Appendix B6

DEIS Public Meeting Report, June 2022

Draft Environmental Impact Statement
Public Meeting Report

Port of Corpus Christi Authority Channel Deepening Project

Department of the Army Permit Application
SWG-2019-00067

Contents

List of Appendices

1. Introduction

The National Environmental Policy Act of 1969 (NEPA) requires an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action. This process is referred to as scoping and is one of several public involvement aspects of the NEPA Environmental Impact Statement (EIS) process. NEPA is a statutory requirement triggered by major federal actions that could significantly affect the quality of the human environment. NEPA requires the identification and analysis of potential environmental effects before those actions take place and serves as a "full disclosure" law with provisions for public access to and public participation in the federal decision-making process.

Scoping is an opportunity for the U.S. Army Corps of Engineers (USACE) to introduce and explain the interdisciplinary approach to our environmental analysis as well as solicit public and agency comments regarding environmental resources, potential impacts, and alternatives that should be included.

In response to the COVID-19 pandemic, on March 24, 2020, the USACE issued a memorandum: *Interim Army Procedures for National Environmental Policy Act (NEPA) in response to the coronavirus (COVID-19) pandemic*, which was relied upon for scoping. The USACE published a Notice of Intent (NOI) and initiated the scoping process in the *Federal Register* to notify the public of the intent to prepare a Draft EIS for the Port of Corpus Christi Authority (PCCA) Channel Deepening Project (proposed Project) on April 9, 2020. A meeting invitation was emailed to federal and state agencies on April 28, 2020, and a virtual agency scoping meeting was held via WebEx Events on May 14, 2020.

Notices to interested parties and local, state, and federal elected officials were sent via email and mail on May 27 and May 28, 2020, respectively. The notice provided information about the proposed Project, announced the virtual public scoping meetings scheduled for June 9, June 11, June 16, and June 18, 2020, and provided a link to the Project website. Due to technical issues associated with the virtual meeting platform during the June 9, 2020, virtual public scoping meeting, the format was changed, and an additional virtual public scoping meeting was scheduled for June 15, 2020, for a total of five scoping meetings. The USACE solicited comments on the proposed Project during the scoping period meetings from the public, federal, state, and local agencies and officials, Native American tribal groups, and other interested parties for the proposed permit activity.

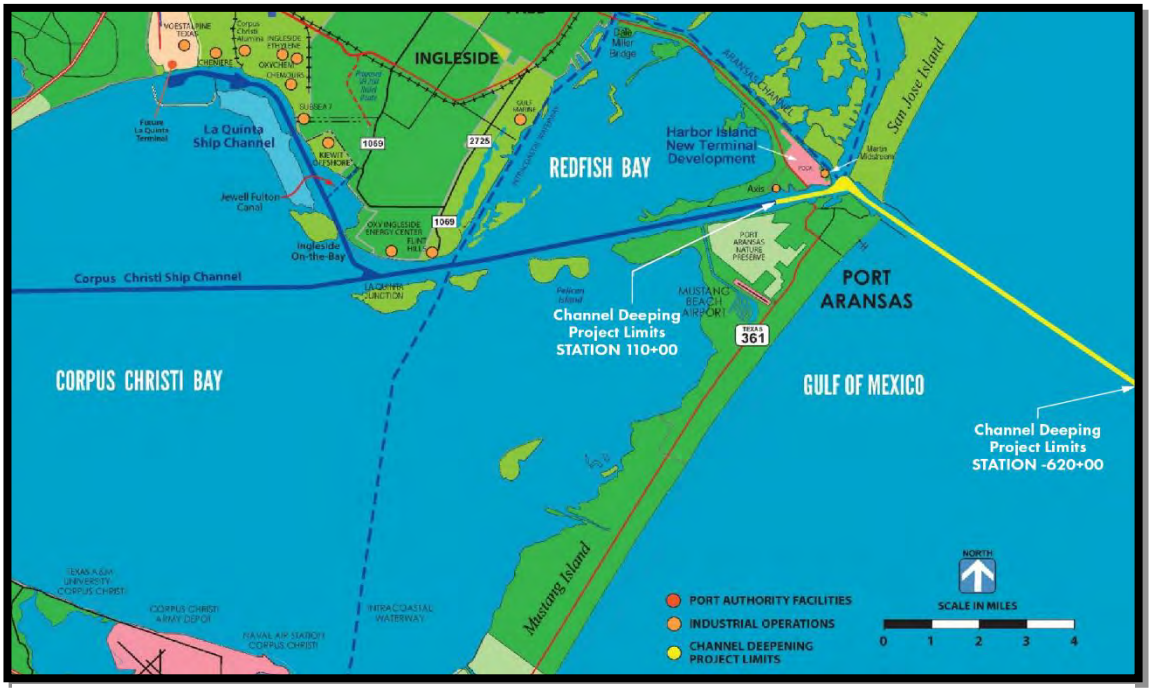
Following the scoping period, a Notice of Availability (NOA) for the Draft EIS was distributed to all cooperating agencies and other potentially interested agencies, stakeholder organizations, nongovernmental organizations, Native American Tribes, and individuals. This distribution ensured that interested parties had an opportunity to provide comments on the Draft EIS and that information pertinent to permissions, permits, authorizations, and approvals were provided to decision-makers for the USACE and the U.S. Environmental Protection Agency (EPA).

This Public Meeting Report has been developed for the USACE to document outreach efforts and comments received during the 63-day public review period for the Draft EIS.

1.1. Project Background

The USACE received a permit application for a Department of the Army (DA) Permit pursuant to Section 10 of the Rivers and Harbors Act of 1899, Section 404 of the Clean Water Act, and Section 103 of the Marine Protection, Research and Sanctuaries Act from the PCCA (SWG-2019-00067) for the deepening of the Corpus Christi Ship Channel. As part of the NEPA process, the EPA, National Oceanic and Atmospheric Administration, National Marine Fisheries Service, U.S. Fish and Wildlife Service, and the U.S. Coast Guard are cooperating agencies in the preparation of the EIS. The Texas Commission on Environmental Quality and the Texas Parks and Wildlife Department are participating agencies in the preparation of the EIS. The DA permit application was first advertised by a Public Notice issued August 1, 2019.

The proposed Project is needed to accommodate transit of fully laden very large crude carriers (VLCCs) that draft approximately 70 feet. The deepening activities would be completed within the footprint of the authorized PCCA channel width.



Map of the proposed Project area

The proposed Project is located within the existing channel bottom of the Corpus Christi Ship Channel starting near the southeast side of Harbor Island, traversing east through the Aransas Pass, and extending into the Gulf of Mexico for an approximate distance of 13.8 miles. To address changing market needs, the proposed Project would deepen this portion of the Corpus Christi Ship Channel beyond the current authorized channel depths of -54 feet and -56 feet mean lower low water to maximum depths of -79 feet and -81 feet mean lower low water to accommodate transit of fully loaded VLCCs with vertical distances between the waterline and the bottom of the hull, or drafts, of approximately 70 feet. An estimated 46.3 million cubic yards of new work dredged material would be generated as a result of the channel deepening.

Additionally, the proposed Project includes:

- Extending the existing terminus of the authorized channel an additional 29,000 feet into the Gulf of Mexico to reach -80 mean lower low water.
- Expanding and straightening the existing Inner Basin at Harbor Island as necessary to accommodate VLCC turning, including construction of a flare transition from the Corpus Christi Ship Channel with Aransas to meet the turning basin expansion.
- Potential placement of the new work dredged material into Waters of the United States for beneficial use sites located in and around Corpus Christi and Redfish Bays.
- Potential placement of dredged material on San Jose Island for dune restoration.
- Potential placement of dredged material feeder berms for beach to provide restoration along San Jose and Mustang Islands.
- Transport of new work dredged material to the New Work Ocean Dredged Material Disposal Site.

The proposed Project does not include widening the channel; however, some minor incidental widening of the channel is expected to meet side slope requirements and to maintain the stability of the channel.

An evaluation of alternatives to the proposed Action were also considered, including:

- A No Action alternative.
- Alternatives that would avoid, minimize, and compensate for impacts to the environment within the proposed Project footprint.
- Alternatives that would avoid, minimize, and compensate for impacts to the environment outside the footprint.
- Alternatives using alternative practices.
- Other reasonable alternatives that will be developed through the EIS scoping process.

1.2. Purpose and Need for the Proposed Project

The USACE has determined that the purpose of the proposed Project is to export safely, efficiently, and economically current and forecasted crude oil inventories through the Corpus Christi Ship Channel via VLCCs, a common vessel in the world fleet. Crude oil is delivered via pipeline from the Eagle Ford Shale and Permian Basin to multiple locations at the Port of Corpus Christi. Crude Oil inventories exported at the Port of Corpus Christi have increased from 280,000 barrels per day in 2017 to approximately 1.65 million barrels in January 2020 with forecasts increasing to 4.5 million barrels per day by 2030. Current facilities require vessel lightening to fully load VLCCs which increases costs and affects safety.

2. Public Participation in the Environmental Review Process

2.1. Public Notification of the Draft EIS

2.1.1. Notice of Availability

The USACE published a NOA for the Draft EIS in the *Federal Register* on June 10, 2022. The NOA was also distributed to all cooperating agencies and other interested agencies, stakeholder organizations, Native American Tribes, and individuals. This distribution ensures that interested parties have an opportunity to provide comments on the Draft EIS and that information pertinent to permissions, permits, authorizations, and approvals is provided to decision-makers for the USACE and EPA. A copy of the NOA is included in **Appendix A**.

2.1.2. Special Public Notice

A Special Public Notice (in English and Spanish) announcing the availability of the Draft EIS as well as the date and time for the public meeting scheduled for June 22, 2022, was distributed via email to a total of 715 interested parties and local, state, and federal elected officials on May 25, 2022.

The Special Public Notice also provided information about the proposed Project, the public review period, and how to provide comments on the Draft EIS. A copy of the Special Public Notice is included in **Appendix A**.

2.1.3. News Release

A news release announcing the availability of the Draft EIS as well as the date and time for the public meeting scheduled for June 22, 2022, was published on the USACE Galveston District website (https://www.swg.usace.army.mil/Media/News-Releases/) on May 25, 2022. A second news release was published on the USACE Galveston District website on June 28, 2022.

The news releases also provided information about the proposed Project, the public review period, and how to provide comments on the Draft EIS. Copies of the press releases are included in **Appendix A**.

2.1.4. Website

The USACE established a webpage for the proposed Project to provide the public access to pertinent information about the proposed Project, including the permit application, NOI, NOA, Special Public Notices, the Draft EIS, and other information as it becomes available. Additionally, the information available on the webpage provides information about the public review period and how to provide comments on the Draft EIS. The Special Public Notice was published on the USACE webpage on May 24, 2022. A copy of the Special Public Notice published on the USACE webpage is included in **Appendix A** and the webpage URL is included below.

https://www.swg.usace.army.mil/Missions/Regulatory/Special-Projects-Environmental-Impact-Statements.aspx

3. Public Meeting Summary

The USACE held one in-person public meeting for the Draft EIS on June 22, 2022, from 3 – 7:30 p.m. Central Time at the Ortiz Center, 402 Harbor Drive, Corpus Christi, Texas 78401. The public meeting was structured in a combined open house and town hall style, beginning with the open house portion from 3 – 5 p.m. and concluding the presentation and public comment period from 5 – 7:30 p.m. The purpose of the public meeting was to provide information about the proposed Project and to receive public input and comment on the Draft EIS.

