Freeport Harbor Channel Improvement Project, Brazoria County, Texas
Final Integrated General Reevaluation Report and Environmental Assessment

Appendix D

PUBLIC COORDINATION

November 2017

DEPARTMENT OF THE ARMY
GALVESTON DISTRICT, CORPS OF ENGINEERS
P. O. BOX 1229
GALVESTON, TEXAS 77553-1229

April 11, 2017

AGENCY: Department of the Army; Corps of Engineers; and Texas Commission on Environmental Quality

Joint Notice of Availability for the Freeport Harbor Channel Improvement Project, Brazoria County, Texas - Draft Integrated General Reevaluation Report – Environmental Assessment

ACTION: Joint Notice of Availability

SUMMARY: The U.S. Army Corps of Engineers-Galveston District (USACE) announces the release of the Draft Integrated General Reevaluation Report (DIGRR-EA) for the Tentatively Select Plan (TSP) of the Freeport Harbor Channel Improvement Project, Brazoria County, Texas.

COMMENT PERIOD: The USACE will accept written public comments or questions on the DIGRR-EA from April 11, 2017 through May 11, 2017, a period of 30 calendar days. Comments must be post marked by May 11, 2017.

ADDRESSES FOR COMMENT SUBMITTAL: You may send written comments or questions to the USACE, Galveston District, Attn: Janelle Stokes, P.O. Box 1229, Galveston, TX 77553-1229, or you may email comments or questions to janelle.s.stokes@usace.army.mil. Comments concerning the USACE application for water quality certification may be submitted to the Texas Commission on Environmental Quality (TCEQ), 401 Coordinator, MC-150, P.O. Box 13087, Austin, Texas 78711-3087.

SUPPLEMENTARY INFORMATION:

Authority: The lead agency for this proposed action is the USACE. The non-Federal sponsor for the study is Port Freeport. This report is an interim response to the study authority, Section 216 of the Flood Control Act (FCA) of 1970 (Public Law [P.L.] 91-611), as amended.

Background: This DIGRR-EA evaluates modifications to the recommended plan from the Freeport Harbor Channel Improvement Project Final Feasibility Report and Environmental Impact Statement dated September 2012 (2012 Feasibility Report). The plan was authorized for construction in Section 7002 of the Water Resources Reform and Development Act of 2014 (WRRDA 2014 Project). The study purpose is to determine what modifications to the WRRDA 2014 Project are necessary to facilitate the safe and efficient navigation of the Panama design vessel around the Dow Thumb and to the Velasco Container Terminal. Additionally, an economic update has been performed to determine whether the overall project as authorized is still in the Federal interest.

The DIGRR-EA study area is located on the middle Texas coast, bounded generally by the Brazos River on the west, Oyster Creek on the north and east, and the Gulf of Mexico on the south. The project area for this DIGRR-EA is a subset of the authorized project study area. It is located immediately south of the City of Freeport, in Brazoria County, Texas. This DIGRR-EA focuses

on the area affected by the first segment of construction modifications proposed within Reaches 2 and 3. The Environmental Assessment for the Freeport DIGRR-EA covers the impact areas of the TSP, which are outside the footprint of the WRRDA 2014 project and within the first segment of construction project area. The 2012 Feasibility Report divided the study area into four separable reaches (Reach 1 through Reach 4, as shown in **Figure 1**).

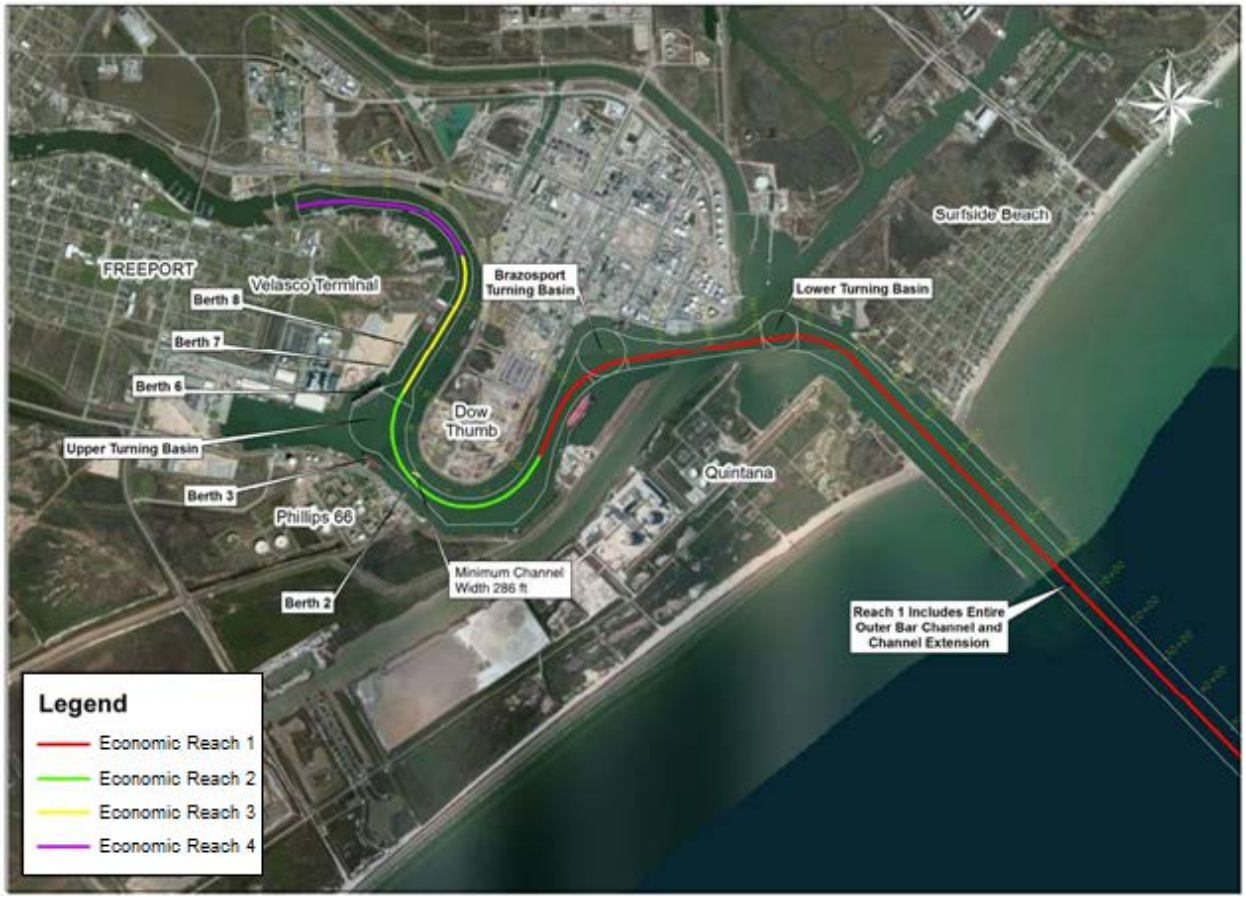

Figure 1 - First Segment of Construction Project Area (Reach 2 and Reach 3)

Authorized Project: The 2012 Feasibility Report identified the locally preferred plan (LPP) as the recommended plan, which was comprised of the following improvements referenced in mean lower low water (MLLW) datum:

- Deepen the Outer Bar Channel into the Gulf of Mexico to 58 feet [Reach 1];
- Deepen from the end of the Jetties in the Gulf of Mexico to the Lower Turning Basin to 56 feet [Reach 1];
- Deepen from the Lower Turning Basin to Station 132+66 near the Brazosport Turning Basin to 56 feet [Reach 1];
- Enlarge the Brazosport Turning Basin from 1,000-foot diameter to 1,200-foot diameter (Reach 1):

- Deepen from Station 132+66, above the Brazosport Turning Basin, through the Upper Turning Basin to 51 feet [Reach 2];
- Deepen and widen the lower 3,700 feet of the Stauffer Channel to 51 feet and 300 feet wide [Reach 3];
- Dredge the remainder of the Stauffer Channel to 26 feet (previously authorized to 30 feet) [Reach 4];

General Reevaluation Trigger:

Panamax Concerns - Shortly after the 2012 study was concluded, Port Freeport, and the Brazos Pilots expressed concerns regarding the ability of Panamax vessels to reach the Velasco Container Terminal in Reach 3. The channel narrows around the Dow Thumb in Reach 2 (**Figure 2**) and the Panamax vessel has issues safely transiting around the Dow Thumb. The study area for this general reevaluation is limited to the area shown in Figure 2.

