider the proposed restoration project suitable for providing compensatory mitigation as proposed. The applicant has not provided sufficient information to inform or evaluate the PRCMP. For example, no hydrological assessments have been conducted to demonstrate that the proposed restoration project will result in a net gain in aquatic resource function that fully offsets functional losses.

Recommendation: 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.

As previously described above, it is not clear how the proposed access roads will affect existing hydrology. The combined effects of potential hydrological changes (project impacts and onsite restorations) have the potential to make the site wetter and increase the frequency and duration of inundation. TPWD is concerned that excessive inundation could result in limited plant survival and growth.

The following information should be provided 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.
- 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.

Mr. Mannie and 401 Coordinator
SWG-2021-00163
March 13, 2023
Page 6 of 6

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. TPWD requests that any revised project documents or draft compensatory mitigation plans be made available for public review and comment. Questions can be directed to Cindy Adams-Smith or Jackie Robinson (361-431-6003) in Corpus Christi.

Sincerely,



EC Emma Clarkson, PhD
Regional Director, Ecosystem Resources Program
Coastal Fisheries Division
Science and Policy Branch

EC:JR:CAS

**PLANNING & ZONING VOTING RECORD
& ATTENDANCE RECORD**

DATE: 12/02/2024

RECORD NO. 660A3

ITEMS NO. 7 & 12

			DESCRIPTION
THIS APPLICATION <u> </u> REQUIRES <u>X</u> DOES NOT REQUIRE A SUPER MAJORITY VOTE BY CITY COUNCIL.	P R E S E N T O R A B S E N T	V O T E	DELIBERATE AND TAKE APPROPRIATE ACTION ON AN APPLICATION FILED BY THE PORT OF CORPUS CHRISTI, REQUESTING TO REZONE, FROM R-1 – SINGLE FAMILY RESIDENTIAL TO C-2 – GENERAL COMMERCIAL, BEARING A LEGAL DESCRIPTION OF: 82.30 Acres, being 125.00 foot, 200.00 foot and 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas, and a 31.96 acre, 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas.
ALAN BEAUBIEN <i>(Place #1 - 12/31/25)</i> 1 ST Term	P	N	<u>PUBLIC HEARING NOTES</u> Speaking For: None
JACOB LOPEZ <i>(Place #1 - 12/31/25)</i> 1 ST Term	A	-	Speaking Against: None
CONNOR BROWN <i>(Place # 3 - 12/31/25)</i> 1 ST Term	P	Y	Dylan Davis with OHM Surface LLC, 2613 Carlow Dr. Austin, Texas 78745 requested clarification on the buffer width.
<i>(Place #4 - 12/31/24)</i>	-	-	There were 10 letters of objection.
BRENDA RICHARDSON <i>(Place # 5 - 12/31/24)</i> 2 ND Term (Chairman)	P	Y	Commission Member Gutierrez made a motion to recommend approval of the request to City Council. Commission Member Brown seconded the motion. Motion carried 4:1.
GERARD GUTIERREZ <i>(Place #6 - 12/31/24)</i> 1 ST Term	P	Y	 Chairman
CYNTHIA WILSON <i>(Place #7 - 12/31/24)</i> 1 ST Term	P	Y	<u>12-2-24</u> Date

ORDINANCE NO. 2025-_____

AN ORDINANCE CHANGING THE ZONING FOR THE FOLLOWING PROPERTY FROM ITS PRESENT ZONING OF R-1 (SINGLE FAMILY RESIDENTIAL) TO C-2 (GENERAL COMMERCIAL) AND FURTHER PROVIDING FOR EFFECTIVE DATE, READING, SEVERANCE AND PUBLICATION:

82.30 ACRES, BEING 125.00 FOOT, 200.00 FOOT AND 300.00 FOOT WIDE COMMERCIAL BUFFER AREA LYING WITHIN THE JEAN MCCAMPBELL DAVIS TRACT 6,091.22 ACRES, VOLUME 103, PAGE 151 DEED RECORDS SAN PATRICIO COUNTY, TEXAS, AND A 31.96 ACRE, 300.00 FOOT WIDE COMMERCIAL BUFFER AREA LYING WITHIN THE JEAN MCCAMPBELL DAVIS TRACT 6,091.22 ACRES, VOLUME 103, PAGE 151 DEED RECORDS SAN PATRICIO COUNTY, TEXAS.

WHEREAS, the City Council of the City Ingleside (“City Council”) has previously approved and adopted a Comprehensive Zoning Ordinance and Zoning Map of the City of Ingleside; and

WHEREAS, the City Council has previously created and appointed a Planning and Zoning Commission as authorized by the Texas Local Government Code; and,

WHEREAS, the Texas Local Government Code authorizes a municipality to adopt zoning districts after compliance with statutory notice provisions; and,

WHEREAS, application was made to rezone the real property legally described as 82.30 Acres, being 125.00 foot, 200.00 foot and 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas, and a 31.96 acre, 300.00 foot wide commercial buffer area lying within the Jean McCampbell Davis Tract 6,091.22 Acres, Volume 103, Page 151 Deed Records San Patricio County, Texas in the San Patricio County property records; and

WHEREAS, after complying with the statutory publication and notification requirements, on December 2, 2024, the Ingleside Planning and Zoning Commission (“Commission”) conducted a public hearing on the potential rezoning application and after considering the testimony and evidence, has provided a recommendation to the City Council on the rezoning of said lots; and,

WHEREAS, after hearing and considering the application, the recommendation of the Commission, the present zoning and use of each of the properties in the surrounding area, the comprehensive master plan of the city, the future development of the city as a whole, and other relevant factors, the City Council is of the opinion and finds that it is in the best interest of the public health, safety, and welfare of the city to rezone this property, that the rezoning effected by this ordinance is in compliance with the Comprehensive Master Plan, that changing the zoning of the aforesaid property would not be detrimental to the public health, safety, or general welfare, and will, in fact, promote the best and most orderly development of the properties affected thereby, and to be affected thereby, in the City of Ingleside, and as well, the owners and occupants of the property, and the City generally.

BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF INGLESIDE, COUNTY OF SAN PATRICIO, STATE OF TEXAS:

Section 1. Zoning Change. The Zoning of the property hereinafter described is hereby changed from R-1 (Single Family Residential) to C-2 (General Commercial)

82.30 ACRES, BEING 125.00 FOOT, 200.00 FOOT AND 300.00 FOOT WIDE COMMERCIAL BUFFER AREA LYING WITHIN THE JEAN MCCAMPBELL DAVIS TRACT 6,091.22 ACRES, VOLUME 103, PAGE 151 DEED RECORDS SAN PATRICIO COUNTY, TEXAS, AND A 31.96 ACRE, 300.00 FOOT WIDE COMMERCIAL BUFFER AREA LYING WITHIN THE JEAN MCCAMPBELL DAVIS TRACT 6,091.22 ACRES, VOLUME 103, PAGE 151 DEED RECORDS SAN PATRICIO COUNTY, TEXAS

Section 2. Zoning Map. It is directed that the official zoning map of the city be changed to reflect the zoning classification change, rezoning, effected by this ordinance.

Section 3. Effective Date. As provided by Article III, Section 3.11C of the Charter of the City of Ingleside, this ordinance shall be effective upon adoption and, in addition, if any penalty, fine or forfeiture is imposed by this ordinance, then this ordinance shall be effective only after publication of this ordinance in its entirety or in summary form once in the official newspaper of the City of Ingleside.

Section 4. Reading. As provided by Article III, Section 3.11.B of the Charter of the City of Ingleside, this ordinance, or the caption of it shall be read at two City Council meetings with at least two weeks elapsing between each reading.

Section 5. Severance. If any part of this ordinance is invalid or void or is declared to be so, then said part shall be severed from the balance of this ordinance and said invalidity shall not affect the balance of this ordinance, the balance of the ordinance to be read as if said invalid or void portion thereof were not included.

Section 6. Publication. As provided by Article III, Section 3.11C, this ordinance shall be published one time in the official newspaper of the City of Ingleside, San Patricio County, Texas, which publication shall contain the caption of this ordinance stating in substance the purposes of same.

PASSED, ORDAINED, APPROVED AND ADOPTED this ____ day of January 2025.

CITY OF INGLESIDE, TEXAS

Pedro Oscar Adame, Mayor

ATTEST:

Jana Stork, City Secretary

First Reading: January 14, 2024

Second Reading: _____

DRAFT

CITY COUNCIL AGENDA
Regular Meeting: January 28, 2025

AGENDA ITEM: 14

Deliberate and take appropriate action on a Resolution of the City Council of Ingleside, San Patricio County, Texas, approving the waiver of pet adoption fees and microchipping fees at the Ingleside Pet Adoption Events occurring on February 01, 2025.

SUBMITTED BY: Martin Molina, Chief of Police

APPROVED FOR AGENDA: Brenton Lewis, City Manager

BACKGROUND:

Staff is requesting the waiver of the pet adoption and microchipping fees on February 01, 2025, for a pet adoption event at the Tractor Supply store in Aransas Pass from 9:00 a.m. to 2:00 p.m. We currently have 12 dogs up for adoption. The average adoption amount in past events has been 2-3 pets. The mobile animal control trailer will be used for this event.

FISCAL ANALYSIS:

Each pet adoption costs \$25.00 plus a \$15.00 microchipping fee, for a total of \$40.00 per pet.

RECOMMENDATION:

Request that the City Council approve a resolution waiving pet adoption and microchipping fees during our pet adoption event on February 1, 2025.

ATTACHMENTS:

1. RES 2025-XXX 19.2 - Resolution - WAIVE PET ADOPTION FEES -February 01 2025

RESOLUTION NO. 2025-_____

A RESOLUTION OF THE CITY COUNCIL OF INGLESIDE, SAN PATRICIO COUNTY, TEXAS, APPROVING THE WAIVER OF PET ADOPTION FEES AND MICROCHIPPING FEES AT THE PET ADOPTION EVENT OCCURRING FEBRUARY 01, 2025.

WHEREAS, in accordance with City of Ingleside Code of Ordinances Chapter 14 ARTICLE I, SECTION 14.43 (f) the City of Ingleside charges a \$25 adoption fee and \$15 Microchipping fee for animals that have been impounded and have not been claimed after the expiration of a redemption period; and

WHEREAS, the Ingleside Animal Shelter wishes to offer free pet adoptions and free microchipping for all new pet adoptions and seeks the approval of the City of Ingleside City Council to waive the \$25.00 Pet Adoption and the \$15.00 Microchipping fee for all new pet adoptions for all persons at the Ingleside Pet Adoption event occurring on February 01, 2025.

WHEREAS, the City Council finds that the Ingleside Animal Shelter is at capacity and that the waiver of such fees will encourage Pet Adoption and alleviate logistical concerns in associated with housing animals in the current facility.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF INGLESIDE, TEXAS, THAT:

Section 1. The matter and facts recited in the preamble hereof are found and determined to be true and correct.

Section 2. The Ingleside Animal Shelter is authorized to waive Pet Adoption fees and Microchipping fees for the Ingleside Pet Adoption event occurring on February 01, 2025.

PASSED AND APPROVED this ____ day of _____, 2025 by ____ (ayes) to ____ (nays) with ____ abstentions by a vote of the City Council of the City of Ingleside, Texas.

CITY OF INGLESIDE, TEXAS

Pedro Oscar Adame, Mayor

Attest:

Jana Stork, Interim City Secretary

CITY COUNCIL AGENDA

Regular Meeting: January 28, 2025

AGENDA ITEM: 15

Deliberate and take appropriate action on the first and only reading of an Ordinance amending the Fiscal Year 2024-2025 budget for the City of Ingleside, Texas, for the Ingleside Development Corporation Fund, Ingleside Development Corp. Fund Promotional Sales Tax Fund, and General Fund Capital Improvement Fund for the appropriation of funds for the cost of the basketball pavilion, cost of construction and engineering of Gallion Street, and additional Attorney Fees.

SUBMITTED BY: Priscilla Solis, Assistant Director of Finance

APPROVED FOR AGENDA: Brenton Lewis, City Manager

BACKGROUND:

The fiscal year 2024-2025 budget was adopted on September 24, 2024. Since that time, a need for additional funds for Ingleside Development Corporation projects are needed to execute Basketball Pavilion, Engineering and Construction of Gallion Street, and Attorney fees.

The City Charter states, "One reading shall be required for emergency and budget/tax ordinances." The City Attorney concurs that only one reading shall be required to pass this budget amendment ordinance.

FISCAL ANALYSIS:

The overall net differences by fund are as follows:

Ingleside Development Corporation Fund 23—
Ending Unaudited Estimated Fund Balance \$2,922,410
Increase Expenditures \$380,000
Ending Operating Fund Balance \$2,545,410

General Fund Capital Improvement Fund 30 —
Ending Unaudited Estimated Fund Balance \$2,608,028
Increase Revenues \$360,000
Increase Expenditures \$360,000
Ending Operating Fund Balance \$2,608,028

RECOMMENDATION:

Staff recommends approving the ordinance to amend the Ingleside Development Corporation budget with the City Manager's recommendations of net increases/net decreases in the listed revenues and expenditures on the Budget Amendment.

ATTACHMENTS:

1. ORD 2025-XXX 2025-01-28 ORDINANCE NO- FY2024-XX BUDGET AMEND-IDC BASKETBALL PAVILLION GALLION ST_

ORDINANCE NO. 2025-__

AN ORDINANCE AMENDING THE FISCAL YEAR 2024-2025 BUDGET FOR THE CITY OF INGLESIDE, TEXAS, FOR THE INGLESIDE DEVELOPMENT CORP. FUND, INGLESIDE DEVELOPMENT CORP. PROMOTIONAL SALES TAX FUND, AND GENERAL FUND CAPITAL IMPROVEMENT FUND FOR THE APPROPRIATION OF FUNDS FOR THE COST OF BASKETBALL PAVILION, COST OF CONSTRUCTION AND ENGINEERING OF GALLION ST, AND ADDITIONAL ATTORNEY FEES.

BE IT ORDAINED BY THE CITY COUNCIL OF INGLESIDE, TEXAS:

WHEREAS, it was unforeseen when the budget was adopted that there would be an additional need for funding for these expenditures this fiscal year.

BE IT ORDAINED by the City Council of the City of Ingleside that the Fiscal Year 2024-2025 budget be amended as shown as follows:

CITY OF INGLESIDE
DEPARTMENT REVENUES AND EXPENSES
BUDGET AMENDMENT

Account Name:	Dept-Acct Number:	Budget Increase	Budget Decrease
Fund 24	Ingleside Development Corp. Promotional Sales Tax		
Expenses			
Capital- Basketball Pavilion	24-500-742		<u>200,000</u>
Capital- Basketball Pavilion	23-500-742	<u>200,000</u>	

[To amend the FY2025 budget as shown above to transfer the funds from the Ingleside Development Corp. Promotional Sales Tax to the Ingleside Development Corp to appropriate the expense for the cost of Basketball Pavillion]

Account Name:	Dept-Acct Number:	Budget Increase	Budget Decrease
Fund 23	Ingleside Development Corp.		
Revenues/Fund Balance			
Fund Balance Reserve-4(B)	23-3000		<u>80,000</u>
Expenses			
Transfer to FD 30-Capital Improv.	23-500-933	<u>80,000</u>	

[To amend the FY2025 budget as shown above to reduce the fund balance account and appropriate the expense for the cost of Gallion Street Engineering and Construction.]

Account Name:	Dept-Acct Number:	Budget Increase	Budget Decrease
Fund 30 GF Capital Improvement Fund			
Revenues			
Transfer From IDC 4(B) Fund 23	30-4952		<u>80,000</u>
Expenses			
Engineering- Gallion Street	30-511-697	<u>20,000</u>	
Construction-Gallion Street	30-511-698	<u>60,000</u>	

[To amend the FY2025 budget as shown above to recognize the revenue and appropriate the expense for the cost of Gallion Street Engineering and Construction.]

Account Name:	Dept-Acct Number:	Budget Increase	Budget Decrease
Fund 23 Ingleside Development Corp.			
Revenues/Fund Balance			
Fund Balance Reserve-4(B)	23-3000		<u>280,000</u>
Expenses			
Capital- Basketball Pavilion	23-500-742	<u>280,000</u>	

[To amend the FY2025 budget as shown above reduce the fund balance account and appropriate the expense for the cost of Basketball Pavillion.]

Account Name:	Dept-Acct Number:	Budget Increase	Budget Decrease
Fund 30 GF Capital Improvement Fund			
Revenues			
Transfer From IDC 4(B) Fund 23	30-4952		<u>280,000</u>
Expenses			
Basketball Pavillion	30-510-723	<u>280,000</u>	

[To amend the FY2025 budget as shown above to recognize the revenue and appropriate the expense for the cost of Basketball Pavillion.]

Account Name:	Dept-Acct Number:	Budget Increase	Budget Decrease
Fund 23 Ingleside Development Corp.			
Revenues/Fund Balance			
Fund Balance Reserve-4(B)	23-3000		<u>20,000</u>
Expenses			
Attorney Fees	23-500-465	<u>20,000</u>	

To amend the FY2025 budget as shown above to reduce the fund balance account and appropriate the expense for additional Attorney fees.]

THAT all Ordinance or parts of Ordinances in conflict with this Ordinance are repealed to the extent of such conflict only.

THAT if for any reason any section, paragraph, subdivision, clause, phrase, word or provision of this ordinance shall be held invalid or unconstitutional by final judgement of a court of competent jurisdiction, it shall not affect any other section, paragraph, subdivision, clause, phrase, word or provision of this ordinance, for it is the definite intent of this City Council that every section, paragraph, subdivision, clause, phrase, word or provision hereof be given full force and effect for its purpose.

THAT this Ordinance shall not be codified, but shall become effective on and after adoption and publication as required by law.

PASSED, APPROVED AND ADOPTED this _____ day of _____ 2025.

CITY OF INGLESIDE, TEXAS

Pedro Oscar Adame, Mayor

ATTEST:

Jana Stork, City Secretary

CITY COUNCIL AGENDA

Regular Meeting: January 28, 2025

AGENDA ITEM: 16

Deliberate and take appropriate action on the first and only reading of an Ordinance amending the Fiscal Year 2024-2025 budget for the City of Ingleside, Texas, for the appropriation of the Grant Funds from the Office of Governor, Public Safety Office, Criminal Justice Division for the FY 2025 License Plate Reader Project Grant for the Police department.

SUBMITTED BY: Priscilla Solis, Assistant Director of Finance

APPROVED FOR AGENDA: Brenton Lewis, City Manager

BACKGROUND:

On February 13, 2024, the Police Department requested to accept the the FY 2025 for the Office of Governor, Public Safety Office, Criminal Justice Division License Plate Reader Program in the amount of \$25,000 of grant funds.