Upon arrival, public meeting attendees were asked to complete an attendee, or registration, card and were provided with meeting materials, including a “Navigating the Public Meeting” handout, a fact sheet about the proposed Project, and comment form for written comments. Accommodations were also made for Spanish speakers, including Spanish meeting materials (e.g., attendee cards, “Navigating the Public Meeting” handouts, fact sheets, comment forms, and a packet of the exhibits available for viewing) and Spanish interpreters to assist discussion with project team members. Copies of meeting materials provided during the public meeting are included in **Appendix B**.

During the open house portion of the public meeting, attendees had the opportunity to view informational exhibits about the proposed Project and discuss the proposed Project with the project team members in attendance. Attendees also had the opportunity to provide verbal comments to a certified court reporter during the open house portion of the meeting if they did not wish to wait until the formal commenting portion of the public meeting. Copies of the informational exhibits presented during the public meeting are included in **Appendix B**.

At the conclusion of the open house portion of the public meeting, the town hall portion of the public meeting was called to order by USACE representatives. During the town hall portion of the public meeting, attendees were invited to view presentations from the USACE and the PCCA, including an overview of the Draft EIS and the EIS process and information about the proposed Project. Copies of the USACE and PCCA presentations are included in **Appendix C**.

Following the USACE and PCCA presentations, attendees were invited to provide verbal comments to the project team with a certified court reporter in attendance to record each comment. Attendees wishing to provide verbal comments were required to sign up during registration and were called to speak in the order in which they registered. Each speaker was provided with three minutes to speak and was asked to state their first and last name before speaking. The public meeting adjourned following the verbal commenting period.

In addition to verbal comments, attendees were invited to submit written comments at the public meeting or at any time during the public review period via mail or email.

A total of 60 people attended the public meeting. Photographs from the public meeting are included in **Appendix D**.

Following the public meeting, the end of the 45-day public review period (July 25, 2022) for the Draft EIS was extended to a 63-day public review period, ending on Aug. 9, 2022.

The USACE provides opening remarks prior to the start of the town hall portion of the public meeting on June 22, 2022.

4. Comments Received

4.1. Comment Collection Methods

All comments received during the 63-day comment period, and those received after the comment period to the extent practicable, were reviewed and considered. The public review period for the Draft EIS ended on Aug. 9, 2022. Comments were received via the following channels:

- Verbal comments were received during the formal public commenting portion of the public meeting.
- Comments were mailed to Mr. Jayson Hudson, U.S. Army Corps of Engineers, Galveston District, Regulatory Branch, P.O. Box 1229, Galveston, Texas 77553-1229.
- Electronic comments were received via the project email addresses at SWG201900067@usace.army.mil.

4.2. Comment Tabulation

A total of 283 comments were received from all available channels. A comment database is included in **Appendix E** and verbal comments recorded by the certified court reporter are included in the public meeting transcript in **Appendix F.** A breakdown of the comments received through each available channel is included below:

- Written comments received via mail and email - **251**
- Verbal comments received during the public meeting verbal comment period – **32**
- Written comments received during the public meeting – **0**

The following list identifies the topics identified in the comments received during the 63-day public review period:

- Air Quality
- Alternatives
- Insufficient analysis
- Cultural resources
- Direct environmental impacts
- Essential fish habitat assessment
- Fisheries
- Purpose and need
- Public meeting/Public outreach
- Socioeconomics
- Storm surge
- Ship wakes
- Ferry
- Beneficial use sites
- Dredged material
- Biological assessment
- Cumulative impacts
- Mitigation
- Navigation
- Threatened and endangered species
- Wetlands
- Not applicable to the Project
- General opposition to the project
- General support of the project

Once all comments have been assembled and reviewed, formal responses will be prepared to address substantive environmental issues raised in the comments. The formal responses, including any changes to the Draft EIS will be included in the Final EIS. All comments received by the USACE are public records, subject to disclosure under the Freedom of Information Act, or the Public Records Act.

5. Next Steps in the NEPA Process

Next steps in the NEPA process for the proposed Action include the following:

- Prepare formal responses to address substantive environmental issues raised in comments received.
- Incorporate appropriate changes to the Final EIS per comments received.
- Issue the Final EIS for public review and comment. The Final EIS will be prepared and circulated in accordance with NEPA requirements and will include responses to all comments. The Final EIS will constitute a reprint of the entire Draft EIS, as required by the USACE. When the Final EIS is complete, the USACE will publish the document and the NOA will be printed in the *Federal Register*, which will mark the start of a 30-day public review period before the USACE can issue a Record of Decision (ROD).
- Following the 30-day public review period for the Final EIS, the USACE will prepare a ROD describing its decision whether to approve a DA permit and provide permission under Section 10 for the proposed Project.

The proposed timeline for these next steps is located on the below Permitting Dashboard for Federal Infrastructure Projects:

https://www.permits.performance.gov/permitting-projects/port-corpus-christi-authority-channel-deepening-project

Appendix A

Public Notices

Notice of Availability

Services, 12225 Wilkins Avenue, Rockville, Maryland 20852.

In addition to publishing the full text of this document in the **Federal Register**, the Commission provides all interested persons an opportunity to view and/or print the contents of this document via the internet through the Commission's Home Page (*http://www.ferc.gov*) using the ''eLibrary'' link. Enter the docket number excluding the last three digits in the docket number field to access the document. At this time, the Commission has suspended access to the Commission's Public Reference Room, due to the proclamation declaring a National Emergency concerning the Novel Coronavirus Disease (COVID–19), issued by the President on March 13, 2020. For assistance, contact the Federal Energy Regulatory Commission at *FERCOnlineSupport@ferc.gov* or call toll-free, (886) 208–3676 or TYY, (202) 502–8659.

Dated: June 6, 2022.

Debbie-Anne A. Reese,

Deputy Secretary.

[FR Doc. 2022–12518 Filed 6–9–22; 8:45 am]

BILLING CODE 6717–01–P

DEPARTMENT OF ENERGY

Federal Energy Regulatory Commission

[Docket No. ER22–2030–000]

Sonoran West Solar Holdings, LLC; Supplemental Notice That Initial Market-Based Rate Filing Includes Request for Blanket Section 204 Authorization

This is a supplemental notice in the above-referenced proceeding of Sonoran West Solar Holdings, LLC's application for market-based rate authority, with an accompanying rate tariff, noting that such application includes a request for blanket authorization, under 18 CFR part 34, of future issuances of securities and assumptions of liability.

Any person desiring to intervene or to protest should file with the Federal Energy Regulatory Commission, 888 First Street NE, Washington, DC 20426, in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure (18 CFR 385.211 and 385.214). Anyone filing a motion to intervene or protest must serve a copy of that document on the Applicant.

Notice is hereby given that the deadline for filing protests with regard to the applicant's request for blanket authorization, under 18 CFR part 34, of future issuances of securities and assumptions of liability, is June 27, 2022.

The Commission encourages electronic submission of protests and interventions in lieu of paper, using the FERC Online links at *http://www.ferc.gov.* To facilitate electronic service, persons with internet access who will eFile a document and/or be listed as a contact for an intervenor must create and validate an eRegistration account using the eRegistration link. Select the eFiling link to log on and submit the intervention or protests.

Persons unable to file electronically may mail similar pleadings to the Federal Energy Regulatory Commission, 888 First Street NE, Washington, DC 20426. Hand delivered submissions in docketed proceedings should be delivered to Health and Human Services, 12225 Wilkins Avenue, Rockville, Maryland 20852.

In addition to publishing the full text of this document in the **Federal Register**, the Commission provides all interested persons an opportunity to view and/or print the contents of this document via the internet through the Commission's Home Page (*http://www.ferc.gov*) using the ''eLibrary'' link. Enter the docket number excluding the last three digits in the docket number field to access the document. At this time, the Commission has suspended access to the Commission's Public Reference Room, due to the proclamation declaring a National Emergency concerning the Novel Coronavirus Disease (COVID–19), issued by the President on March 13, 2020. For assistance, contact the Federal Energy Regulatory Commission at *FERCOnlineSupport@ferc.gov* or call toll-free, (886) 208–3676 or TYY, (202) 502–8659.

Dated: June 6, 2022.

Debbie-Anne A. Reese,

Deputy Secretary.

[FR Doc. 2022–12515 Filed 6–9–22; 8:45 am]

BILLING CODE 6717–01–P

ENVIRONMENTAL PROTECTION AGENCY

[FRL OP–OFA–019]

Environmental Impact Statements; Notice of Availability

Responsible Agency: Office of Federal Activities, General Information 202–564–5632 or *https://www.epa.gov/nepa.*

Weekly receipt of Environmental Impact Statements (EIS)

Filed May 27, 2022 10 a.m. EST

Through June 6, 2022 10 a.m. EST

Pursuant to 40 CFR 1506.9.

Notice: Section 309(a) of the Clean Air Act requires that EPA make public its comments on EISs issued by other Federal agencies. EPA's comment letters on EISs are available at: *https://cdxnodengn.epa.gov/cdx-enepa-public/action/eis/search.*

EIS No. 20220074, Final, CHSRA, CA, California High-Speed Rail Authority San Francisco to San Jose Project Section Final Environmental Impact Report/Environmental Impact Statement, Review Period Ends: 07/11/2022, Contact: Scott Rothenberg 916–403–6936.

EIS No. 20220075, Final, USCG, PRO, Offshore Patrol Cutter Acquisition Program, Review Period Ends: 07/11/2022, Contact: Andrew Haley 202–372–1821.

EIS No. 20220076, Draft, USACE, TX, Proposed Corpus Christi Ship Channel Deepening Project, Comment Period Ends: 07/25/2022, Contact: Jayson M Hudson 409–766–3108.

EIS No. 20220077, Draft, USFS, CA, Meeks Bay Restoration, Comment Period Ends: 08/09/2022, Contact: Ashley Sibr 530–543–2615.

Dated: June 6, 2022.

Cindy S. Barger,

Director, NEPA Compliance Division, Office of Federal Activities.

[FR Doc. 2022–12537 Filed 6–9–22; 8:45 am]

BILLING CODE 6560–50–P

FEDERAL COMMUNICATIONS COMMISSION

[OMB 3060–0010; FR ID 90628]

Information Collection Being Submitted for Review and Approval to Office of Management and Budget

AGENCY: Federal Communications Commission.

ACTION: Notice and request for comments.

SUMMARY: As part of its continuing effort to reduce paperwork burdens, as required by the Paperwork Reduction Act (PRA) of 1995, the Federal Communications Commission (FCC or the Commission) invites the general public and other Federal Agencies to take this opportunity to comment on the following information collection. Pursuant to the Small Business Paperwork Relief Act of 2002, the FCC seeks specific comment on how it can further reduce the information collection burden for small business concerns with fewer than 25 employees.

