

Consent Decree Progress and Overview

Nicholas J. Winkelmann, P.E.
Interim Chief Operating Officer – Corpus Christi Water
February 10, 2026



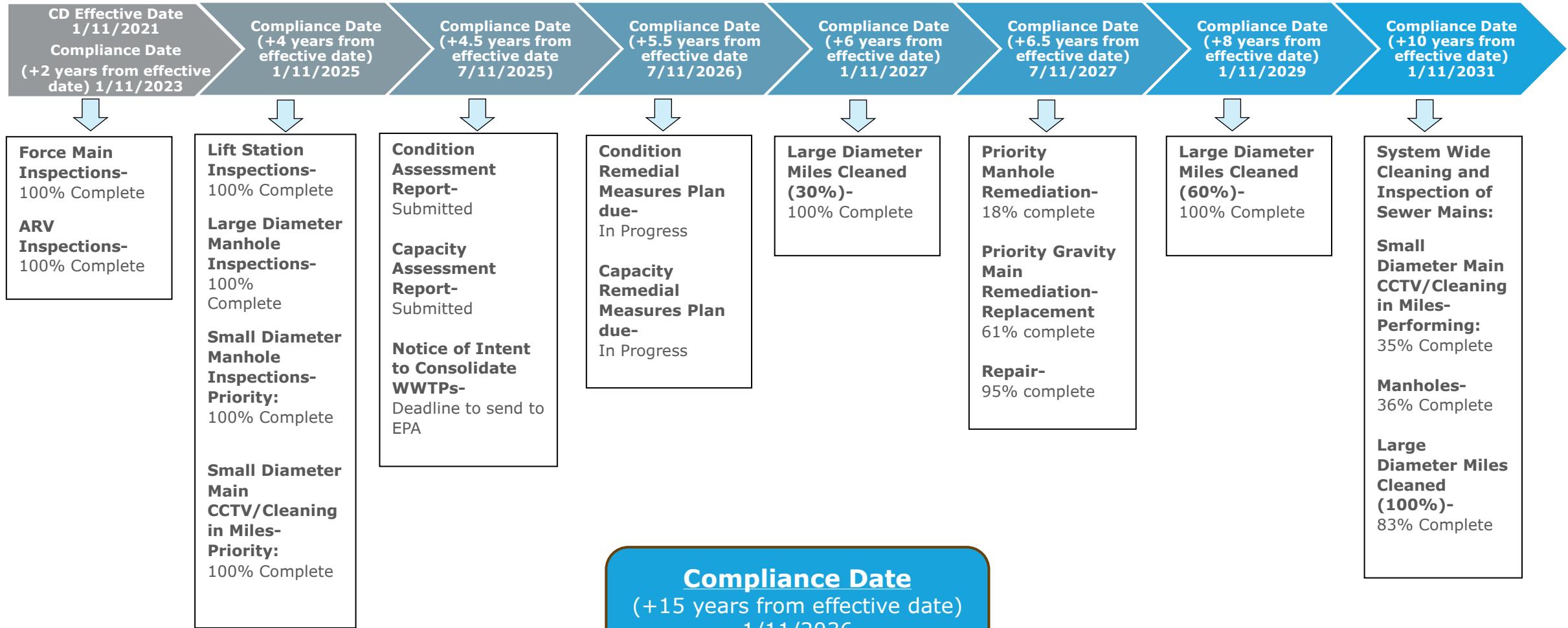
Wastewater Consent Decree

A court-approved agreement between:

- U.S. Environmental Protection Agency (EPA)
- U.S. Department of Justice (DOJ)
- Texas Commission on Environmental Quality (TCEQ)
- The City of Corpus Christi

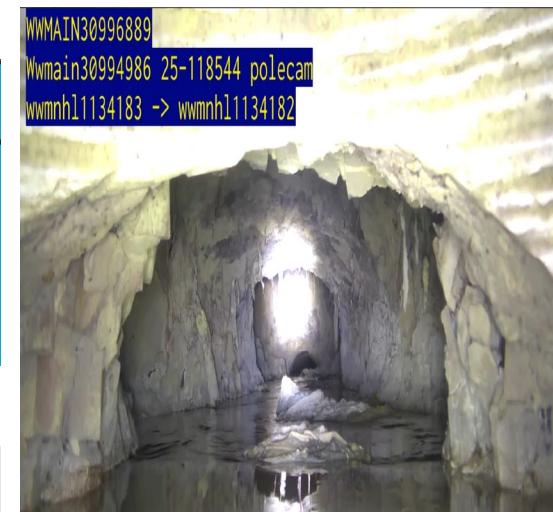
Requirements:

- Full compliance with Clean Water Act (CWA) and Texas Water Code (TWC)
- Prevention of sanitary sewer overflows (SSOs)/spills
- Responding to SSOs/spills
- Upgrade, operate and maintain the sewer collection system
- Upgrade, operate, and maintain wastewater treatment plants (WWTPs) to ensure adherence to Texas Pollutant Discharge Elimination System (TDPES) permits