The City Charter states, "One reading shall be required for emergency and budget/tax ordinances". The City Attorney concurs that only one reading shall be required to pass this budget amendment ordinance.

FISCAL ANALYSIS:

Fund 25 GRANTS FUND

Increase

Revenues

PD-TXDOT-LICENSE PLATE READER	25-4510	<u>25,000</u>
-------------------------------	---------	---------------

Increase Expenses

PD-EQUIPMENT	25-509-764	<u>25,000</u>
--------------	------------	---------------

RECOMMENDATION:

Request Council approve amending the fiscal year 2024-2025 budget for the City of Ingleside, Texas, for the Grants Fund from the Office of Governor, Public Safety Office, Criminal Justice Division for the FY 2025 License Plate Reader Program Grant for the Police Department.

ATTACHMENTS:

1. ORD 2025-XXX 2025-01-28 ORDINANCE NO FY2025-XX BUDGET AMENDMENT LICENSE PLATE READER GRANTS

ORDINANCE NO. 2025-__

AN ORDINANCE AMENDING THE FISCAL YEAR 2024-2025 BUDGET FOR THE CITY OF INGLESIDE, TEXAS, FOR THE APPROPRIATION OF THE GRANT FUNDS FROM THE OFFICE OF GOVENOR, PUBLIC SAFETY OFFICE, CRIMINAL JUSTICE DIVISION FOR THE FY 2025 LICENSE PLATE READER PROJECT GRANT FOR THE POLICE DEPARTMENT.

BE IT ORDAINED BY THE CITY COUNCIL OF INGLESIDE, TEXAS:

WHEREAS, it was unforeseen when the budget was adopted that there would be a need for funding for these expenditures this fiscal year.

BE IT ORDAINED by the City Council of the City of Ingleside that the Fiscal Year 2024-2025 budget be amended as shown as follows:

CITY OF INGLESIDE DEPARTMENT REVENUES AND EXPENSES BUDGET AMENDMENT				
Account Name:	Dept-Acct Number:	Budget Increase	Budget Decrease	
Fund 25	GRANTS FUND			
Revenues				
PD-TXDOT-LICENSE PLATE READER	25-4510	<u>25,000</u>		
Expenses				
PD-EQUIPMENT	25-509-764	<u>25,000</u>		

[To amend the FY2025 budget as shown above to recognize the revenue and appropriate the expense for the Office of the Governor, Public Safety Office, Criminal Justice Division for the License Plate Reader Grant.]

THAT all Ordinance or parts of Ordinances in conflict with this Ordinance are repealed to the extent of such conflict only.

THAT if for any reason any section, paragraph, subdivision, clause, phrase, word or provision of this ordinance shall be held invalid or unconstitutional by final judgement of a court of competent jurisdiction, it shall not affect any other section, paragraph, subdivision, clause, phrase, word or provision of this ordinance, for it is the definite intent of this City Council that every section, paragraph, subdivision, clause, phrase, word or provision hereof be given full force and effect for its purpose.

THAT this Ordinance shall not be codified, but shall become effective on and after adoption and publication as required by law.

PASSED, APPROVED AND ADOPTED this _____ day of _____ 2025.

CITY OF INGLESIDE, TEXAS

Pedro Oscar Adame, Mayor

ATTEST:

Jana Stork, City Secretary

CITY COUNCIL AGENDA

Regular Meeting: January 28, 2025

AGENDA ITEM: 17

Deliberate and take appropriate action on the first and only reading of an Ordinance amending the Fiscal Year 2024-2025 Budget for the City of Ingleside, Texas, for the General Fund for the appropriation of the donation funds for the Volunteer Fire Department received from Enbridge for Radios and Plains Marketing for Decontamination Units.

SUBMITTED BY: Priscilla Solis, Assistant Director of Finance

APPROVED FOR AGENDA: Brenton Lewis, City Manager

BACKGROUND:

The Volunteer Fire Department received two donations to purchase Radios and Decontamination Units to be charged to the Volunteer Fire Department.

The City Charter states, "One reading shall be required for emergency and budget/tax ordinances." The City Attorney concurs that only one reading shall be required to pass this budget amendment ordinance.

FISCAL ANALYSIS:

Volunteer Fire Department Donation: Enbridge \$5,000.

Volunteer Fire Department Donation: Plains Marketing \$4,500.

RECOMMENDATION:

Staff recommends Council approve the ordinance to amend the fiscal year 2024-2025 Budget as presented.

ATTACHMENTS:

1. ORD 2025-XXX 2025-01-28 ORDINANCE NO FY2025-XX BUDGET AMENDMENT DONATIONS VFD-ENBRIDGE AND PLAINS MARKETING

ORDINANCE NO. 2025-__

AN ORDINANCE AMENDING THE FISCAL YEAR 2024-2025 BUDGET FOR THE CITY OF INGLESIDE, TEXAS, FOR THE GENERAL FUND FOR THE APPROPRIATION OF THE DONATION FUNDS FOR THE VOLUNTEER FIRE DEPARTMENT RECEIVED FROM ENBRIDGE FOR RADIOS AND PLAINS MARKETING FOR DECONTAMINATION UNITS.

BE IT ORDAINED BY THE CITY COUNCIL OF INGLESIDE, TEXAS:

WHEREAS, it was unforeseen when the budget was adopted that there would be a need for funding for these expenditures this fiscal year.

BE IT ORDAINED by the City Council of the City of Ingleside that the Fiscal Year 2024-2025 budget be amended as shown as follows:

CITY OF INGLESIDE
DEPARTMENT REVENUES AND EXPENSES
BUDGET AMENDMENT

Account Name:	Dept-Acct Number:	Budget Increase	Budget Decrease
Fund 10 General Fund			
Revenues			
Donations- Vol Fire Dept	10-4592	<u>5,000</u>	
Expenses			
Donations- Vol Fire Dept Exp	10-508-590	<u>5,000</u>	

[To amend the FY2025 budget as shown above to recognize the revenue and appropriate the expense for the donation to the Volunteer Fire Department for the purchase of Radios.]

Revenues			
Donations-Vol Fire Dept	10-4592	<u>4,500</u>	
Expenses			
Donations-Vol Fire Dept Exp	10-508-590	<u>4,500</u>	

[To amend the FY2025 budget as shown above to recognize the revenue and appropriate the expense for the donation to the Volunteer Fire Department for the purchase of Decontamination Units.]

THAT all Ordinance or parts of Ordinances in conflict with this Ordinance are repealed to the extent of such conflict only.

THAT if for any reason any section, paragraph, subdivision, clause, phrase, word or provision of this ordinance shall be held invalid or unconstitutional by final judgement of a court of competent jurisdiction, it shall not affect any other section, paragraph, subdivision, clause, phrase, word or

provision of this ordinance, for it is the definite intent of this City Council that every section, paragraph, subdivision, clause, phrase, word or provision hereof be given full force and effect for its purpose.

THAT this Ordinance shall not be codified, but shall become effective on and after adoption and publication as required by law.

PASSED, APPROVED AND ADOPTED this _____ day of _____ 2025.

CITY OF INGLESIDE, TEXAS

Pedro Oscar Adame, Mayor

ATTEST:

Jana Stork, City Secretary

CITY COUNCIL AGENDA

Regular Meeting: January 28, 2025

AGENDA ITEM: 18

Deliberate and take appropriate action on approval of the HOT Fund Post Event Form from Ingleside Chamber of Commerce for the Ingleside Renaissance Faire Event and authorizing payment in the amount of \$46,120.00.

SUBMITTED BY: Jodi Carr, Director of Economic Development

APPROVED FOR AGENDA: Brenton Lewis, City Manager

BACKGROUND:

City Council approved the original HOT Fund Application from the Ingleside Chamber of Commerce on 8-13-24 covering the total amount of \$101,000.00 with \$54,880 funded in advance for advertising. This amount was put into the 2025 Budget.

The Chamber of Commerce held the Ingleside Renaissance Faire event December 14-15, 2024 at Live Oak Park. The Post Event Form is attached with expenses totaling \$101,000.00.

The last Renaissance Faire was held in 2018 and the City asked the Chamber to bring the event back. This year was a success and the Chamber is already planning on continuing this event. 25 hotel rooms were rented as a result of the Renaissance Faire.

The HOT Fund Post Event Form has been reconciled and expenses verified to comply with Chapter 351 of the Texas Tax Code.

FISCAL ANALYSIS:

\$46,120.00 due to Ingleside Chamber of Commerce which was included in the 2025 Budget (Fund 21). These funds are generated through the Hotel Occupancy Tax.

RECOMMENDATION:

Staff recommends approval of Post Event Form and authorizing payment to Ingleside Chamber of Commerce in the amount of \$46,120.00.

ATTACHMENTS:

1. Post Event Ren Faire 24

\$ 46,120

21-500-604

POST EVENT REPORT FORM

**Note: You are required to submit copies of the documentation showing hotel room nights associated with your event with your Post Event Report.*

Date: 1/9/2025

ORGANIZATION INFORMATION

Name of Organization: Ingleside Chamber of Commerce & Visitor Center
Address: 2809 Main Street / PO BOX 686
City, State, Zip: Ingleside, TX 78362
Contact Name: Barbara Gregg
Contact Phone Number: 361-776-2906

PROJECT OR EVENT

Name of Event or Project: Ingleside Renaissance Faire
Date of Event or Project: December 14th & 15th, 2024
Primary Location of Event or Project: 2020 Parkview Pl (Live Oak Park) Ingleside, TX
Primary Purpose of Funded Event/Project: To draw visitors to Ingleside
Amount Received from Hotel Occupancy Tax Funds: \$101,000.00
Amount Used from Hotel Occupancy Tax Funds: \$101,000.00
City Advanced \$54,880 for Ads.
How many years have you held this Event or Project? 20 yrs (back after 5 years)

\$ 46,120 due
Chamber

Event Funding Information

1. Actual percentage of funded Event costs covered by hotel occupancy tax: 100%
2. Actual percentage of Facility costs covered by hotel occupancy tax (if applicable): _____
3. Actual percentage of Staff costs covered by hotel occupancy tax (if applicable): _____
4. If staff costs were covered, estimate of actual hours staff spent on funded Event: _____
5. Did the event charge admission? Was there a net profit from this event? If there was a Net profit, what was the amount and how is it being used?

Yes, \$20.00 per person, Kids 8 & under / Military Free. Net profit will be used to
fund other events and to give back to the community

Event Attendance Information

1. How many people did you predict would attend this Event? (Number submitted in application for hotel occupancy tax funds): 2000-2500
2. What would you estimate was the actual attendance at the event? 4000-5000
3. How many room nights were generated at Ingleside hotels, motels, or bed & breakfasts by attendees of this Event or Project? 2 nights, 20 rooms
4. If this Event has been funded by hotel occupancy tax in the last three years, how many room nights were generated at Ingleside hotels, motels, or bed & breakfasts by attendees of this Event or Project?

Last Year N/A
Two Years Ago N/A
Three Years ago N/A
5. What method did you use to determine the number of people who booked rooms at Ingleside hotels, motels, or bed & breakfasts (e.g.; room block usage, information, survey of hoteliers, etc.)? survey of hotels

6. Was a room block established for this Event at an area hotel(hotels) yes, and if so, did the room block fill. yes If the room block did not fill, how many rooms were picked up? _____

Event Promotion Information

1. Please check all efforts your organization actually used to promote this Event and how much was actually spent in each category:

Newspaper: \$ _____
Radio: \$ 6,000
TV: \$ 9000
Press Release \$ _____
Other \$ 60,000
2. Did you include a link to the Ingleside Visitor's Center or other source on your promotional handouts and in your website for booking hotel nights during this event? yes
3. Did you negotiate a special rate or hotel/event package to attract overnight stays? yes

4. What new marketing initiatives did you utilize to promote hotel and convention activity for this Event?
Posted on social media and website advertising hotels in Ingleside

5. Please attach samples of documents showing how the City of Ingleside was recognized in your advertising/promotional campaign.
6. Please attach at least one sample of all forms of advertising/promotion used in your campaign. If the sample itself does not indicate the medium (radio, TV, print, or mail) used or where the advertising took place (e.g. a city's newspaper, or a radio spot that does not indicate the city where the spot was played), please include other information that would show location of the advertising and medium utilized.

Sporting Related Events

1. If the Event funded by hotel occupancy tax was a sporting-related function/facility, how many individuals actually participated in this event? _____
2. If the event was a sporting-related function/facility, how many of the participants were from another city or county? _____
3. If the event was a sporting-related function/facility, quantify how the activity substantially increased economic activity at hotel and motels within the city or its vicinity?

Additional Event Information

What Ingleside businesses did you utilize for food, supplies, materials, printing, etc?
HEB, Lone Star Lumber, Whataburger, Stripes, Sonic,

Please Submit no later than 60 days after the event to:

City of Ingleside Attn:
Economic Development Director
P.O. Drawer 400
Ingleside, TX 78362

	A	B	C	D	E
1	Fund	Vendor	Amount	Description of Expense	
2	"C"	Lamar Advertising	✓ \$54,880.00	Billboards ✓ need inv w/ \$	4 checks 8 invoices
3		Band Tango Radio	• \$1,000.00	Radio Advertising	
4		KRIS TV	\$4,550.00	TV/Digital/Facebook 4600	6 invoices
5		I Heart Media	• \$4,000.00	Radio Advertising	1 invoice w/backup
6		KIII	• \$5,150.00	TV/Digital/Facebook	4 invoices
7		KLTG-FM	• \$1,000.00	Radio Advertising	3 invoices
8		B&T Rents	• \$924.00	Tables & Chairs	
9		CC Rentals	• \$3,639.25	Restrooms/Trash Dumpster	
10		Pure Water & Ice	• \$455.40	Ice	
11		AA Express	✓ \$1,418.70	T-Shirts ? - 256.92	2 invoices 1161.78
12		GIG'S	• \$3,842.91	Slide/Rock wall	2 invoices (1 cc payment)
13		Rockit It Services	• \$2,888.00	Commercial and All Graphics	
14		Event Security	• \$4,550.00	Security	8 checks
15		CR3 Designs	• \$455.00	Signs	
16		Adrian Gonzalez	✓ \$200.00	Town Crier	entertain - move "D" } \$800 entertain - move "D" }
17		Martin Hill	✓ \$600.00	Tribal Circus	
18		January Goelte	• \$4,000.00	Petting Zoo	
19		Oriental Trading	• \$1,349.90	Mugs	C/C payment
20		Padre Island Axe Hats	• \$1,500.00	Axe Throwing	
21		HEB	• \$229.33	Soda and water	2 receipts
22		Lowe's	• \$121.16	Rugs for stage	2 receipts
23		TABC	• \$153.63	TABC License	C/C payment
24		Total Category "C"	\$96,907.28		
25	"D"	Danielle Morgan	• \$450.00	Variety Show	
26		Mark Williams	• \$1,000.00	Music	
27		Colleen Pannell	• \$300.00	Variety Show	
28		Mark Logsdon	• 1,200.00	Magic Escape Show	
29		Dean Campbell	• \$300.00	Music	
30		Desirre de Jongh	• \$1,000.00	Mermaid	
31		Total Category "D"	\$4,250.00		
32				TOTALS	
33				Requested Hot Funds	\$101,000.00
34				Category C	\$96,907.28
35				Category D	\$4,250.00
36				Total	\$101,157.28
37				Chamber pays	(\$157.28)
38				Hot Funds Advance	(\$54,880.00)
39				Balance Due Chamber	\$46,120.00

OK
JC
1-17-25

\$ 46,120

	A	B	C	D
1	2024 Ingleside Renaissance Faire Hot Funds Request			
2				
3	HOT Funds Account "C"			
4	Advertising	Cost		
5	TV	\$ 8,500.00		
6	Radio	\$ 3,000.00		
7	Digital	\$ 6,500.00		
8	Billboards	\$ 54,880.00		54,880
9	Newspapers	\$ 2,120.00		
10				
11	Administration	\$ 21,871.00		
12				
13				
14	Total for Category C	\$ 96,871.00		
15				
16				
17	HOT Funds Account "D"			
18	Graphic Arts	\$4,129.00		
19				
20				
21	Hot Funds Requested	\$ 101,000.00		
22				
23				
24	The Ingleside Chamber would like to request \$54,880.00 in advance to pay for			
25	Billboard Advertising			
26				

Advanced
\$ 54,880

CITY COUNCIL AGENDA

Regular Meeting: January 28, 2025

AGENDA ITEM: 19

Deliberate and take appropriate action on a Resolution appointing members to the Coastal Bend Council of Governments Board of Directors.

SUBMITTED BY: Elisabeth Staton, Administrative Assistant

APPROVED FOR AGENDA: Brenton Lewis, City Manager

BACKGROUND:

As a member of the Coastal Bend Council of Governments, the City of Ingleside has one (1) voting board member representative and one (1) alternate voting member appointment to the Board. The monthly board meetings are scheduled as follows:

January 23rd	July 24th
February 27th	August 28th
March 27th	September 25th
April 24th	October 23rd
May 22nd	November- No Meeting
June 26th	December 11th

Current representatives of the City of Ingleside are:

Council Member David Pruitt – Representative
Mayor Adame – Alternate Representative

FISCAL ANALYSIS:

N/A

RECOMMENDATION:

Staff recommends adopting the Resolution for the Council Appointments of the Representative and the Alternate Representative to the Coastal Bend Council of Governments.

ATTACHMENTS:

1. Backup - CBCOG Board Membership and Meeting Schedule
2. RES 2025-XX - Resolution Appoint CBCOG



COASTAL BEND
COUNCIL OF GOVERNMENTS

January 15, 2025

Dear CBCOG Member:

Enclosed is a statement for your City or County Membership dues to the Coastal Bend Council of Governments (CBCOG) for 2025. The CBCOG membership adopted the 2025 Annual Budget on December 13, 2024, establishing the 2025 dues structures. The City and County membership dues are based on \$0.14 cents per capita using the 2020 redistricting census for Counties and the 2025 census for cities. Membership dues are payable upon receipt and become delinquent on April 30, 2025. We are providing you with our ACH Direct Deposit information as an option to remit your payment.

Membership dues are an essential source of local revenues in assisting the CBCOG meeting match requirements for state and federal grants. These grants provide regional planning for the Coastal Bend Region in the program areas of emergency communication systems, criminal justice, solid waste management, environmental protection, homeland security, economic development planning and nutrition and social services for the elderly population.