Special Public Notice

English and Spanish

US Army Corps of Engineers

Galveston District
Regulatory Division

NOTICE OF AVAILABILITY AND PUBLIC MEETINGS FOR THE PORT OF CORPUS CHRISTI AUTHORITY'S CHANNEL DEEPENING PROJECT, NUECES AND ARANSAS COUNTIES, TEXAS (DEPARTMENT OF THE ARMY PERMIT NUMBER SWG-2019-00067)

PURPOSE OF PUBLIC NOTICE: To inform you that the U.S. Army Corps of Engineers Galveston District (Corps) is issuing a notice to advise the public that a Draft Environmental Statement (DEIS), for which you may be interested, has been completed and will published in the Federal Register on June 10, 2022. It is also to solicit your comments and information to better enable us to make a reasonable decision on factors affecting the public interest.

SCOPING: The Corps published a notice of intent and initiated the scoping process in the *Federal Register* to notify the public of the intent to prepare a DEIS on April 7, 2020. A meeting invitation was emailed to federal and state agencies for a virtual agency scoping meeting on May 14, 2020. Notices to interested parties and local, state, and federal elected officials were sent via email and mail on May 27 and May 28, 2020, respectively. The notices provided information about the proposed Action, announced the virtual public scoping meetings scheduled for June 9, June 11, June 16, and June 18, 2020, and provided a link to the Project website. Due to technical issues associated with the virtual meeting platform during the June 9, 2020, virtual public scoping meeting, the format was changed and an additional virtual public scoping meeting was scheduled for June 15, 2022, for a total of five scoping meetings. The Corps solicited comments on the proposed Action during the scoping period meetings from the public, federal, state, and local agencies and officials, Native American tribal groups, and other interested parties for the proposed permit activity.

BACKGROUND: The Corps received a permit application for a Department of the Army (DA) Permit pursuant to Section 10 of the Rivers and Harbors Act of 1899, Section 404 of the Clean Water Act, and Section 103 of the Marine Protection, Research and Sanctuaries Act from the Port of Corpus Christi Authority (PCCA) (SWG-2019-00067) for the deepening of the Corpus Christi Ship Channel (proposed Action). The Corps is the lead Federal agency under the National Environmental Policy Act (NEPA) and the President's Council on Environmental Quality regulations and has prepared an EIS for the proposed Action. The U.S. Environmental Protection Agency, National Oceanic and Atmospheric Administration, National Marine Fisheries Service, the U.S. Fish and Wildlife Service, and the U.S. Coast Guard are cooperating agencies under NEPA. The DA permit application was first publicized by an extended Public Notice issued on August 1, 2019.

The PCCA Channel Deepening Project (CDP) is located at Port Aransas, Nueces County, Texas. The CDP channel alignment is within the existing channel bottom of the Corpus Christi Ship Channel (CCSC) starting at Station 110+00 near the southeast side of Harbor Island. The CDP traverses easterly through Aransas Pass and extends beyond the currently authorized terminus at Station –330+00. The CDP extension terminates at an additional 29,000 feet into the Gulf of Mexico (Gulf) at Station –620+00, the channel's proposed new terminus. The approximate distance of the proposed PCCA CDP is 13.8 miles. The Federal navigation channel segments from Stations 110+00 to –72+50 (Jetties Channel's seaward limits) is currently authorized at -54 feet Mean Lower Low Water (MLLW). The Federal navigation channel segments from –72+50 to –330+00 (Offshore Channel's seaward limits) is currently authorized at -56 feet MLLW. For these segments, the Federally authorized channel bottom widths vary from 530 feet (inshore segments) to 700 feet (offshore segments).

The proposed Action would deepen the channel from its current authorized depth of –54 feet MLLW from Station 110+00 to Station –72+50 to –75 feet MLLW. From Station -72+50 to Station –330+00, the channel would be deepened from –54 feet MLLW to –77 feet MLLW. The proposed project includes a 29,000-foot extension of the CCSC from Station–330+00 to Station –620+00 and would be deepened to –77 feet MLLW. Two feet of advanced maintenance and 2 feet of allowable over dredge would be applied to each CDP channel segment. The proposed Action would span approximately 13.8 miles from a location near the southeast side of Harbor Island to the –80-foot MLLW bathymetric contour in the Gulf. The proposed Action footprint would cover 1,778 acres, generating 46.3 million cubic yards of new work dredged material.

PUBLIC INVOLVEMENT: The Corps invites full public participation to promote open communication on the potential concerns surrounding the DEIS. In addition, participation by Federal, State, local agencies and other interested organizations is encouraged.

The Corps will host an in-person public meeting on June 22, 2022, from 3 – 7:30 p.m. at the Ortiz Center 402 Harbor Dr, Corpus Christi, TX 78401. The open house session, where you will have the opportunity to learn more about the project, talk with project staff, and get questions answered, will be available from 3:00 PM-7:30 PM in the Kleberg Room.

For those participants who wish to provide oral comments at the public meeting, the Corps will be accepting public comments starting at 5:00 pm in the Nueces Room. Each speaker will be given three minutes to speak. If you have additional comments that you would like to submit beyond what you are able to address during your time allotted, please submit them in writing. Written comments are just as valid and count the same as verbal comments presented during the public meeting.

The public meetings will be conducted in English and a Spanish interpreter will be available. Those in need of additional language interpreters should contact the Corps at SWG201900067@usace.army.mil, by June 15, 2022 (7 days prior to the public meetings), to make arrangements. Every effort will be made to address requests.

The notice of availability for the DEIS will be published by the Corps in the Federal Register on June 10, 2022. The DEIS will be available for a 45-day public review period

beginning on June 10, 2022 and ending July 25, 2022. The DEIS will be accessible at the Project website included above and the Corps' Project webpage below.

www.swg.usace.army.mil/Missions/Regulatory/Special-Projects-Environmental-Impact-Statements.aspx

SOLICITATION OF COMMENTS: The Corps 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. Any comments received will be considered by the Corps to determine whether to issue, modify, condition, or deny a permit for this proposal. To make this decision, comments are used to assess impacts on endangered species, historic properties, water quality, general environmental effects, and the other public interest factors.

Comments received will be considered by the Corps to assist in determining whether to issue, modify, condition, or deny a permit for the proposed Action. Comments will be considered in the Final Environmental Impact Statement analysis pursuant to NEPA. All comments must be received or postmarked by **Monday, July 25, 2022** (33 calendar days following the public meeting).

This public notice is being distributed to all known interested persons in order to assist in developing facts upon which a decision by the Corps may be based. For accuracy and completeness of the record, all data in support of or in opposition to the proposed work should be submitted in writing setting forth sufficient detail to furnish a clear understanding of the reasons for support or opposition.

CLOSE OF COMMENT PERIOD: Comments may be submitted during the entire 45-day period and will be reviewed and incorporated into the administrative record prior to the Corps' finalization of the procedure. All comments pertaining to this Notice must reach this office on or before **July 25, 2022**. Electronic (email) comments regarding the DEIS should be addressed to SWG201900067@usace.army.mil. Emailed comments, including attachments, should be provided in .docx, .jpeg, or .pdf formats. Written comments and requests for additional information should be submitted to:

Regulatory Division,
Policy Analysis Branch
U.S. Army Corps of Engineers
2000 Fort Point Road
Galveston, Texas 77550
409-766-3108 Phone

DISTRICT ENGINEER
GALVESTON DISTRICT
CORPS OF ENGINEERS

Aviso Público Especial

Reuniones Públicas sobre la Declaración de Impacto Ambiental del Proyecto de Profundización del Canal del Puerto de Corpus Christi
25 de mayo, 2022

US Army Corps of Engineers®

División Regulatoria del Distrito de Galveston

AVISO DE DISPONIBILIDAD Y REUNIONES PÚBLICAS SOBRE EL PROYECTO DE PROFUNDIZACIÓN DEL CANAL DE LAS AUTORIDADES PORTUARIAS DE CORPUS CHRISTI, PARA LOS CONDADOS DE NUECES Y ARANSAS, EN TEXAS (NÚMERO DE PERMISO DEL DEPARTAMENTO DEL EJÉRCITO- SWG-2019-00067)

PROPÓSITO DEL AVISO PÚBLICO: Para informarle que el Distrito de Galveston del U.S. Army Corps of Engineers (Cuerpo de Ingenieros del Ejército de los EE. UU.) está emitiendo un aviso para informar al público que se ha concluido un Borrador de la Declaración de Impacto Ambiental (DEIS), que le puede interesar, misma que se publicará en el Registro Federal el 10 de junio de 2022. También es para solicitar sus comentarios e información y así permitirnos tomar una decisión razonable sobre los factores que afectan el interés público.

ALCANCE: El U.S. Army Corps of Engineers publicó el día 7 de abril, 2020 un aviso de intención e inició el proceso de alcance ante el *Registro Federal* para notificar al público sobre la intención de preparar un Estudio de Impacto Ambiental . Para ello, el día 14 de mayo, 2020 se envió por correo electrónico una invitación a las agencias federales y estatales para llevar a cabo una reunión virtual de alcance por parte de la agencia. Los avisos a las partes interesadas y a los funcionarios electos locales, estatales y federales se enviaron por correo electrónico y postal el 27 y 28 de mayo de 2020, respectivamente. Los avisos proporcionaron información sobre la acción propuesta, anunciaron las reuniones públicas virtuales de alcance programadas para los días 9, 11, 16 y 18 de junio de 2020 y proporcionaron un enlace al sitio web del Proyecto. Debido a problemas técnicos asociados con la plataforma de reunión virtual durante la reunión de alcance público virtual del 9 de junio de 2020, se cambió el formato y se programó una reunión de alcance público virtual adicional para el 15 de junio de 2022, para un total de cinco reuniones de alcance. Durante las reuniones del período de alcance, el Cuerpo de Ingenieros solicitó comentarios sobre la Acción propuesta de parte del público, agencias y funcionarios federales, estatales y locales, grupos tribales nativos americanos y otras partes interesadas respecto a la actividad del permiso propuesto.

ANTECEDENTES: El U.S. Army Corps of Engineers recibió una solicitud para un permiso del Departamento del Ejército (DA) de conformidad con la Sección 10 de la Ley de Ríos y Puertos de 1899, la Sección 404 de la Ley de Agua Limpia y la Sección 103 de la Ley de Protección, Investigación y Santuarios Marinos de 1972 por parte de la Autoridad del Puerto de Corpus Christi (PCCA) para la profundización del Canal de Navegación de Corpus Christi (Acción propuesta). El U.S. Army Corps of Engineers es la agencia federal líder bajo la Ley de Política Ambiental Nacional (NEPA) y las regulaciones del Consejo del Presidente sobre Calidad Ambiental y ha preparado una Declaración de Impacto Ambiental para la Acción propuesta. La Agencia de Protección Ambiental de los EE. UU., la Administración Nacional Oceánica y Atmosférica, el Servicio Nacional de Pesca Marina, el Servicio de Pesca y Vida Silvestre de los EE. UU. y la Guardia Costera de los EE. UU. son agencias colaboradoras bajo la NEPA. Esta solicitud para un permiso de DA se hizo público por primera vez mediante un Aviso público ampliado emitido el 1 de agosto, 2019.