Work Completed - District Breakdown

Consent Decree Gravity Main Progress					
District	Miles of CCTV complete	Miles of CCTV pending	Complete repairs	Miles of pipe bursting complete	Miles of pipe bursting in process
1	177	84	186	11.1	23
2	133	64	180	19.2	21
3	136	73	229	8.3	11
4	135	48	149	2.3	6
5	65	80	154	0.8	5
Total	646	349	898	41.7	68

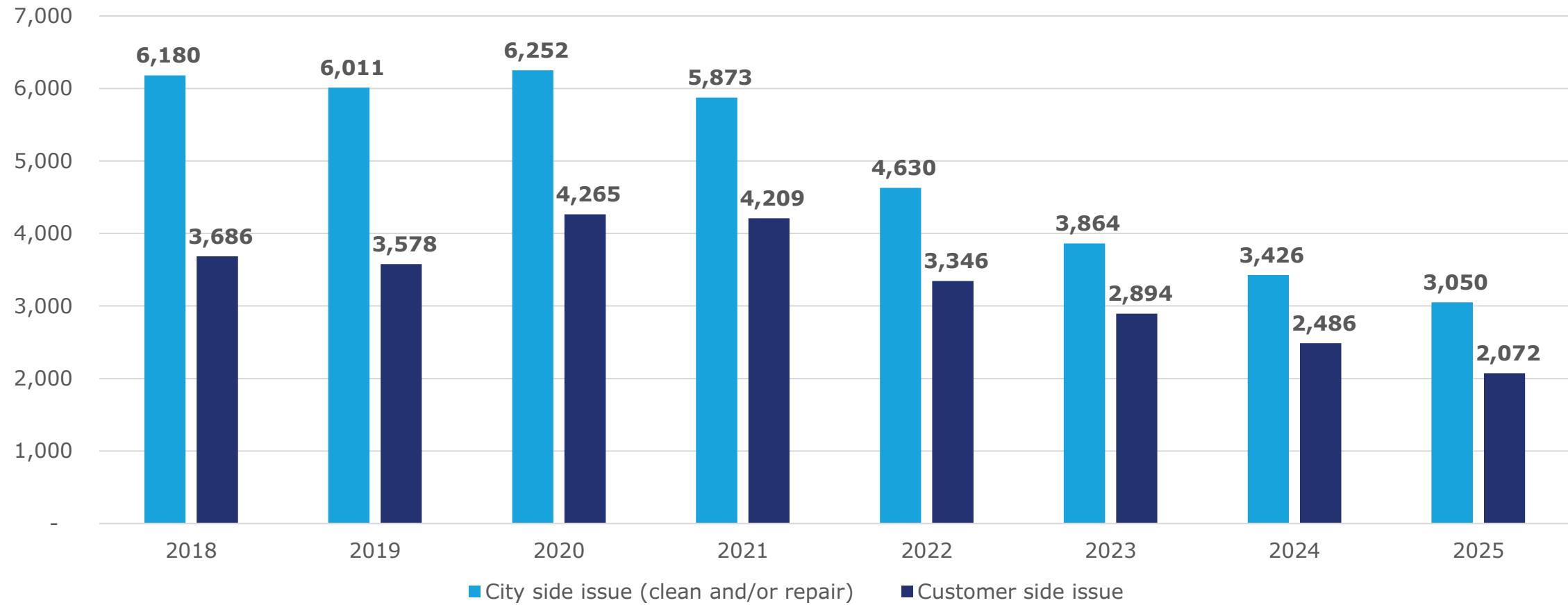


Work Completed - District Breakdown