Government members have voting representative(s) on the CBCOG Board of Directors based on population. Please fill out the attached Board Membership Designation Form and email the completed form to johnmaldonado@coastalbendcog.org by Friday, February 21, 2025. Board meetings are held on the 4th Thursday of the month except for November (no meeting) and December (2nd Thursday).

We appreciate your continued support and look forward to working with you and your organization in 2025. Please feel free to contact me if you have any questions or would like additional information regarding any of our programs.

Sincerely,

Emily Martinez, MPA
Executive Director

Enclosures:

- (1) 2025 Membership Invoice
- (2) Schedule of Board of Directors' Monthly Meetings
- (3) Board Membership Designation Form

2910 Leopard St. • P.O. Box 9909 • Corpus Christi, TX, 78469 • Main (361) 883-5743 • Fax (361) 883-5749
www.coastalbendcog.org



Coastal Bend Council of Governments

2025 Board Meeting Schedule

Schedule of tentative Coastal Bend Council of Governments Board of Directors meetings:

January 23rd

February 27th

March 27th

April 24th

May 22nd

June 26th

July 24th

August 28th

September 25th

October 23rd

November – No Meeting

December 11th

Meetings are scheduled on the fourth Thursday of each month. Please note the exceptions are no meeting in November and December's meeting is the second Thursday. All meetings are at 2 p.m. in the John Buckner Conference Room, Coastal Bend Council of Governments, 2910 Leopard Street, Corpus Christi, TX 78408.

Meeting agendas will be emailed to Board of Directors on the Thursday, one week before each meeting. The agenda and Zoom link will be posted on our website: www.coastalbendcog.org.

2025 Board Membership Designation Form

Please email completed form to johnmaldonado@coastalbendcog.org.

Please list your **one (1)** voting board member representative for the City of Ingleside.

Name: _____

Title: _____

Email: _____

Phone: _____

Please list **one (1)** alternate voting members.

Name: _____

Title: _____

Email: _____

Phone: _____

Representatives approved by:

RESOLUTION NO. 2025-__

**A RESOLUTION APPOINTING MEMBERS TO THE COASTAL BEND
COUNCIL OF GOVERNMENTS BOARD OF DIRECTORS.**

WHEREAS, the Coastal Bend Council of Governments is a volunteer association of local governments including 32 cities and 11 counties, and other public and private entities; and

WHEREAS, Coastal Bend Council of Governments serves a 11-county region in the Texas Coastal Bend and has over; and

WHEREAS, Coastal Bend Council of Governments is a designated Area Agency on Aging, an Economic Development District, a designated water quality management agency and provides regional solid waste management planning, coordination, and implementation of projects; and

WHEREAS, Coastal Bend Council of Governments also delivers Criminal Justice services, Emergency Communications (9-1-1) planning and implementation, and Department of Homeland Security Services; and

NOW, THEREFORE, the City of Ingleside hereby appoints _____

as the voting representative and appoints _____ as the alternate representative to the Coastal Bend Council of Governments Board of Directors.

PASSED AND APPROVED this ____ day of _____, 2025 by ____ (ayes) to ____ (nays) with ____ abstentions by a vote of the City Council of the City of Ingleside, Texas.

CITY OF INGLESIDE, TEXAS

Pedro Oscar Adame, Mayor

ATTEST:

Jana Stork, City Secretary

CITY COUNCIL AGENDA

Regular Meeting: January 28, 2025

AGENDA ITEM: 20

Deliberate and take appropriate action on the General Engineering Services Agreement between the City of Ingleside and Hanson Professional Services, Inc.

SUBMITTED BY: Brenton Lewis, City Manager

APPROVED FOR AGENDA: Brenton Lewis, City Manager

BACKGROUND:

The City Council has been in the process of reviewing agreements and contracts that have been in effect for more than five (5) years to determine Requests for Qualifications and/or Proposals should be sought. At the regular City Council meeting dated January 14, 2025, Council Member Diehl requested an update on the current general services agreement for engineering services. The City of Ingleside and Hanson Professional Services, Inc entered into an agreement on April 11th, 2017 to perform engineering services only as, from time to time, may be requested by the City Council or the City Manager. It is contemplated that general engineering services will be performed under this contract, including tasks that require special consideration of limited, specific duration and scope. Task Orders must be developed and approved in advance for all special projects. Fees for general services matters not subject to a task order shall not exceed \$5,000 in any given month without prior approval from the City Manager.

City Staff will be receiving and publicly opening Request for Qualifications (RFQ's) for General Services Agreement for Engineering Services (City Engineer) on February 27, 2025.

The City has also began requesting project based RFQ's for engineering services.

FISCAL ANALYSIS:

Engineering fees are based on the Task Order.

RECOMMENDATION:

Staff recommends to take no action on the agreement and to continue with the process to advertise RFQ's for General Engineering Services.

ATTACHMENTS:

1. 2017 04 11 Hanson General Engineering Services Agreement_189549

GENERAL ENGINEERING SERVICES AGREEMENT

THIS AGREEMENT is made effective as of this 11 day of April, 2012, ("Effective Date") between the City of Ingleside, Texas, hereinafter referred to as "CITY", and Hanson Professional Services, Inc., hereinafter referred to as "ENGINEER," for engineering services as described in this Agreement. In consideration of the mutual covenants contained herein, the parties agree as follows:

SECTION I. GENERAL SERVICES

- 1) Scope and Standard Services: ENGINEER agrees to perform such engineering services only as, from time to time, may be requested by the City Council or the City Manager. It is contemplated that general engineering services will be performed under this contract, including tasks that require special consideration of limited, specific duration and scope. Task Orders, in the form attached as Exhibit A, must be developed and approved in advance for all special projects. Fees for general services matters not subject to a task order shall not exceed \$5,000 in any given month without prior approval from the City Manager. All services hereunder will be performed in a timely manner, All services hereunder will be performed with that degree of skill and care normally exercised by professional engineers practicing under similar circumstances, and in accordance and in compliance with applicable federal, state and local law.
- 2) Fee: (a) CITY will pay ENGINEER a fee for the general services performed hereunder and will reimburse costs, both at the rates reflected on the attached Rate Sheet attached hereto as Exhibit B, provided that the Rate Sheet may be changed in the future by written agreement between CITY and ENGINEER. ENGINEER will bill for general services rendered and costs incurred hereunder on a monthly basis, and such bill will be timely paid. (b) Notwithstanding the foregoing, the fee with respect to a matter which is subject to a Task Order shall be as set forth in said Order. (c) All funding obligations of CITY under this Agreement are subject to the appropriation of funds in its annual budget. CITY may direct ENGINEER to suspend pending receipt and appropriation of funds. All billing for engineering services rendered, whether for general services or for task orders, shall describe in itemized detail the services performed and fees/rates for services, including dates and hours worked, the names of the consultant/s performing the work, and the nature or subjectmatter of the work performed.

SECTION 2. SPECIAL PROJECT TASK ORDERS

- 1) Each special project which ENGINEER performs for CITY hereunder shall be designated by a "Task Order." When a special project will involve deliverables, the Task Order for the special project shall specify the deliverables, and make timing of payment contingent upon satisfactory completion of performance and receipt of the deliverables. A sample Task Order is attached to this Agreement marked as Exhibit "A." and incorporated herein by reference for all intents and purposes. No Task Order shall be binding or enforceable unless and until it

has been properly executed by both CITY and ENGINEER. Each properly executed Task Order shall become a separate supplemental agreement to this Agreement.

- 2) In resolving potential conflicts between this Agreement and the Task Order pertaining to a specific project, the terms of the Task Order shall control.
- 3) ENGINEER will provide the Scope of Services as set forth in each Task Order.
- 4) Under this Agreement, ENGINEER will provide services for special projects on a Task Order basis (reference Exhibit A) for a range of services related to assisting the CITY with typical municipal engineering, surveying and environmental projects including, surveying, design, permitting, construction and project management. All work will be subject to authorization from CITY. A detailed Scope of Services and Fee provision, both amount and payment, will be contained in each Task Order.
- 5) The actual schedule and duration for each task is subject to the detailed scope of work negotiated between CITY and ENGINEER for desired tasks, the sequencing of the tasks, and the timing of CITYs' task authorizations. The actual schedule for each task will be established in each Task Order.
- 6) CITY shall have the responsibilities described in each Task Order.
- 7) Compensation for ENGINEER's Services shall be in accordance with each Task Order. The anticipated fee structure will be established as a negotiated lump-sum amount, or on a time and materials (T&M) basis with a negotiated not-to-exceed amount. The fee for Task Orders that are authorized on a T&M basis will be determined using ENGINEER's current rate schedule (attached). These rates are subject to revision in the future by written agreement between CITY and ENGINEER.

SECTION 3. INSURANCE

MANDATORY INSURANCE REQUIREMENTS & INDEMNIFICATION FOR A/E PROFESSIONAL SERVICES/CONSULTANT SERVICES

- A. Engineer must not commence work under this agreement until all insurance required herein has been obtained and such insurance has been approved by the City. The Engineer must not allow any subcontractor to commence work until all similar insurance required of the subcontractor has been obtained.
- B. Engineer must furnish to the City, two (2) copies of Certificates of Insurance, showing the following minimum coverages by insurance company(s) acceptable to the City. The City must be named as an additional insured for all liability policies, and a blanket waiver of subrogation is required on all applicable policies.

TYPE OF INSURANCE	MINIMUM INSURANCE COVERAGE
30-Day Written Notice of Cancellation, non-renewal or material change required on all certificates	Bodily Injury & Property Damage Per occurrence- aggregate

COMMERCIAL GENERAL LIABILITY \$1,000,000 COMBINED SINGLE LIMIT Including: 1. Broad Form 2. Premises – Operations 3. Products/Completed Operations 4. Contractual Liability 5. Independent Contractors	
AUTOMOBILE LIABILITY to include 1. Owned vehicles 2. Hired-Non-owned vehicles	\$1,000,000 COMBINED SINGLE LIMIT
PROFESSIONAL LIABILITY including: Coverage provided shall cover all employees, officers, directors and agents 1. Enors and Omissions	\$1,000,000 per claim/\$2,000,000 aggregate (Defense costs not included in face value of the policy) If claims made policy, retro date must be prior to inception of agreement; have extended reporting period provisions and identity any limitations regarding who is an insured
WORKERS' COMPENSATION	Which Complies with the Texas Workers Compensation Act
EMPLOYERS' LIABILITY	500,000/500,000/500,000

- C. In the event of accidents of any kind, Engineer must furnish the City with copies of all reports within (10) ten days of accident.
- D. Engineer must obtain workers' compensation coverage through a licensed insurance company in accordance with Texas law. The contract for coverage must be written on a policy and endorsements approved by the Texas Department of Insurance. The coverage provided must be in amounts sufficient to assure that all workers' compensation obligations incurred will be promptly met.
- E. Engineer's financial integrity is of interest to the City; therefore, subject to Engineer's right to maintain reasonable deductibles in such amounts as are approved by the City, Engineer shall obtain and maintain in full force and effect for the duration of this Contract, and any extension hereof, at Engineer's sole expense, insurance coverage written on an occurrence basis, by companies authorized and admitted to do business in the State of Texas and with an A.M. Best's rating of no less than A-VII.
- F. The City shall be entitled, upon request and without expense, to receive copies of the policies, declarations page and all endorsements thereto as they apply to the limits required by the City, and may require the deletion, revision, or modification of particular policy terms, conditions, limitations or exclusions (except where policy provisions are established by law or regulation binding upon either of the parties hereto or the underwriter of any such policies). Engineer shall be required to comply with any such requests and shall submit a copy of the replacement certificate of insurance to City at the address provided below within 10 days of the requested change. Engineer shall pay any costs incurred resulting from said changes. All notices under this Article shall be given to City at the following address:

City of Ingleside
Attn: City Manager
P. O. Drawer 400
Ingleside, TX 78362
Phone: (361) 776-2517

G. Engineer agrees that with respect to the above required insurance, all insurance policies are to contain or be endorsed to contain the following required provisions:

- i. Name the City and its officers, officials, employees, volunteers, and elected representatives as additional insured by endorsement, as respects operations and activities of, or on behalf of, the named insured performed under contract with the City, with the exception of the workers' compensation and professional liability policies;
 - ii. Provide for an endorsement that the "other insurance clause shall not apply to the City where the City is an additional insured shown on the policy;
 - iii. Workers' compensation and employers' liability policies will provide a waiver of subrogation in favor of the City;
 - iv. Provide thirty (30) calendar days advance written notice directly to City of any suspension, cancellation, non-renewal or material change in coverage, and not less than ten (10) calendar days advance written notice for nonpayment of premium.
- H. Within five (5) calendar days of a suspension, cancellation, or non-renewal of coverage, Successful Engineering shall provide a replacement Certificate of Insurance and applicable endorsements to City. City shall have the option to suspend Engineer's performance should there be a lapse in coverage at any time during this contract. Failure to provide and to maintain the required insurance shall constitute a material breach of this contract.
- I. In addition to any other remedies the City may have upon Engineer's failure to provide and maintain any insurance or policy endorsements to the extent and within the time herein required, the City shall have the right to order Engineer to stop work hereunder, and/or withhold any payment(s) which become due to Engineer hereunder until Engineer demonstrates compliance with the requirements hereof.
- J. Nothing herein contained shall be construed as limiting in any way the extent to which Engineer may be held responsible for payments of damages to persons or property resulting from Engineer's or its subcontractors' performance of the work covered under this agreement.
- K. It is agreed that Engineer's insurance shall be deemed primary and non-contributory with respect to any insurance or self-insurance carried by the City for liability arising out of operations under this contract.
- L. It is understood and agreed that the insurance required is in addition to and separate from any other obligation contained in this contract.

INDEMNIFICATION AND HOLD HARMLESS

Engineering shall indemnify, save harmless and defend the City, and its agents, servants, and employees, and each of them against and hold it and them harmless from any and all lawsuits, claims, demands, liabilities, losses and expenses, including court costs and attorneys' fees, for or on account of any injury to any person, or any death at any time resulting from such injury, or any damage to any property, which may arise or which may be alleged to have arisen out of or in connection with the negligent performance of

Engineer's services covered by this contract. The foregoing indemnity shall apply except if such injury, death or damage is caused by the sole or concurrent negligence of the City, its agents, servants, or employees or any other person indemnified hereunder.

SECTION 4. MISCELLANEOUS:

- 1) **Applicable Law:** This agreement shall be construed under and in accord with the laws of the State of Texas, and all obligations of the parties created herein are performable in Ingleside, Texas.
- 2) **Binding:** This Agreement shall be binding upon and inure to the benefit of the parties and their respective heirs, executors, administrators, legal representatives, successors and assigns permitted by this Agreement.
- 3) **Severance:** In the event that one or more of the provision contained in this Agreement shall for and reason be held to be invalid, illegal, or unenforceable in any respect, such invalidity, or unenforceability shall not affect and other provision thereof and the Agreement shall be construed as if such invalid, illegal, or unenforceable provision had never been contained herein.
- 4) **Amendment:** This Agreement may be amended by written agreement of the parties hereto.
- 5) **Termination of Contract:** Either party shall have the right to terminate this Agreement , with or without cause, by giving written notice to the other party of such termination and specifying the effective date thereof; provided that ENGINEER cannot terminate a Task Order project before completion, except with the written consent of CITY or for good cause. In such event, all finished or unfinished documents, data, studies, surveys, drawings, maps, models, photographs, and reports prepared by ENGINEER under this Agreement shall, at the option of OWNER, become its property. All work performed by ENGINEER is property of OWNER. If the Agreement is terminated, ENGINEER will be paid for the services provided and expenses incurred to the termination date.
- 6) **Confidentiality:** All of the reports, information, data, etc. prepared or assembled by ENGINEER under this Agreement are confidential and ENGINEER agrees that they shall not be made available to any individual or organization without the prior approval of OWNER.
- 7) **Exhibits:** There are two exhibits to this Agreement, Exhibit A Task Order form and Exhibit B Rate Sheet, both of which are incorporated herein by reference as part of this Agreement.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the day and year first written above.

CITY OF INGLESIDE

BY:

NAME:

TITLE:

ADDRESS:

Melissa Byrne Vossmer
Melissa Byrne Vossmer
City Manager
2671 San Angelo
Ingleside, Texas 78362

HANSON PROFESSIONAL SERVICES, INC.

BY:

NAME:

TITLE:

ADDRESS:

John A. Michael, P.E.
Senior Vice President
450 I Gollihar
Corpus Christi, Texas 78411

EXHIBIT A

TASK ORDER

This Task Order pertains to an Agreement by and between the City of Ingleside, ("OWNER"), and HANSON PROFESSIONAL SERVICES, Inc. ("ENGINEER"), dated _____ 20__, ("the Agreement"). ENGINEER shall perform services on the project described below as provided herein and in the Agreement. This Task Order shall not be binding until it has been properly signed by both parties. Upon execution, this Task Order shall supplement the Agreement as it pertains to the project described below.

TASK ORDER NUMBER:
PROJECT NAME:

PART 1. PROJECT DESCRIPTION:

PART 2. SCOPE OF SERVICES TO BE PERFORMED BY ENGINEER ON THE PROJECT:

PART 3. OWNER'S RESPONSIBILITIES:

PART 4. PROJECT SCHEDULE

PART 5. PROJECT DELIVERABLES

PART 6. FEE AND PAYMENT:

PART 7. OTHER:

This Task Order is executed this _____ day of _____, 20____

CITY OF INGLESIDE

HANSON PROFESSIONAL SERVICES,
INC.

BY: _____

BY: _____

NAME: _____

NAME: _____

TITLE: _____

TITLE: _____

ADDRESS: _____

ADDRESS: _____

EXHIBITB
RATE SHEET



Rate Schedule

Custom Rate Schedule

NEI 272

Principal\$295.00

Engineer/Architect/Scientist Positions:

Engineer/Architect/Scientist VIII	\$200.00
Engineer/Architect/Scientist VII	\$181.00
Engineer/Architect/Scientist VI	\$165.00
Engineer/Architect/Scientist V	\$150.00
Engineer/Architect/Scientist IV	\$130.00
Engineer/Architect/Scientist III	\$115.00
Engineer/Architect/Scientist II	\$90.00
Engineer/Architect/Scientist I	\$80.00

Technical Positions:

Manager/Designer	\$136.00
Technician VII	\$125.00
Technician VI	\$99.00
Technician V	\$92.00
Technician IV	\$86.00
Technician III	\$76.00
Technician II	\$63.00
Technician I	\$58.00
Aide	\$40.00

Administrative Positions:

Administrative VII	\$170.00
Administrative VI	\$124.00
Administrative V	\$102.00
Administrative IV	\$80.00
Administrative III	\$70.00
Administrative II	\$50.00
Administrative I	\$30.00

Equipment Rental and Expendable Charges:

Environmental Truck including expendable supplies, and minor tools and equipment (per day)	\$150.00
Survey Truck including expendable supplies, and total station or GPS (per day)	\$500.00

1. The above rates cover straight time only. Overtime directed by the client will be surcharged by 25 percent.
2. Charges for outside consultants, contractors and equipment rental will be at invoice cost plus 10 percent.
3. Mileage charges for automobile = IRS-approved rate per mile. Mileage charges for mobile lab or truck = IRS-approved rate plus 15 cents per mile.
4. Services will be billed every four weeks and at the completion of the project. There will be an additional charge of 1½ percent per billing period compounded each billing period on amounts outstanding more than 28 days.
5. Rates are subject to change and may be superseded by a new schedule on or about January 31, 2018.