El Proyecto de Profundización del Canal PCCA (CDP) está ubicado en Port Aransas, Condado de Nueces, Texas. La alineación del canal CDP está dentro del fondo del canal existente del Canal de Navegación de Corpus Christi (CCSC) comenzando en la Estación 110+00 cerca del lado sureste de Harbor Island. El CDP atraviesa hacia el este a través de Aransas Pass y se extiende más allá del término actualmente autorizado en la estación –330+00. La extensión del CDP termina a 29,000 pies adicionales al interior del Golfo de México (Golfo) en la Estación -620+00, el nuevo término propuesto para el canal. La distancia aproximada del PCCA CDP propuesto es de 13.8 millas. Los segmentos federales del canal de navegación desde las estaciones 110+00 a –72+50 (límites hacia el mar de los espigones del canal) están actualmente autorizados a -54 pies de la bajamar promedio inferior (MLLW). Los segmentos del canal de navegación federal de -72+50 a -330+00 (límites hacia el mar del canal costa afuera están actualmente autorizados a -56 pies MLLW. Para estos segmentos, los anchos de fondo del canal autorizados federalmente varían de 530 pies (segmentos costeros) a 700 pies (segmentos costa afuera).

La Acción propuesta profundizaría el canal desde su profundidad actual autorizada de -54 pies MLLW desde la Estación 110+00 hasta la Estación -72+50 a -75 pies MLLW. Desde la estación -72+50 hasta la estación -330+00, el canal se profundizaría de -54 pies MLLW a -77 pies MLLW. El proyecto propuesto incluye una extensión de 29,000 pies del CCSC desde la Estación–330+00 hasta la Estación –620+00 y se profundizaría a –77 pies MLLW. Se aplicarían dos pies de mantenimiento avanzado y 2 pies de sobre dragado permitido a cada segmento del canal CDP. La Acción propuesta abarcaría aproximadamente 13.8 millas desde una ubicación cerca del lado sureste de Harbor Island hasta el contorno batimétrico MLLW de -80 pies en el Golfo. La huella de Acción propuesta cubriría 1,778 acres, generando 46.3 millones de yardas cúbicas de material de dragado de la nueva obra.

PARTICIPACIÓN PÚBLICA: El U.S. Army Corps of Engineers invita a la participación pública plena para promover una comunicación abierta sobre las preocupaciones potenciales con respecto al borrador del Estudio de Impacto Ambiental. Además, se alienta la participación de agencias federales, estatales, locales y otras organizaciones interesadas.

El U.S. Army Corps of Engineers organizará una reunión pública de carácter presencial el 22 de junio de 2022, de 3 a 7:30 p.m. en el Centro Ortiz 402 Harbor Dr, Corpus Christi, TX 78401. La sesión de puertas abiertas, donde tendrá la oportunidad de enterrarse con más detalle sobre el proyecto, hablar con el personal del proyecto y obtener respuestas a sus preguntas, estará disponible de 3:00 p.m. a 7:30 p.m. en la sala Kleberg.

Para aquellos participantes que deseen proporcionar comentarios verbales en la reunión pública, el U.S. Army Corps of Engineers aceptará comentarios públicos a partir de las 5:00 pm en el Salón Nueces. Cada participante que desee expresarse tendrá tres minutos para hablar. Si tiene comentarios adicionales que le gustaría enviar más allá de lo que se puede abordar durante el tiempo asignado, envíelos por escrito. Los comentarios por escrito son tan válidos y cuentan igual que los comentarios verbales presentados durante la reunión pública.

Las reuniones públicas se llevarán a cabo en inglés y habrá un intérprete de español disponible. Las personas que necesiten intérpretes de idiomas adicionales deben comunicarse con el U.S. Army Corps of Engineers en SWG201900067@usace.army.mil, antes del 15 de junio de 2022 (7 días antes de las reuniones públicas), para poder hacer los arreglos. Se hará todo lo posible para atender las solicitudes.

El aviso de disponibilidad del borrador de la Declaración de Estudio de Impacto Ambiental se publicará por el U.S. Army Corps of Engineers en el Registro Federal el día 10 de junio, 2022. El DEIS estará disponible para un período de revisión pública de 45 días

a partir del 10 de junio de 2022 y terminando el 25 de julio de 2022. El DEIS estará accesible en el sitio web del Proyecto, el cual se incluye anteriormente y en la página web del Proyecto de U.S. Army Corps of Engineers a continuación.

www.swg.usace.army.mil/Missions/Regulatory/Special-Projects-Environmental-Impact-Statements.aspx

SOLICITUD DE COMENTARIOS: El U.S. Army Corps of Engineers está solicitando comentarios del público, agencias y funcionarios federales, estatales y locales, tribus indígenas y otras partes interesadas para considerar y evaluar los impactos de esta actividad propuesta. Todo comentario recibido será considerado por el U.S. Army Corps of Engineers para ayudar a determinar si se debe emitir, modificar, condicionar o negar un permiso para la propuesta. Para tomar esta decisión, se utilizan comentarios para evaluar los impactos sobre las especies en peligro de extinción, las edificaciones históricas, la calidad del agua, los efectos ambientales generales y otros factores de interés público.

Todo comentario recibido en la será considerado por el U.S. Army Corps of Engineers para ayudar a determinar si se debe emitir, modificar, condicionar o negar un permiso para la Acción propuesta. Los comentarios se considerarán en el análisis de la Declaración de Impacto Ambiental Final de conformidad con NEPA. Todos los comentarios deben ser recibidos o tener estampado el matasellos postal a más tardar el día **lunes 25 de julio, 2022** (33 días calendario después de la audiencia pública).

Este aviso público se distribuye a todas las personas interesadas conocidas para ayudar a desarrollar los hechos en los que se puede basar una decisión del U.S. Army Corps of Engineers. Para que el registro sea exacto y completo, todos los datos que apoyen o se opongan al trabajo propuesto deben presentarse por escrito con detalles suficientes para proporcionar una comprensión clara de los motivos del apoyo o la oposición.

CIERRE DEL PERÍODO DE COMENTARIOS: Los comentarios se pueden enviar durante todo el período de 45 días y se revisarán e incorporarán al registro administrativo antes de que el U.S. Army Corps of Engineers finalice el procedimiento. Todos los comentarios relacionados con este Aviso deben llegar a esta oficina en o antes **25 de julio de 2022**. Los comentarios por vía electrónica (correo electrónico) acerca del DEIS deben enviarse a SWG201900067@usace.army.mil. Los comentarios enviados por correo electrónico, incluidos los archivos adjuntos, deben proporcionarse en formato .docx, .jpeg ó . pdf. Los comentarios por escrito y las solicitudes de información adicional deben enviarse a:

Regulatory Division,
Policy Analysis Branch
U.S. Army Corps of Engineers
2000 Fort Point Road
Galveston, Texas 77550
409-766-3108 Teléfono

INGENIERO DEL DISTRITO
CORPS OF ENGINEERS
DISTRITO DE GALVESTON

News Release

May 25 and June 28, 2022

Galveston District publishes Notice of Availability for the Draft Environmental Impact Statement and Public Meetings for the Port of Corpus Christi Authority's Channel Deepening Project, Nueces and Aransas Counties, Texas (Department of The Army Permit Number SWG-2019-00067)

Published May 25, 2022 /
Updated: May 25, 2022

GALVESTON, Texas --

The U. S. Army Corps of Engineers (USACE) Galveston District is publishing a notice of availability for the Port of Corpus Christi Authority's (PCCA) Channel Deepening Project Draft Environmental Impact Statement (DEIS) for Department of the Army Permit SWG-2019-00067. USACE invites all affected federal, state, and local agencies, affected Native American Tribes, other interested parties, and the general public to participate in the (National Environmental Policy Act) NEPA process during the review and comment of the DEIS. The DEIS will be made available for a 45-day public review period beginning on June 10, 2022, continuing through July 25, 2022. In addition, USACE has scheduled an in-person public meeting to be held on June 22, 2022, from 3:00pm. 7:30pm at the Ortiz Center, 402 Harbor Drive, Corpus Christi, TX 78401. The public meetings will provide information about the proposed action and receive public input and comment on the DEIS. Additional information about the public meeting and a copy of the DEIS will also be available on the Galveston District's Project webpage below.
www.swg.usace.army.mil/Missions/Regulatory/Special-Projects-Environmental-Impact-Statements.aspx

The PCCA Channel Deepening Project (CDP) is located near Port Aransas, Nueces and Aransas Counties, Texas. The proposed action would deepen the existing channel from its currently authorized depth of -54 feet to -77 feet and extend the existing offshore channel limits an additional 29,000 feet into the Gulf of Mexico. The CDP channel alignment is within the existing channel bottom of the Corpus Christi Ship Channel starting near the southeast side of Harbor Island and traverses easterly through Aransas Pass and extends beyond the currently authorized terminus.

The proposed action would span approximately 13.8 miles from Harbor Island to the Gulf generating approximately 47 million cubic yards of new work dredge material. PCCA has proposed to use suitable dredged material for beneficial use by constructing nearshore berms and beach nourishment on San Jose and Mustang Islands, as well as restore eroded shorelines on Harbor Island and near the Port Aransas Nature Preserve impacted by Hurricane Harvey. Dredged material determined not to be suitable for beneficial use will be placed in the Corpus Christi New Work Ocean Dredge Material Disposal Site located offshore Corpus Christi.

Written comments regarding the DEIS should be addressed to Mr. Jayson Hudson, Galveston District, Regulatory Division, 2000 Fort Point Road, Galveston, Texas 77550. Individuals who would like to provide comments electronically should submitted them by electronic mail to: SWG201900067@usace.army.mil. Emailed attachments should be provided in either docx, .jpeg, or .pdf formats.

Comments received during the comment period will be considered by USACE to assist in determining whether to issue, modify, condition or deny a permit for the proposed Action. Comments will be considered in the Final EIS analysis pursuant to NEPA. All comments must be received by July 25, 2022 (33 calendar days following the public meeting.

Contact
SWG Public Affairs Office
409-766-3404
swgpao@usace.army.mil

Release no. 22-017

DEIS regulatory USACE

USACE Galveston District publishes Notice of Availability for the Draft Environmental Impact Statement and Public Meetings for the Port of Corpus Christi Authority's Channel Deepening Project, Nueces and Aransas Counties, Texas (Department of The Army Permit Number SWG-2019-00067)

Published June 28, 2022

GALVESTON, Texas --

The U. S. Army Corps of Engineers (USACE) Galveston District is inviting all affected federal, state, and local agencies, affected Native American Tribes, other interested parties, and the general public to review and comment on the Port of Corpus Christi Authority's (PCCA) Channel Deepening Project Draft Environmental Impact Statement (DEIS) for Department of the Army Permit SWG-2019-00067. The DEIS is available on the Galveston District's Project **webpage** [www.swg.usace.army.mil/Missions/Regulatory/Special-Projects-Environmental-Impact-Statements.aspx].