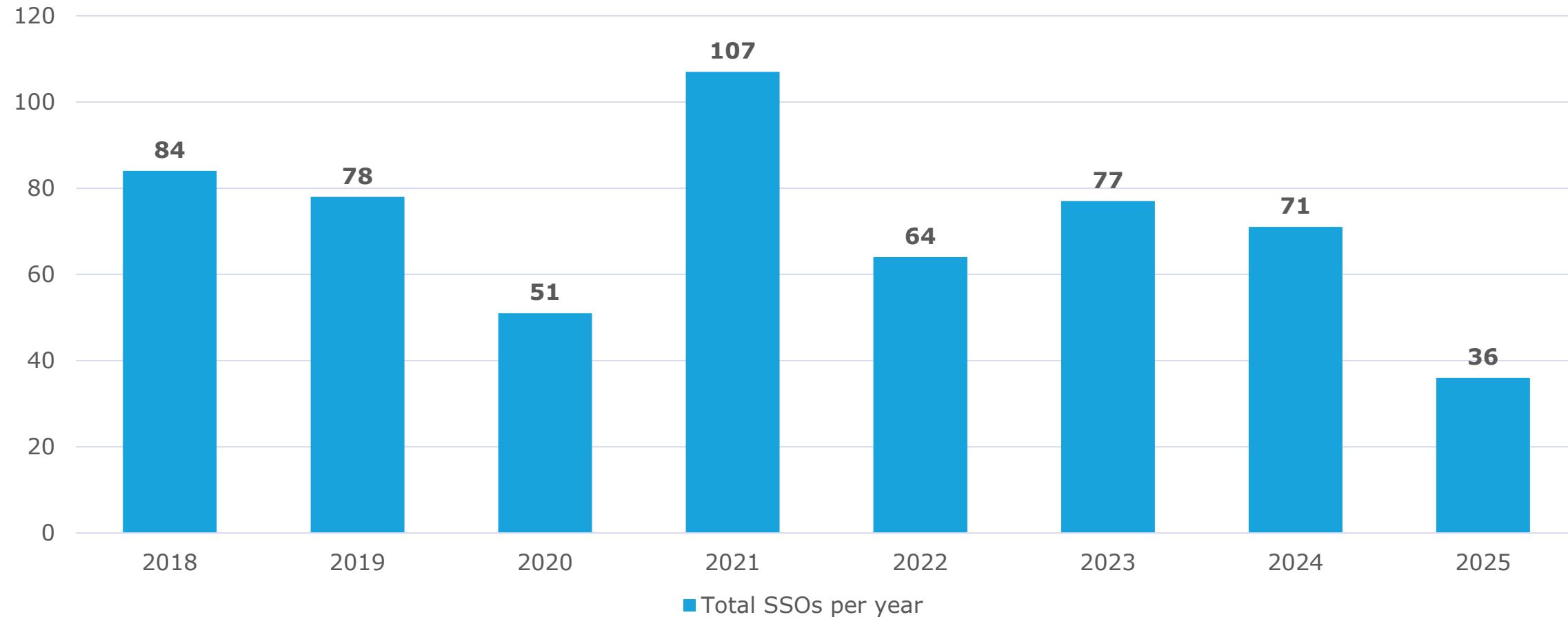
Consent Decree Manhole Progress				
District	Manholes inspected	Manhole inspections remaining	Number of manholes remediated	Number of manholes pending remediation
1	2,815	1,928	69	407
2	2,174	1,138	57	301
3	2,249	1,585	48	270
4	2,112	1,304	11	278
5	2,811	423	7	199
Total	12,161	6,378	196	1462



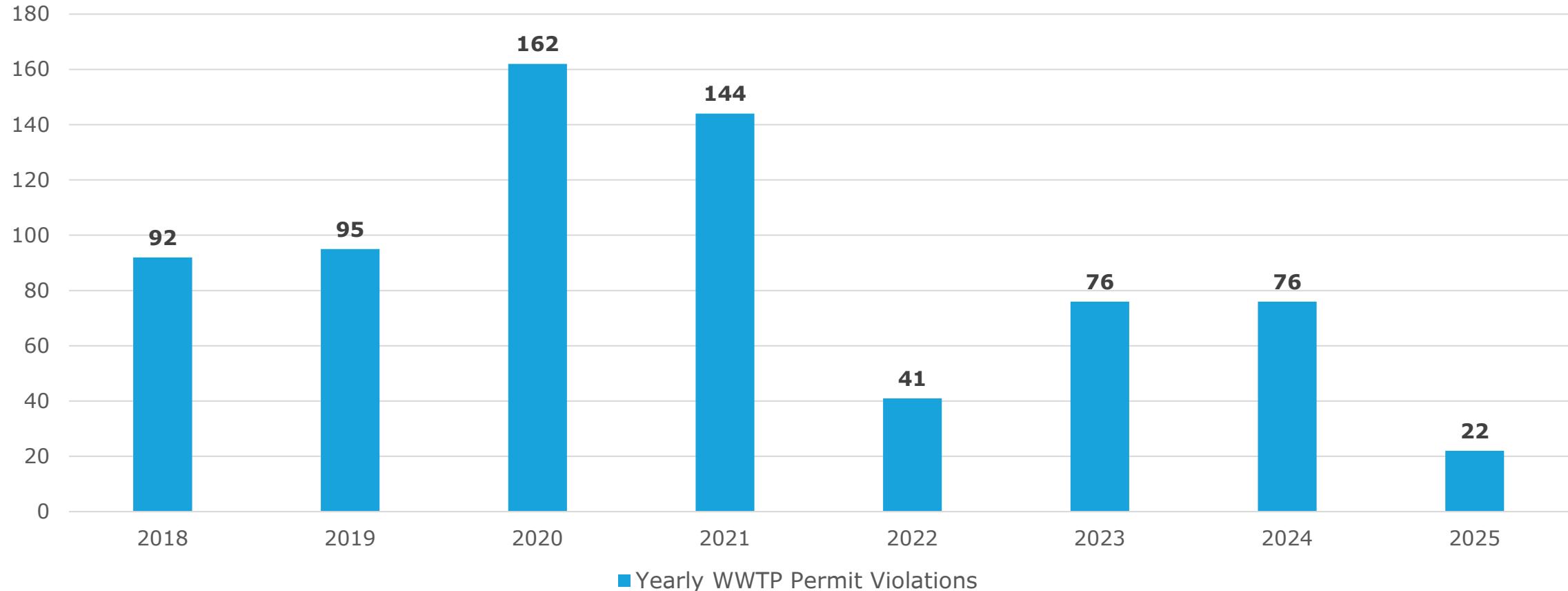
Wastewater Service Line Issues Reported



Sanitary Sewer Overflows (SSOs)

