

# Consent Decree Progress and Overview

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Interim Chief Operating Officer – Corpus Christi Water

February 10, 2026

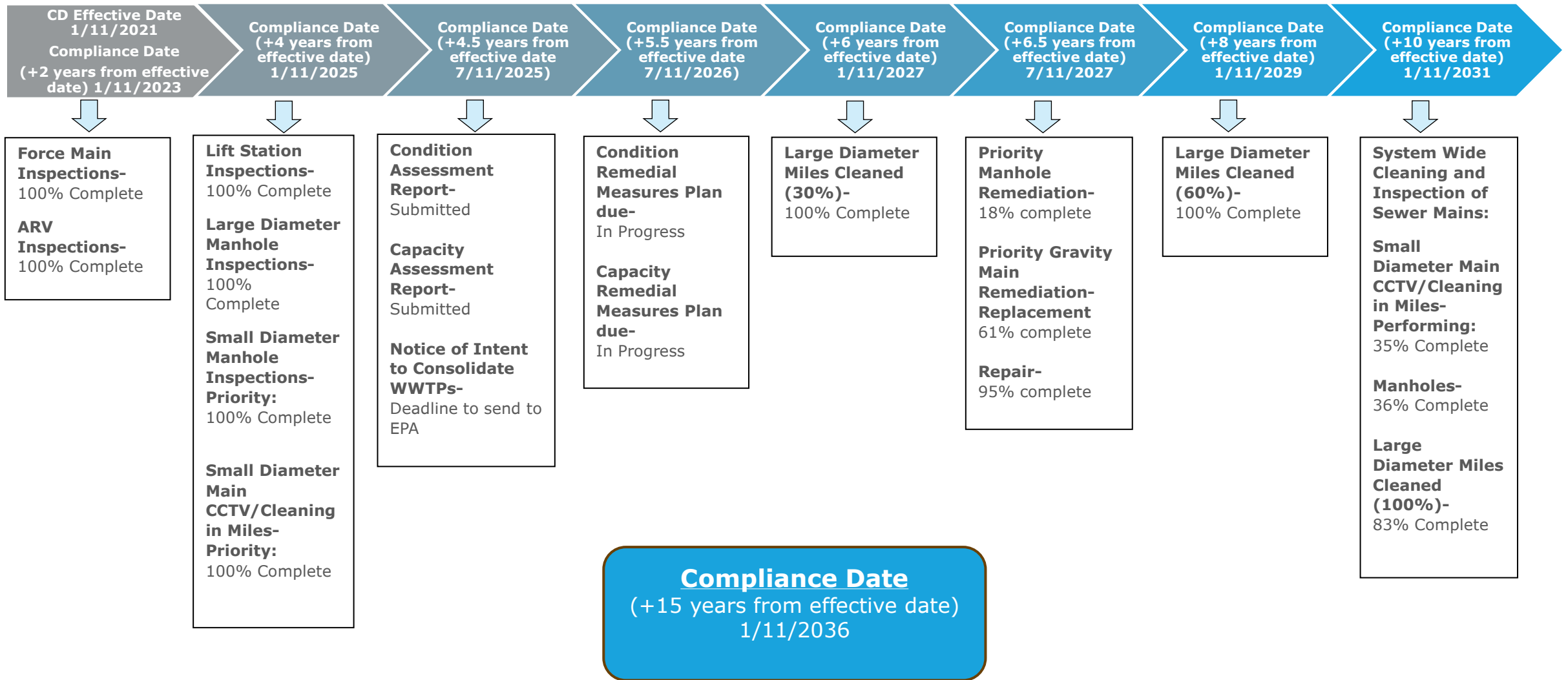
# Wastewater Consent Decree

## 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 (TD PES) 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
<b>Total</b>	<b>646</b>	<b>349</b>	<b>898</b>	<b>41.7</b>	<b>68</b>

