

PUBLIC HEARING AND OPPORTUNITY TO COMMENT
REGION N WATER PLANNING GROUP – WHAT’S AT STAKE?

On June 2, 2020 the Region N Water Planning Group will accept public comment on the 2021 Initially Prepared Plan (IPP) to be submitted to the Texas Water Development Board (TWDB).

What is a Regional Water Planning Group?

In 1997, the Texas Legislature authorized the creation of water planning Districts throughout the state. Those Districts enlist a Water Planning Group consisting of members representing a variety of interests, including agriculture, industry, environment, public, municipalities, business, water districts, river authorities, water utilities, counties, groundwater management areas, and power generation.

Water Planning Groups are charged with developing long-range plans to address the demands on water supplies for years to come. Every 5 years, they update the plan. In doing so, they engage in a number of tasks that include quantifying current and projected population and water demand over a 50-year planning horizon, evaluating and quantifying current water supplies, and evaluating water management strategies to meet the projected needs and the potential impacts of drought on water supply. The Plan must also address the long-term protection of the state’s water, agricultural, and natural resources, describing how water management strategies are financed and the overall impacts to the environment.

Region N Water Planning Group

There are 16 Water Planning Groups in the state. Region N includes 11 counties in the Coastal Bend of Texas: Aransas, Bee, Brooks, Duval, Jim Wells, Kenedy, Kleberg, Live Oak, McMullen, Nueces, and San Patricio.

Region N has been working on the 2021 Plan for a long while. Water management strategies have included conservation, water re-use and reclamation, and available aquifer groundwater. In recent years, the Group has been presented a number of proposed water management strategies that include the construction of seawater desalination facilities. As a potential water management strategy, the 2021 Plan includes proposals from the City of Corpus Christi, the Port of Corpus Christi Authority, and the City of Ingleside to build five (5) separate and distinct facilities, all to be located within Corpus Christi Bay.

Public Hearing

The Public Hearing on June 2 affords the public an opportunity to comment on the 2021 Plan that is submitted to the TWDB, where plans submitted by all the Regions are then used to develop state strategies, including those that would require prioritization for state financing. Written comments can also be submitted until August 1, 2020.

Costs and Permitting for Seawater Desalination

Financing these facilities will be costly. In the 2021 Plan, the total *capital and indirect costs* for construction of the facilities to their desired maximum capacity range from \$457.7 million to \$1.281 billion. Thereafter, *annual operating costs* will range from \$78 million to \$218.9 million.

As with any project involving this large amount of capital and ongoing expenditures, the cost to build the facilities and operate them will have to be borne by someone. Eventually, it will be the consumer who buys the water for agricultural, residential, commercial, and industrial use. All proposals estimate substantially higher rates per 1,000 gallons than what current ratepayers are paying, especially during the 20 years of debt service.

These are current projected costs. How those costs will escalate over time is another concern. The experience with other seawater desalination facilities in Florida and California reveals capital cost overruns and underestimated operational costs.

Permits are also required. Each facility requires two separate permits from the TCEQ, one for Intake (Water Rights Permit), and one for the Discharge (Water Quality Permit).

Intake- All of the facilities will seek water from the bay. Hundreds of millions of gallons will be drawn from the Bay at multiple points, with intake rates as high as 115,417 gallons per minute. While most impactful on larvae that are the foundation of our ecosystem, aquatic life of all sizes are susceptible to entrapment (aquatic life caught in the pipeline suction and cannot escape), impingement (aquatic life that are stuck on the screens by the force of the suction), and entrainment (aquatic life small enough to pass through the screens and enter the treatment process).

Discharge - All of the facilities will discharge brine concentrate into the bay system at amounts beyond comprehension, hundreds of millions of gallons per day. These too will be at multiple locations throughout the bay. The danger to seagrasses and nurseries in our estuaries is very real. Unless dispersed properly, this plume of brine will be heavier and will sink to the bottom of the channels choking aquatic life and seagrasses. Even if dispersed, the plume will increase the salinity levels throughout the bay where the supply of freshwater is critical to maintaining the balance of water quality to sustain aquatic life and is currently monitored to assure proper freshwater inflow. The introduction of the high amounts of brine into the bay and estuary system will upset this delicate balance.

Seawater Desalination as a Management Strategy

Seawater desalination, as currently proposed, should not be included as a management strategy in the 2021 Plan. The approach is the *most expensive* and carries the *greatest risk* to the natural environment. And lest we forget, each of the entities seeking to incorporate this strategy have acknowledged they are doing so to promote and *support industrial growth*, bringing with it the concomitant air and water quality problems that will inevitably come from industrializing our communities.