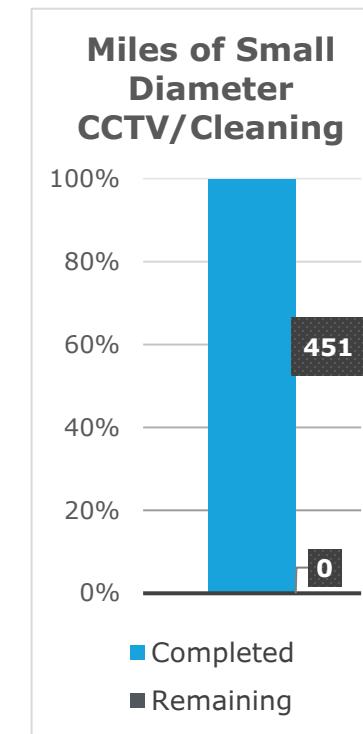
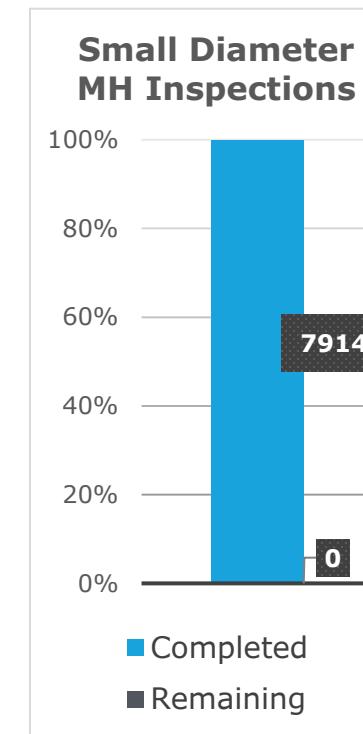
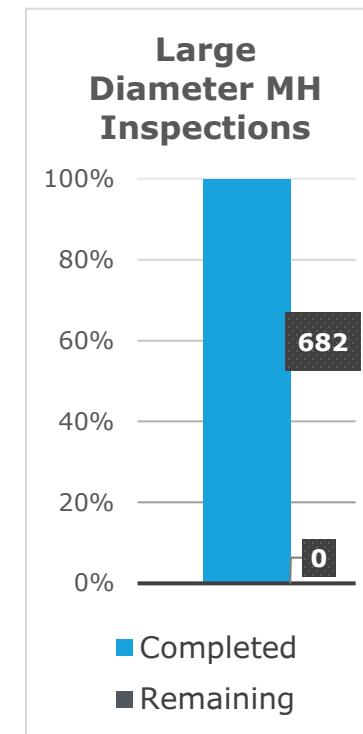
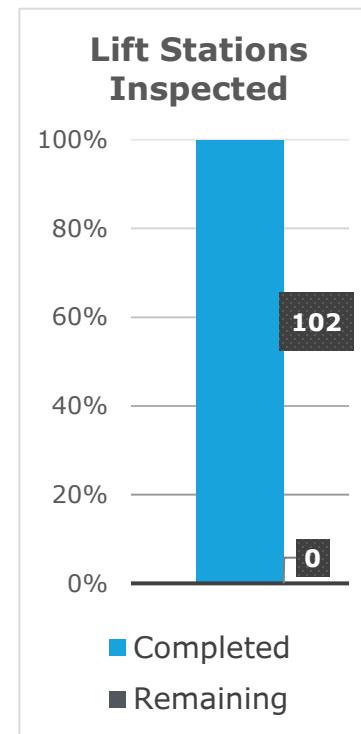
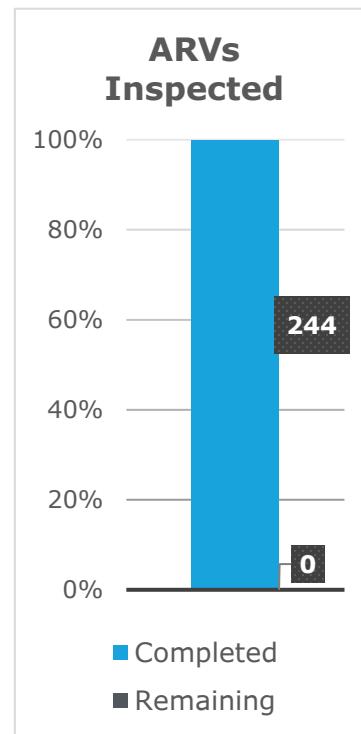
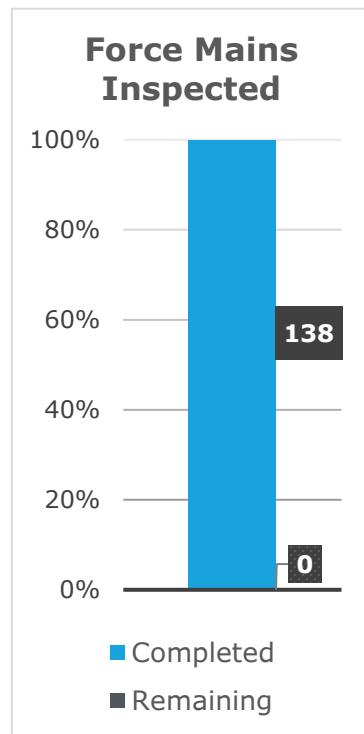