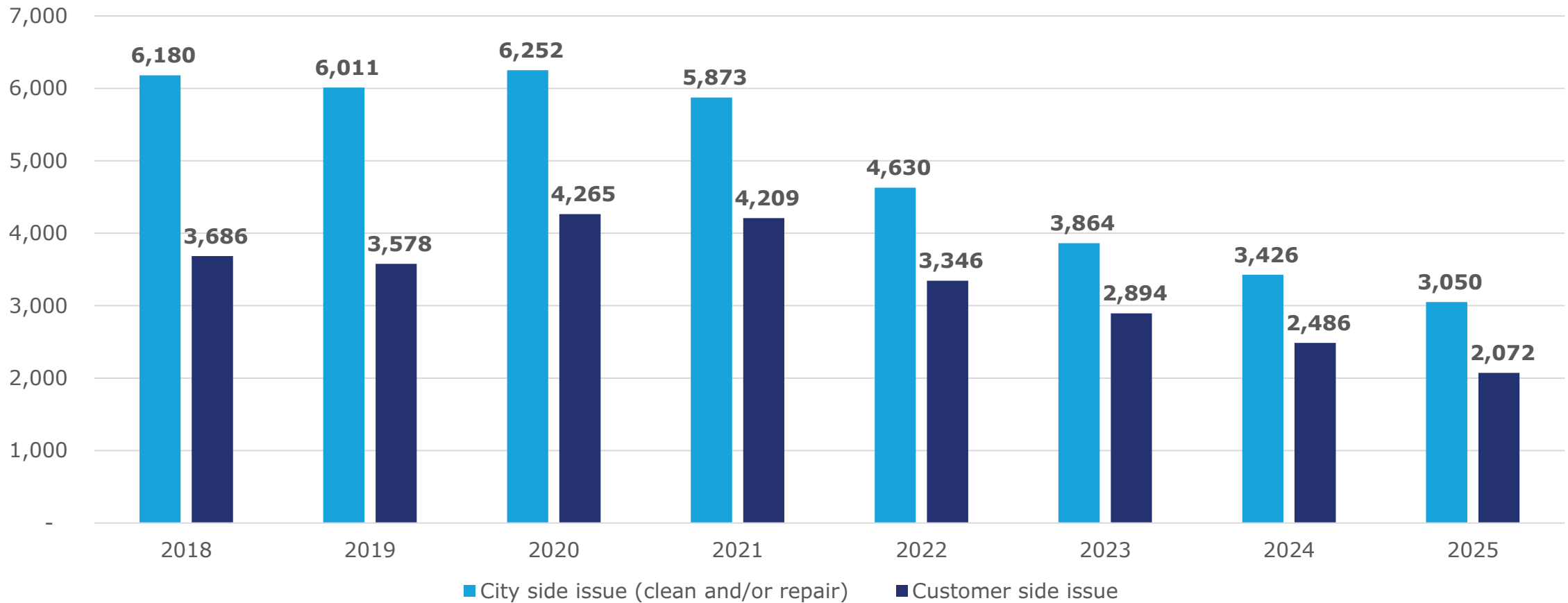


# Work Completed - District Breakdown

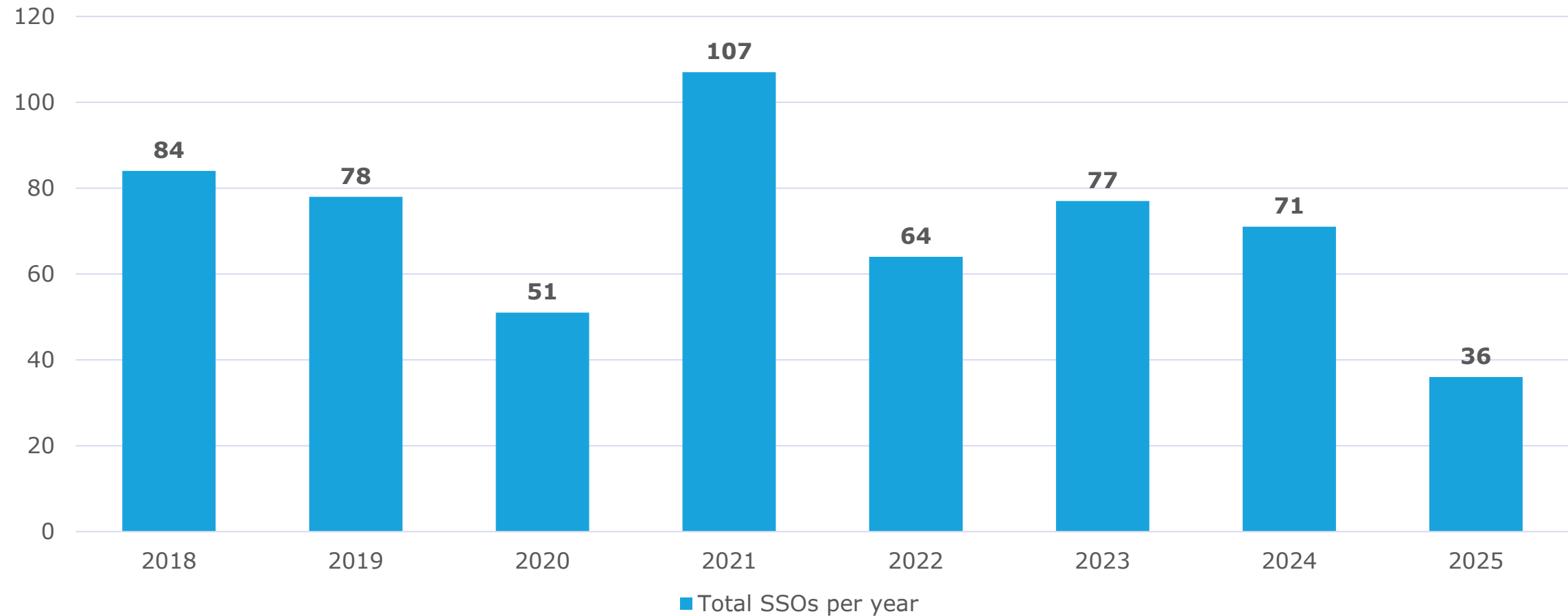
Consent Decree Manhole Progress				
District	Manholes inspected	