CITY COUNCIL AGENDA
Regular Meeting: January 28, 2025

AGENDA ITEM: 21

Deliberate and take appropriate action on approving State Highway 200 Joint Use Agreement (JUA) between the City of Ingleside and the Texas Department of Transportation.

SUBMITTED BY: Gary Paredez, Director of Infrastructure Services

APPROVED FOR AGENDA: Brenton Lewis, City Manager

BACKGROUND:

The City of Ingleside started a joint venture with TxDot several years back for the construction of State Hwy 200 which would allow the traffic from local industries to bypass the City of Ingleside. The City has a water line, sewer line, and a gas line that intersect the proposed State Hwy 200 route. TxDot is requesting that the City enter into a JUA for this crossing. The Engineering and an Opinion of Probable Construction Cost (OPCC) has been done, which is attached.

FISCAL ANALYSIS:

The OPCC is estimated at \$257,127.02. This amount is supposed to be included in the plans let out by TxDot for this construction. The JUA documents indicate the City is to be reimbursed for this amount from TxDot.

RECOMMENDATION:

Staff recommends approval of State Hwy 200 JUA.

ATTACHMENTS:

1. SH 200 (3540-01-001) City of Ingleside_U35_1-8-25



Standard Utility Agreement

U Number: **N/A** Utility ID: **U00010626**

District: Corpus Christi
ROW Project ID (TxC): STP 1602(265)
ROW CSJ: 3540-01-002
Construction CSJ: 3450-01-001
Highway Project Letting Date: 12-01-2027

County: San Patricio
Highway: SH 200
From: SH 361
To: FM 1069

This Agreement by and between the State of Texas, acting by and through the Texas Transportation Commission, ("**State**"), and City of Ingleside, ("**Utility**"), acting by and through its duly authorized representative, shall be effective on the date of approval and execution by and on behalf of the **State**.

WHEREAS, the **State** has deemed it necessary to make certain highway improvements as designated by the **State** and approved by the Federal Highway Administration within the limits of the highway as indicated above (the "**Highway Project**");

WHEREAS, the proposed Highway Project will necessitate the adjustment, removal, and/or relocation of certain facilities of the **Utility** as indicated in the following statement of work: [encase the City of Ingleside's following uncased utility lines:

- (1) 12" waterline - Encase approx. 180LF of 12" waterline with a [insert casing size] at Sta. 78+34
- (1) 6" sewer force main - Encase approx. 180LF of 6" sewer force main with a [insert casing size] at Sta. 78+50 ; and more specifically as shown in the **Utility's** plans, specifications and estimated costs, which are attached hereto as Attachment "A".

WHEREAS, the **State** will participate in the costs of the adjustment, removal, and relocation of certain facilities to the extent as may be eligible for State and/or Federal participation.

WHEREAS, the **State**, upon receipt of evidence it deems sufficient, acknowledges the **Utility's** interest in certain lands and facilities that entitle it to reimbursement for the adjustment, removal, and relocation of certain of its facilities located upon the lands as indicated in the statement of work above.

NOW, THEREFORE, BE IT AGREED:

The **State** will pay to the **Utility** the costs incurred in adjustment, removal, and relocation of the **Utility's** facilities up to the amount said costs may be eligible for **State** participation.

All conduct under this agreement, including but not limited to the adjustment, removal, and relocation of the facility, the development and reimbursement of costs, any environmental requirements, and retention of records will be in accordance with all applicable federal and state laws, rules and regulations, including, without limitation, the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act, 42 U.S.C. §§ 4601, et seq., the National Environmental Policy Act, 42 U.S.C. §§ 4321, et seq., the Buy America provisions of 23 U.S.C. § 313 and 23 CFR 635.410, as amended, Texas Transportation Code § 223.045, the Utility Relocations, Adjustments, and Reimbursements provisions of 23 CFR 645, Subpart A, and the Utility Accommodation provisions of 23 CFR 645, Subpart B.

The **Utility** shall supply, upon request by the **State**, proof of compliance with the aforementioned laws, rules, regulations, and guidelines prior to the commencement of the adjustment, removal, and relocation of the facility.

Initial Date
TxDOT

Initial Date
Utility

The Utility shall not commence any physical work, including without limitation site preparation, on the State's right of way or future right of way, until TxDOT provides the Utility with written authorization to proceed with the physical work upon TxDOT's completion and clearance of its environmental review of the Highway Project. Any such work by the Utility prior to TxDOT's written authorization to proceed will not be eligible for reimbursement and the Utility is responsible for entering any property within the proposed limits of the Highway Project that has not yet been acquired by TxDOT. This written authorization to proceed with the physical work is in addition to the authorization to commence work outlined below. Notwithstanding the foregoing, the provisions of this paragraph are required only when TxDOT has not obtained completion and clearance of its environmental review of the Highway Project prior to the execution of this Agreement by the State and the Utility.

The **Utility** shall comply with the Buy America provisions of 23 U.S.C. § 313, 23 CFR 635.410, as amended, and the Steel and Iron Preference provisions of Texas Transportation Code § 223.045 and, when products that are composed predominately of steel and/or iron are incorporated into the permanent installation of the utility facility, use domestically manufactured products. TxDOT Form 1818 (Material Statement), along with all required attachments, must be submitted, prior to the commencement of the adjustment, removal, and relocation of the facility, as evidence of compliance with the aforementioned provisions. Failure to submit the required documentation or to comply with the Buy America, and Steel and Iron Preference requirements shall result in: (1) the **Utility** becoming ineligible to receive any contract or subcontract made with funds authorized under the Intermodal Surface Transportation Efficiency Act of 1991; (2) the **State** withholding reimbursement for the costs incurred by the **Utility** in the adjustment, removal, and relocation of the **Utility's** facilities; and (3) removal and replacement of the non-compliant products.

The **Utility** agrees to develop relocation or adjustment costs by accumulating actual direct and related indirect costs in accordance with a work order accounting procedure prescribed by the **State**, or may, with the **State's** approval, accumulate actual direct and related indirect costs in accordance with an established accounting procedure developed by the **Utility**. Bills for work hereunder are to be submitted to the **State** not later than one (1) year after completion of the work. Failure to submit the request for final payment, in addition to all supporting documentation, within one (1) year after completion of the work may result in forfeiture of payment for said work.

When requested, the **State** will make intermediate payments at not less than monthly intervals to the **Utility** when properly billed. Such payments will not exceed 90 percent (90%) of the eligible cost as shown in each such billing. Intermediate payments shall not be construed as final payment for any items included in the intermediate payment.

The **State** will, upon satisfactory completion of the adjustment, removal, and/or relocation and upon receipt of final billing prepared in an approved form and manner and accounting for any intermediate payments, make payment in the amount of 90 percent (90%) of the eligible costs as shown in the final billing prior to audit and after such audit shall make an additional final payment totaling the reimbursement amount found eligible for **State** reimbursement.

Alternatively, if the approved accounting method is a lump sum, the **State** agrees to pay the **Utility** an agreed lump sum of \$ _____ as supported by the attached estimated costs. The **State** will, upon satisfactory completion of the adjustments, removals, and relocations and upon receipt of a final billing, make payment to the **Utility** in the agreed amount.

Upon execution of this agreement by both parties hereto, the **State** will, by written notice, authorize the **Utility** to perform such work diligently and to conclude said adjustment, removal, and relocation by the stated completion date which is attached hereto in Attachment "C". The completion date shall be extended for delays caused by events outside the **Utility's** control, including an event of Force Majeure, which shall include a strike, war or act of war (whether an actual declaration of war is made or not), insurrection, riot, act of public enemy, accident, fire, flood or other act of God, sabotage, or other events, interference by the **State** or any other party with the **Utility's** ability to proceed with the work, or any other event in which the **Utility** has exercised all due care in the prevention thereof so that the causes of other events are beyond the control and without the fault or negligence of the **Utility**.

Initial Date
TxDOT

Initial Date
Utility

This agreement in its entirety consists of the following elements:

Standard Utility Agreement – ROW-U-35;

- Plans, Specifications, and Estimated Costs (Attachment “A”);
- Accounting Method (Attachment “B”);
- Schedule of Work (Attachment “C”);
- Statement Covering Contract Work – ROW-U-48 (Attachment “D”);
- Utility Joint Use Agreement – ROW-U-JUA and/or Utility Installation Request – Form 1082 (Attachment “E”);
- Eligibility Ratio (Attachment “F”);
- Betterment Calculation and Estimate (Attachment “G”); and
- Proof of Property Interest – ROW-U-Affidavit (Attachment “H”).

All attachments are included herein as if fully set forth. In the event it is determined that a substantial change from the statement of work contained in this agreement is required, reimbursement therefore shall be limited to costs covered by a modification or amendment of this agreement or a written change or extra work order approved by the **State** and the **Utility**.

This agreement is subject to cancellation by the **State** at any time up to the date that work under this agreement has been authorized, and such cancellation will not create any liability on the part of the **State**. However, the **State** will review and reimburse the **Utility** for eligible costs incurred by the **Utility** in preparation of this Agreement.

The State Auditor may conduct an audit or investigation of any entity receiving funds from the **State** directly under this contract or indirectly through a subcontract under this contract. Acceptance of funds directly under this contract or indirectly through a subcontract under this contract acts as acceptance of the authority of the State Auditor, under the direction of the Legislative Audit Committee, to conduct an audit or investigation in connection with those funds. An entity that is the subject of an audit or investigation must provide the state auditor with access to any information the state auditor considers relevant to the investigation or audit.

The **Utility** by execution of this agreement does not waive any of the rights that the **Utility** may have within the limits of the law.

It is expressly understood that the **Utility** conducts the adjustment, removal, and relocation at its own risk, and that the **State** makes no warranties or representations regarding the existence or location of utilities currently within its right of way.

Initial Date
TxDOT

Initial Date
Utility

The signatories to this agreement warrant that each has the authority to enter into this agreement on behalf of the party represented.

UTILITY

Utility: City of Ingleside
Name of Utility

By: _____
Authorized Signature

Print or Type Name

Title: _____

Date: _____

EXECUTION RECOMMENDED:

Director of TP&D (or designee), Corpus Christi District

THE STATE OF TEXAS

Executed and approved for the Texas Transportation Commission for the purpose and effect of activating and/or carrying out the orders, established policies or work programs heretofore approved and authorized by the Texas Transportation Commission.

By: _____
District Engineer (or designee)

Date: _____

Initial Date
TxDOT

Initial Date
Utility

Attachment "A"

Plans, Specifications, and Estimated Costs

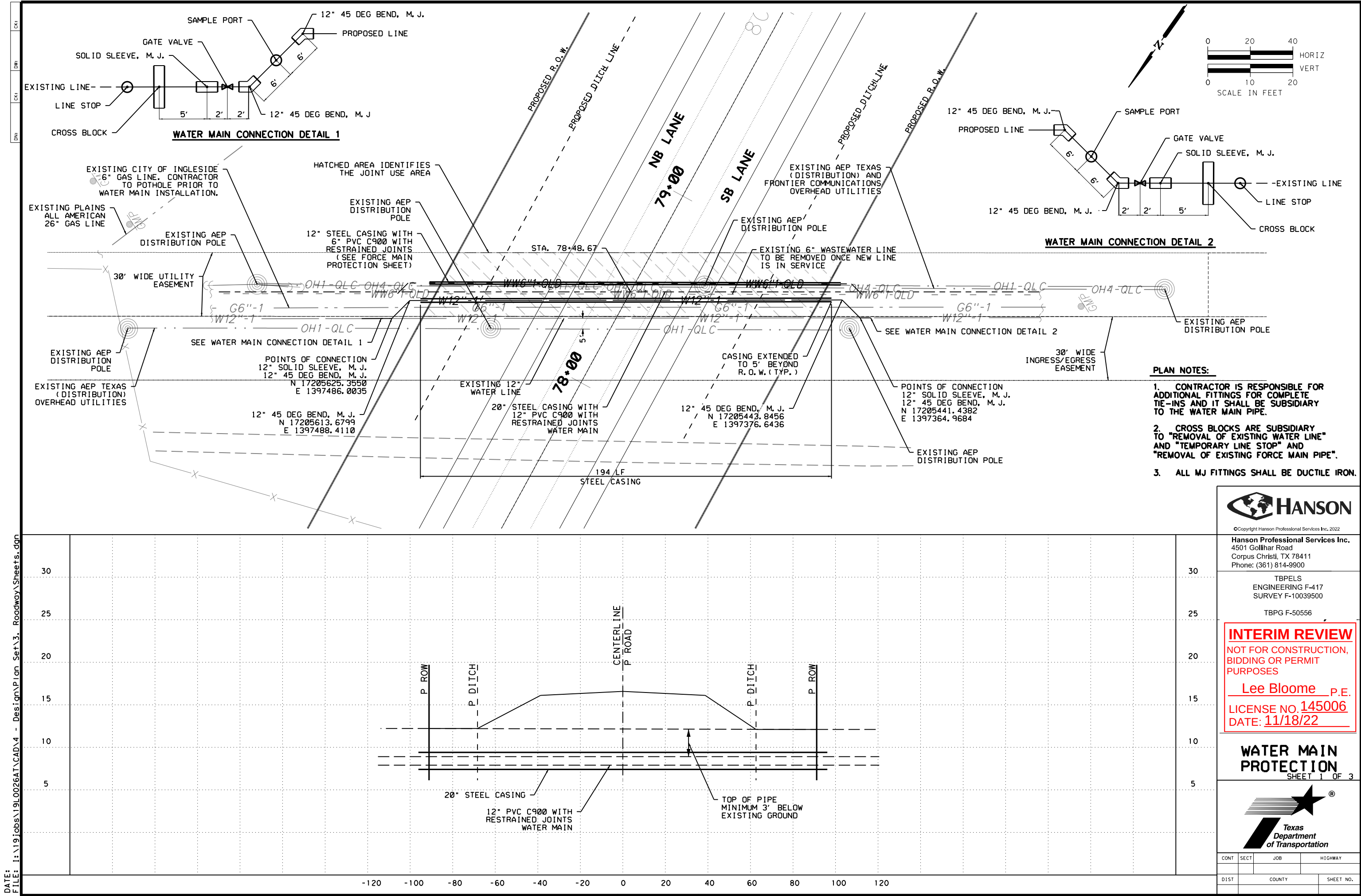
All material items within the cost estimate that must meet Buy America or Steel and Iron Preference Provision requirements must be indicated with an asterisk (*).

- ☐ Currently, **this project does not plan to use** iron and steel subject to Buy America requirements. In the event that Buy America compliant materials are used during construction on this project, compliance documentation will be provided.
- ☐ There are non-domestic iron and steel materials in this project that fall under the De Minimus equation. Calculation showing the total cost does not exceed one-tenth of one percent (0.1 %) of the individual utility agreement amount or \$2,500.00, whichever is greater is required.
- ☒ We understand the Buy America Compliance Requirements for iron and steel and will supply the required documentation to TxDOT indicating compliance with this provision. The following documents will be supplied prior to installation of the materials:

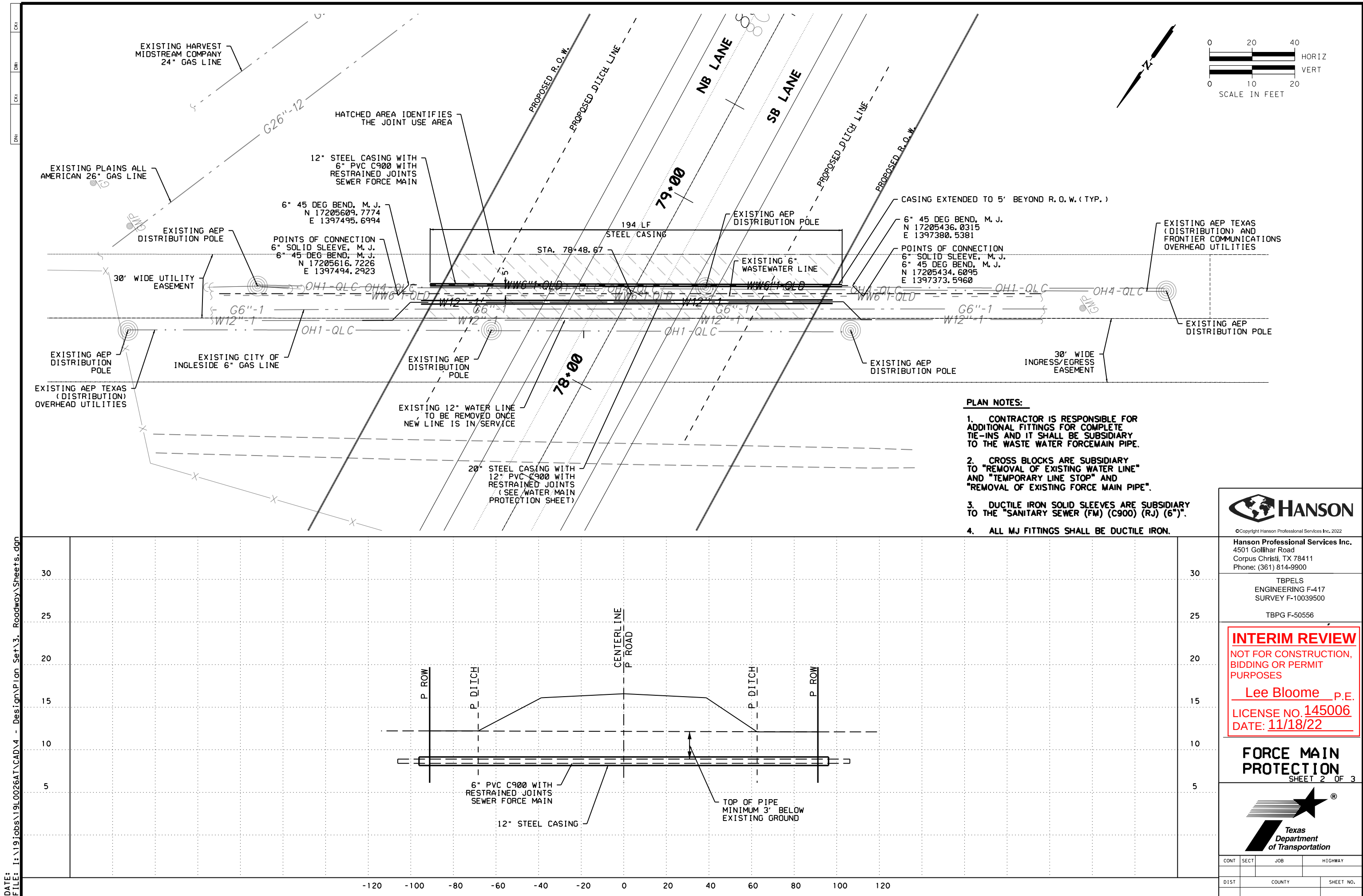
- 1) Form 1818 - Material Statement
- 2) Material Test Reports or Certifications