Figure 2 – Channel Constriction

The decision was made to proceed with a general reevaluation study to examine different scenarios of ship passage around the Dow Thumb to the Velasco Container Terminal. The non-Federal Sponsor requested the modifications be investigated at the existing channel depth of 46 feet MLLW, with intent to eventually construct the project authorized under WRRDA 2014, to its full dimensions.

Project Description: The Tentatively Selected Plan consists of widening the channel at the Dow Thumb to 400 feet, and constructing a bend easing and turning notch to the existing channel depth (46 feet MLLW) (**Figure 3**). Channel Widening to 400 feet from approximately Sta. 142+28 to Sta. 184+20 would require dredging of about 7.5 acres of submerged bottom. The widening may require removal of the underwater berm around the perimeter of the Dow Thumb. A stability wall could be inserted into the terrestrial portion of the Dow Thumb at the waterside toe of the HFPP levee to provide foundation reinforcement. Bend Easing would be constructed at the west end of the HFPP North Wave Barrier from Sta. 147+00 to Sta. 160+00, requiring excavation of approximately 16.4 acres of emergent land and 7.5 acres of submerged bottom. Prior to constructing the bend easing, the wave barrier could be relocated through a re-designation of a segment of the Old Quintana Road, which is of higher elevation, to serve as the wave barrier. Old Quintana Road currently serves as the wave barrier for the east side of the North Wave Barrier. This could be required prior to construction of the bend easing; no modifications to the existing road are anticipated. The Turning Notch would be constructed at the Upper Turning Basin (Sta. 175+00 to 182+00). Construction of the turning notch would require dredging of about 8.3 acres of submerged bottom.

Construction of the TSP would generate approximately 1.7 million cubic yards (MCY) of material. Placement options were evaluated to determine the best placement alternative for all material from the TSP, both new work and operations and maintenance. These alternatives considered possible beneficial use of dredged material, as well as traditional Placement Areas (PAs). The least cost

placement plan for the TSP provides for the new work going to PA 1 and approximately 2.7 MCY of maintenance over the 50-year period of analysis going offshore to the Ocean Dredged Material Disposal Area (1A) designated for maintenance.

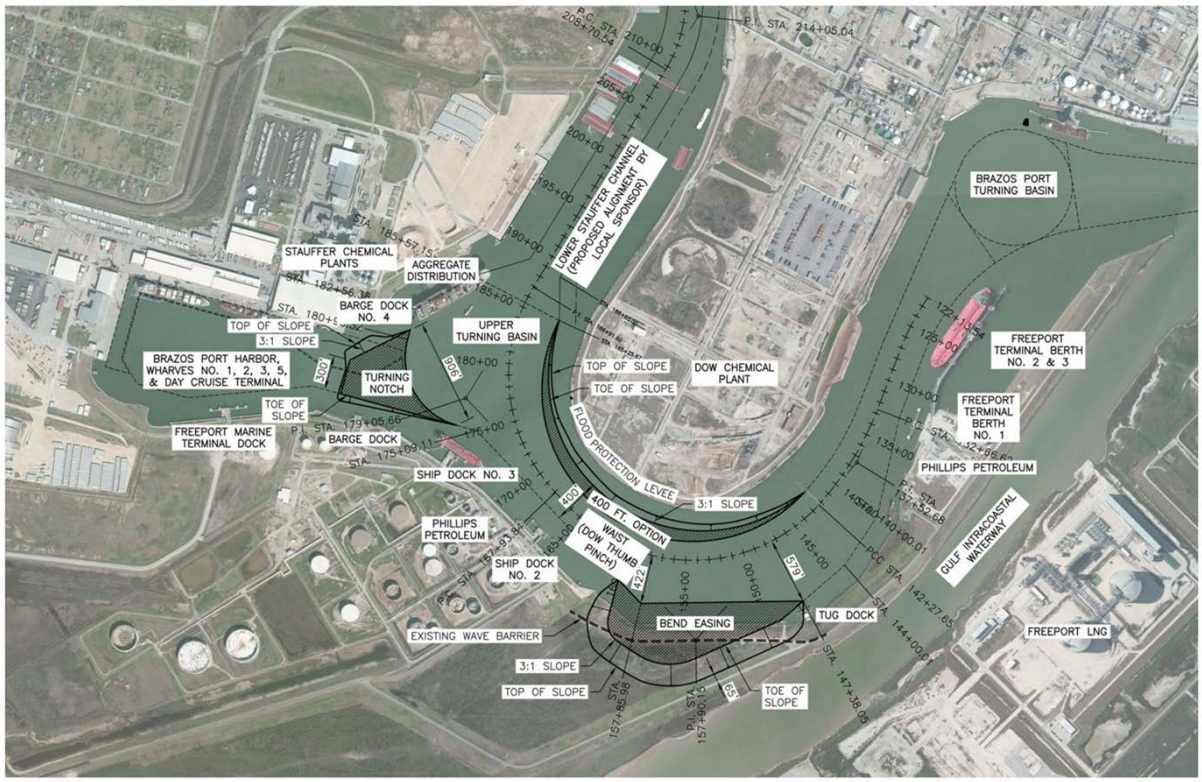

Figure 3 – Tentatively Selected Plan

Project Impacts and Environmental Compliance: The TSP would result in no significant environmental or historic property impacts and therefore no mitigation is required. The impact analysis determined there would be no effects to existing salinity, long-term water quality, threatened or endangered species, essential fish habitat, wetlands, submerged aquatic vegetation, or prime farmlands, and historic properties, and that there would be no negative socio-economic effects. Temporary and minor impacts to water quality, turbidity, benthic organisms and noise would occur during dredging and placement activities in the project area.

Construction of the TSP would not be expected to violate National Ambient Air Quality Standards, but a General Conformity Determination will be required because emissions of NOx are estimated to exceed the current applicability threshold. However, the emissions are well within emissions budgets in the most recent State Implementation Plan (SIP).

Clean Air Act: General Conformity Determination. Pursuant to Section 176 of the Clean Air Act Amendments of 1990, the USACE has prepared a document entitled "Draft General Conformity Determination, Freeport Harbor Channel Improvement Project, Brazoria County, Texas" (Appendix J of the DIGRR-EA). During the USACE public comment period, the USACE will consult with the Texas Commission on Environmental Quality (TCEQ) and the EPA seeking concurrence that emissions from the TSP are conformant with the SIP for the Houston-Galveston-

Brazoria ozone nonattainment area. Once written conformation is received from TCEQ, the USACE will prepare a Final General Conformity Determination for the project.

Clean Water Act: This public notice is also issued for the purpose of advising all known interested persons that there is pending before the TCEQ a decision on water quality certification. The USACE is requesting §401 State Water Quality certification from the TCEQ for this action. A Clean Water Act §404(b)(l) evaluation of the proposed action, provided in the Appendix F of the DIGRR-EA, describes the effects of the TSP. The USACE has determined that construction of the TSP will not violate water quality standards. The TSP is the environmentally preferable alternative. Any comments concerning this application may be submitted to the TCEQ at the address shown on the first page of this notice. A copy of the public notice, with a description of work is available for review in the TCEQ's Austin office.

Texas Coastal Management Plan: Texas Coastal Zone consistency certification is required. The USACE has prepared a Consistency Determination that evaluated the TSP for consistency with the Texas Coastal Management Plan and has concluded that it is fully consistent to the maximum extent practicable with the enforceable policies of the Texas program (Appendix G). The DIGRR-EA and Texas Coastal Consistency Determination have been submitted to the General Land Office for review.

Public Interest Review Factors: The decision whether to implement the TSP will be based on an evaluation of the probable impacts, including cumulative impacts, of the proposed activity on the public interest. That decision will reflect the national concern for both protection and utilization of important resources. The benefits, which reasonably may be expected to accrue from the TSP, must be balanced against reasonably foreseeable detriments associated with the TSP. All factors which may be relevant to the proposal will be considered. These include, but are not limited to: water and sediment quality, air quality, historic properties, protected species, hazardous materials, and in general, the welfare of the people.