Manhole inspections remaining	Number of manholes remediated	Number of manholes pending remediation
1	2,815	1,928	69	407
2	2,174	1,138	57	301
3	2,249	1,585	48	270
4	2,112	1,304	11	278
5	2,811	423	7	199
<b>Total</b>	<b>12,161</b>	<b>6,378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



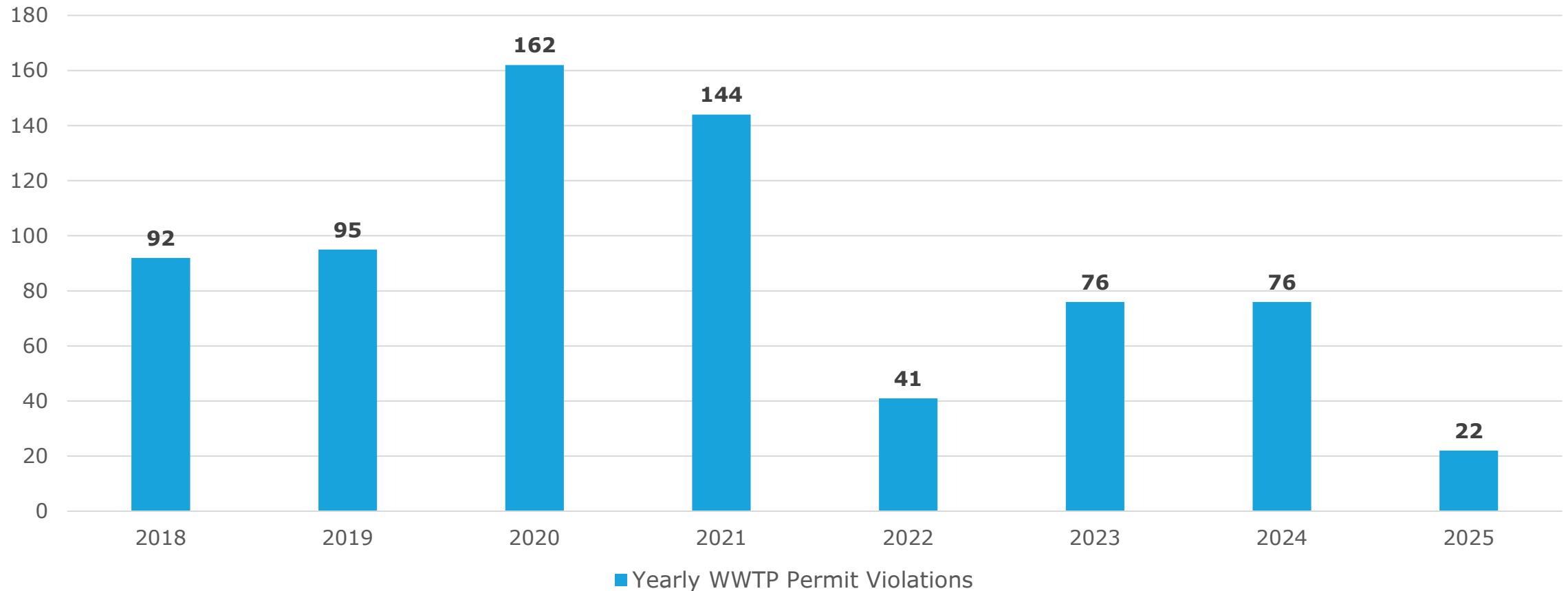
# Wastewater Service Line Issues Reported