Initial Date
TxDOT

Initial Date
Utility



DATE: I:\19\obs\1910026AT\CAD\4 - Design\Plan_Sett3. Roadway\Sheets.dgn
FILE:



DATE: I:\19\obs\19\0026AT\CAD\4 - Design\Plan_Sett3. Roadway\Sheets.dgn



Copyright Hanson Professional Services Inc. 2022

Hanson Professional Services Inc.
4501 Gollihar Road
Corpus Christi, TX 78411
Phone: (361) 814-9900

TBPELS
ENGINEERING F-417
SURVEY F-10039500
TBPG F-50556

INTERIM REVIEW

NOT FOR CONSTRUCTION,
BIDDING OR PERMIT
PURPOSES

Lee Bloome P.E.
LICENSE NO. 145006
DATE: 11/18/22

**FORCE MAIN
PROTECTION**
SHEET 2 OF 3

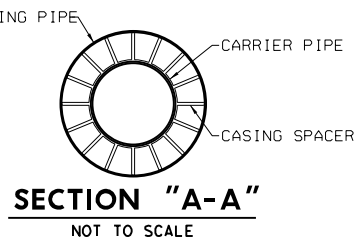
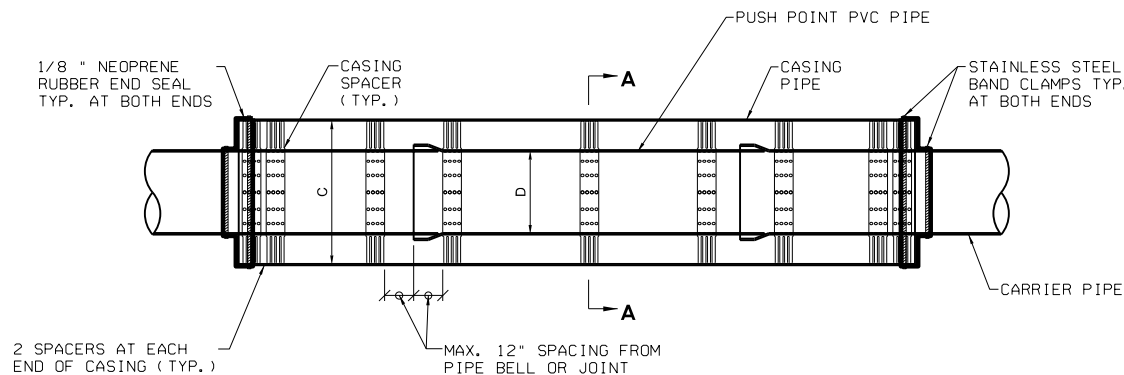
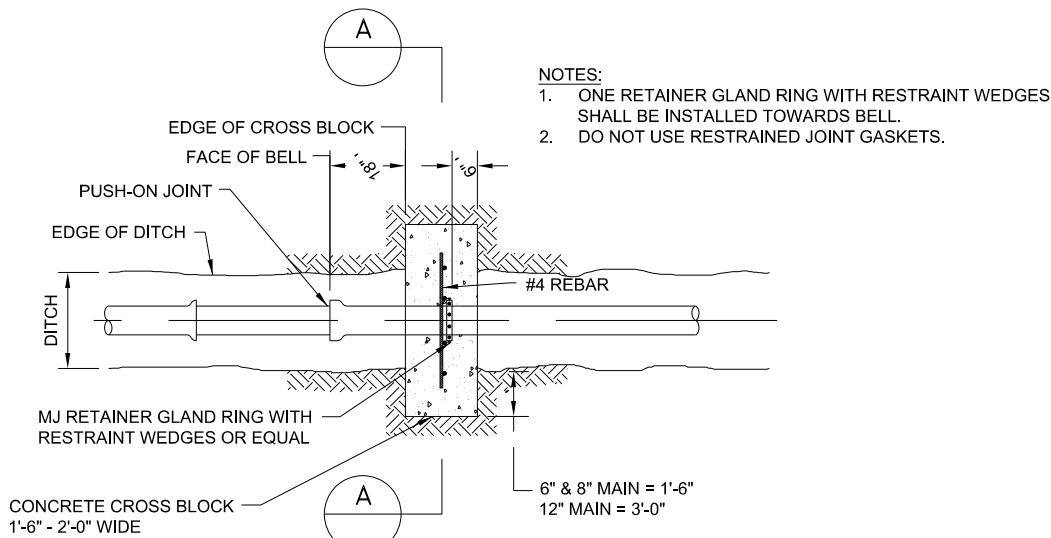
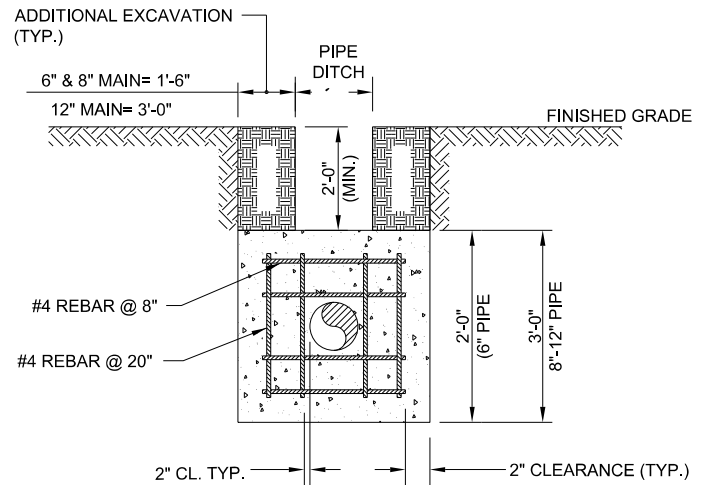


Texas
Department
of Transportation

CONT	SECT	JOB	HIGHWAY

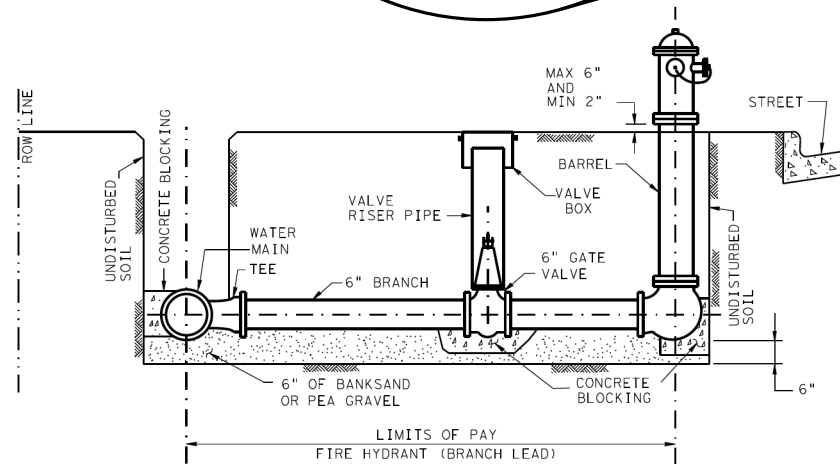
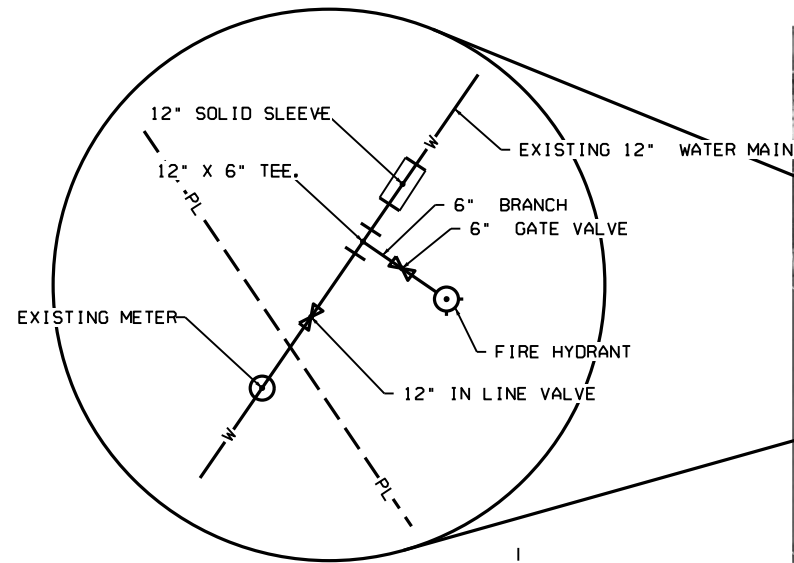
DIST	COUNTY	SHEET NO.

CKE
DNF
CKE
DNF



TYPICAL DETAIL OF CASING PIPE INSTALLATION SHOWING PLACEMENT OF SPACERS

NOT TO SCALE



- NOTES:
- FIRE HYDRANT ASSEMBLY INCLUDES HYDRANT, BARREL, GATE VALVE W/ BOX, AND RISER PIPE.
 - LOCATE HYDRANT VALVE IMMEDIATELY ADJACENT TO WATER LINE.

- FIRE HYDRANT NOTES:
- DUCTILE IRON SOLID SLEEVE AND TEE SHALL BE SUBSIDIARY TO THE FIRE HYDRANT BRANCH(LEAD)(6 IN.)
 - CONTRACTOR TO COORDINATE WITH CITY TO LOCATE WATER MAIN
 - CONTRACTOR TO COORDINATE WITH CITY FOR LOCATION OF FIRE HYDRANT.
 - CONTRACTOR IS RESPONSIBLE FOR ADDITIONAL FITTINGS FOR COMPLETE TIE IN AND IT SHALL BE SUBSIDIARY TO THE FIRE HYDRANT BRANCH (LEAD)(6 IN.)

GENERAL WASTEWATER CONSTRUCTION NOTES:

- THE CONTRACTOR SHALL VISIT THE SITE OF THE WORK AND EXAMINE LOCAL CONDITIONS TO BE ENCOUNTERED, IMPROVEMENTS TO BE PROTECTED, AND PERMITS AND FEES TO BE REQUIRED, ALONG WITH OTHER RESEARCH THAT IS NECESSARY TO ENSURE THAT THE CONTRACTOR THOROUGHLY UNDERSTANDS THE PROJECT AND IS FULLY AWARE OF ALL THE CONDITIONS AND CONSTRAINTS THAT MAY BE ENCOUNTERED DURING THE COURSE OF CONSTRUCTION.
- THE CONTRACTOR SHALL ADHERE TO ALL TCEQ REGULATIONS PER 30 TAC CHAPTER 217 AND TRENCH SAFETY FOR EXCAVATIONS.
- THE CONTRACTOR IS RESPONSIBLE FOR ALL TRAFFIC CONTROL AND MUST ADHERE TO THE MANUAL ON UNIFORM TRAFFIC CONTROL DEVICES (MUTCD).

CONSTRUCTION SEQUENCING WATER MAIN PROTECTION:

- THE FORCE MAIN IMPROVEMENTS SHALL BE COMPLETED PRIOR TO BEGINNING WATER MAIN IMPROVEMENTS.
- THE CONTRACTOR SHALL POTHOLE FOR THE EXISTING GAS MAIN IN AREAS OF WATER MAIN CROSSINGS.
- THE CONTRACTOR SHALL PREPARE THE UPSTREAM AND DOWNSTREAM SIDE OF THE CROSSING WITH CROSS BLOCKS AND A LINE STOP ON THE UPSTREAM SIDE ONLY.
- THE CONTRACTOR SHALL INSTALL THE NEW 12" WATER MAIN IN THE STEEL CASING AND PREASSEMBLE THE 12" WATER MAIN WITH TWO 45-DEGREE BENDS, VALVES AND SOLID SLEEVES AHEAD OF THE CONNECTION.
- THE CONTRACTOR SHALL COORDINATE A SHUTDOWN WITH KIEWIT TO MAKE THE TRANSITION.
- ONCE THE SHUTDOWN STARTS, THE LINE STOP SHALL BE INSTALLED AND THE EXISTING MAIN CUT INTO.
- THE NEW 12" MAIN AND FITTING ASSEMBLY SHALL BE INSTALLED AS WELL AS THE PROPOSED HYDRANT AND ISOLATION VALVE ON THE DOWNSTREAM SIDE OF THE CROSSING.
- ONCE CONNECTED, THE MAIN WILL BE RE-PRESSURIZED AND CHECKED FOR LEAKS PRIOR TO BACKFILLING.
- THE MAIN WILL BE FLUSHED AT THE KIEWIT TERMINUS AND TWO SEQUENTIAL SAMPLES TAKEN TO ENSURE THE WATER IS SAFE.
- CONTRACTOR WILL REMOVE THE OLD WATER MAIN AND BACKFILL ONCE THE NEW MAIN IS PLACED IN SERVICE.

CONSTRUCTION SEQUENCING SANITARY FORCE MAIN PROTECTION:

- CONTRACTOR WILL INSTALL THE NEW FORCE MAIN IN CASING AND HAVE THE DOUBLE 45-DEGREE BEND ASSEMBLY PREFABRICATED AND READY TO INSTALL ON BOTH ENDS.
- THE FORCE MAIN SHALL BE UNCOVERED AND A SUMP DUG ADJACENT TO THE EXCAVATION ON BOTH SIDES.
- CONTRACTOR SHALL COORDINATE WITH KIEWIT AHEAD OF THE TEMPORARY SHUTDOWN TO ESTABLISH A PERIOD OF LOW USE.
- CONTRACTOR SHALL STATION A VACTOR TRUCK AT THE LIFT STATION, PUMP THE STATION DOWN AS LOW AS POSSIBLE AND NOTIFY THE CREW TO START.
- CREWS WILL CUT INTO THE FORCE MAIN, ALLOW BACKFLOW OF SEWAGE AND REMOVE THE SEWAGE WITH A VACTOR TRUCK ALLOWING THE CREWS TO INSTALL THE NEW SECTION OF FORCE MAIN.
- THE CONTRACTOR SHALL CONNECT THE TWO 45-DEGREE SEGMENTS AND THE SOLID SLEEVES.
- ONCE INSTALLED, THE CONTRACTOR SHALL START THE LIFT STATION BACK UP AND CHECK FOR LEAKS.
- CONTRACTOR WILL REMOVE THE OLD FORCE MAIN AND BACKFILL THE TRENCH ONCE THE NEW MAIN IS PLACED IN SERVICE.



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Hanson Professional Services Inc.
4501 Gollihar Road
Corpus Christi, TX 78411
Phone: (361) 814-9900

TBPELS
ENGINEERING F-417
SURVEY F-10039500

TBPG F-50556

INTERIM REVIEW
NOT FOR CONSTRUCTION,
BIDDING OR PERMIT
PURPOSES

Lee Bloome P.E.
LICENSE NO. 145006
DATE: 11/18/22

**WATER AND
SEWER DETAILS**
SHEET 3 OF 3



CONT	SECT	JOB	HIGHWAY
DIST	COUNTY		SHEET NO.

DATE: 11/19/2022
FILE: I:\19\jobs\1910026AT\CAD\4 - Design\Plan Set\3. Roadway\Sheets.dgn

Estimate of Probable Construction Costs



Title: Ingleside Water and Sewer Relocation and Encasement

Date of Estimate: July 8, 2024

Owner: City of Ingleside

Hanson Engineer: Lee Bloome

Contact: Gary Paredes

Hanson Contact: Melanie Gavlik

Address:

INTERIM REVIEW
NOT FOR CONSTRUCTION,
BIDDING OR PERMIT
PURPOSES
Lee Bloome, P.E.
LICENSE NO. 145006
DATE: 07/08/2024

ON-SITE IMPROVEMENTS

B. Water Relocation

ITEM NO.	DESCRIPTION	QUANTITY	UNIT		CONTRACT UNIT PRICE	TOTAL COST
7218 XXXX	CASING (STEEL) (20 IN)	194	LF	*	\$325.00	\$63,050.00
7218 XXXX	WATER MAIN PIPE (PVC)(C900)(12")	232	LF	*	\$150.00	\$34,800.00
7218 XXXX	REMOVAL OF EXISTING WATER LINE	228	LF	*	\$35.00	\$7,980.00
7218 XXXX	TEMPORARY LINE STOP	1	EA	*	\$5,500.00	\$5,500.00
7218 XXXX	FIRE HYDRANT ASSEMBLY	1	EA	*	\$7,500.00	\$7,500.00
7218 XXXX	FIRE HYDRANT BRANCH (LEAD) (6 IN.)	10	LF	*	\$75.00	\$750.00
7218 XXXX	GATE VALVE (12")	3	EA	*	\$9,500.00	\$28,500.00
B. Water Relocation Subtotal:						\$148,080.00

C. Sanitary Forcemain Relocation

ITEM NO.	DESCRIPTION	QUANTITY	UNIT		CONTRACT UNIT PRICE	TOTAL COST
7218 XXXX	CASING (STEEL) (SANITARY SEWER) (12IN)	194	LF	*	\$250.00	\$48,500.00
7218 XXXX	SANITARY SEWER (FM) (C900) (RJ) (6")	228	LF	*	\$125.00	\$28,500.00
7218 XXXX	REMOVAL OF EXISTING FORCE MAIN PIPE	224	LF	*	\$29.00	\$6,496.00
C. Sanitary Forcemain Relocation Subtotal:						\$83,496.00

ESTIMATED CONSTRUCTION COSTS \$231,576.00

OTHER EXPENSES - CITY OF INGLESIDE & ENGINEERING

ENGINEERING DESIGN PHASE SERVICES		QUANTITY	UNIT		CONTRACT UNIT PRICE	TOTAL COST
PROJECT MANAGER		14	HR		\$247.00	\$3,458.00
ENGINEER VI		38	HR		\$212.00	\$8,056.00
ENGINEER IV		50	HR		\$158.00	\$7,900.00
TECH VII		50	HR		\$96.00	\$4,800.00
ENGINEERING DESIGN PHASE SERVICES Subtotal:						\$24,214.00

DESIGN & CONSTRUCTION PHASES - CITY EXPENSES		QUANTITY	UNIT		CONTRACT UNIT PRICE	TOTAL COST
CITY MANAGER		6	HR		\$70.67	\$424.02
DIRECTOR OF INFRASTRUCTURE		10	HR		\$53.82	\$538.20
STREET ASSISTANT DIRECTOR		5	HR		\$37.34	\$186.70
WATER SUPERINTENDENT		6	HR		\$31.35	\$188.10
DESIGN & CONSTRUCTION PHASES - CITY EXPENSES Subtotal:						\$1,337.02

ESTIMATED PROJECT COSTS \$257,127.02

Buy America material is be denoted with an astrick (*).