WWTP Permit Violations



Completed Targets

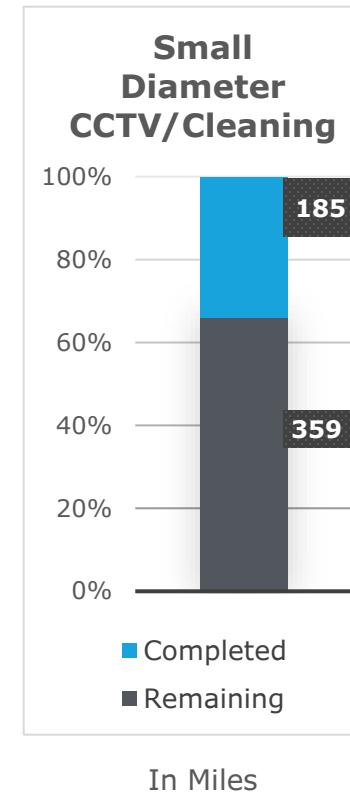
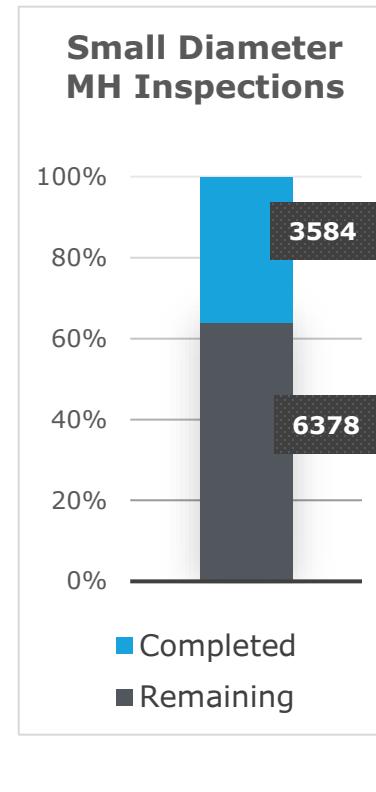
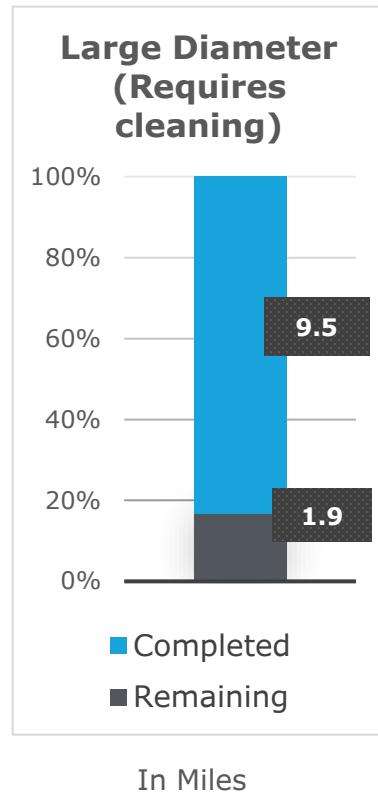
Priority Assets