The PCCA Channel Deepening Project (CDP) is located near Port Aransas, Nueces and Aransas Counties, Texas. The proposed action would deepen the existing channel from its currently authorized depth of -54 feet to -77 feet and extend the existing offshore channel limits an additional 29,000 feet into the Gulf of Mexico. The CDP channel alignment is within the existing channel bottom of the Corpus Christi Ship Channel starting near the southeast side of Harbor Island and traverses easterly through Aransas Pass and extends beyond the currently authorized terminus. The proposed action would span approximately 13.8 miles from Harbor Island to the Gulf generating approximately 47 million cubic yards of new work dredge material. PCCA has proposed to use suitable dredged material for beneficial use by constructing nearshore berms and beach nourishment on San Jose and Mustang Islands, as well as restore eroded shorelines on Harbor Island and near the Port Aransas Nature Preserve impacted by Hurricane Harvey. Dredged material determined not to be suitable for beneficial use will be placed in the Corpus Christi New Work Ocean Dredge Material Disposal Site located offshore Corpus Christi.

Written comments regarding the DEIS should be addressed to Mr. Jayson Hudson, USACE, Galveston District, Regulatory Division, 2000 Fort Point Road, Galveston, Texas 77550. Individuals who would like to provide comments electronically should submit them by **electronic mail** to: SWG201900067@usace.army.mil. Emailed attachments should be provided in docx, .jpeg, or .pdf formats.

Comments received during the comment period will be considered by the Corps to assist in determining whether to issue, modify, condition, or deny a permit for the proposed Action. Comments will be considered in the Final EIS analysis pursuant to NEPA. All comments must be received or postmarked by Monday, July 25, 2022, (33 calendar days following the public meeting).

Contact

USACE, Galveston District, Regulatory Division
SWG201900067@usace.army.mil
2000 Fort Point Road, Galveston TX 77550

Release no. 22-019

USACE Website

Special Public Notice SWG-2019-00067 Port of Corpus Christi Authority's Draft Environmental Impact Statement and Notice of Public Meetings

Published May 24, 2022

Special Public Notice Aviso Público Especial Draft Environmental Impact Statement Website

The Notice of Availability for the Port of Corpus Christi Authority's Channel Deepening Project Draft Environmental Impact Statement for Permit Application no. SWG-2029-00067 will be published n the Federal Register on June 10, 2022. The DEIS will be available for review and comment for a 45-day period beginning June 10, 2002 and ending July 25, 2022.

The Corps will host an in-person public meeting on June 22, 2022, from 3 – 7:30 p.m. at the Ortiz Center 402 Harbor Dr., Corpus Christi, TX 78401. The open house session, where you will have the opportunity to learn more about the project, talk with project staff, and get questions answered, will be available from 3:00 PM-7:30 PM in the Kleberg Room.

For those participants who wish to provide oral comments at the public meeting, the Corps will be accepting public comments starting at 5:00 pm in the Nueces Room. Each speaker will be given three minutes to speak. If you have additional comments that you would like to submit beyond what you are able to address during your time allotted, please submit them in writing. Written comments are just as valid and count the same as verbal comments presented during the public meeting.

Appendix B

Public Meeting Materials (English and Spanish)

Attendee Card

ATTENDEE CARD/Tarjeta de asistente

Port of Corpus Christi Channel Deepening Project (SWG-2019-00067)

Public Meeting – 06/22/2022

Would you like to make a verbal comment at tonight's public meeting?
¿Le gustaría hacer un comentario verbal en la reunión pública de esta noche?
❑ NO | No ❑ YES | Si

Are you a public official? | ¿Es usted un funcionario público? ❑ NO | No ❑ YES | Si - Position | Puesto: _____

First and Last Name | Nombre y Apellido _____

Mailing Address | Dirección de Envío _____

Email Address | Correo Electrónico _____

Affiliation | Afiliación _____

How did you learn about this public meeting?
¿Como aprendió usted sobre esta reunión pública?
❑ Mail | Correo
❑ Email | Correo electrónico
❑ Newspaper Notice | Aviso Periódico
❑ Other (Please explain) | Otros (Por favor explique)
_____

How would you prefer to receive information about the project?
¿Cómo prefiere recibir información sobre este proyecto?
❑ Mail | Correo
❑ Email | Correo electrónico
❑ Facebook/Twitter
❑ Website | Sitio de Web
❑ Other (Please explain) | Otros (Por favor explique)
_____

ATTENDEE CARD/Tarjeta de asistente

Port of Corpus Christi Channel Deepening Project (SWG-2019-00067)

Public Meeting – 06/22/2022

Would you like to make a verbal comment at tonight's public meeting?
¿Le gustaría hacer un comentario verbal en la reunión pública de esta noche?
❑ NO | No ❑ YES | Si

Are you a public official? | ¿Es usted un funcionario público? ❑ NO | No ❑ YES | Si - Position | Puesto: _____

First and Last Name | Nombre y Apellido _____

Mailing Address | Dirección de Envío _____

Email Address | Correo Electrónico _____

Affiliation | Afiliación _____

How did you learn about this public meeting?
¿Como aprendió usted sobre esta reunión pública?
❑ Mail | Correo
❑ Email | Correo electrónico
❑ Newspaper Notice | Aviso Periódico
❑ Other (Please explain) | Otros (Por favor explique)
_____

How would you prefer to receive information about the project?
¿Cómo prefiere recibir información sobre este proyecto?
❑ Mail | Correo
❑ Email | Correo electrónico
❑ Facebook/Twitter
❑ Website | Sitio de Web
❑ Other (Please explain) | Otros (Por favor explique)
_____

“Navigating the Public Meeting” Handout

NAVIGATING THE PUBLIC MEETING

US Army Corps of Engineers®
Galveston District

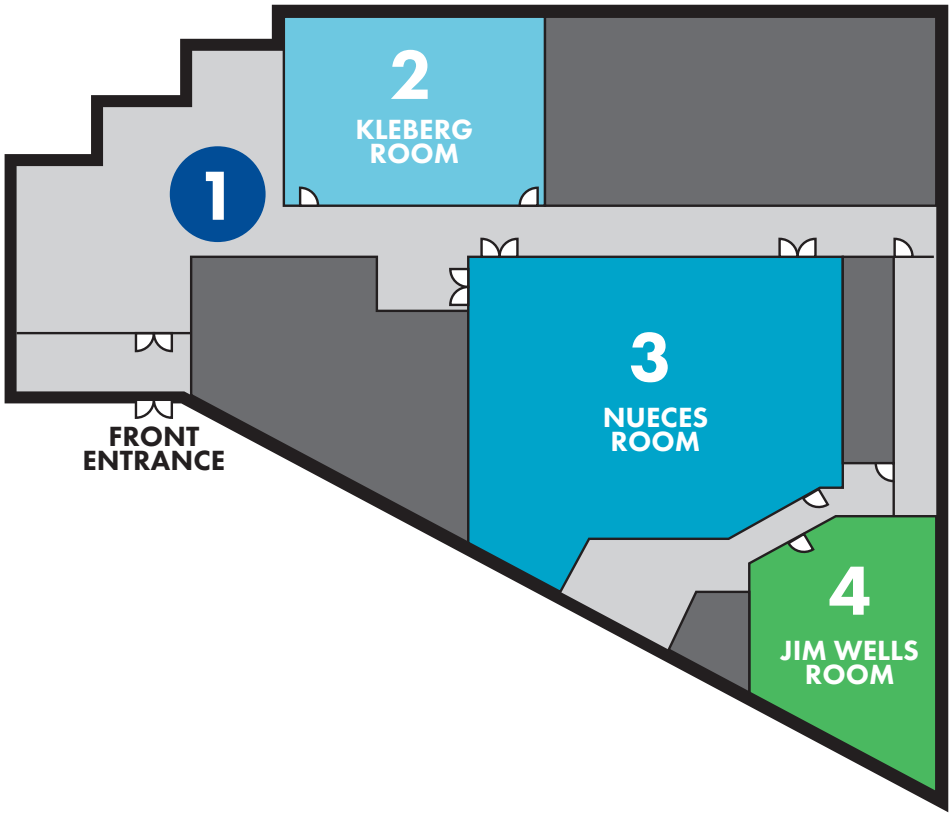
PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

1 **Registration**
Lobby
3:00 PM - 7:30 PM

2 **Open House Session**
Kleberg Room
3:00 PM - 7:30 PM

3 **USACE & Proposed Project Presentations/ Public Comment Session**
Nueces Room
5:00 PM - 7:30 PM

4 **Public Comment Room**
Jim Wells Room
3:00 PM - 7:30 PM



How do I provide comments?

You may provide comments verbally today during the public meeting, or by mail or email. Verbal comments may be provided following the presentations in the Nueces Room, or at any time in the Jim Wells Room. If you prefer to submit your comments in writing, please submit to the mail or email address below. Written comments are just as valid and count the same as verbal comments presented during the public meeting.

Comments may be submitted by mail or email to:

Mr. Jayson Hudson
USACE, Galveston District, Regulatory Branch
P.O. Box 1229
Galveston, Texas 77553-1229

Email: SWG201900067@usace.army.mil

All comments must be received or postmarked by Monday, July 25, 2022.

NAVEGANDO POR LA REUNIÓN PÚBLICA

US Army Corps of Engineers®
Galveston District

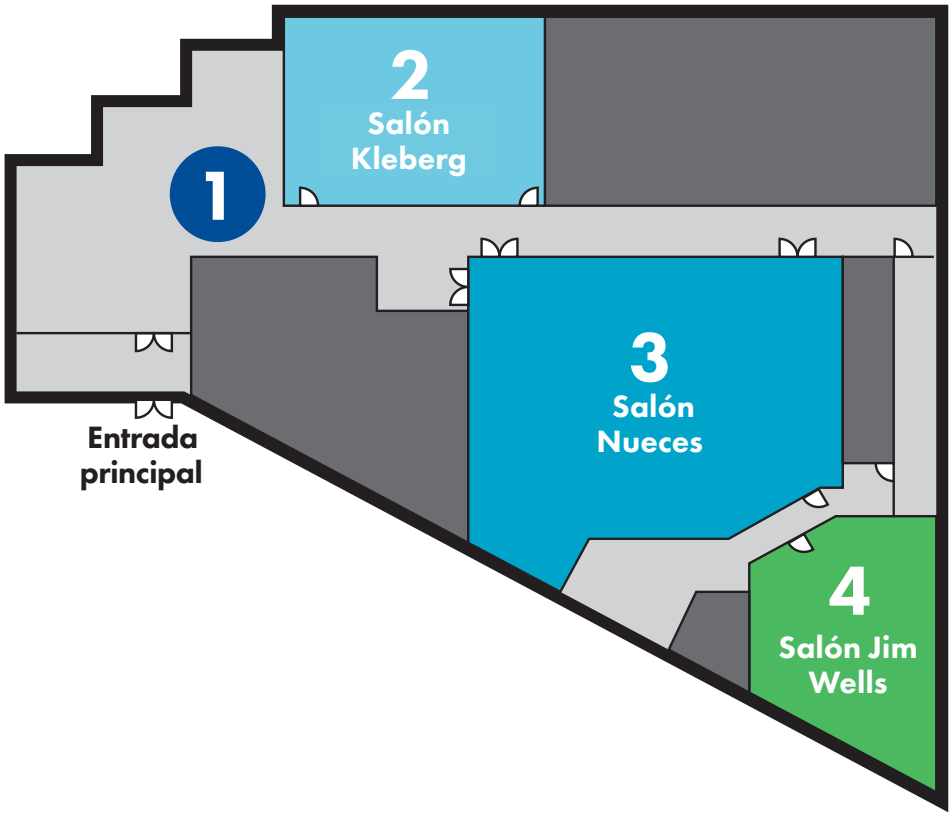
PROYECTO DE PROFUNDIZACIÓN DEL CANAL DEL PUERTO DE CORPUS CHRISTI

1 **Registro**
Área de recepción
3:00 p.m. - 7:30 p.m.