# Sanitary Sewer Overflows (SSOs)



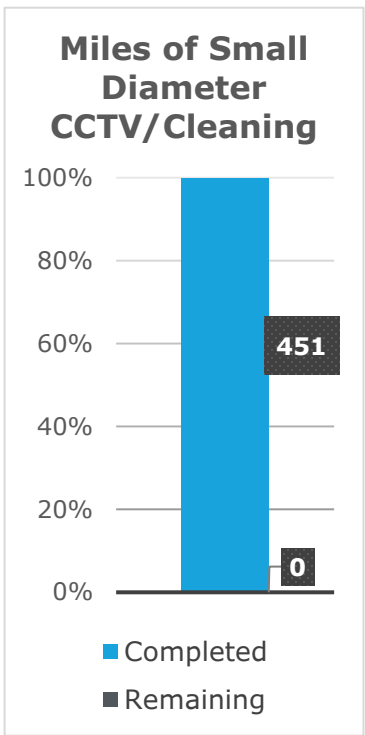
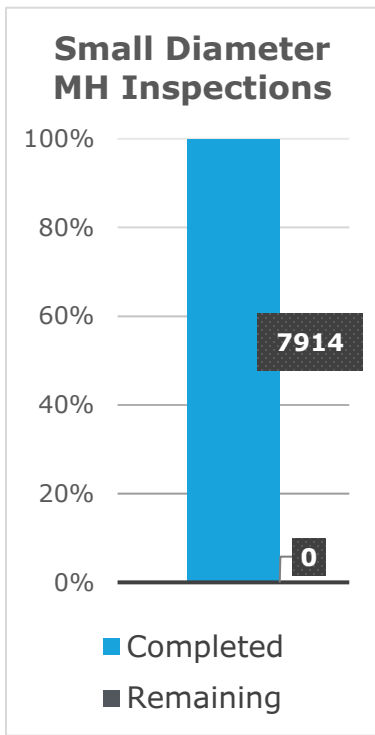
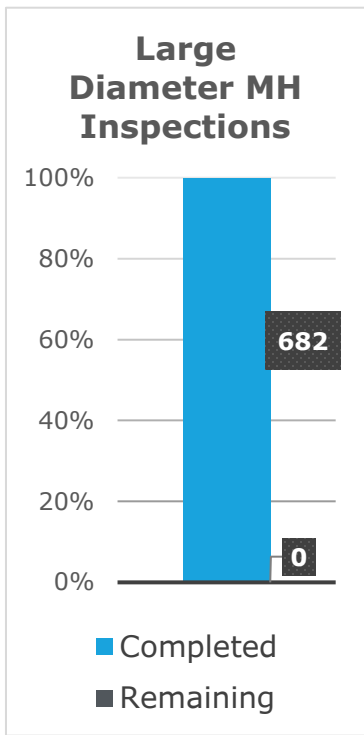
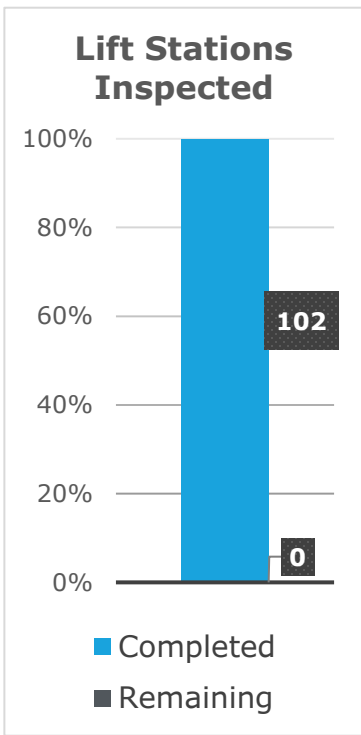
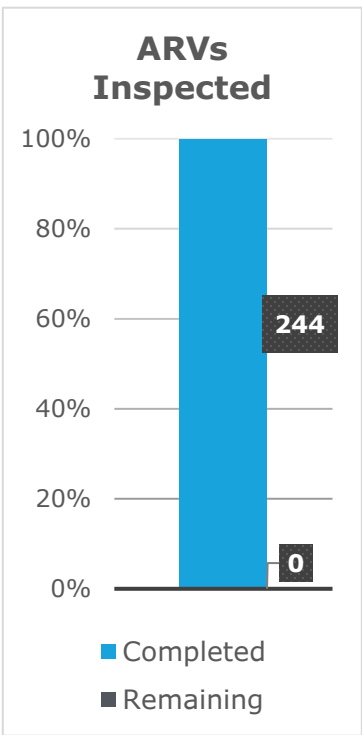
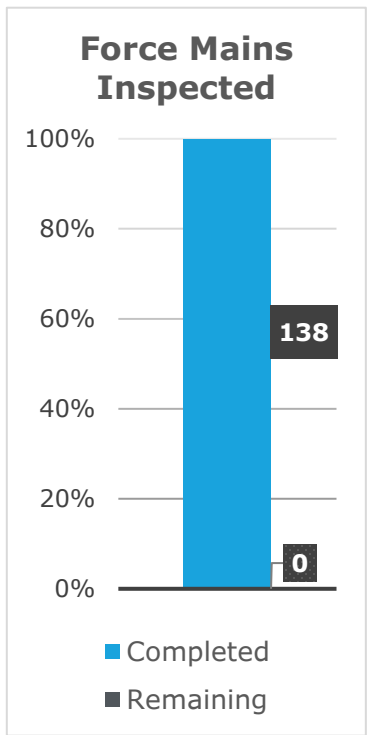
# WWTP Permit Violations