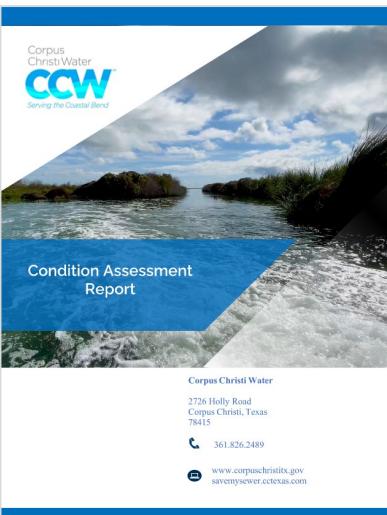
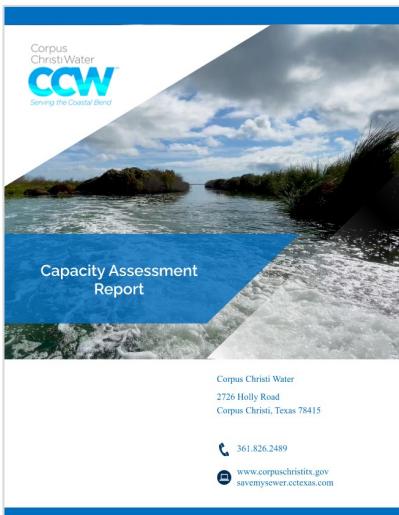
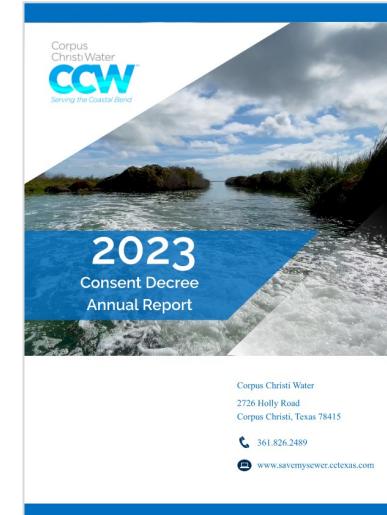
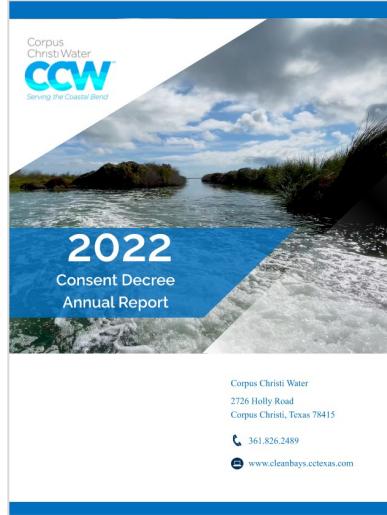
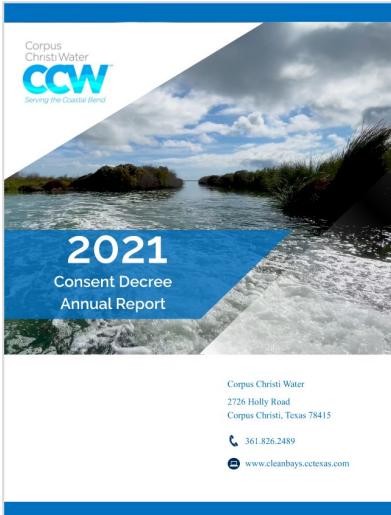
In Miles

Targets In Progress

Collection System Performing Assets



Reporting



Reports In Progress:

- 2025 Annual Report
- Capacity Remedial Measures Plan
- Condition Remedial Measures Plan

Request to be Removed from Consent Decree



U.S. Department of Justice

Environment and Natural Resources Division

Environmental Enforcement Section
P.O. Box 7611
Washington, DC 20544

Telephone (202) 514-4051
Thomas Carroll@usdoj.gov

Settlement Communication

December 9, 2025

By Email
Nathan K. Vassar, Esq.
Lloyd Gosselink Rochelle & Townsend, P.C.
816 Congress Ave., Suite 1900,
Austin, TX 78701
www.lglawfirm.com

Re: *United States and State of Texas v. City of Corpus Christi*, S.D. Texas, Case No. 2:20-cv-00235; Plaintiffs' Response to City of Corpus Christi's Letter of September 23, 2025

Dear Nathan:

I write on behalf of Plaintiffs, the United States on behalf of the U.S. Environmental Protection Agency, and the State of Texas to respond to the City's September 23, 2025, letter regarding terminating the Consent Decree in this case. I am directing this to you to obviate any concern with respect to my communicating with the City as a represented party. I know you will share it with the appropriate representatives of the City.

The City's letter requests, "in light of actions by the Trump Administration . . . regarding other federal consent decrees" and other factors that Plaintiffs waive the requirements of Section XX (Termination), Paragraph 111(a) and (b), to allow the Consent Decree to be terminated. First, we are not aware of other Clean Water Act municipal cases like the City of Corpus Christi Decree that have been terminated early during the current administration.

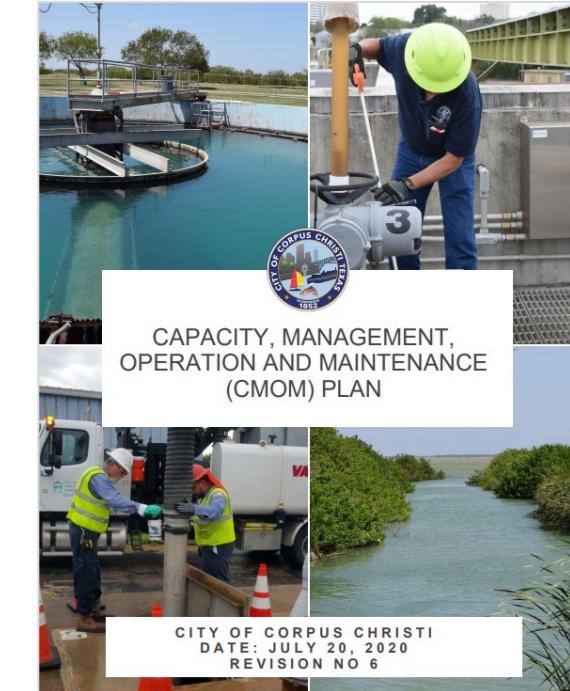
Further, Paragraphs 111(a) and (b) require that a request for termination include a certification by the City that the City has satisfied "all requirements of Section V (Remedial Measures, Prioritization and Schedules) of [the] Consent Decree" and "all other requirements of [the] Consent Decree." The Consent Decree is both an agreement between Plaintiffs and the City and a court order. Any material modification of the Consent Decree, such as the change to the termination provisions that the City requests, are governed by Consent Decree Paragraph 106. That paragraph provides that a material modification of the Decree can only be effective upon approval by the court. Thus, Plaintiffs cannot "waive" compliance with the Decree as requested by the City; instead, any material modification agreed to by the parties must be negotiated and agreed to, by the appropriate high-level officials, lodged with the court, subject to public notice and comment, and approved and entered by the court. As part of any modification request by the City, the City must provide to the United States and the State information