Utility Adjustment for TxDOT Project

TXDOT STANDARD
SUA ESTIMATE
6/2021

City of Ingleside Water & Waste Water
SH 200

RCSJ: 3540-01-002
Utility ID#: U00013808
UNNUMBER: N/A

The cost estimate items must be sufficiently detailed to provide TxDOT with a reasonable basis for analysis. Items should include appropriate units and unit price for each (See Utility Manual, Chapter 6 Section 2). Applies to All "EA" or "LS" items

Line Item / Item Description	Unit	Quantity	\$/Unit	Total
Materials to be purchased by TxDOT - JOINT BID				
* CASING (STEEL) (20 IN)	LF	194	\$325.00	\$ 63,050.00
WATER MAIN PIPE (PVC)(C900)(12")	LF	232	\$150.00	\$ 34,800.00
* FIRE HYDRANT ASSEMBLY	EA	1	\$7,500.00	\$ 7,500.00
* FIRE HYDRANT BRANCH (LEAD) (6 IN.)	LF	10	\$75.00	\$ 750.00
* GATE VALVE (12")	EA	3	\$9,500.00	\$ 28,500.00
* CASING (STEEL) (SANITARY SEWER) (12IN)	LF	194	\$250.00	\$ 48,500.00
SANITARY SEWER (FM) (C900) (RJ) (6")	LF	228	\$125.00	\$ 28,500.00
				\$ -
SUBTOTAL				\$ 211,600.00
Internally Supplied Materials - documented with Certified Ledger at Payment				
				\$ -
				\$ -
				\$ -
				\$ -
OVERHEAD (%)	Enter % if applicable	0.00%		\$ -
SUBTOTAL				\$ -
Externally Acquired Materials - documented with Invoices and/or Checks				
				\$ -
				\$ -
				\$ -
				\$ -
				\$ -
SUBTOTAL				\$ -
MATERIALS SUBTOTAL			\$	211,600.00
* Indicated items are being tracked for BUY AMERICA COMPLIANCE and will be documented using Form 1818 and all supporting documentation prior to installation.				
X Indicated items are IRON or STEEL, but will not be tracked for BUY AMERICA COMPLIANCE due to falling under the DE MINIMUS of \$2,500, or .1% of the project total cost, whichever is greater.			Sum of De Minimus Items	\$0.00
TxDOT contractor labor - JOINT BID				
REMOVAL OF EXISTING WATER LINE	LF	228	\$35.00	\$ 7,980.00
TEMPORARY LINE STOP	EA	1	\$5,500.00	\$ 5,500.00
REMOVAL OF EXISTING FORCE MAIN PIPE	LF	224	\$29.00	\$ 6,496.00
SUBTOTAL				\$ 19,976.00
Internal Labor Costs - documented with Certified Ledger at payment.				
				\$ -
				\$ -
OVERHEAD (%)	Enter % if applicable	0.00%		\$ -
SUBTOTAL				\$ -
External Labor Costs - documented with Invoices and / or checks				

				\$	-
				\$	-
			SUBTOTAL	\$	-
			LABOR SUBTOTAL	\$	19,976.00
Engineering Procured by TxDOT - 100% eligibiity required					
				\$	-
				\$	-
			SUBTOTAL	\$	-
Internal Engineering - Costs Documented with Certified Ledger at payment.					
PROJECT MANAGER	HR	14	\$247.00	\$	3,458.00
ENGINEER VI	HR	38	\$212.00	\$	8,056.00
ENGINEER IV	HR	50	\$158.00	\$	7,900.00
TECH VII	HR	50	\$96.00	\$	4,800.00
				\$	-
			SUBTOTAL	\$	24,214.00
Internal Survey / Landman					
				\$	-
				\$	-
			SUBTOTAL	\$	-
Internal Inspection					
				\$	-
				\$	-
			SUBTOTAL	\$	-
Internal Administration					
CITY MANAGER	HR	6	\$70.67	\$	424.02
DIRECTOR OF INFRASTRUCTURE	HR	10	\$53.82	\$	538.20
STREET ASSISTANT DIRECTOR	HR	5	\$37.34	\$	186.70
WATER SUPERINTENDENT	HR	6	\$31.35	\$	188.10
				\$	-
			SUBTOTAL	\$	1,337.02
Internal Engineering/ Survey/ Inspection/ Administration Overhead					
	OVERHEAD (%)	Enter % if applicable	0.00%	\$	-
			SUBTOTAL	\$	25,551.02
External Engineering - Cost documented with INVOICES and / or CHECKS					
				\$	-
				\$	-
				\$	-
			SUBTOTAL	\$	-
External Survey/ Landman					
				\$	-
				\$	-

	SUBTOTAL	\$ -
External Inspection		
		\$ -
		\$ -
	SUBTOTAL	\$ -
Engineering / Administration / Inspection	SUBTOTAL	\$ 25,551.02

Line Item / Item Description	Unit	Quantity	\$/Unit	Total
Existing Easement Compensation - following Quit Claim / Eligibility Ratio not applied.				Will
				\$ -
				\$ -
			SUBTOTAL	\$ -
Replacement Easement Compensation - following Quit Claim / Eligibility Ratio is applied.				ROW
				\$ -
				\$ -
			SUBTOTAL	\$ -
Easement Compensation	SUBTOTAL		\$	-

SUMMARY:

TOTAL PROJECT COST	\$ 257,127.02
Amount Payable in TxDOT Contract (Joint Bid)	\$ 231,576.00
Gross Reimbursable to Utility	\$ 25,551.02
Amount Due to TxDOT Via an Advance Funding Agreement	\$ -

SALVAGE and/or Depreciation CREDIT	\$ -
BETTERMENT RATIO 0.00%	Ratio Deduction \$ -
Amount reimbursable after Betterment and Salvage Credit	\$ 25,551.02
ELIGIBILITY RATIO 100.00%	
NET REIMBURSEMENT TO UTILITY	\$ 25,551.02

Attachment “B” Accounting Method



Actual Cost Method of Accounting

The utility accumulates cost under a work order accounting procedure prescribed by the Federal or State regulatory body and proposes to request reimbursement for actual direct and related indirect costs.



Lump Sum Method of Accounting

The Utility proposed to request reimbursement based on an agreed lump sum amount supported by a detailed cost analysis.

Initial Date
TxDOT

Initial Date
Utility

Attachment “C” Schedule of Work

Estimated Start Date (mm/dd/yyyy): _____, subject to physical work restrictions prior to the issuance of environmental clearance as required by the provisions of this agreement. (If construction will be joint bid and included in the highway contract, enter the project let date.)

Estimated Duration (number of days): _____

Estimated Completion Date (mm/dd/yyyy): _____

Initial Date
TxDOT

Initial Date
Utility

Attachment “D” Statement Covering Contract Work

Construction Contract: Complete form ROW-U-48 and ROW-U-48-1 if applicable.

- ☐ Utility performing with their own forces (timesheets will be required at the time of billing).
- ☒ Utility will use outside forces to perform the adjustment, complete attached ROW-U-48 or ROW-U-48-1 (joint bid).

Engineering Contract:

- ☐ Utility performing with their own forces (timesheets will be required at the time of billing).
- ☒ Utility will use consultant contract (continuing contract rate sheets or fee schedule will be required).
- ☐ TxDOT will procure a utility engineering consultant.

Initial Date
TxDOT

Initial Date
Utility

**Statement Covering Utility Construction Contract Work – In the State’s
Highway Construction Contract
(As Referenced in Form ROW-U-48, Option E)**

Work Responsibilities

- A. The **Utility** shall provide the following services under this contract:
- i. Responsible for engaging the services of a Texas Registered Professional Engineer to prepare drawings and technical specifications for relocations and adjustments along SH 200.
 - ii. Provide the plans and specifications to the State to include in the current planning specifications and estimate package being prepared by representatives of the Texas Department of Transportation’s Sinton Area Office.
 - iii. Secure all necessary permitting as may be required for the installation of the City of Ingleside’s line.
 - iv. Arrange and coordinate with the contractor, through the State, materials and equipment testing, rejection of all work not conforming to minimum requirements of the construction contract documents, maintenance of the proposed 12" waterline and 6" sewer forcemain during construction, and the relocation of the 12" waterline and 6" sewer forcemain and connection of services to customers.
 - v. Advise the State of work that Utility determines should be corrected or rejected.
 - vi. Arrange, observe, and inspect all acceptance testing and notify the State of the results of these activities.
 - vii. Provide inspection services for the construction, notify the State of defects and deficiencies in the work, and observe actions of the contractor to correct such defects and deficiencies.
 - viii. Assume all responsibility for the maintenance of the existing 12" waterline and 6" sewer forcemain during and upon completion of the construction contract.
 - ix. Ensure all Texas Commission on Environmental Quality and all other regulatory rules, regulations and laws are strictly adhered to.
 - x. Prepare and submit both a certificate of substantial completion and a list of observed items requiring completion or correction for the relocations and adjustments to the Project Engineer for concurrence.
 - xi. Coordinate all construction activities performed by Utility’s staff for the relocations and adjustments through the Project Engineer.

B. The State shall provide the following services under this contract:

- i. Combine the 12" waterline and 6" sewer forcemain relocation and adjustment plans with the plans being prepared for the Project.
- ii. Review and approve the final construction plans prior to any construction-related activities. In order to ensure federal and/or state funding eligibility, projects must be authorized by the State prior to advertising for construction.
- iii. Advertise for construction bids, issue bid proposals, receive and tabulate the bids, and award and administer the contract for construction of the Project.
- iv. Negotiate and administer all field changes and change orders required for the Project. All change orders increasing construction costs for Utility's Project shall be submitted to Utility for review and approval together with an evaluation. Utility agrees to review and either approve or disapprove all change orders within five (5) business days after receipt of such order unless Utility Board's approval is necessary in which case Utility shall bring the item to Utility Board as soon as reasonably possible.
- v. Provide overall project management to supervise the day-to-day activities of the construction and monitor the activities of the contractor to promote the timely and efficient completion of the Project in accordance with the approved Plans and Specifications and construction schedule.
- vi. Conduct field observations and coordinate with Utility's inspectors and the contractor to cure defects and deficiencies in the construction prior to final acceptance.
- vii. Make timely payment to the contractor for work performed in connection with the Project.
- viii. Ensure access and permit Utility's inspectors and other authorized representatives to inspect the waterline construction at all times.
- ix. Conduct and coordinate final inspection of the Project in the presence of Utility's Engineer and Inspector, transmit final list of items to be completed or repaired and observe contractor correction of same.
- x. Maintain job file.

Attachment “E” Utility Joint Use Agreement – (ROW-U-JUA) and/or RULIS Permit

- ☒ Utility Joint Use Agreement (ROW–U–JUA)
☒ Plans with joint use area highlighted are included.

- ☐ RULIS Permit Number:
The utility should obtain an approved permit before the start of construction inside of the highway right of way.

- ☐ Quitclaim will be submitted at the Final Billing

Initial Date
TxDOT

Initial Date
Utility



UTILITY JOINT USE AGREEMENT

Form ROW-U-JUA
Replaces ROW-U-JUAA
(rev. 10/20)
Page 1 of 2

U-Number: N/A

Utility ID: U00010626

ROW CSJ: 3540-01-002

County: San Patricio

District: Corpus Christi

Highway: SH 200

Federal Project No.: STP 1602(265)

From: SH361

Projected Highway Letting Date: 12/01/27

To: FM 1069

WHEREAS, the State of Texas, ("**State**"), acting by and through the Texas Department of Transportation ("**TxDOT**"), proposes to make certain highway improvements on that section of the above-indicated highway; and

WHEREAS, the City of Ingleside, ("**Utility**"), proposes to adjust or relocate certain of its facilities, if applicable, and retain title to any property rights it may have on, along or across, and within or over such limits of the highway right of way as indicated by the location map attached hereto.

NOW, THEREFORE, in consideration of the covenants and acknowledgements herein contained, the parties mutually agree as follows:

It is agreed that joint usage for both highway and utility purposes will be made of the area within the highway right of way limits as such area is defined and to the extent indicated on the aforementioned plans or sketches. Nothing in this Agreement shall serve to modify or extinguish any compensable property interest vested in the **Utility** within the above described area. If the facilities shown in the aforementioned plans need to be altered or modified or new facilities constructed to either accommodate the proposed highway improvements or as part of **Utility's** future proposed changes to its own facilities, **Utility** agrees to notify **TxDOT** at least 30 days prior thereto, and to furnish necessary plans showing location and type of construction, unless an emergency situation occurs and immediate action is required. If an emergency situation occurs and immediate action is required, **Utility** agrees to notify **TxDOT** promptly. If such alteration, modification or new construction is in conflict with the current highway or planned future highway improvements, or could endanger the traveling public using said highway, **TxDOT** shall have the right, after receipt of such notice, to prescribe such regulations as necessary for the protection of the highway facility and the traveling public using said highway. Such regulations shall not extend, however, to requiring the placement of intended overhead lines underground or the routing of any lines outside of the area of joint usage above described.

If **Utility's** facilities are located along a controlled access highway, **Utility** agrees that ingress and egress for servicing its facilities will be limited to frontage roads where provided, nearby or adjacent public roads and streets, or trails along or near the highway right of way lines which only connect to an intersecting road. Entry may be made to the outer portion of the highway right of way from any one or all access points. Where supports, manholes or other appurtenances of the **Utility's** facilities are located in medians or interchange areas, access from the through-traffic roadways or ramps will be allowed by permit issued by the **State** to the **Utility** setting forth the conditions for policing and other controls to protect highway users. In an emergency situation, if the means of access or service operations as herein provided will not permit emergency repairs as required for the safety and welfare of the public, the **Utility** shall have a temporary right of access to and from the through-traffic roadways and ramps as necessary to accomplish the required repairs, provided **TxDOT** is notified immediately when such repairs are initiated and adequate provision is made by **Utility** for the convenience and safety of highway traffic. Except as expressly provided herein, the **Utility's** rights of access to the through-traffic roadways and/or ramps shall be subject to the same rules and regulations as apply to the general public.

_____ Initial	_____ Date	_____ Initial	_____ Date
TxDOT		Utility	

If **Utility's** facilities are located along a non-controlled access highway, the **Utility's** rights of ingress and egress to the through-traffic roadways and/or ramps are subject to the same rules and regulations as apply to the general public.

Participation in actual costs incurred by the Utility for any future adjustment, removal or relocation of utility facilities required by highway construction shall be in accordance with applicable laws of the State of Texas.

Utility will, by written notice, advise **TxDOT** of the beginning and completion dates of the adjustment, removal, or relocation, and, thereafter, agrees to perform such work diligently, and to conclude said adjustment, removal, or relocation by the stated completion date. The completion date shall be extended for delays caused by events outside **Utility's** control, including an event of Force Majeure, which shall include a strike, war or act of war (whether an actual declaration of war is made or not), insurrection, riot, act of public enemy, accident, fire, flood or other act of God, sabotage, or other events, interference by the **State** or any other party with **Utility's** ability to proceed with the relocation, or any other event in which **Utility** has exercised all due care in the prevention thereof so that the causes or other events are beyond the control and without the fault or negligence of **Utility**.

It is expressly understood that **Utility** conducts the new installation, adjustment, removal, and/or relocation at its own risk, and that **TxDOT** makes no warranties or representations regarding the existence or location of utilities currently within its right of way.

The **Utility** and the **State**, by execution of this Agreement, do not waive or relinquish any right that they may have under the law.

The signatories to this Agreement warrant that each has the authority to enter into this Agreement on behalf of the party represented.

IN WITNESS WHEREOF, the parties hereto have affixed their signatures.

UTILITY

Utility: City of Ingleside

Name of Utility

By:

Authorized Signature

Print or Type Name

Title:

Date:

EXECUTION RECOMMENDED:

Director of TP&D: Corpus Christi District

THE STATE OF TEXAS

Executed and approved for the Texas Transportation Commission for the purpose and effect of activating and/or carrying out the orders, established policies or work programs heretofore approved and authorized by the Texas Transportation Commission.

By:

District Engineer

Date:

Initial Date
TxDOT

Initial Date
Utility

Attachment “F” Eligibility Ratio

Eligibility Ratio established: 100 %

- ☒ Non-interstate Highway (Calculations attached)
- ☐ Interstate Highway
- ☐ Toll Road
- ☐ SP2125 Approved Application (100%)
Minute Order #: _____
- ☐ Master Utility Agreement

ROW Utility Manual Chapter 8, Section 2

In developing the ratio, line length or number of poles is restricted to facilities located within the existing and proposed highway right of way. Facilities located outside the existing and proposed right of way limits will not be used in developing the ratio.

Please see example of eligibility ratio calculations below.

Plan Sheet or Page#	In Easement (Eligible) Existing # of Poles or LF	In Public ROW (Ineligible) Existing # of Poles or LF
1	0	0
2	84	2
3	91	385
4	238	96
Totals	412	503

Total Existing # of Poles or LF (Eligible)	412
Total Existing # of Poles or LF (Ineligible)	503
Total Existing # of Poles or LF	915
Total Existing # of Poles or LF (Eligible) divided by the Total Existing # of Poles or LF	45.03%

Initial _____ Date _____
TxDOT

Initial _____ Date _____
Utility

ELIGIBILITY RATIO CALCULATOR

Linear Feet of Existing Facility Permit		EASEMENT (LF)
12" waterline	0	180
6" sewer forcemain	0	180
SUM	0	360
TOTAL EXISTING FACILITY		360

ACCEPTED ELIGIBILITY RATIO 100.00%

Attachment “G” Betterment Calculation and Estimate

- ☐ Elective Betterment Ratio established: _____ %
☐ Calculation is attached and the justification is included below
☐ A betterment and an in-kind estimate are included
- ☐ Forced Betterment
☐ To comply with regulated industry standards, laws, and regulations. (Supporting documentation required)
☐ To comply with published current design practice followed by the utility in its own work. (Supporting documentation required)
☐ Due to proposed roadway design. (Provide explanation below)
- ☒ Not Applicable

A statement explaining Elective and/or Forced Betterment:

Initial Date
TxDOT

Initial Date
Utility

Attachment “H” Proof of Property Interest

☒ Supporting documentation of compensable property interest that establishes reimbursement eligibility as referenced in Texas Transportation Code §203.092.