# Completed Targets

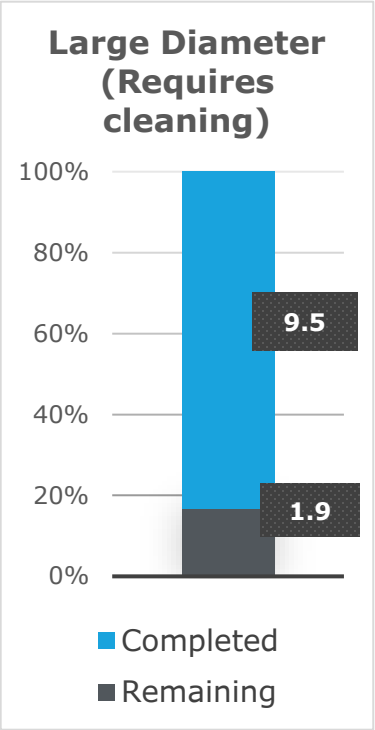
## Priority Assets



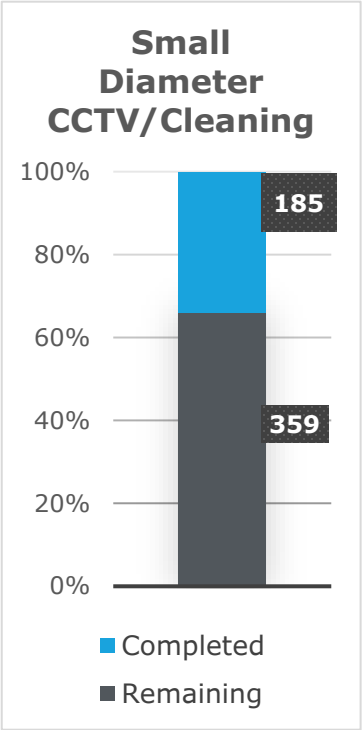
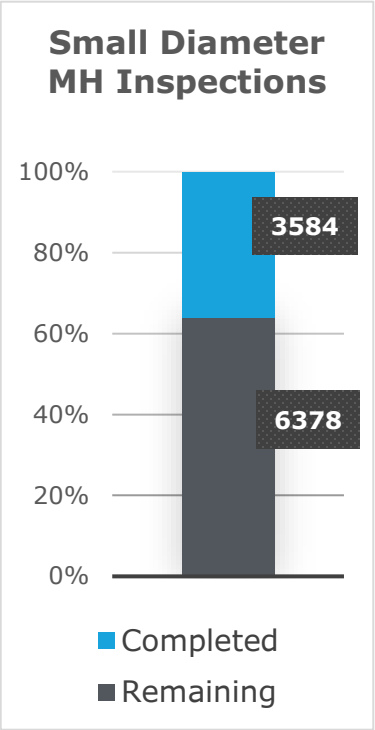
In Miles

# Targets In Progress

Collection System Performing Assets



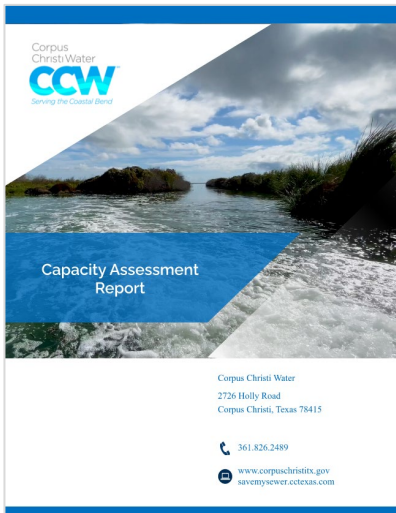
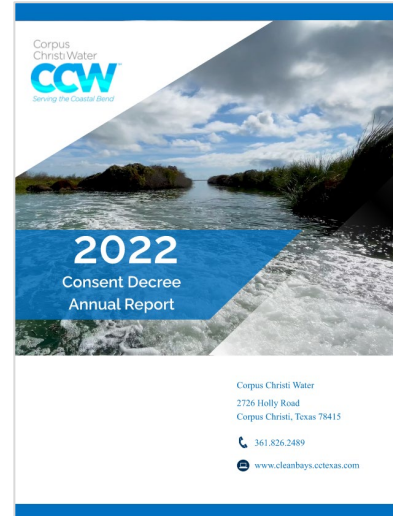
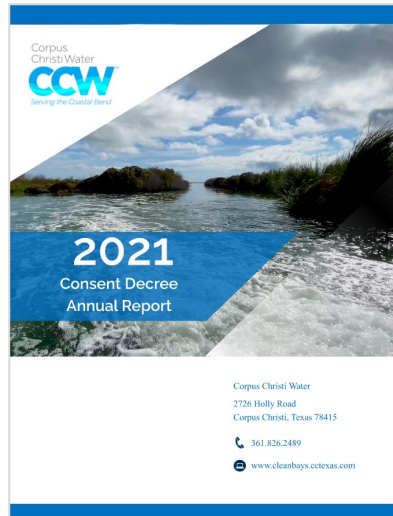
In Miles