Solicitation of Comments: The USACE is soliciting comments from the public, Federal, State, and local agencies and officials, Indian tribes, and other interested parties in order to consider and evaluate the impacts of this proposed activity. Comments will be used in preparation of the FIGRR-EA.

Compact disc copies of the DIGRR-EA are available for viewing at the following libraries:

- Brazoria Library, 620 South Brooks, Brazoria, TX 77422
- Clute Branch Library, 215 North Shanks Street, Clute, TX 77531
- Danbury Branch Library, 1702 North Main, Danbury, TX 77534
- Freeport Library, 410 Brazosport Blvd, Freeport, TX 77541
- Lake Jackson Library, 250 Circle Way, Lake Jackson, TX 77566
- West Columbia Branch Library, 518 East Brazos, West Columbia, TX 77486

The document can also be viewed or downloaded from the Galveston District website: http://www.swg.usace.army.mil/Business-With-Us/Planning-Environmental-Branch/Documents-for-Public-Review/

THE ALLIANCE™
The Economic Development Alliance for Brazoria County

May 11, 2017

Department of the Army
Galveston District, Corps of Engineers
P. O. Box 1229
Galveston, Texas 77533

ATTN: Janelle Stokes

Brazoria County, Fort Bend County and Port Freeport have embarked on what could be one of the most significant infrastructure development projects in the State of Texas, the Texas International Trade Corridor project. These entities have formed a special district charged with developing a roughly 58-mile, greenfield rail line from Freeport, Texas to Rosenberg, Texas. With this rail link, Port Freeport will have connection to three Class 1 railroads (Union Pacific, Burlington Northern Santa Fe and Kansas City Southern). From Rosenberg, both UPRR and BNSF have further connections to the Dallas-Fort Worth area. Texas is the third largest market in the United States for the consumption of foreign produced goods. The Dallas-Fort Worth area is Texas' largest logistic hub and third in the nation behind Los Angeles/Long Beach and New York/New Jersey.

The Freeport Harbor Channel Improvement Project, which was authorized by the Congress in 2014 is a key component of the Texas International Trade Corridor. Since the project was authorized by Congress, minor improvements were identified to improve navigation for the design vessel. These improvements were studied in the Draft Integrated General Reevaluation Report Environmental Assessment, shown to be economically justified, and shown to benefit the efficiency and safety for navigation of the design vessel.

On behalf of the Economic Development Alliance of Brazoria County, I support the findings of the Corps of Engineers in the Draft Integrated General Reevaluation Report Environmental Assessment.

Sincerely,

Sean H Stockard, CEcD
President/CEO

SHS:djp

4005 Technology Drive, Ste. 1010
Angleton, Texas 77515
979-848-0560 • Fax 979-848-0403
800-759-1822
info@eda-bc.com
www.eda-bc.com

Sean H. Stockard
The Alliance – The Economic Development Alliance for Brazoria County
4005 Technology Drive, Ste. 1010
Angleton, Texas 77515

RESPONSE TO COMMENTS

Comment No	Response
1	Thank you for taking the time to provide your position on the proposed project.

COMMISSIONER
DAVID LINDER
PRECINCT 4
121 N. 10TH STREET,
SUITE 110
WEST COLUMBIA, TEXAS 77486

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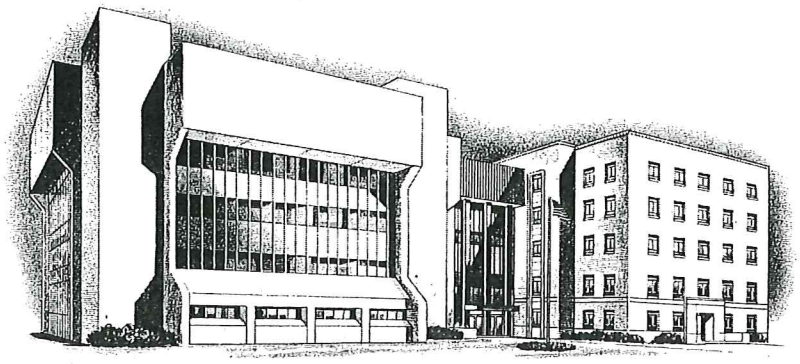


PRECINCT 4
PHONE (979) 345-1130
FAX (979) 345-2839
ANGLETON (979) 864-1529
BRAZOSPORT (979) 388-1529
HOUSTON (281) 756-1529
COURTHOUSE (979) 849-5711 X 1529

May 11, 2017

BRAZORIA COUNTY

ANGLETON, TEXAS 77515

Department of the Army
Galveston District, Corps of Engineers
PO Box 1229
Galveston, TX 77533
ATTN: Janelle Stokes

RE: Freeport Harbor Channel Improvement Project
General Reevaluation Report

Brazoria County, Fort Bend County, and Port Freeport have embarked on what could be one of the most significant infrastructure development projects in the State of Texas, the Texas International Trade Corridor project. These entities have formed a special district charged with developing a roughly 58 mile, Greenfield rail line from Freeport, TX to Rosenberg, TX. With this rail link, Port Freeport will have connection to three Class 1 railroads (Union Pacific, Burlington Northern Santa Fe and Kansas City Southern). From Rosenberg both UPRR and BNSF have further connections to Dallas-Fort Worth. Texas is the 3rd largest market in the United States for the consumption of foreign produced goods. Dallas-Fort Worth is Texas' largest logistic hub and 3rd in the nation behind Los Angeles/Long Beach and New York/New Jersey.

The Freeport Harbor Channel Improvement Project, which was authorized by the Congress in 2014 is a key component of the Texas International Trade Corridor. Since the project was authorized by Congress, minor improvements were identified to improve navigation for the design vessel. These improvements were studied in the Draft Integrated General Reevaluation Report Environmental Assessment and shown to be economically justified and shown to benefit the efficiency and safety for navigation of the design vessel.

On behalf of the Brazoria County Precinct 4, I support the findings of the Corps of Engineers in the Draft Integrated General Reevaluation Report Environmental Assessment.

Regards,

David Linder

David Linder, Commissioner
Brazoria County, Precinct 4

David Linder, Commissioner
Brazoria County, Precinct 4
121 N. 10th Street, Ste. 110
West Columbia, Texas 77486

RESPONSE TO COMMENTS

Comment No	Response
1	Thank you for taking the time to provide your position on the proposed project.

DONALD "DUDE" PAYNE
County Commissioner
Precinct 1

KELLI SMITH
Chief Administrator
Precinct 1

Proudly serving the area of
Angleton, Clute, Freeport, Jones Creek, Lake Jackson, Liverpool, Oyster Creek, Richwood, Quintana & Surfside

May 11, 2017

Department of the Army
Galveston District, Corps of Engineers
PO Box 1229
Galveston, TX 77533
ATTN: Janelle Stokes

RE: Freeport Harbor Channel Improvement Project
General Reevaluation Report

Brazoria County, Fort Bend County and Port Freeport have embarked on what could be one of the most significant infrastructure development projects in the State of Texas, the Texas International Trade Corridor project. These entities have formed a special district charged with developing a roughly 58 mile, greenfield rail line from Freeport, TX to Rosenberg, TX. With this rail link, Port Freeport will have connection to three Class 1 railroads (Union Pacific, Burlington Northern Santa Fe and Kansas City Southern). From Rosenberg both UPRR and BNSF have further connections to Dallas-Fort Worth. Texas is the 3rd largest market in the United States for the consumption of foreign produced goods. Dallas-Fort Worth is Texas' largest logistic hub and 3rd in the nation behind Los Angeles/Long Beach and New York/New Jersey.

The Freeport Harbor Channel Improvement Project, which was authorized by the Congress in 2014 is a key component of the Texas International Trade Corridor. Since the project was authorized by Congress, minor improvements were identified to improve navigation for the design vessel. These improvements were studied in the Draft Integrated General Reevaluation Report Environmental Assessment and shown to be economically justified and shown to benefit the efficiency and safety for navigation of the design vessel.

On behalf of Brazoria County Precinct 1, I support the findings of the Corps of Engineers in the Draft Integrated General Reevaluation Report Environmental Assessment.