- September 23, 2025 - City requests the dismissal of the Consent Decree
- December 9, 2025 - U.S. Department of Justice responds, stating the agreement will not be dismissed

Post Consent Decree Asset Management

Capacity, Management, Operations, and Maintenance (CMOM)

Miles of clay or cast-iron gravity mains	Estimated miles replaced by 2036	Miles remaining
793	123	670
Brick manholes	Estimated upgrade/remediation by 2036	Remaining to upgrade/remediate
13,924	2,666	11,258



Mandated by the Consent Decree, cleaning, inspections, and necessary repairs will continue on a 20-year inspection cycle described in the CMOM document

Operational Expenses/Budget

Direct

- Wastewater (WW) collection system
- WW collection major maintenance and repair
- WW collection operation and maintenance

Indirect (remaining WW Budget)

- WWTPs
- Lift station operation and maintenance
- WW pre-treatment
- WW electric and instrumentation support

Capital Projects

- WWTP Upgrades
- Lift stations improvements
- Capacity constraints projects
- WW IDIQ



FY 21-26

	Operational		Capital Cost	
	Direct Cost	Indirect Cost		
FY 21	\$ 14,773,713	\$ 52,698,455	\$ 29,689,103	
FY 22	\$ 14,288,744	\$ 60,148,673	\$ 34,177,793	
FY 23	\$ 13,988,262	\$ 66,911,617	\$ 43,898,703	
FY 24	\$ 15,276,085	\$ 66,911,617	\$ 53,220,599	
FY 25	\$ 16,444,118	\$ 71,102,453	\$ 90,314,633	
FY 26 (Est.)	\$ 16,608,559	\$ 71,813,478	\$ 109,748,304	
Total	\$ 91,379,481	\$ 389,586,292	\$ 361,049,136	