☐ Property interest documented through applicable affidavits and required attachments.

☐ ROW-U-Affidavit

☐ The roadway improvement project is designated as an Interstate Highway project; therefore, no supporting documentation of compensable interest is required. Supporting documentation for existing easements is required for easement replacement.

☐ Toll Road (Supporting documentation of compensable property interest required if more than 50% eligibility ratio is applied)

☐ SP2125

☐ Master Utility Agreement

Initial Date
TxDOT

Initial Date
Utility



INGRESS-EGRESS ACCESS EASEMENT

THE STATE OF TEXAS §
 § KNOW ALL MEN BY THESE PRESENTS:
COUNTY OF SAN PATRICIO §

That we, Hamilton-Ingleside Limited, a Texas Limited Partnership, David Edwards, Trustee of the Edwards 1976 Trust "A", Patricia Edwards Carson, Trustee of the Edwards 1976 Trust "B", Ford-Powers Family Properties, Ltd., a Texas Limited Partnership, Ford-Allen Family Properties, Ltd., a Texas Limited Partnership, Helen Ford Allen, as her separated property, Grace Ford Powers, as her separate property, John Worley Powers, as his separate property, Roberta Powers Wallace, as her separate property, Kyle Powers Cromwell, as her separate property, William Daly Powers, as his separate property, Elizabeth Allen Holmes, as her separate property, Ford Welder Allen, as his separate property, Janet Wallace Allen, as her separate property, Kyle Powers Cromwell, as Custodian for Jackelyn Kay Cromwell, a minor, Kyle Powers Cromwell, as Custodian for Sterling Robert Cromwell, a minor, Kyle Powers Cromwell, as Custodian for Charles Welder Cromwell, a minor, James Power Allen, Timothy Hughes Powers, John Worley Powers, as Custodian for John Worley Powers, III, a minor, John Worley Powers, as Custodian for Grace McMillan Powers, a minor, Roberta Powers Wallace, as Custodian for Kylie Beth Wallace, a minor, Roberta Powers Wallace, as Custodian for Charles Joseph Schindler III, a minor, and Elizabeth Allen Holmes, as Custodian for Graham Warner Holmes, a minor, Grantors, in consideration of the sum of Ten and no/100 Dollars (\$10.00) to us in hand paid and other good valuable consideration, have Granted, Sold and Conveyed, and by these presents do Grant, Sell and Convey unto the CITY OF INGLESIDE, Grantee of the County of San Patricio and State of Texas, a permanent easement for the purpose of constructing, replacing, repairing,

and maintaining a Public Roadway, together with the necessary incidentals and appurtenances thereto, in, along, upon, across, above, under and through all that certain parcel of land situated in San Patricio County, Texas, and being more fully described on Exhibit A hereto attached.

TO HAVE AND TO HOLD the above described easement in and to said premises with the right of ingress and egress thereto, together with all and singular the usual rights thereto in anywise belonging, unto the said City of Ingleside and its successors and assigns forever. And we do hereby bind ourselves, our heirs, executors and administrators to Warrant and Forever Defend, all and singular, the said premises unto the said City of Ingleside, its successors and assigns, against every person whomever lawfully claiming or to claim the same or any part thereof. Grantee shall convey the easement back to the Grantor in the event the Grantee abandons the use of the Public Roadway.

It is understood, and by the acceptance of this instrument, it is recognized that Grantors retain title to all of the oil, gas and sulphur and other mineral interests in and under said land, but waive any and all rights of ingress and egress to the surface thereof for the purpose of exploring, developing, mining or drilling for same; provided, however, that operations for exploration or recovery of any such minerals shall be permissible so long as all surface operations in connection therewith are located at a point outside of the above-described property, and upon the condition that none of such operations shall be conducted so near the surface of said land as to interfere with the intended use thereof or in any way interfere with, jeopardize, or endanger the facilities of the City of Ingleside, Texas, or create a hazard to the public users thereof.

It is understood that this easement shall be used only as an access easement and for no other purposes. The City of Ingleside, at its own cost and expense, shall construct and pave the Roadway, and maintain and repair the same to keep the same in a clean, sightly, safe, unobstructed, good and usable condition.

IN WITNESS WHEREOF THIS 6th day of JANUARY, 2009.

HAMILTON-INGLESIDE LIMITED, a Texas Limited Partnership

By: DWH Management Co., LC, a Texas Limited Liability Company, General Partner

By: Diana Welder Hamilton
Diana Welder Hamilton, Manager

David Edwards, Trustee of the Edwards 1976 Trust "A"

Patricia Edwards Carson, Trustee of the Edwards 1976 Trust "B"

FORD-POWERS FAMILY PROPERTIES, LTD, a Texas Limited Partnership

By: Ford-Powers Family Management Co., L.L.C.,
a Texas Limited Liability Company, General Partner

By: _____
Edmond J. Ford, Manager

FORD-ALLEN FAMILY PROPERTIES, LTD, a Texas Limited Partnership

By: Ford-Allen Family Management Co., L.L.C.,
a Texas Limited Company, General Partner

By: _____
Edmond J. Ford, Manager

Helen Ford Allen, as her separate property

Grace Ford Powers, as her separate property

IN WITNESS WHEREOF THIS _____ day of _____, 2008.

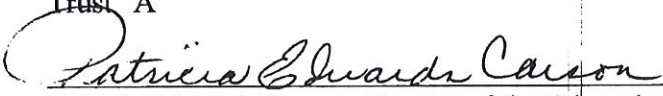
HAMILTON-INGLESIDE LIMITED, a Texas Limited Partnership

By: DWH Management Co., LC, a Texas Limited Liability Company, General Partner

By: _____
Diana Welder Hamilton, Manager



David Edwards, Trustee of the Edwards 1976 Trust "A"



Patricia Edwards Carson, Trustee of the Edwards 1976 Trust "B"

FORD-POWERS FAMILY PROPERTIES, LTD, a Texas Limited Partnership

By: Ford-Powers Family Management Co., L.L.C.,
a Texas Limited Liability Company, General Partner

By: _____
Edmond J. Ford, Manager

FORD-ALLEN FAMILY PROPERTIES, LTD, a Texas Limited Partnership

By: Ford-Allen Family Management Co., L.L.C.,
a Texas Limited Company, General Partner

By: _____
Edmond J. Ford, Manager

Helen Ford Allen, as her separate property

Grace Ford Powers, as her separate property

IN WITNESS WHEREOF THIS _____ day of _____, 2008.

HAMILTON-INGLESIDE LIMITED, a Texas Limited Partnership

By: DWH Management Co., LC, a Texas Limited Liability Company, General Partner

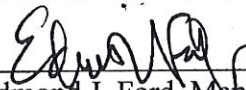
By: _____
Diana Welder Hamilton, Manager

David Edwards, Trustee of the Edwards 1976 Trust "A"

Patricia Edwards Carson, Trustee of the Edwards 1976 Trust "B"

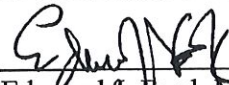
FORD-POWERS FAMILY PROPERTIES, LTD, a Texas Limited Partnership

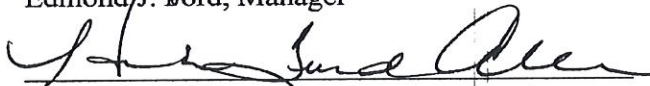
By: Ford-Powers Family Management Co., L.L.C.,
a Texas Limited Liability Company, General Partner

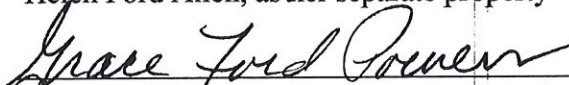
By: 
Edmond J. Ford, Manager

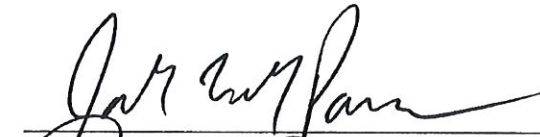
FORD-ALLEN FAMILY PROPERTIES, LTD, a Texas Limited Partnership

By: Ford-Allen Family Management Co., L.L.C.,
a Texas Limited Company, General Partner

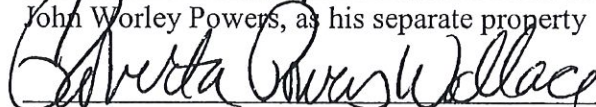
By: 
Edmond J. Ford, Manager


Helen Ford Allen, as her separate property

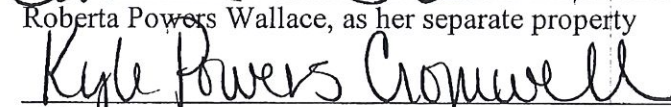

Grace Ford Powers, as her separate property



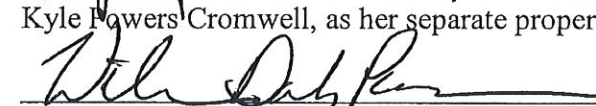
John Worley Powers, as his separate property



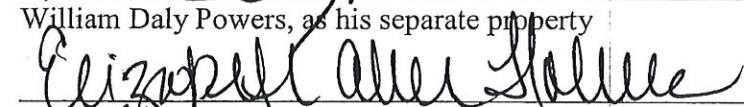
Roberta Powers Wallace, as her separate property



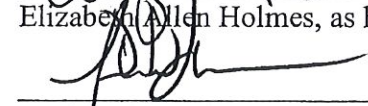
Kyle Powers Cromwell, as her separate property



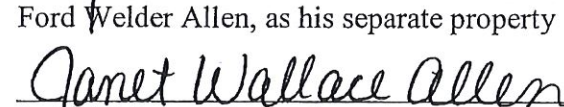
William Daly Powers, as his separate property



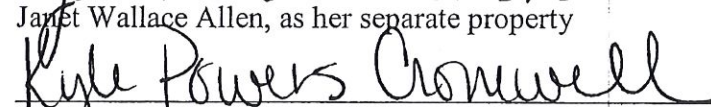
Elizabeth Allen Holmes, as her separate property



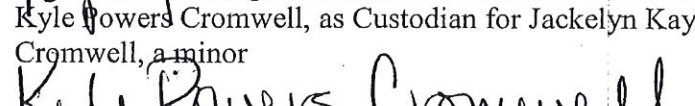
Ford Welder Allen, as his separate property



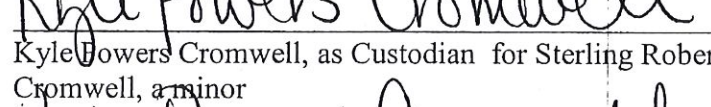
Janet Wallace Allen, as her separate property



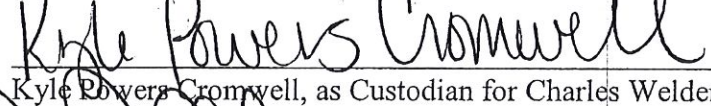
Kyle Powers Cromwell, as Custodian for Jackelyn Kay Cromwell, a minor



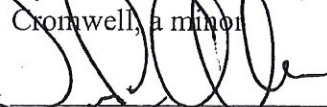
Kyle Powers Cromwell, as Custodian for Sterling Robert Cromwell, a minor



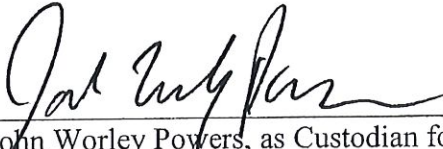
Kyle Powers Cromwell, as Custodian for Charles Welder Cromwell, a minor

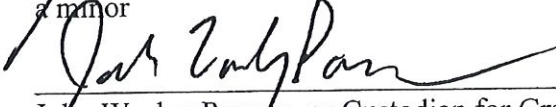


James Power Allen

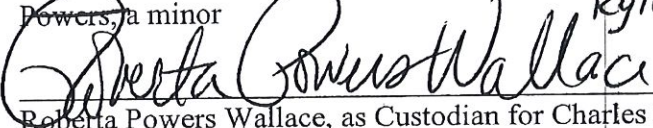


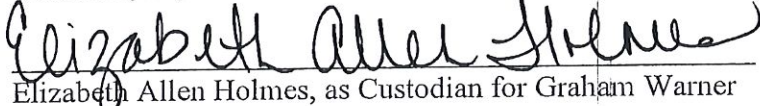
Timothy Hughes Powers


John Worley Powers, as Custodian for John Worley Powers, III,
a minor


John Worley Powers, as Custodian for Grace McMillan Powers,
a minor


Roberta Powers Wallace, as Custodian for ~~Grace McMillan~~
Powers, a minor ^{pm} *Kylie Beth Wallace*


Roberta Powers Wallace, as Custodian for Charles Joseph
Schindler, III, a minor

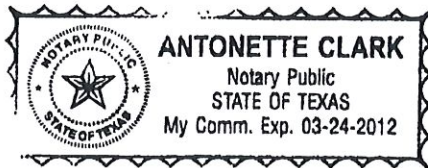

Elizabeth Allen Holmes, as Custodian for Graham Warner
Holmes, a minor

ACKNOWLEDGMENT

STATE OF TEXAS

COUNTY OF

This instrument was acknowledged before me on the 18 day of December, 2008, by **Diana Welder Hamilton**, acting in her capacity as manager of DWH Management Co., LC, acting in its capacity as general partner of Hamilton-Ingleside Limited.



Notary Public

ACKNOWLEDGMENT

STATE OF TEXAS

COUNTY OF

This instrument was acknowledged before me on the _____ day of _____, 2008,
by **David Edwards**, Trustee of the Edwards 1976 Trust "A".

Notary Public

ACKNOWLEDGMENT

STATE OF TEXAS

COUNTY OF

This instrument was acknowledged before me on the _____ day of _____, 2008,
by **Patricia Edwards Carson**, Trustee of the Edwards 1976 Trust "B"

Notary Public

ACKNOWLEDGMENT

STATE OF TEXAS

§

§

COUNTY OF _____

§

This instrument was acknowledged before me on the _____ day of _____, 2008,
by **Diana Welder Hamilton**, acting in her capacity as manager of DWH Management Co., LC,
acting in its capacity as general partner of Hamilton-Ingleside Limited.

Notary Public

ACKNOWLEDGMENT

STATE OF TEXAS

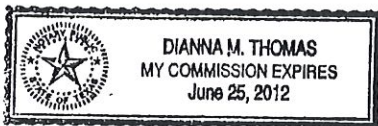
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COUNTY OF San Patricio

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This instrument was acknowledged before me on the 15th day of December, 2008,
by **David Edwards**, Trustee of the Edwards 1976 Trust "A".



Dianna M. Thomas
Notary Public

ACKNOWLEDGMENT

STATE OF TEXAS

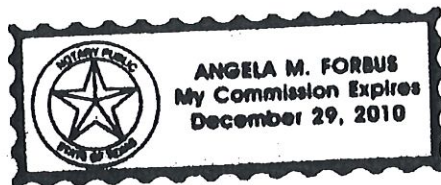
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§

COUNTY OF Yell

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This instrument was acknowledged before me on the 18th day of December, 2008,
by **Patricia Edwards Carson**, Trustee of the Edwards 1976 Trust "B"



Angela M. Forbus
Notary Public

ACKNOWLEDGMENT

STATE OF TEXAS

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COUNTY OF Queces

This instrument was acknowledged before me on 23rd day of December 2008, by **Edmond J. Ford**, acting in his capacity as Manager of Ford-Powers Family Management Co., LLC, acting in its capacity as general partner of Ford-Powers Family Properties, Ltd.



Donna L. Elledge
Notary Public

ACKNOWLEDGMENT

STATE OF TEXAS

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COUNTY OF Queces

This instrument was acknowledged before me on 23rd day of December 2008, by **Edmond J. Ford**, acting in his capacity as Manager of Ford-Powers Family Management Co., LLC, acting in its capacity as general partner of Ford-Powers Family Properties, Ltd.



Donna L. Elledge
Notary Public

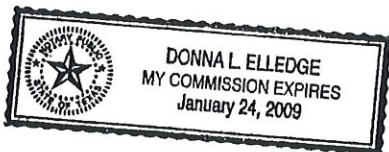
ACKNOWLEDGMENT

STATE OF TEXAS

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COUNTY OF Queces

This instrument was acknowledged before me on the 23rd day of December, 2008, by **Helen Ford Allen**.



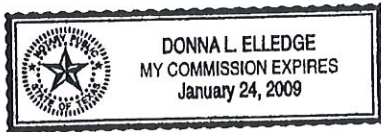
Donna L. Elledge
Notary Public

ACKNOWLEDGMENT

STATE OF TEXAS)

COUNTY OF Queces)

This instrument was acknowledged before me on the 23rd day of December, 2008,
by **Grace Ford Powers**.



Donna L. Elledge
Notary Public

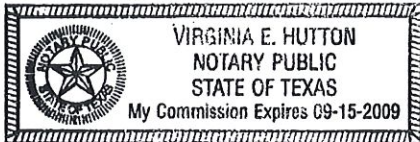
ACKNOWLEDGMENT

STATE OF TEXAS

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COUNTY OF San Patricio

This instrument was acknowledged before me on the 26th day of Dec, 2008, by
Roberta Powers Wallace.



Virginia E. Hutton
Notary Public

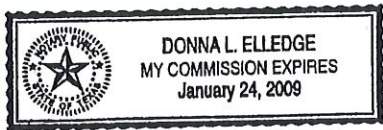
ACKNOWLEDGMENT

STATE OF TEXAS

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COUNTY OF Queen

This instrument was acknowledged before me on the 29th day of December, 2008, by
John Worley Powers.



Donna L. Elledge
Notary Public

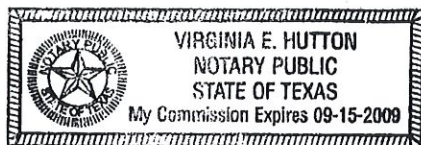
ACKNOWLEDGMENT

STATE OF TEXAS

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COUNTY OF San Patricio

This instrument was acknowledged before me on the 26th day of Dec, 2008, by
Roberta Powers Wallace.