Regards,

Donald "Dude" Payne, Commissioner
Brazoria County Precinct 1

P.O. Box 998, Clute, TX 77531 - 1432 Highland Park, Clute, TX 77531
979.265.3953 • 979.864.1523 • 281.756.1523 • Fax: 979.265.5409

Donald “Dude” Payne, Commissioner
Brazoria County, Precinct 1
P.O. Box 998
Clute, TX 77531

RESPONSE TO COMMENTS

Comment No	Response
1	Thank you for taking the time to provide your position on the proposed project.

BRAZOS PILOTS ASSOCIATION
FREEPORT, TEXAS

USACE
Galveston District
Attn: Janelle Stokes
PO Box 1229
Galveston, TX 77553-1229

May 11, 2017

Re: DIGRR-EA Freeport Harbor Channel Improvement Project

Dear Ma'am,

At this time we would like to withdraw our request for extension and submit these comments after clarification with Port Stake Holders and CORP's personnel.

Reach 2-3

- Deepen the Outer Bar Channel into Gulf of Mexico to 58', Pilots have no objection and support this without comment.

- Deepen from end of Jetties in Gulf of Mexico to Lower Turning Basin to 56', Pilots have no objection and support this without comment.

- Deepen from Lower Turning Basin to Station 132 +66 near the Brazosport Turning Basin to 56', Pilots have no objection and support without comment.

- Enlarge the Brazosport Turning Basin from 1000' to 1200' diameter, Pilots have no objection and support without comment.

- Deepen from Station 132 +66 above Brazosport Turning Basin through the Upper Turning Basin to 51', Pilots have no objection and support without comment.

- Deepen and widen the lower 3,7000' of the Stauffer Channel to 51' and 300' wide, Pilots have no objections and support but would request input on plans for barge fleet management and additional activity increase. 1

- Dredge the remainder of the Stauffer Channel to 26', Pilots would like to ensure all Port Users understand the proposed channel traffic increase as stated in the 2012 Feasibility Report for this reach and ensure they agree to potential traffic conflicts. 2

- As for Tentatively Selected Plans (TSP) for the Dow thumb widening to 400' constructing bend easing and turning notch, the Pilots support this project with these

comments and stand by our previously submitted letter in support of this project, to ensure the reach of the channel can accommodate panamax 106' beam vessels under the restrictions laid out in simulations conducted at STAR Center in June 2016.

Thank you for consideration of our comments.

Regards,

Daniel Blanton
President

Daniel Blanton, President
Brazos Pilots Association
P.O. Box 2246
Freeport, TX 77542

RESPONSE TO COMMENTS

Comment No	Response
1	The Pilots can provide input on plans for barge fleet management to Port Freeport and the U.S. Coast Guard Vessel Traffic Service.
2	The 2012 Feasibility Report predicted a potential increase in channel traffic. The Pilots can work with Port Freeport and the U.S. Coast Guard to manage traffic.

BRAZOS PILOTS ASSOCIATION
FREEPORT, TEXAS

USACE
Galveston District
Attn: Janelle Stokes
PO Box 1229
Galveston, TX 77553-1229

May 5, 2017

Re: DIGRR-EA Freeport Harbor Channel Improvement Project

Dear Ma'am,

1 The Brazos Pilots are requesting a 45 day extension to the comment period to acquire more information from the Port users. During simulations we only focused on Reach 2 and the current proposal includes Reaches 3 and 4. We need more information from the Port users to determine final comments.

Thank you for consideration of our request.

Regards,

Daniel Blanton
President

PO Box 2246 • Freeport, TX 77542 • 979-233-1120 • Fax 979-233-7071 • www.brazospilots.com

Daniel Blanton, President
Brazos Pilots Association
P.O. Box 2246
Freeport, TX 77542

RESPONSE TO COMMENTS

Comment No	Response
1	The deadline was not extended as requested. The Pilots rescinded this request in their letter dated May 11, 2017.

Enterprise Products

ENTERPRISE PRODUCTS PARTNERS L.P.
ENTERPRISE PRODUCTS HOLDINGS LLC
(General Partner)

ENTERPRISE PRODUCTS OPERATING LLC

July 24, 2017

Janelle Stokes
Regional Technical Specialist
U.S. Army Corps of Engineers
2000 Fort Point Road
Galveston, Texas 77550

RE: U.S. Army Corps of Engineers Freeport Harbor Channel Improvement Project in Freeport, Brazoria County, Texas (DB11012)

Dear Ms. Stokes:

Based on the Joint Notice Availability document dated April 11, 2017 along with Draft Integrated General Reevaluation Report Environmental Assessment dated March 2017 provided by you, Enterprise Crude Pipeline LLC (Enterprise) has completed a preliminary assessment of the U.S. Army Corps of Engineers (USACE) proposed Tentatively Selected Plan (TSP) for the Freeport Harbor Channel improvements as shown on the attached Exhibit A (GIS Map-DB 11012). Enterprise is supportive of improvements to the Channel as long as the work does not encroach into the Enterprise's facilities or prevents Enterprise from performing our operational and maintenance responsibilities. Based on our assessment, there are essentially two overall concerns as follows:

"Bend Easing" Area:

The location where the proposed channel widening encroaches the three (3) Enterprise pipelines listed below is within the Bend Easing.

- 30" Seaway "Freeport Dock #2-Jones Creek #1", Line No. S2
- 30" Seaway "Freeport Dock #2-Jones Creek #2", Line No. S3
- 42" Seaway "Freeport Dock #2-Jones Creek, Line No. S4

- The TSP illustrates dredging and excavating this area between USACE Stations 147+00 to 160+00. Based on the TSP provided, the report indicates that the excavation in this area would affect approximately 16.4 acres of emergent land area and 7.5 acres of submerged channel bottom in order to widening the channel. The top of slope would be located approximately 65' north of the Hurricane Protection Levee. Based on this information, the slope of the excavated "Bend Easing" area appears that it will encroach over and within the location of Enterprise's pipelines. 1

P.O. BOX 4324
HOUSTON, TEXAS 77210-4324
713.381.6500

9420 WEST SAM HOUSTON PARKWAY NORTH
HOUSTON, TEXAS 77064-6317
www.enterpriseproducts.com

- Prior to constructing the bend easing, the existing wave barrier will require relocation per TSP. However, it is not clear in the USACE plans of the exact method of removal and how this would impact Enterprises pipelines. 2

Overall Channel Improvements:

- In Economic Reach #2, the proposed project at USACE Stations 150+00 could prevent use of Enterprise's overland pipeline route where it comes ashore at the proposed "bend easing". This route and associated piping must remain protected for the project duration while the "bend easing" is being constructed or otherwise, could cause disruption and potential loss of an oil supply line to a major Gulf Coast refinery. 3

- Enterprise is supportive of a larger turning basin such that it does not affect the allowable width of ships currently mooring at Enterprise. In economic reach #1, Enterprise's docks may be affected by the current USACE plan to enlarge the Brazosport Turning basin. The 200' diameter increase would have the potential to decrease allowable width for Enterprise's ship dock #2. The current maximum allowable beam is 145' which already restricts the size and type of ships handled at this birth. Enterprise's preference is to accommodate 175' width beam vessels and at docks 2 or 3. 4

- Increase in Stauffer basin development will negatively impact inbound/outbound deep-draft ships to lower channel users. Freeport is a one-way traffic port with channel development and channel development further upstream for smaller draft vessels will lessen the opportunity for deep draft vessel transits. 5

