

## Talking Points: POCCA Solar Farm Project- Ingleside by McCampbell Airport Rezone request from Residential to Industrial

- United States Army Corp of Engineers (USACE) has **NOT** yet approved their permit. This USACE permit would allow POCCA to discharge approximately 111,100 cubic yards of fill material into 13.9 acres of wetlands adjacent to McCampbell Slough, a tidal water of the United States. The discharges are associated with constructing an approximate 600-megawatt solar panel to include photovoltaic solar panel development on the property. Work consists of constructing 10-foot wide aggregate access routes, rotating solar panels mounted on helical piles, power inverters, and two electric substations in an approximate 1,866-ac area.
- Texas Parks and Wildlife Department recommended that the USACE deny their permit request on March 13, 2023. They requested that it include practical alternatives that avoid and minimize impacts on notable aquatic species.
- To support the attainment of water quality standards for the Mission-Aransas Estuary, impacts on wetland functions should be avoided and minimized to the extent practicable.
- POCCA should contact San Patricio County to determine if the 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 designed to minimize potential impacts.
- POCCA states the temporary impacts would be restored to pre-construction conditions, but these temporary impacts have not been adequately described in terms of location, extent, or habitat types affected.
- Insufficient research is available on photovoltaic solar panels' direct and indirect effects on wetland ecosystems. Any adverse effects that may result from the installation, operation, and decommissioning of these panels have the potential to affect up to 1,588 acres of wetlands adversely.
- POCCA states that this solar farm project is for economic development in the clean hydrogen sector at the site where it would be developed. Since this is part of a more significant effort, POCCA should provide an appropriate scope of the proposed project, identify connected facilities or actions, and complete an Environmental Impact Statement.
- USACE still needs to assess public interest. **POCCA states that low-carbon** energy generation and moving the region toward carbon neutrality are unequivocally aligned with the public interest. This response assumes that all other factors, such as biodiversity, conservation of wetlands, fish and wildlife values, native peoples' sites, navigation, safety, etc., are to be sacrificed to a goal (not a fact) of carbon neutrality.
- POCCA evaluated many sites and determined McCampbell property to be the best suited; see Attachment A. Attachment A is not included in this document and cannot be reviewed and assessed. The rationale for selecting McCampbell remains unclear. It could be necessary to recover some value from the purchase to spur the siting of other industrial development. The response does not directly address the suggested site or include a clear rationale for selecting the McCampbell property.
- "Alternative Analysis Summary" suggests it may not comply with Clean Water Act Sec. 404(b)(1) guidelines. **POCO states:** A more detailed analysis is provided in Attachment D, and an updated analysis is included as part of Attachment A. Neither Attachment D nor Attachment A is included in this document and cannot be reviewed and assessed.
- There is missing information on the application since POCCA has an approved lease agreement for carbon sequestration on this site. **POCCA states:** The carbon sequestration project and the solar farm project are separate, and regulatory approval will be sought for the sequestration project independent of the solar farm project. The McCampbell property is 2,850 acres, and the solar farm plans to occupy 1,866 acres. There is an opportunity for additional independent projects. **Comment:** This response appears to support the assessment that the development of the solar farm is intended to spur additional industrial development in this area, specifically on this property. POCCA should declare its intent so that the City of Ingleside can determine whether further development is in the interest of the city and its citizens.
- Wetlands within the project area function to attenuate flood waters from stormwaters associated with rainfall and storm surge, remove pollutants related to runoff from neighboring communities and onsite

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activities, store and recycle nutrients, and support water quality functions for fish and wildlife onsite and those located downstream McCampbell Slough and Port Bay.