

August 14, 2013

Mr. Derek Green Senior Project Manager Atkins North America, Inc. 6504 Bridge Point Parkway, Suite 200 Austin, TX 78730

Re: Proposed Barney Davis to Naval Base 138-kV Transmission Line Project

PLANINING ENVIRONMENTAL SERVICES

P.O. Box 9277 Corpus Christi Texas 78469-9277 Phone 361-826-3245 www.cctexas.com Dear Mr. Green:

In response to your letter dated July 29, 2013 requesting environmental or land use concerns that the City may have regarding the potential environmental effects from the construction of new transmission line facilities between the existing Barney M. Davis Substation and the existing Naval Base Substation, the City has investigated this location and determined that issues of significance include:

Environmental concerns:

- Numerous Surrounding Wetlands
- Possible contamination from LPST sites, spent drilling muds, oil field brines, former chloride spill at BDPP
- Endangered species (Whooping crane critical habitat/blue crab spawning-season is Dec - Oct))
- Redhead Pond Wildlife Management Area
- Numerous City Parks
- Laguna Madre
- Waldron Field (possible chemical spills, USTs, munitions)
- Oso Bay/Oso Creek EPA 303(d) listed impaired waters
- Hans Suter Wildlife Refuge
- Ward Island
- Trailing Ponds
- Other ecologically sensitive areas i.e. seagrasses
- Other critical species habitat, i.e. white and brown shrimp

In addition, there are likely height issues related to AICUZs. Consideration of the City Planning efforts, i.e., Unified Development Code, JLUS, etc. should also be included. The following are links:

- The City's Comprehensive Plan: http://www.cctexas.com/government/planning-&-environment/index
- The City's Unified Development Code and Code of Ordinances: http://www.cctexas.com/government/development-services/index

click on Zoning

 The City's Municipal Code http://library.municode.com/index.aspx?clientId=13945

Also, please be aware of the City's effort to create compatible land use around the four City Airports: www.ccjlus.com

In response to your question regarding permits the City may require, the City of Corpus Christi Development Services had the following comments:

- No building permits would be needed.
- ETT probably needs an agreement with the City to use its right-of-way. AEP has one, but ETT will likely need one. Otherwise, Use Privilege Agreements would be needed in every instance that ETT's infrastructure is located in City ROW.
- ETT must obtain easements through City-owned property (e.g. parks).

Proposed development or construction in the area includes:

- JFK Causeway Improvements
- Waldron Road Improvements from Airdome Drive to Caribbean Drive
- Flour Bluff Solid Waste Collection System
- Laguna Shores Forced Main Replacement
- Wranosky State Park Project at Graham Road

The City appreciates the efforts of the Atkins North America, Inc. and Electric Transmission Texas in collecting and evaluating environmental data of the study area and the opportunity to provide comments which will be considered in both the selection and evaluation of alternative routes, as well as in the assessment of impacts. Once a route has been delineated, we will be available to provide more specific information and to review any proposed routes. Please feel free to contact me if you require additional information.

Sincerely.

Pete Anaya, P.E.

Director of Planning and Environmental Services

City of Corpus Christi