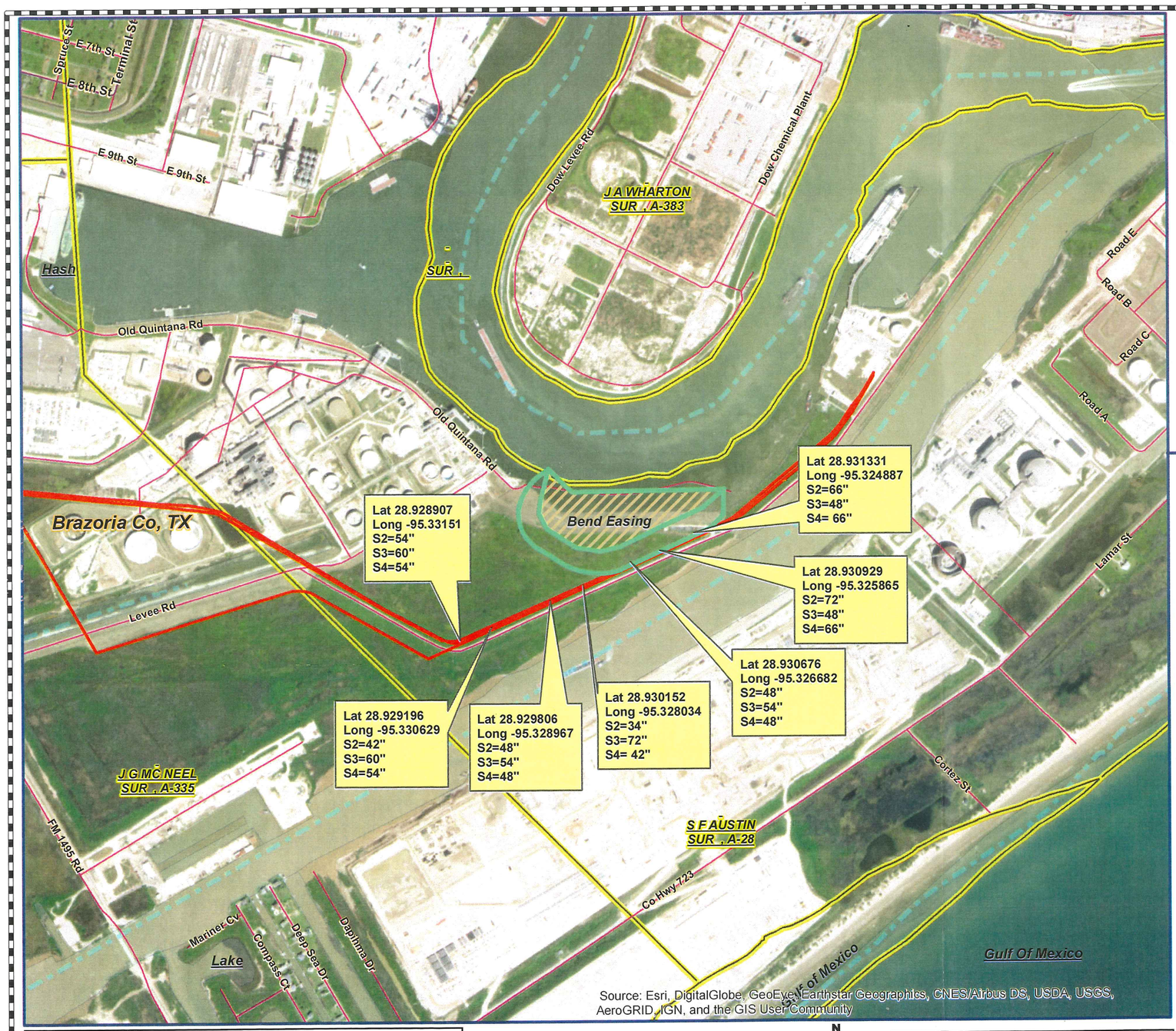
Thank you for the solicitation of comments and opportunity to review and identify our concerns. For your reference, enclosed are alignments of Enterprise's pipelines in the subject area. We are open to meeting with you and your colleagues to further discuss.

If you have any questions regarding engineering design and construction, please feel free to contact Alfredo Saenz at 281-887-3340 or ASaenz@eprod.com. For any additional submittals, please forward to my attention.

Sincerely,

Rebecca Eguia Curry
Manager, Land-Encroachments
281-887-3312
recurry@eprod.com

cc: E. Sangel, A. Saenz, G. DeLong, J. Hazley, C. Yorgensen, J. Rychilik, A. Dugan, M. Brown



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This GIS map has been created from Enterprise Products Operating LLC's proprietary GIS data. Neither Enterprise Products Operating LLC, nor any entity associated therewith, guarantees the accuracy of the data, or assumes any responsibility or liability for any reliance thereon. 05/26/2017 (YS).

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COORDINATES SHOWN HEREON MAY NOT REPRESENT PRECISE LOCATIONS. THEY SHOULD BE USED FOR GENERAL LOCATIONAL PURPOSES ONLY.

USACE-CHANNEL IMPROV-FREEPORT HARBOR
BRAZORIA CO, TX
ENCROACHMENT DB-11012
EXHIBIT A

Rebecca Eguia Curry, Manager Land-Encroachments
Enterprise Products
9420 West Sam Houston Parkway North
Houston, Texas 77064-6317

RESPONSE TO COMMENTS

Comment No	Responses
1	Thank-you for providing detailed information on Enterprise pipeline alignments in the project area. During the Pre-Construction Engineering and Design Phase (PED), USACE will determine if the Bend Easing design can be modified to avoid impacts. If it is not possible to avoid impacts, Port Freeport will work with Enterprise Products to develop a relocation plan.
2	The precise method(s) to be used to remove the wave barrier will be determined during PED. USACE will determine if the Bend Easing design can be modified to avoid impacts. If it is not possible to avoid impacts, Port Freeport will work with Enterprise Products to develop a relocation plan.
3	USACE and Port Freeport will coordinate with Enterprise Products to avoid disruption of pipeline use if possible.
4	The channel widening, bend easing and channel notch that are proposed by this General Reevaluation Report would have no effect on the Brazosport Turning Basin. Proposed improvements to the Brazosport Turning Basin are included in the project authorized by the Water Resources Reform Development Act of 2014. Improvements authorized in 2014 will likely be constructed separately from those proposed by this GRR. During the PED phase for the 2014 authorized improvements, the recommended plan will be reviewed to determine if it would restrict the size of vessels using the Enterprise/Seaway dock.
5	The channel widening, bend easing and channel notch that are proposed by this General Reevaluation Report would have no effect on the Stauffer basin. Proposed improvements to the Stauffer Basin are included in the project authorized by the Water Resources Reform Development Act of 2014. If the 2014 authorized project is constructed and additional traffic management is needed, Enterprise Products may coordinate with Port Freeport and the U.S. Coast Guard to develop new use protocols.

COMMISSIONER, PRECINCT 1
Fort Bend County, Texas

VINCENT M. MORALES JR.
Commissioner

(281) 344-9400
Fax (281) 342-0587

May 11,2017

Department of the Army
Galveston District, Corps of Engineers
PO Box 1229
Galveston, TX 77533
ATTN: Janelle Stokes

RE: Freeport Harbor Channel Improvement Project/ General Reevaluation Report

Fort Bend County, Brazoria County and Port Freeport have embarked on a very significant infrastructure development project in the State of Texas, the Texas International Trade Corridor project. These entities have formed a special district charged with developing a roughly 58 mile, greenfield rail line from Freeport, TX to Rosenberg, TX. With this rail link, Port Freeport will have connection to three Class 1 railroads (Union Pacific, Burlington Northern Santa Fe and Kansas City Southern). From Rosenberg both UPRR and BNSF have further connections to Dallas-Fort Worth. Texas is the 3rd largest market in the United States for the consumption of foreign produced goods. Dallas-Fort Worth is Texas' largest logistic hub and 3rd in the nation behind Los Angeles/Long Beach and New York/New Jersey.

The Freeport Harbor Channel Improvement Project, which was authorized by the Congress in 2014 is a key component of the Texas International Trade Corridor. Since the project was authorized by Congress, minor improvements were identified to improve navigation for the design vessel. These improvements were studied in the Draft Integrated General Reevaluation Report Environmental Assessment and shown to be economically justified and shown to benefit the efficiency and safety for navigation of the design vessel.

On behalf of the Fort bend County, I support the findings of the Corps of Engineers in the Draft Integrated General Reevaluation Report Environmental Assessment. 1

Regards,

Vincent Morales, Jr.
Commissioner, Fort bend County Precinct 1

Vincent Morales, Jr., Commissioner
Fort Bend County Precinct 1
301 Jackson
Richmond, Texas 77469

RESPONSE TO COMMENTS

Comment No	Response
1	Thank you for taking the time to provide your position on the proposed project.