2 **Evento de Puertas Abiertas**
Salón Kleberg
3:00 p.m. - 7:30 p.m.

3 **Presentaciones de USACE y del Proyecto Propuesto/Sesión Pública para Comentarios**
Salón Nueces
5:00 p.m. - 7:30 p.m.

4 **Salón para Comentarios del Público**
Salón Jim Wells
3:00 p.m. - 7:30 p.m.



¿Cómo puedo proporcionar mis comentarios?

Usted puede proporcionar sus comentarios verbalmente el día de hoy durante la reunión pública, o por correo postal o correo electrónico. Los comentarios verbales se pueden proporcionar después de las presentaciones en el Salón Nueces, o en cualquier momento en el Salón Jim Wells. Si prefiere enviar sus comentarios por escrito, envíelos al correo postal o a la dirección de correo electrónico a continuación. Los comentarios por escrito son tan válidos y cuentan igual que los comentarios verbales presentados durante la reunión pública.

Las solicitudes pueden enviarse por correo postal o por correo electrónico a:

Mr. Jayson Hudson
USACE, Galveston District, Regulatory Branch
P.O. Box 1229
Galveston, Texas 77553-1229

Correo electrónico: SWG201900067@usace.army.mil

Todos los comentarios deben recibirse o tener estampado el matasellos con fecha del día lunes 25 de julio, 2022 o anterior.

Project Fact Sheet

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT FACT SHEET

June 2022

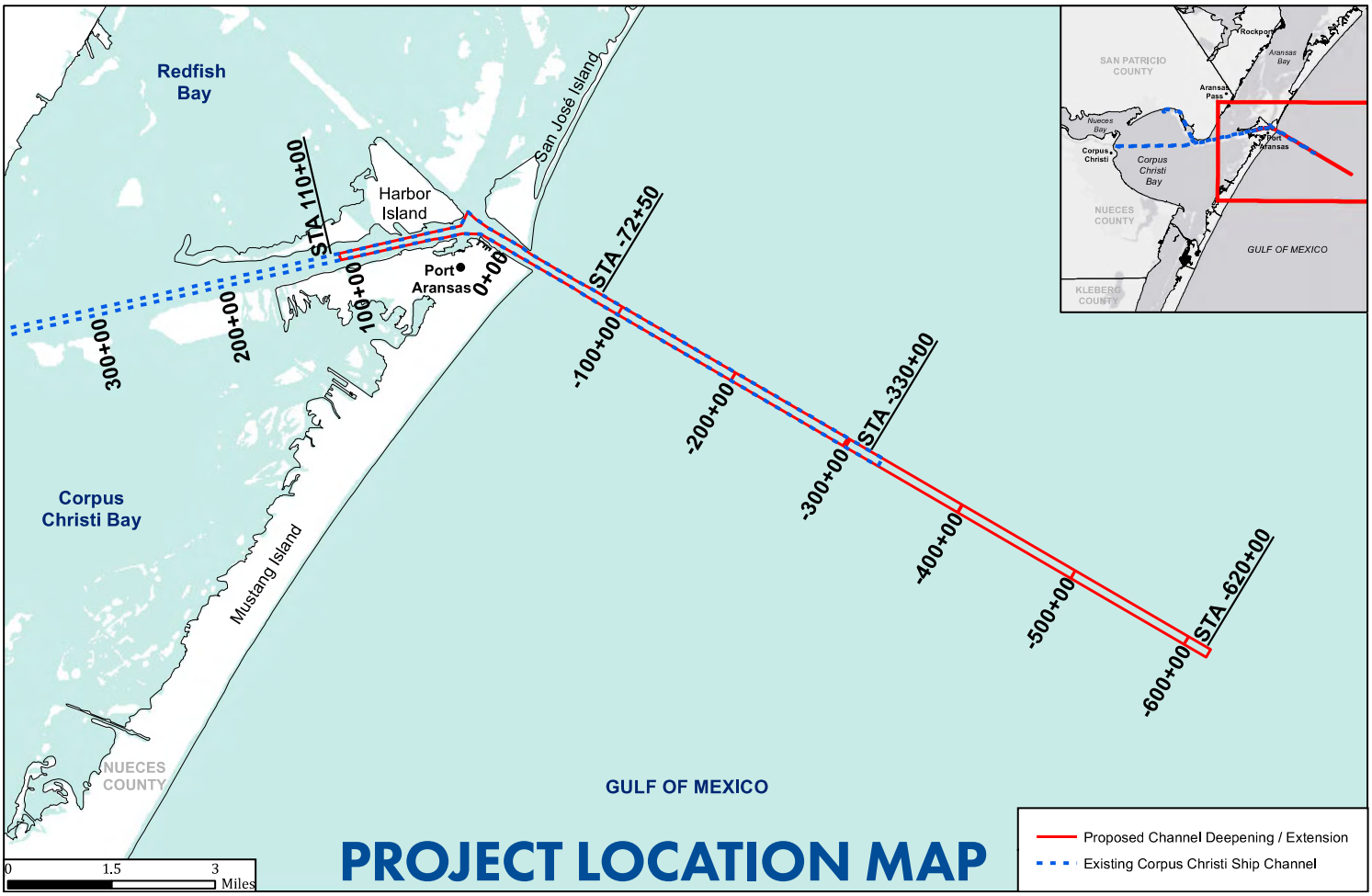
US Army Corps of Engineers®
Galveston District

Thank you for your interest in the Port of Corpus Christi Authority Channel Deepening Project. This Fact Sheet is intended to give you information about the U.S. Army Corps of Engineers' Environmental Impact Statement that is being prepared to support the proposed Project. We look forward to receiving your feedback.

Project Background

The U.S. Army Corps of Engineers, Galveston District (USACE) received a permit application for a Department of the Army (DA) Permit pursuant to Section 10 and Section 14 of the Rivers and Harbors Act of 1899, Section 404 of the Clean Water Act, and Section 103 of the Marine Protection, Research and Sanctuaries Act from the Port of Corpus Christi Authority (PCCA) (SWG-2019-00067) for the deepening of the Corpus Christi Ship Channel. As part of the National Environmental Policy Act (NEPA) process, the U.S. Environmental Protection Agency, National Oceanic and Atmospheric Administration, National Marine Fisheries Service, the U.S. Fish and Wildlife Service, and the U.S. Coast Guard are cooperating agencies in the preparation of the Environmental Impact Statement (EIS). The Texas Commission on Environmental Quality and the Texas Parks and Wildlife Department are participating agencies in the preparation of the EIS. The DA permit application was first advertised by a Public Notice issued August 1, 2019.

The proposed Project is needed to safely, efficiently, and economically export current and forecasted crude oil inventories through the Corpus Christi Ship Channel via Very Large Crude Carriers, a common vessel in the world fleet. Crude oil is delivered via pipeline from the Eagle Ford Shale and Permian Basin to multiple locations at the Port of Corpus Christi. Crude Oil inventories exported at the Port of Corpus Christi have increased from 280,000 barrels per day in 2017 to approximately 1.65 million barrels in January 2020 with forecasts increasing to 4.5 million barrels per day by 2030. Current facilities require vessel lightening to fully load Very Large Crude Carriers which increases costs and affects safety.



PROJECT LOCATION MAP

About the Proposed Project

The proposed Project is located within the existing channel bottom of the Corpus Christi Ship Channel starting near the southeast side of Harbor Island, traversing east through the Aransas Pass, and extending into the Gulf of Mexico for an approximate distance of 13.8 miles. To address changing market needs, the proposed Action would deepen this portion of the Corpus Christi Ship Channel beyond the current authorized channel depths of -54 feet and -56 feet mean lower low water to maximum depths of -79 feet and -81 feet mean lower low water to accommodate transit of fully loaded Very Large Crude Carriers with vertical distances between the waterline and the bottom of the hull, or drafts, of approximately 70 feet. An estimated 46.3 million cubic yards of new work dredged material would be generated as a result of the channel deepening.

Additionally, the proposed Action includes:

- Extending the existing terminus of the authorized channel an additional 29,000 feet into the Gulf of Mexico to reach -80 mean lower low water;
- Expanding and straightening the existing Inner Basin at Harbor Island as necessary to accommodate Very Large Crude Carrier turning, including construction of a flare transition from the Corpus Christi Ship Channel with Aransas to meet the turning basin expansion;
- Placement of the new work dredged material into Waters of the United States for beneficial use sites located in and around Corpus Christi and Redfish Bays;
- Placement of dredged material on San Jose Island for dune restoration;
- Placement of dredged material nearshore berms for beach to provide restoration along San Jose and Mustang Islands; and
- Transport of new work dredged material to the Corpus Christi New Work Ocean Dredged Material Disposal Site.

The proposed Action does not include widening the channel, as the deepening activities would be completed within the footprint of the authorized ship channel width. However, some minor incidental widening would be expected to meet the side slope requirements of the deepened channel enhancements.

An evaluation of alternatives to the proposed Action were also considered, including:

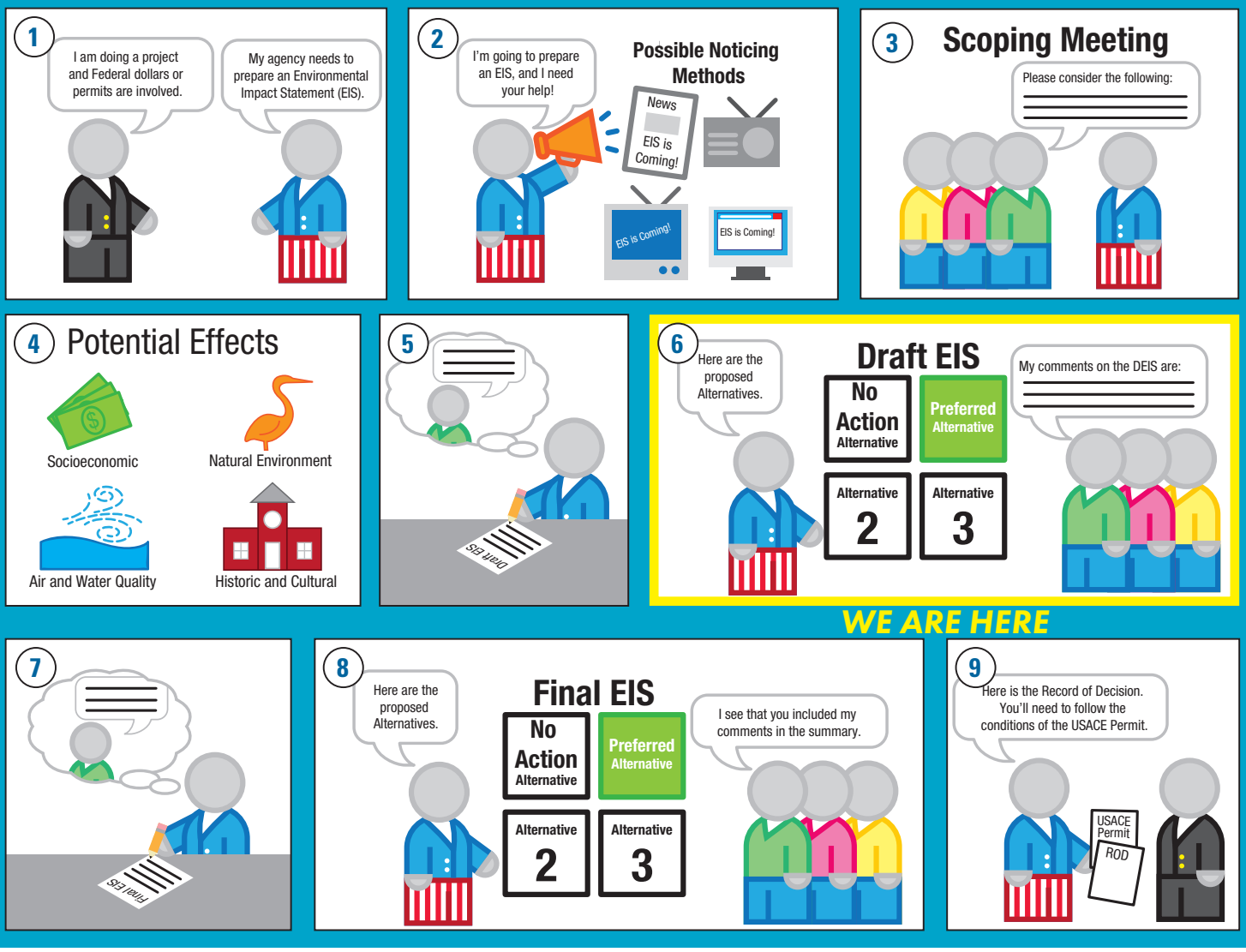
- A No Action alternative;
- Alternatives that would avoid, minimize, and compensate for impacts to the environment within the proposed Project footprint;
- Alternatives that would avoid, minimize, and compensate for impacts to the environment outside the footprint;
- Alternatives using alternative practices; and
- Other reasonable alternatives that will be developed through the EIS scoping process.

The EIS Process

U.S. Army Corps of Engineers (the Lead Agency)

Port of Corpus Christi Authority (The Applicant)

You The Public and Local Stakeholders



Where are we in the EIS process?

An EIS is prepared in a series of steps. The first step, referred to as "Scoping", involves an open process where government and public comments are gathered to define issues that will be analyzed in the EIS. After the Scoping stage, the Draft EIS is prepared and is then made available for public and agency review; the project team will then receive and respond to public comments on the Draft EIS and prepare the Final EIS in consideration of all feedback received during the EIS process. Decisions are not made in an EIS; rather, the EIS analysis serves as one of several factors decisionmakers consider. The decision is announced in the Record of Decision after the Final EIS has been published.

We are currently in the Draft EIS public and agency review stage of the EIS process. After reviewing public and Federal, State, regional, and local agency comments on the identified alternatives in Draft EIS, our team will then proceed with refining alternatives for the development of the Final EIS.

How do I participate in the EIS process?

You may participate in this process by providing comments for the Project team's consideration. Your comments will be addressed in the environmental impacts analysis to help define the scope of the EIS.

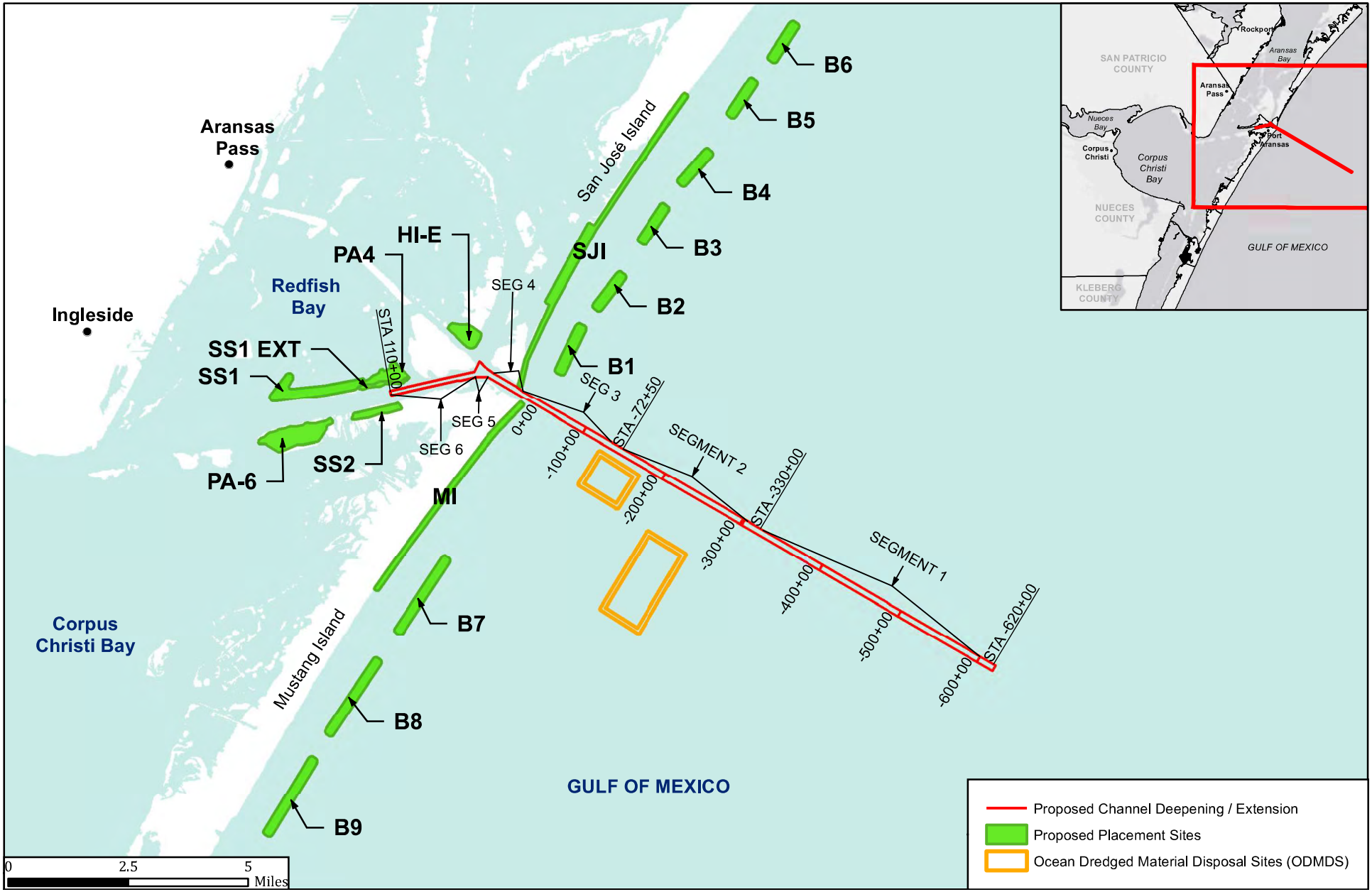
The USACE encourages full public participation to promote open communication on the issues surrounding the EIS for the proposed Project. In addition, participation by Federal, State, regional, and local agencies and other interested organizations is encouraged.

Comments may be submitted by mail or email to:

Mr. Jayson Hudson
USACE, Galveston District, Regulatory Branch
P.O. Box 1229
Galveston, Texas 77553-1229
Email: SWG201900067@usace.army.mil

All comments must be received or postmarked by Monday, July 25, 2022.

PROJECT FEATURES



HOJA INFORMATIVA DEL PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

Junio 2022

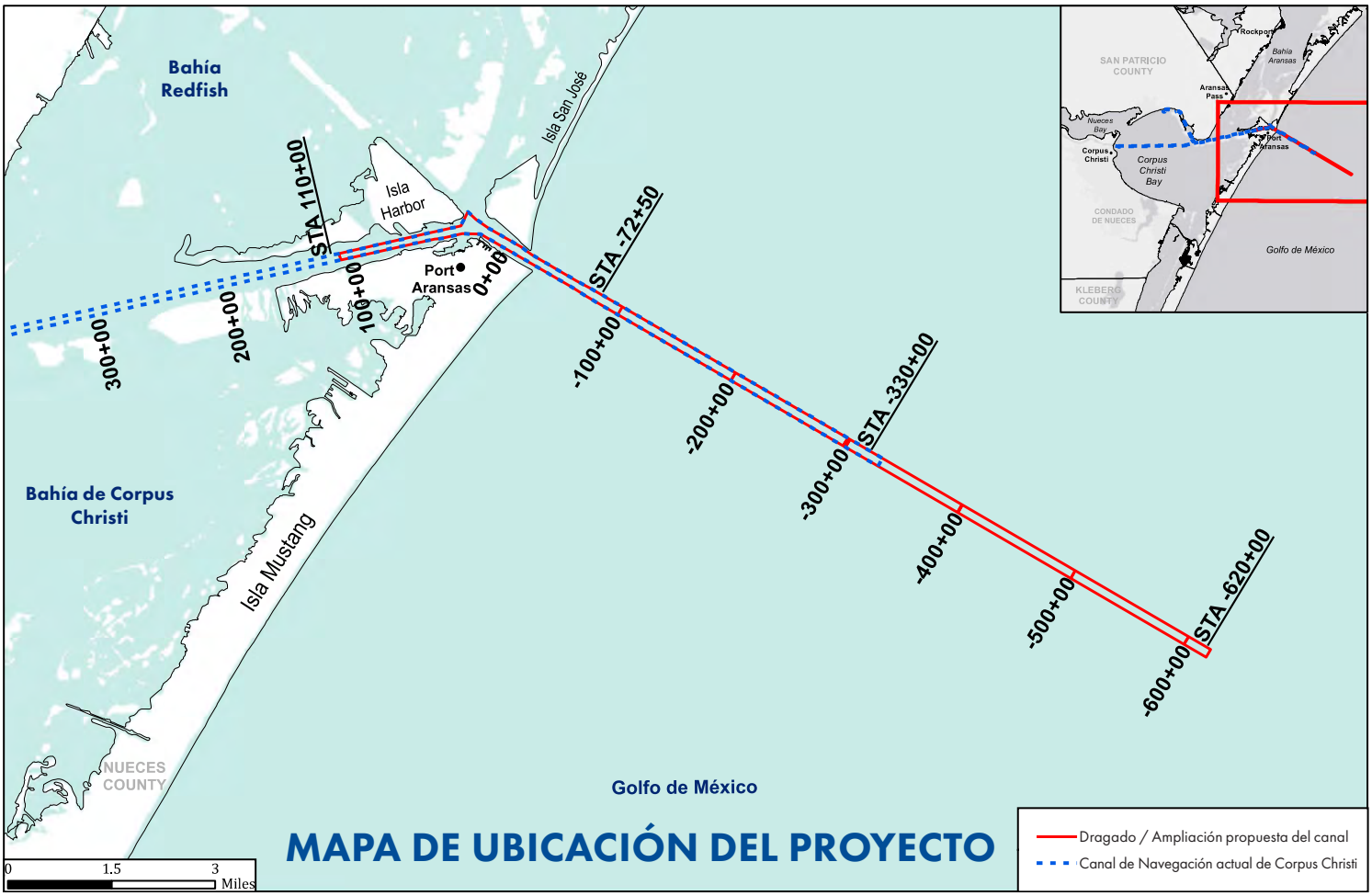
US Army Corps of Engineers®
Galveston District

Gracias por su interés en el Proyecto de Dragado del Canal de la Autoridad del Puerto de Corpus Christi. Esta Hoja Informativa tiene como objetivo brindarle información sobre la Declaración de Impacto Ambiental (Environmental Impact Statement, EIS) preparada por el U.S. Army Corps of Engineers (Cuerpo de Ingenieros del Ejército de los EE. UU.) que se está preparando para respaldar el Proyecto propuesto. Esperamos recibir sus comentarios.

