



ANNISE D. PARKER
MAYOR

OFFICE OF THE MAYOR
CITY OF HOUSTON
TEXAS

Monday, April 18, 2011

Colonel Christopher W. Sallese
Army Corps of Engineers
Galveston District
2000 Fort Point Road
Galveston, TX 77553-1229

RE: White Stallion Energy Center Permit Application No. SWG-2009-00945

Dear Colonel Sallese:

I write to ask that the U.S. Army Corps of Engineers require an Environmental Impact Statement (EIS) of White Stallion Energy Center in its application for its 404 permit, permit number SWG-2009-00945.

I am concerned that the proposed White Stallion Energy Center (White Stallion) located just 20 miles outside the Houston-Galveston-Brazoria non-attainment region will put my city at greater risk for additional bad air days and put at risk the investment made by industries within this area to clean up our air. Houston's industries have put time and money into reducing our pollution. Allowing such a large new source of nitrogen oxide (which is a key component of ozone), mercury, dioxin, sulfur dioxide, and lead from White Stallion to be emitted so closely to this area should be examined through the EIS process. The Texas Commission on Environmental Quality (TCEQ) received a letter from the EPA dated September 29, 2010 wherein they expressed grave reservations that White Stallion's proposed permit did not adequately demonstrate that its emissions would "not cause or contribute to violations of the National Ambient Air Quality Standards (NAAQS) for ozone."

Further, I understand that White Stallion has proposed to fill adjacent wetlands in order to complete its proposed project. Wetlands, as you know, serve as great buffers for hurricane storms and so it is important to look at the impact White Stallion would have on dredging and filling them.

Lastly, it has come to my attention that the proposed White Stallion Energy Center will require multiple coal-barge trips per day, up and down the fragile lower Colorado River; necessitating dredging and widening the river. This unusually high commercial boat traffic is likely to erode the unprotected shoreline, and eventually destroy recreational and subsistence fishing.

I have copied Carl Edlund and Larry Starfield of the EPA, so that they are also aware of these concerns.

Thank you for your consideration. Please feel free to contact me with any questions via my assistant Brenda Murphy (832-393-1036).

Sincerely,

A handwritten signature in black ink that reads "Annise Parker". The signature is written in a cursive, flowing style.

Annise Parker
Mayor

cc:

Mr. Steven Walls
Regulatory Branch, CESWG-PE-RE
U.S. Army Corps of Engineers
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