COMMISSIONER PRECINCT 3
Fort Bend County, Texas

W.A. "Andy" Meyers
Commissioner

May 11, 2017

Department of the Army
Galveston District, Corps of Engineers
PO Box 1229
Galveston, TX 77533
ATTN: Janelle Stokes

RE: Freeport Harbor Channel Improvement Project
General Reevaluation Report

Fort Bend County, Brazoria County and Port Freeport have embarked on what could be one of the most significant infrastructure development projects in the State of Texas, the Texas International Trade Corridor project. These entities have formed the Brazoria Fort Bend Rail District, which is charged with developing an approximately 58 mile, greenfield rail line from Port Freeport to the rail hub at Rosenberg, TX. With this rail link to the only rail hub on the Texas Gulf Coast, Port Freeport will have connection to the three Class 1 railroads (Union Pacific, Burlington Northern Santa Fe and Kansas City Southern) that serve Texas. From Rosenberg both UPRR and BNSF have further connections to Dallas-Fort Worth. Texas is the third largest market in the United States for the consumption of foreign produced goods. Dallas-Fort Worth is the largest inland port in the U.S. and is the third largest distribution center in the nation behind the sea ports of Los Angeles/Long Beach and New York/New Jersey.

The Freeport Harbor Channel Improvement Project, which was authorized by the Congress in 2014 is a key component of the Texas International Trade Corridor. Since the project was authorized by Congress, minor improvements were identified to improve navigation for the design vessel. These improvements were studied in the Draft Integrated General Reevaluation Report Environmental Assessment and shown to be economically justified and shown to benefit the efficiency and safety for navigation of the design vessel.

On behalf of my office, I support the findings of the Corps of Engineers in the Draft Integrated General Reevaluation Report Environmental Assessment. 1

Regards,

W. A. "Andy" Meyers
County Commissioner Pct. 3

22333 Grand Corner Dr., Suite 105 • Katy, Texas 77494 • (281) 238-1400 • Fax (281) 238-1401

W.A. “Andy” Meyers., Commissioner
Fort Bend County Precinct 3
22333 Grand Corner Dr., Ste. 105
Katy, Texas 77494

RESPONSE TO COMMENTS

Comment No	Response
1	Thank you for taking the time to provide your position on the proposed project.

From:	Sam Bosworth
To:	Stokes, Janelle S CIV USARMY CESWF (US)
Subject:	[Non-DoD Source] Freeport Harbor Channel Improvement Project
Date:	Thursday, May 11, 2017 9:26:51 AM

May 11, 2017

USACE

Galveston District

PO Box 1229

Galveston, TX

ATTN: Janelle Stokes

RE: Freeport Harbor Channel Improvement Project

Freeport Terminal LLC is the terminal operator for Mediterranean Shipping Company at Port Freeport. We currently call the Velasco Terminal multiple times per month with container vessels. The proposed channel improvements (bend easing, widening, and turning notch) will allow for larger ships to call the terminal and will improve safety and efficiency in the channel for all users.

I urge the Corps of Engineers to begin construction of this project immediately. 1

Sam Bosworth

General Manager

Houston Terminal.LLC/

Freeport Terminal.LLC

12619 Port Dr.

Pasadena, TX 77586

O - 281.291.6900

C - 713.494.4606

Sbosworth@houtml.com <mailto:Sbosworth@houtml.com>

Sam Bosworth, General Manager
Houston Terminal, LLC
Freeport Terminal, LLC
12619 Port Dr.
Pasadena, Texas 77586

RESPONSE TO COMMENTS

Comment No	Response
1	Thank you for taking the time to provide your position on the proposed project.

GREATER FORT BEND
ECONOMIC DEVELOPMENT
COUNCIL

May 11, 2017

Department of the Army
Galveston District, Corps of Engineers
PO Box 1229
Galveston, TX 77533
ATTN: Janelle Stokes

RE: Freeport Harbor Channel Improvement Project
General Reevaluation Report

Fort Bend County, Brazoria County and Port Freeport have embarked on what could be one of the most significant infrastructure development projects in the State of Texas, the Texas International Trade Corridor project. These entities have formed a special district charged with developing a roughly 58 mile, greenfield rail line from Freeport, TX to Rosenberg, TX. With this rail link, Port Freeport will have connection to three Class 1 railroads (Union Pacific, Burlington Northern Santa Fe and Kansas City Southern). From Rosenberg both UPRR and BNSF have further connections to Dallas-Fort Worth. Texas is the 3rd largest market in the United States for the consumption of foreign produced goods. Dallas-Fort Worth is Texas' largest logistic hub and 3rd in the nation behind Los Angeles/Long Beach and New York/New Jersey.

The Freeport Harbor Channel Improvement Project, which was authorized by the Congress in 2014 is a key component of the Texas International Trade Corridor. Since the project was authorized by Congress, minor improvements were identified to improve navigation for the design vessel. These improvements were studied in the Draft Integrated General Reevaluation Report Environmental Assessment and shown to be economically justified and shown to benefit the efficiency and safety for navigation of the design vessel.

On behalf of the Greater Fort Bend Economic Development Council, I support the findings of the Corps of Engineers in the Draft Integrated General Reevaluation Report Environmental Assessment. 1

Regards,

Jeffery C. Wiley
President/CEO
Greater Fort Bend Economic Development Council

Jeffery C. Wiley, President/CEO
Greater Fort Bend Economic Development Council
One Fluor Daniel Drive
Sugarland, Texas 77478

RESPONSE TO COMMENTS

Comment No	Response
1	Thank you for taking the time to provide your position on the proposed project.

May 10, 2017

USACE
Galveston District
Attn: Janelle Stokes
PO Box 1229
Galveston, Texas 77553

REF: Freeport GRR – Letter of Support

As a current tenant of Port Freeport (HTS a division of Hoegh Autoliners) with multiple vessel calls per month, we are in support of this project. 1

As the vessels that call Port Freeport continue to increase in both frequency and size, the deepening and widening and the creation of a “bend-easing” of the Freeport Channel will improve navigation not only for our vessels but for all vessels that call Port Freeport in the future.

Should you require any additional information, please do not hesitate to contact me.

Regards,

James Nash

James Nash
General Manager
Horizon Terminal Services, LLC
Freeport, Texas
james.nash@horizonterminals.com
Tel: 979-373-8556

James Nash, General Manager
Horizon Terminal Services, LLC
Freeport, TX

RESPONSE TO COMMENTS

Comment No	Response
1	Thank you for taking the time to provide your position on the proposed project.

To: Dept. of the Army Corps of Engineers / TCEQ 5/10/2017

Re: Freeport Harbor Channel Improvement Project, Brazoria County, Texas, Draft Integrated General Reevaluation Report (Environmental Assessment)

From: Melanie Oldham (979) 481-2723
922 W. 5th St., Freeport, Tx 77541

I understand that this DIGRR-EA (Environmental Assessment) evaluates modifications to the recommended Plan from the Freeport Harbor Channel Improvement Project Final Feasibility Report and EIS, dated Sept 2012 (2012 Feasibility Report). This plan was authorized for Construction - WRRDA 2014 Project), ~~and the Study~~ MO MG

I understand the need For Modifications to the WRRDA 2014 Project are Necessary to Facilitate the Safe and EFficient Navigation of the Panama design Vessels around the DOW Thumb and to the Velasco Container Termind (Berth 7), But I present my Comments and Questions inorder to ensure that this Project is done in an Open, Transparent manner that Protects our Health/Safety in Freeport, Tx. as well as the Surrounding area.

After ~~the~~ (2) Panamax Ship Simulation Studies in Florida, Port Freeport and the Brazos Pilots expressed Concerns re: the ability of Panamax vessels to reach the Velasco Container Termind in Reach 3. The TSP consists of Widening the Channel at the DOW Thumb to 400 Ft. and construct a Bend Easing and Turning Notch to the Existing Channel Depth (46 Ft MLLW), which requires dredging of about 7.5 acres Safely

of Submerged Channel Bottom. The plan states that a Stability Wall could be Inserted into the Terrestrial portion of the DOW Thumb at the waterside toe of the Hurricane Flood Protection Project(HFPP) Levee to Provide Foundation Reinforcement and the Wave Barrier Could be relocated thru a re-designation of a Segment of the Old Quintana Rd.

~~Construction~~ MO I understand, that the Construction of the TSP would generate about 1.7 MCY of (Dredged Material) which would be placed at DMPS 1, ~~in~~ located immediately south of the City of Freeport – "the Least Cost Placement Plan" for the TSP, as well as about 2.7 MCY of maintenance material over the 50-year period going offshore to the Ocean Dredged Material Disposd Area (1A).

The Impact Analysis determined there would be no effects to existing salinity, long-term Water quality, threatened or endangered species, essential Fish habitat, wetlands, submerged aquatic vegetation, prime Farmlands or historic properties?