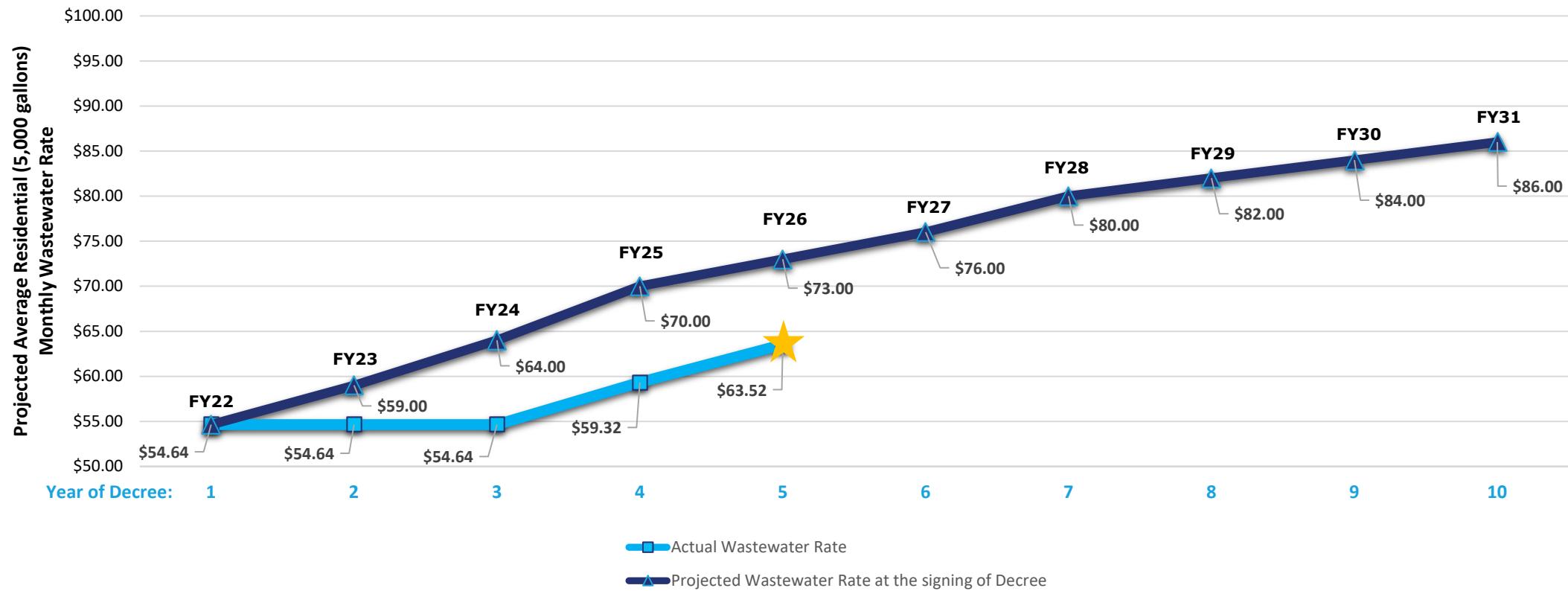
Savings Attributed to Self-Performance

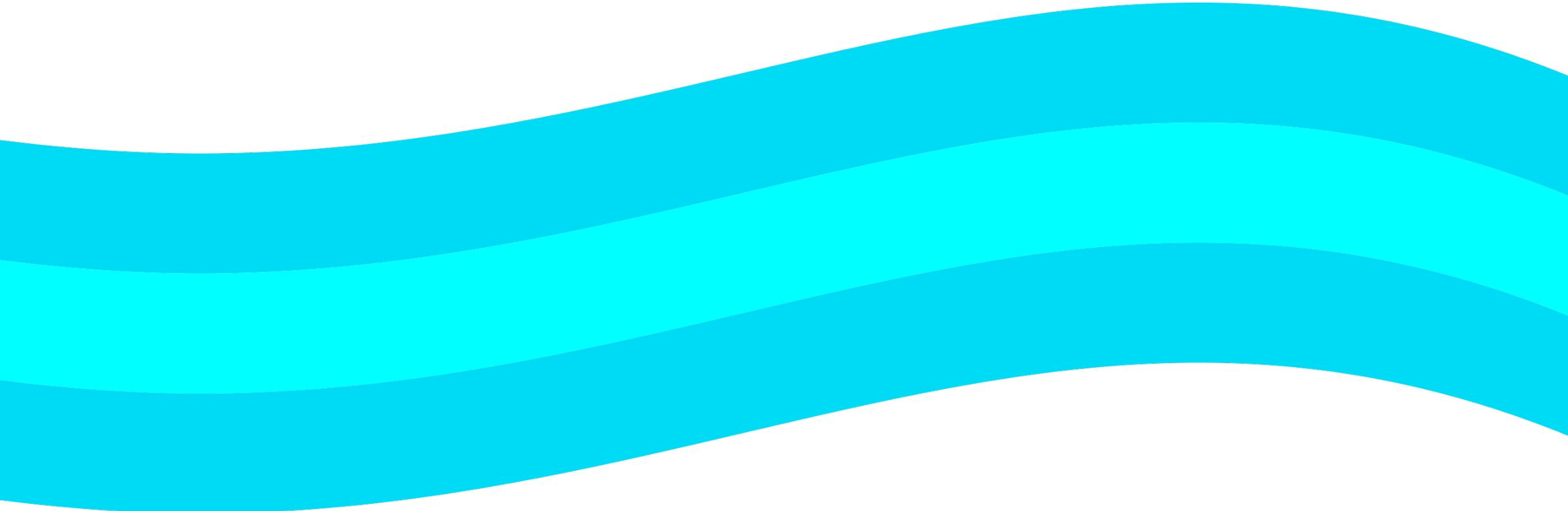
Consent Decree cost analysis through 12/31/2025				
Work performed	Quantity	CCW costs	Estimated contractor / professional service costs	Estimated savings
Feet of CCTV completed	2,383,909	\$12,038,741	\$34,328,291	\$22,289,550
Point repairs completed	1,018	\$5,425,913	\$16,797,000	\$11,371,087
Manhole inspections	12,148	\$1,214,800	\$3,778,028	\$2,563,228
Manhole condition assessments	12,148	\$121,480	\$2,004,420	\$1,882,940
Manhole repairs	1,802	\$1,802,000	\$5,604,220	\$3,802,220
Consent Decree administration	N/A	\$2,292,924	\$15,000,000	\$12,707,076
Total savings				\$54,616,101

Projected Cost FY27-36

	Operational		Capital
	Direct Cost	Indirect Cost	Cost
FY 27	\$ 16,774,645	\$ 72,531,612	\$ 129,505,909
FY 28	\$ 16,942,391	\$ 73,256,929	\$ 122,310,776
FY 29	\$ 17,111,815	\$ 73,989,498	\$ 79,360,000
FY 30	\$ 17,282,933	\$ 74,729,393	\$ 156,860,000
FY 31	\$ 17,455,763	\$ 75,476,687	\$ 151,580,000
FY 32	\$ 17,630,320	\$ 76,231,454	\$ 128,920,000
FY 33	\$ 17,806,623	\$ 76,993,768	\$ 117,500,000
FY 34	\$ 17,984,690	\$ 77,763,706	\$ 87,000,000
FY 35	\$ 18,164,537	\$ 78,541,343	\$ 58,000,000
FY 36	\$ 18,346,182	\$ 79,326,756	
Total	\$ 175,499,898	\$ 758,841,145	\$ 1,031,036,685

Projected vs. Actual Wastewater Rate Impact





Thank you