In Miles



# Reporting



## Reports In Progress:

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

# Request to be Removed from Consent Decree

- 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



Environmental Enforcement Section  
P.O. Box 7611  
Washington, DC 20044

U.S. Department of Justice

Environment and Natural Resources Division

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

Settlement Communication

December 9, 2025

By Email

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Austin, TX 78701  
[www.lglawfirm.com](http://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, approved 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



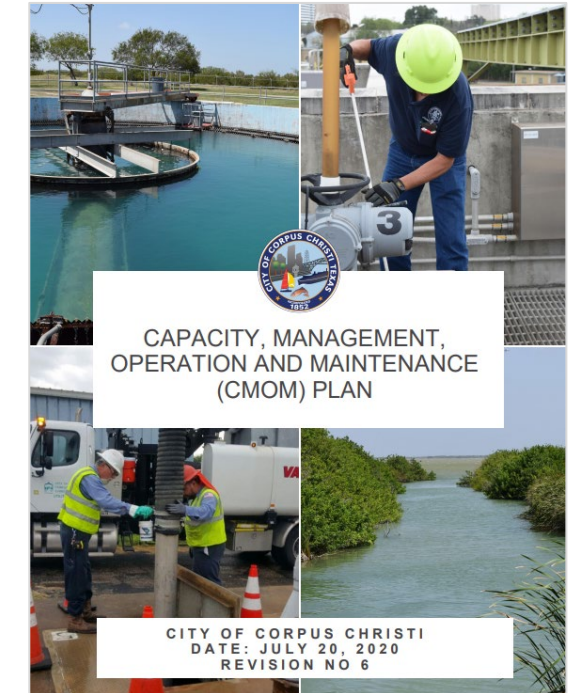
# Post Consent Decree Asset Management

## 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
	Direct Cost	Indirect Cost	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
<b>Total</b>	<b>\$ 91,379,481</b>	<b>\$ 389,586,292</b>	<b>\$ 361,049,136</b>

# Savings Attributed to Self-Performance

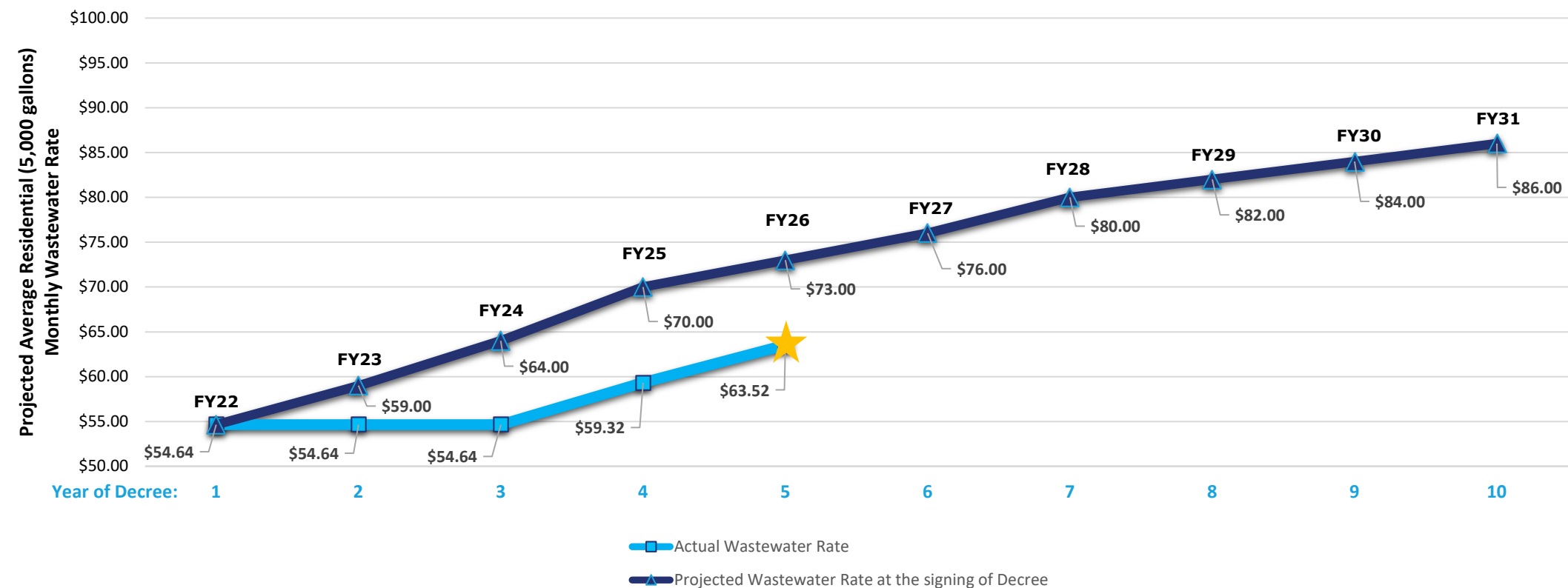
Consent Decree cost analysis through 12/31/2025				
Work performed	Quantity	CCW costs	Estimated contractor / professional service costs	Estimated savings
Feet of CCTV completed	2,383,909	\$12,038,741	\$34,328,291	\$22,289,550
Point repairs completed	1,018	\$5,425,913	\$16,797,000	\$11,371,087
Manhole 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				<b>\$54,616,101</b>