* I have Concerns about this Statement because, I think there could be some Contaminated Dredged Material in the Project Site, that could Impact the (Water Quality) and must be taken to the appropriate DMPS or LandFill. 1

Air Quality Also, since Brazoria County is a Severe Non-attainment Area for Ozone, there must be a General Conformity Determination concurrence of TCEQ and EPA that

Water * Also, dredging Operations Could negatively affect Water Quality ? ③

Air Quality Emissions from the TSP are conformant with the SIP For the Houston-Galveston-Brazoria Ozone Nonattainment Area —

* I have concerns that it will not conform to our SIP, unless — 2

① USACE / Port Freeport give preference to Bidders who use Cleaner, Newer equipment or/and apply for TERP Grants.

② Monitor the NO_x and VOC's in the Project Area during Construction and Dredging - with Citizen-Friendly Data to assure what Emissions Levels are during the entire Project.

#1 ③ There are potential impacts to the threatened and endangered Sea Turtles, which are associated with * Hopper Dredge Use. 3

④ Direct contractors to use Air Quality Best Mtg Practices

#1 The draft report states that Construction Related Impacts are less for Alternative 2 - so it's the environmentally preferable alternative — please explain to me why and how Alternative #2 was chosen ? and what will be the Total Cost of this Alternative #2 Project ? Im interested in Costs because I'm a long-term Taxpayer to Port Freeport. 4

* #2 Discussion of Low Soil Shear Strength Concern - it was noted that no new Geotechnical Data was Gathered for this Study, the current slope stability analysis are based on historical Foundation information obtained in 1970's. Why has there not been a recent, new analysis done ? with Field logs and lab reports available for this GRR Study ? to validate the existing critical Foundational strata to validate the 5

Current Conceptual Design? Has this type of Piling/Metal Sheets been used for similar Project (?)

#3 Port Freeport/USACE has not proven that there will not be any significant Contamination from the Proposed Dredging Projects 6
- the DOW Thumb has historically had contaminated Soil since 1941, when the Mag Plant was located there., as well as numerous chemical producing plants. The Mag Cell Plant handled heavy metals, lead, chromium, etc. Long-term environmentalist, including, Sharron Stewart, in Brazoria Co strongly feel there is Contamination in the Project Area.

#4 Don't use DMPS #1 due to Possible Contaminated dredge sediment/Spoil From dredging around the DOW Thumb and other areas in the Project.
- because if there is some Contaminated Dredge Sediment, this contaminated 7
Spoil would significantly affect Fish and Wildlife in the entire area. If and when we get a "bad" storm/hurricane - could DMPS #1 Flood and spread possible contaminated dredged soil/sediment to the surrounding area/River?

You must treat the Dredge Materid From 8
the Proposed Project Dredging Prism Area @ DOW Thumb as "Contaminated".

Prasad Rajuk P.E. for Terracon - Will Terracon, ALS Lab (Houston) and Dr. Montgomery back up their professional licensed ~~opion~~ opinions that there is no contamination dredge material coming From this Project?

Also, this possible Spoil should not be placed in the Ocean Placement Sites? 9

As you know, PA 1 was constructed in 1990, modified in 1997. The existing ground elevation is about (21 Ft.) This needs to be raised to at least (25 Ft). Correct? Please explain. 10

#5 (6) Coring with Testing of Sediments From the submerged Bench at DOW Thumb waist were conducted in April 2016 by Terracon - collecting sediment, water and modified elutriate samples within the dredge prism at the "Waste" of the DOW Thumb.
- should there have been more coring ~~and~~ MO and testing of Sediments done? 11
- Terracon states "no significant contaminants were identified during the Survey? ~~The~~ MO

#6 ALS Lab Testing in Houston For Dioxins/Furans and other COC's were questionable on accuracy?
(*) On some Cooler Receipt Forms it was stated that there was no Custody Seals on Coolers? 12
- So if the samples were not Sealed it causes doubt on the Sediment Lab Testing. Since there is Doubt, it would be Best to assume some of the sediment is Contaminated
- So, DMPS 1 must be elevated to at least 25' above sea level to prevent entry of a Storm Surge/Wave into the DMPA 1, under consideration and/or 13

(Prasad Rajulu P.E for Terracon)
Terracon/ALS Lab state that some VOC constituents were detected above MDL's in Samples - S3, S4, but there is no published benchmarks for the detected COC's. They state 4,4-DDD and 4,4-DDT were detected in Samples SC, S4 at concentrations exceeding screening benchmarks?

(*) Dioxins and DBF's were detected in all sediment samples at concentrations exceeding MDL's, but there are no published screening benchmarks for the COC's? 14

—Dioxins were detected in Surface Water Samples W2-W6, DBF's detected in W1, W5, W6 exceeding MDL's and Dioxins were detected in modified elutriate samples E1, E2, E3, E4, E6, but there are no published screening benchmarks?

Please address all my Comments and answer my questions re: this Proposed Project. I agree that it is a good, much need Project, that needs to be done as soon as possible — but it must be done in a manner to protect our Public Health Safety

Melanie Oldham
(979) 481-2723

Melanie Oldham
922 W. 5th St.
Freeport, TX 77541

RESPONSE TO COMMENTS

Comment No	Response
1	Subsequent comments in this letter indicate that the area of contaminant concern is the channel widening area at the Dow Thumb. Coring and testing of sediments from the submerged bench at Dow Thumb were conducted in April of 2016. Samples of sediment, surface water and modified elutriates were collected at six representative locations within the project area, and a chemical and miscellaneous analysis of each sample was performed. Analytical results were compared to at least three State and/or Federal screening benchmarks for each media to evaluate potential adverse impacts. Of the sediment samples, only 4 constituents exceeded screening benchmarks; these exceedance were marginal and are not expected to have adverse ecological effects. Of surface water and elutriate samples, none of the detected constituents exceeded screening benchmarks.
2	A General Conformity Analysis has been completed and coordinated with the Texas Commission on Environmental Quality (TCEQ) and the U.S. Environmental Protection Agency (EPA). TCEQ has reviewed the air emission impact analysis, and concurred with the USACE determination that the total direct and indirect emissions from the proposed project will not exceed the 2018 emissions budgets specified in the State Implementation Plan (SIP). TCEQ does not require implementation of the specific air pollution reduction and monitoring measures mentioned in the comment. However, USACE will encourage that contractors implement pollution reduction measures to the extent possible.
3	A cutterhead dredge will be utilized to construct the channel widening, bend easing and turning notch covered by this Environmental Assessment. No adverse effects to listed sea turtles are expected because cutterhead dredges are not known to impact sea turtles. Potential impacts to listed sea turtles may occur during new work dredging to deepen the jetty and extension channels and during maintenance dredging. New work construction impacts were addressed with the 2012 Final Environmental Impact Statement. USACE will comply with all of the reasonable and prudent measures required by the National Marine Fisheries Service Biological Opinion (2012) to minimize impacts of the incidental take of sea turtles during the deepening project. Impacts associated with the use of hopper dredging for maintenance dredging will be minimized by compliance with the existing Gulf Regional Biological Opinion.
4	Alternative 2 was selected as the Recommended Plan based on an evaluation of economic, engineering and environmental considerations. The plan formulation process and decision is described in Section 5.0 of the Final Integrated General Reevaluation Report/Environmental Assessment (FIGRR-EA).
5	Additional geotechnical investigations will be undertaken during the Pre-Construction Engineering and Design (PED) phase, prior to construction, to provide detailed information needed for final design of the stability structure.

6	Sediments to be dredged have been sampled, tested and described in Comment 2. Analysis of the sampled media has determined that the sediments to be dredged do not contain significant contaminants.
7	See responses to Comments 2 and 6.
8	See responses to Comments 2 and 6.
9	New work material from the channel widening, bend easing and turning notch areas evaluated by this FIGRR-EA will be placed in upland, confined PA #1. None of this material will be placed in an Ocean Dredged Material Disposal Site (ODMDS).
10	The containment dikes around existing PA 1 would be raised to 31.5 feet NAVD in elevation in order to accommodate all new work material from the proposed modifications.
11	Testing was conducted at a very close frequency at the Dow Thumb precisely because the adjacent land had been part of a chemical manufacturing plant. This is a closer frequency of testing than would typically have been performed. No contamination was evident and there is no need to treat the material as contaminated.
12	Custody of the samples was carefully controlled throughout the sampling and testing process. Control was maintained through collection, transport and analysis. Lack of custody seals on a few samples does not mean that sediment13 was compromised in any way or is contaminated.
13	See response to Comment 10.
14	Dredge material placement decisions evaluate and integrate chemical analytical data for all tests conducted. The results from all media (sediment, surface water and modified elutriate) are reviewed as a group for presence/absence, magnitude, frequency, and average concentrations. When COCs are present at such low levels that their concentrations are estimated (i.e. “J” qualified), detections and/or exceedances of screening benchmarks are marginal and/or sample results average below screening benchmarks, the material is acceptable for upland placement.