Virginia E. Hutton
Notary Public

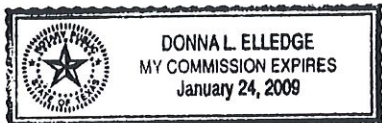
ACKNOWLEDGMENT

STATE OF TEXAS

COUNTY OF Neues

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This instrument was acknowledged before me on the 29th day of December, 2008, by
Kyle Powers Cromwell.



Donna L. Elledge
Notary Public

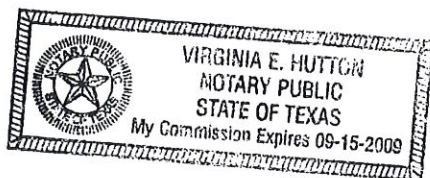
ACKNOWLEDGMENT

STATE OF TEXAS

COUNTY OF San Patricio

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This instrument was acknowledged before me on the 26th day of Dec, 2008, by
William Daly Powers.



Virginia E. Hutton
Notary Public

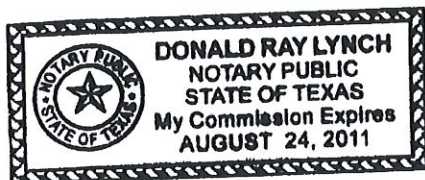
ACKNOWLEDGMENT

STATE OF TEXAS

COUNTY OF Harris

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This instrument was acknowledged before me on the 05th day of Jan, ²⁰⁰⁹ ~~2008~~, by
Elizabeth Allen Holmes.



Donald Ray Lynch
Notary Public

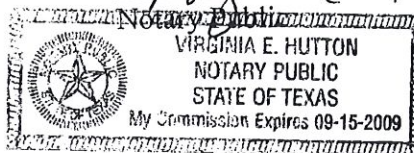
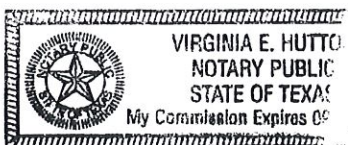
ACKNOWLEDGMENT

STATE OF TEXAS

COUNTY OF San Patricio

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This instrument was acknowledged before me on the 26th day of Dec, 2008, by **Ford Welder Allen**.



ACKNOWLEDGMENT

STATE OF TEXAS

COUNTY OF Queens

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This instrument was acknowledged before me on the 23rd day of December, 2008, by **Janet Wallace Allen**.



Donna L. Elledge
Notary Public

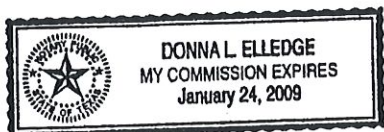
ACKNOWLEDGMENT

STATE OF TEXAS

COUNTY OF Queens

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This instrument was acknowledged before me on 29th day of December, 2008, by **Kyle Powers Cromwell**, acting in her capacity as Custodian for Jackelyn Kay Cromwell, a minor, and acting in her own capacity as Custodian for Sterling Robert Cromwell, a minor, and acting in her capacity as Custodian for Charles Welder Cromwell, a minor.



Donna L. Elledge
Notary Public

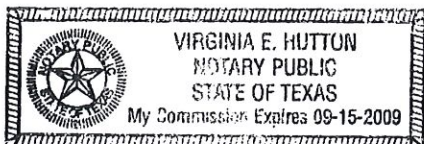
ACKNOWLEDGMENT

STATE OF TEXAS

COUNTY OF San Patricio

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This instrument was acknowledged before me on 26th day of Dec, 2008, by **James Power Allen**.



Virginia E. Hutton
Notary Public

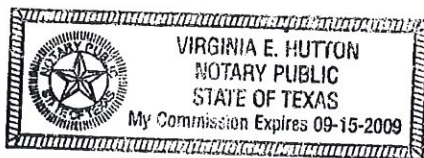
ACKNOWLEDGMENT

STATE OF TEXAS

COUNTY OF San Patricio

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This instrument was acknowledged before me on 26th day of Dec, 2008, by **Timothy Hughes Powers**.



Virginia E. Hutton
Notary Public

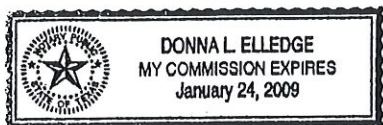
ACKNOWLEDGMENT

STATE OF TEXAS

COUNTY OF Quercus

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This instrument was acknowledged before me on the 29th day of December, 2008, by **John Worley Powers**, acting in his capacity as Custodian for John Worley Powers III, a minor and acting in his capacity as Custodian for Grace McMillan Powers, a minor.



Donna L. Elledge
Notary Public

ACKNOWLEDGMENT

STATE OF TEXAS

COUNTY OF

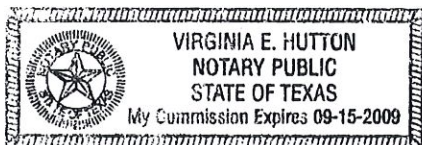
San Patricio

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This instrument was acknowledged before me on the 26th day of Dec, 2008, by **Roberta Powers Wallace** acting in her capacity as Custodian for Kylie Beth Wallace, a minor and acting in her capacity as Custodian for Charles Joseph Schindler, III, a minor.

Virginia E. Hutton

Notary Public



ACKNOWLEDGMENT

STATE OF TEXAS

COUNTY OF

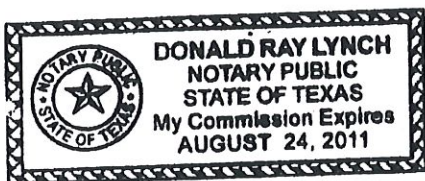
Harris

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This instrument was acknowledged before me on the 05th day of Jan, ²⁰⁰⁹~~2008~~, by **Elizabeth Allen Holmes**, acting in her capacity as Custodian for Graham Warner Holmes, a minor.

Donald Ray Lynch

Notary Public



ADDRESS OF GRANTORS:

c/o Edmond Ford
4225 Avalon
Corpus Christi, TX 78412

ADDRESS OF GRANTEE:

City of Ingleside
P.O. Drawer 400
Ingleside, TX 78362

RETURN TO:

Kimberly Drysdale
City Secretary
P.O. Drawer 400

ADDRESS OF GRANTORS:

c/o Edmond Ford
4225 Avalon
Corpus Christi, TX 78412

ADDRESS OF GRANTEE:

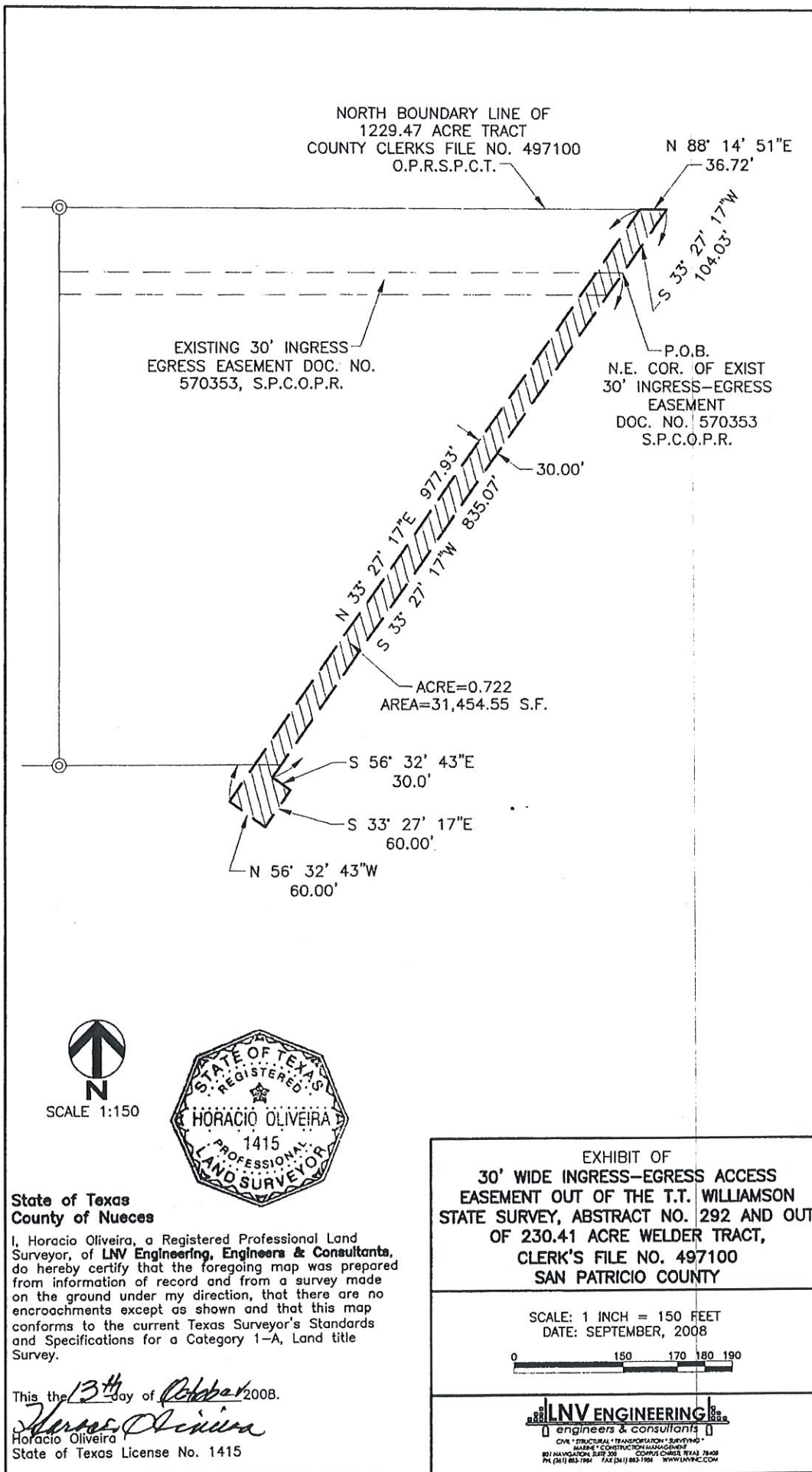
City of Ingleside
P.O. Drawer 400
Ingleside, TX 78362

RETURN TO:

Kimberly Drysdale
City Secretary
P.O. Drawer 400
Ingleside, TX 78362

Attachments:

Exhibit A Legal Description (2 pages)



LVN ENGINEERING
ENGINEERS & CONSULTANTS
801 Navigation, Suite 300
Corpus Christi, Texas 78408
Phone: (361) 883-1984 Fax: (361) 883-1986

Page 1 of 1-LVN-30' Ingress-Egress Easement-Welder

Description for a 30 foot wide **Ingress-Egress Access Easement** out of the T. T. Williamson State Survey, Abstract No. 292 and out of the 230.41 acre Welder Tract recorded in County Clerk's File No. 497100, San Patricio County, Texas Official Public Records and being out of a portion of that particular 30 foot wide Ingress-Egress Access Easement dated June 21, 2007, recorded in Document No. 570353, Official Public Records, San Patricio County, Texas, said proposed 30 foot wide Ingress-Egress Access Easement being more particularly described by **metes and bounds** as follows:

Beginning at the northeast corner of said recorded 30 foot wide Ingress-Egress Access Easement for the northeast and **beginning** corner of the tract herein described:

Thence **South-33°-27'-17"-West**, with the southeast line of said recorded 30 foot Access Easement, at 36.72 feet pass its southeast corner thereof, in all, a distance of 835.07 feet to a point for an interior corner of the tract herein described:

Thence **South-56°-32'-43"-East**, a distance of 30.00 feet to a point for a corner of the tract herein described:

Thence **South-33°-27'-17"-West**, a distance of 60.00 feet to a point for a corner of the tract herein described:

Thence **North-56°-32'-43"-West**, a distance of 60.00 feet to a point for the most westerly corner of the tract herein described:

Thence **North-33°-27'-17"-East**, at 837.18 feet pass the south line of said ingress-egress easement, at 873.90 feet pass its north line thereof, in all, a distance of 977.93 feet to a point in the north line of said 1,229.47 acre tract, for the northwest corner of the tract herein described:

Thence **North-88°-14'-51"-East**, with the north line of said 1229.47 acre tract, a distance of 36.72 feet to a point for its northeast corner thereof and for the northeast corner of the tract herein described:

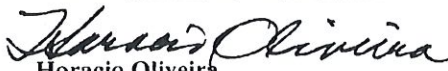
Thence **South-33°-27'-17"-West**, a distance of 104.03 feet to the **Point of Beginning**.

Containing 0.722 acre (31,455.5 square feet) of land.

State of Texas
County of Nueces

I, **Horacio Oliveira**, a Registered Professional Land Surveyor, of **LVN ENGINEERING, Engineers & Consultants**, do hereby certify that the foregoing Field Note Description was prepared from information of record and from a survey made on the ground under my direction, that there are no encroachments, except as shown, and that this description conforms to the current Texas Surveyor's Association Standards and Specifications for a Category I-A, Land Title Survey.

This the 13th day of October 2008.


Horacio Oliveira
State of Texas License No. 1415



FILED AND RECORDED
OFFICIAL PUBLIC RECORDS

Gracie Alaniz-Gonzales

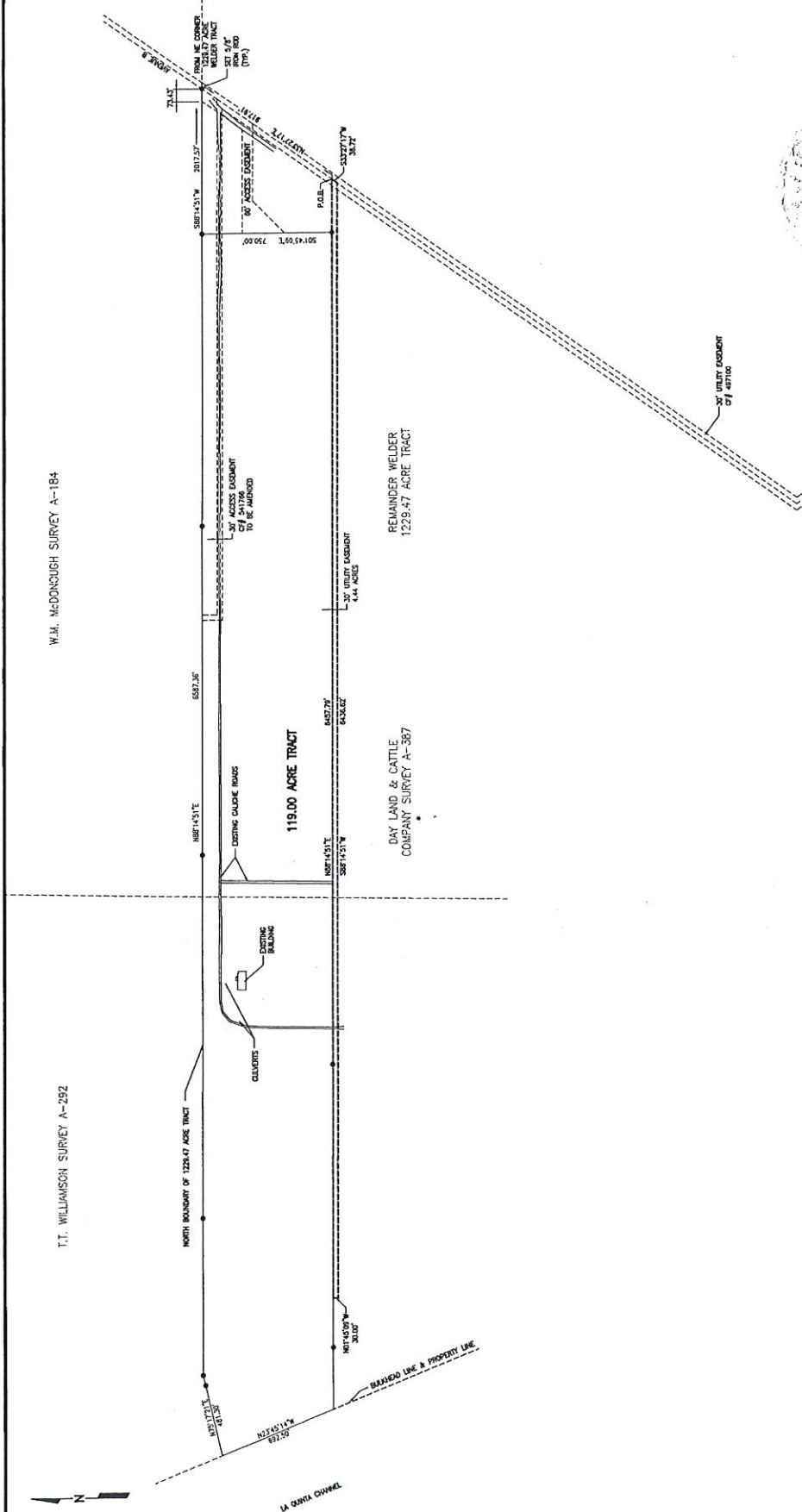
Gracie Alaniz-Gonzales, County Clerk
San Patricio Texas



March 31, 2009 01:55:32 PM

FEE: \$96.75
ING ER EASE

589388



5/29/08

EXHIBIT A
METES AND BOUNDS DESCRIPTION
OF A
THIRTY FOOT WIDE
UTILITY EASEMENT

Being a 30 foot wide utility easement, within a 1229.47 acre Welder Tract being out of the Day Land & Cattle Survey, A-387, and the T.T. Williamson Survey, A-292, and this thirty foot wide utility easement being more particularly described by metes and bounds as follows:

Beginning at the northeast corner of this easement, said corner being on the west boundary line of an existing thirty foot wide utility easement as described in Clerk's File Number 497100, Official Records of San Patricio County, Texas, and from which a 5/8 inch iron rod set at the intersection of the North boundary of said 1229.47 acre tract with the west line of said existing easement bears N 33-27-17 E, 917.91 feet;

Thence S 33-27-17 W along the west boundary line of said recorded utility easement, 36.72 feet, to the southeast corner of this easement;

Thence S 88-14-51 W and running 30 feet south of and parallel to the south boundary of a 119.00 acre tract, 6436.62 feet, to the southwest corner of this easement;

Thence N 01-45-09 W, 30.00 feet, to the northwest corner of this easement, said corner also being on the south boundary of said 119.00 acre tract;

Thence N 88-14-51 E with the north boundary of this easement, the same being the south boundary of said 119.00 acre tract, at 1355.50 feet pass a 5/8 inch iron rod, at 6152.57 feet pass a 5/8 inch iron rod being the southeast corner of said 119.00 acre tract, in all 6457.79 feet to the point of beginning containing 4.44 acres of land, more or less.



Note: Bearings are State Plane Grid bearings.