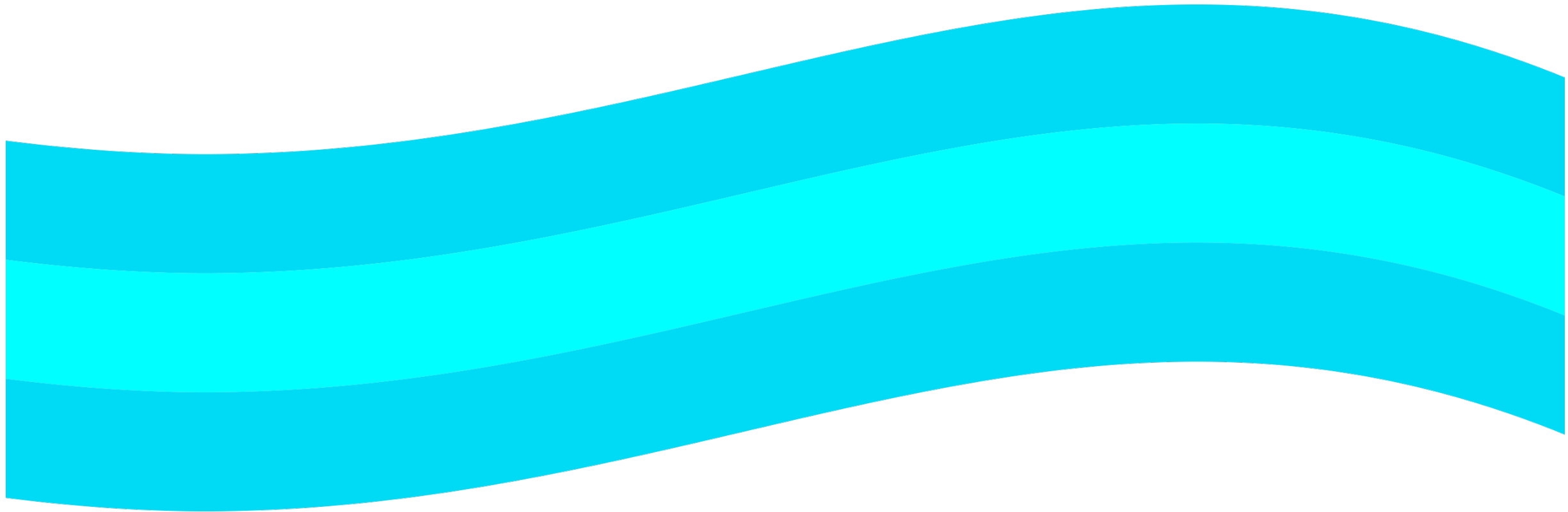


# Projected Cost FY27-36

	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	
<b>Total</b>	<b>\$ 175,499,898</b>	<b>\$ 758,841,145</b>	<b>\$ 1,031,036,685</b>

# Projected vs. Actual Wastewater Rate Impact





**Thank you**