Via USPS and E-Mail transmission (janelle.s.stokes@usace.army.mil)

11 May 2017

U.S. Army Corps of Engineers, Galveston District
P.O. Box 1229
Galveston, Texas 77553-1229
Attention: Janelle Stokes

Subject: **Draft Integrated General Reevaluation Report – Environmental Assessment (DIGRR-EA) for the Tentatively Select Plan (TSP) of the Freeport Harbor Channel Improvement Project, Brazoria County, Texas**

Ladies and Gentlemen:

The U.S. Army Corps of Engineers, Galveston District has solicited written public comments on the Draft Integrated General Reevaluation Report – Environmental Assessment (DIGRR-EA) for the Tentatively Select Plan (TSP) of the Freeport Harbor Channel Improvement Project, Brazoria County, Texas, with comments accepted from April 11, 2017 through May 11, 2017. Accordingly, please be advised that Phillips 66 Company does not oppose the TSP (Alternative 2; reference March 2017 USACE document, Page ES-9) provided that it does not adversely affect/impact Phillips 66 Ship Docks No. 2 & No. 3 structurally or adversely affect/ impact any of the current operating parameters of the Phillips 66 Freeport facility, all located in Economic Reach 2. 1

If there are any questions and/or should any clarity be required, please so contact the undersigned at any time.

Respectfully submitted,

Kevin C. Mulholland
General Manager, Marine
Phillips 66 Company
Office: (832)-765-3147

Cc: Mr. David Erfert GM Sweeny Refinery; Mr. Heath S. DePriest Managing Director BD-Terminals
Cc: Global Marine Operations – Phillips; Global Marine Risk Management -Phillips
CAB/cab

Kevin C. Mulholland, General Manager, Marine
Phillips 66 Company

RESPONSE TO COMMENTS

Comment No	Response
1	Thank you for taking the time to provide your position on the proposed project.

April 14, 2017

USAE, Galveston District

Attn: Janelle Stokes

In regard to the DIGRR-EA for the TSP for the Freeport Harbor Channel Improvement Project, Brazoria County Texas, I would like to comment that I have no concerns regarding the environmental aspects of the project but am concerned about maintaining the integrity of the hurricane protection levee system. The project summary states that widening of the channel around the Dow Thumb may require removal of the underwater berm around the perimeter of the Dow Thumb and states that a stability wall COULD be inserted into the terrestrial portion of the Dow Thumb at the waterside toe of the Hurricane Protection Levee to provide foundation reinforcement. This aspect of maintaining the levee integrity should be a firm requirement and major goal of the project. The word "could" leaves room for this requirement to become a lower priority in my opinion. Very large vessels navigating a very narrow 180 degree channel can cause major damage and the design needs to be robust enough to protect the levee system. 1

Thank you for the opportunity to comment on this project.

Sincerely

James P Saccomanno

James P Saccomanno

1507 W 10th St.

Freeport, Texas 77541

James P. Saccomanno
1507 W. 10th St.
Freeport, TX 77541

RESPONSE TO COMMENTS

Comment No	Response
1	As stated in the document: "Removal of the underwater berm could reduce the stability of a portion of the existing Freeport Hurricane Flood Protection Project (HFPP). To stabilize to recommended levels, a stability wall would be inserted into the terrestrial portion of the Dow Thumb at the waterside toe of the HFPP levee to provide foundation reinforcement." Taking action to avoid impacts to the stability of the HFPP is definitely part of the proposed project. The conditional tense (i.e. "would") is used because the project is not yet authorized.

From:	DeLong, Gregory
To:	Stokes, Janelle S CIV USARMY CESWF (US)
Cc:	Souliere, Michael; Craft, Zachary; Bany, Jay; Phan, Phu; Retif, Mike
Subject:	[Non-DoD Source] Comments: Joint Notice of Availability for the Freeport Harbor Channel Improvement Project
Date:	Wednesday, May 10, 2017 5:05:54 PM

Ms. Stokes,

We are hereby requesting the deadline for comments be extended for 60-days. Enterprise/Seaway operates a large marine facility which is affected by the project and only recently became aware of the request for comments. Many port stakeholders were not notified of the May 11, 2017 deadline. Because of the general impacts as identified below; we are requesting 60-days in order to complete a detailed analysis of the project impact. 1

We are supportive of the improvements to the port, but only subject to no work or encroachment into the Seaway pipeline easement. In economic reach #2, the proposed project at STA 150+00 may encroach on the Enterprise/Seaway overland pipeline route where it comes ashore at the proposed "bend easing". This route and associated piping must remain protected for the project duration while the bend easing is being constructed, or would otherwise cause a business disruption and potential loss of an oil supply line to major gulf coast refineries. 2

Additionally, we are supportive of a larger turning basin, such that it does not affect the allowable width of ships currently mooring at Seaway/Enterprise. In economic reach #1, Enterprise/Seaway may be affected by the current plan to enlarge the Brazosport Turning Basin. The 200 foot diameter increase would have the potential to decrease allowable width for our existing ship dock #2. Currently, the maximum allowable ship width is 145', which already limits the size and type of ships handled at this berth. Our preference is to accommodate 175' width vessels. Enterprise/Seaway is interested in reviewing a detailed rendering of the proposed channel width and size of the enlarged turning basin, so that it can be determined if our dock would be affected by the enlargement of the Brazoport Turning Basin. 3

Operationally, we will be negatively impacted by increasing Stauffer basin development. Freeport is a one-way traffic port, and channel development further upstream for smaller draft vessels will lessen the opportunity for deep draft vessel transits. 4

Thank you for your review of these issues.

Future correspondence may be routed to:

Seaway Marine Terminal Manager

Seaway Crude Pipeline Company

c/o Enterprise Crude Pipeline

P.O. Box 2486

Freeport, TX 77541

Greg DeLong

Sr. Manager - Marine Liaison

Enterprise Products

713-381-6587 - Direct

409 – 370-9107 - Cell

gndelong@eprod.com <mailto:gndelong@eprod.com>

Gregory DeLong, Seaway Marine Terminal Manager
Seaway Crude Pipeline Company
c/o Enterprise Crude Pipeline
P.O. Box 2486
Freeport, TX 77541

RESPONSE TO COMMENTS

Comment No	Response
1	The deadline was not extended as requested. Port Freeport organized a meeting for all port users that clarified improvements proposed by the General Reevaluation Report.
2	Enterprise Products has provided detailed plans of the Enterprise/Seaway pipeline of concern. During the Pre-Construction Engineering and Design Phase (PED), USACE will determine if the Bend Easing design can be modified to avoid impacts. If it is not possible to avoid impacts, Port Freeport will work with Enterprise Products to develop a relocation plan. USACE and Port Freeport will coordinate with Enterprise Products/Seaway Terminal to avoid disruption of pipeline use if possible.
3	The channel widening, bend easing and channel notch that are proposed by this General Reevaluation Report would have no effect on the Brazosport Turning Basin. Proposed improvements to the Brazosport Turning Basin are included in the project authorized by the Water Resources Reform Development Act of 2014. Improvements authorized in 2014 will likely be constructed separately from those proposed by this GRR. During the PED phase for the 2014 authorized improvements, the recommended plan will be reviewed to determine if it would restrict the size of vessels using the Enterprise/Seaway dock.
4	The channel widening, bend easing and channel notch that are proposed by this General Reevaluation Report would have no effect on the Stauffer basin. Proposed improvements to the Stauffer Basin are included in the project authorized by the Water Resources Reform Development Act of 2014. If the 2014 authorized project is constructed and additional traffic management is needed, the Seaway Terminal may coordinate with Port Freeport and the U.S. Coast Guard to develop new use protocols.