Antecedentes del Proyecto

El U.S. Army EE.UU. Corps of Engineers (USACE) del Distrito de Galveston recibió una solicitud para un permiso del Departamento del Ejército (DA) de conformidad con la Sección 10 de la Ley de Ríos y Puertos de 1899, la Sección 404 de la Ley de Agua Limpia y la Sección 103 de la Ley de Protección, Investigación y Santuarios Marinos de 1972 por parte de la Autoridad del Puerto de Corpus Christi (PCCA) (SWG-2019-00067) para el dragado del Canal de Navegación de Corpus Christi para aumentar su profundidad. Como parte del proceso de la Ley de Política Nacional Ambiental (NEPA), la Agencia de Protección Ambiental de los EE. UU. (EPA), la Administración Nacional Oceánica y Atmosférica (NOAA), el Servicio Nacional de Pesca Marina, el Servicio de Pesca y Vida Silvestre de los EE. UU. y la Guardia Costera de los EE. UU. son agencias colaboradoras en la preparación de la Declaración de Impacto Ambiental (EIS). La Comisión de Calidad Ambiental de Texas y el Departamento de Parques y Vida Silvestre de Texas son agencias que están participando en la preparación del EIS. La solicitud de permiso del DA se anunció por primera vez mediante un Aviso público emitido del día 1 de agosto, 2019.

El Proyecto propuesto es necesario para exportar de manera segura, eficiente y económica los inventarios de petróleo crudo actuales y pronosticados a través del Canal de Navegación de Corpus Christi mediante buques tanque petroleros de grandes dimensiones, un tipo de buque común en la flota mundial. El petróleo crudo se entrega a través de un oleoducto desde Eagle Ford Shale y Permian Basin a múltiples puntos en el Puerto de Corpus Christi. Los inventarios de petróleo crudo que se exporta desde el Puerto de Corpus Christi han aumentado de 280,000 barriles por día en 2017 a aproximadamente 1.65 millones de barriles en enero de 2020 con pronósticos que aumentan a 4.5 millones de barriles por día para 2030. Las instalaciones actuales requieren el aligeramiento de buques para cargar completamente los buques tanque petroleros de grandes dimensiones, lo que aumenta los costos y afecta la seguridad.



Acerca del Proyecto propuesto

El Proyecto propuesto se ubica dentro del fondo del actual Canal de Navegación de Corpus Christi, y comienza cerca del lado sureste de Harbour Island, atravesando hacia el este a través del Paso Aransas y extendiéndose hacia el Golfo de México por una distancia aproximada de 13.8 millas. Para abordar las necesidades cambiantes del mercado, la acción propuesta profundizaría esta parte del Canal de Navegación de Corpus Christi más allá de las profundidades autorizadas actuales del canal, que son -54 pies y -56 pies de bajamar promedio inferior hasta profundidades máximas de -79 pies y -81 pies de bajamar promedio inferior para recibir el tránsito de buques tanques petroleros de grandes dimensiones completamente cargados con distancias verticales entre la línea de flotación y la parte inferior del casco, o calados, de aproximadamente 70 pies. Como resultado del dragado del canal para aumentar su profundidad, se generarían aproximadamente 46.3 millones de yardas cúbicas de material de dragado nuevo.

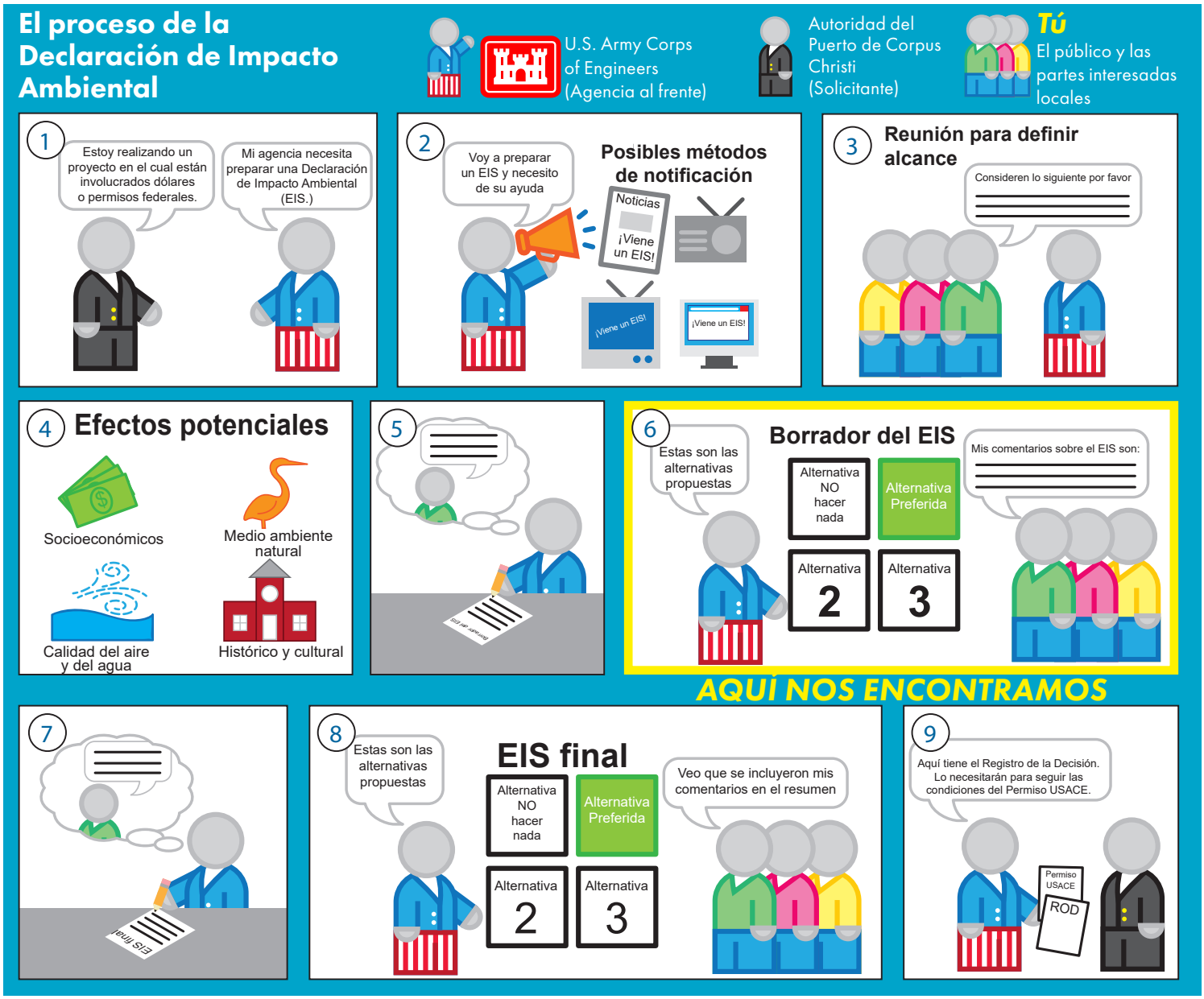
Además, la acción propuesta incluye:

- Ampliar el término existente del canal autorizado 29,000 pies adicionales hacia el Golfo de México para llegar a -80 de bajamar promedio inferior;
- Ampliar y enderezar la cuenca interior existente en Harbour Island según sea necesario para facilitar el viraje de buques tanques petroleros de grandes dimensiones, incluida la construcción de una transición abocinada desde el canal de navegación de Corpus Christi con Aransas para cumplir con la expansión de la cuenca de giro;
- Colocación del nuevo material de las obras de dragado en aguas territoriales de los Estados Unidos para uso en beneficio de sitios ubicados en las bahías de Corpus Christi y Redfish y sus alrededores;
- Colocación de material dragado en Isla San José para la restauración de dunas;
- Colocación de bermas de material dragado cerca de la costa para brindar restauración a las playas a lo largo de las islas San José y Mustang; y
- Transporte de material de las nuevas obras de dragado al sitio de disposición de material de las nuevas obras de dragado de Corpus Christi.

La acción propuesta no incluye la ampliación del canal, ya que las actividades de dragado se completarían dentro de la huella del ancho autorizado del canal de navegación. Sin embargo, se esperaría algún ensanchamiento incidental menor para cumplir con los requisitos de pendiente lateral de las mejoras del canal profundizado.

También se consideró una evaluación de alternativas a la acción propuesta, la cual incluye:

- Una alternativa de No ejercer acción;
- Alternativas que evitarían, minimizarían y compensarían los impactos al medio ambiente dentro de la huella del Proyecto propuesto;
- Alternativas que evitarían, minimizarían y compensarían los impactos al medio ambiente fuera de la huella;
- Alternativas utilizando prácticas alternativas; y
- Otras alternativas razonables que se desarrollarán a través del proceso de alcance de la declaración de impacto ambiental.



¿Dónde nos encontramos dentro del proceso de Declaración de Impacto Ambiental?

Una Declaración de Impacto Ambiental se prepara en una serie de pasos. El primer paso, denominado "definición del alcance", implica un proceso abierto en el que se reúnen los comentarios del gobierno y del público para definir los problemas que se analizarán en la Declaración. Después de la etapa de determinación del alcance, se prepara el borrador de la Declaración de Impacto Ambiental y luego se pone a disposición del público y de la agencia para su revisión; posteriormente, el equipo del proyecto recibirá y responderá a los comentarios públicos sobre el borrador de la Declaración de Impacto Ambiental y preparará la versión final teniendo en cuenta todos los comentarios recibidos durante el proceso de la preparación. En una Declaración de Impacto Ambiental no se incluyen tomas de decisiones; más bien, el análisis de la misma sirve como uno de varios factores a ser consideradas por quienes toman las decisiones. La decisión se anuncia en el Registro de Decisión después de que se haya publicado la Declaración de Impacto Ambiental final.

Actualmente nos encontramos en la etapa de revisión del borrador de la Declaración de Impacto Ambiental por parte del público y de las agencias. Después de revisar los comentarios del público y de las agencias federales, estatales, regionales y locales sobre las alternativas identificadas en el borrador de la de la Declaración de Impacto Ambiental, nuestro equipo procederá a refinar las alternativas para el desarrollo de la versión final.

¿Cómo puedo participar en el proceso de Declaración de Impacto Ambiental?

Usted puede participar en este proceso aportando sus comentarios para que sean considerados por el equipo del Proyecto. Sus comentarios se atenderán en el análisis de impacto ambiental para ayudar a definir el alcance del Declaración de Impacto Ambiental.

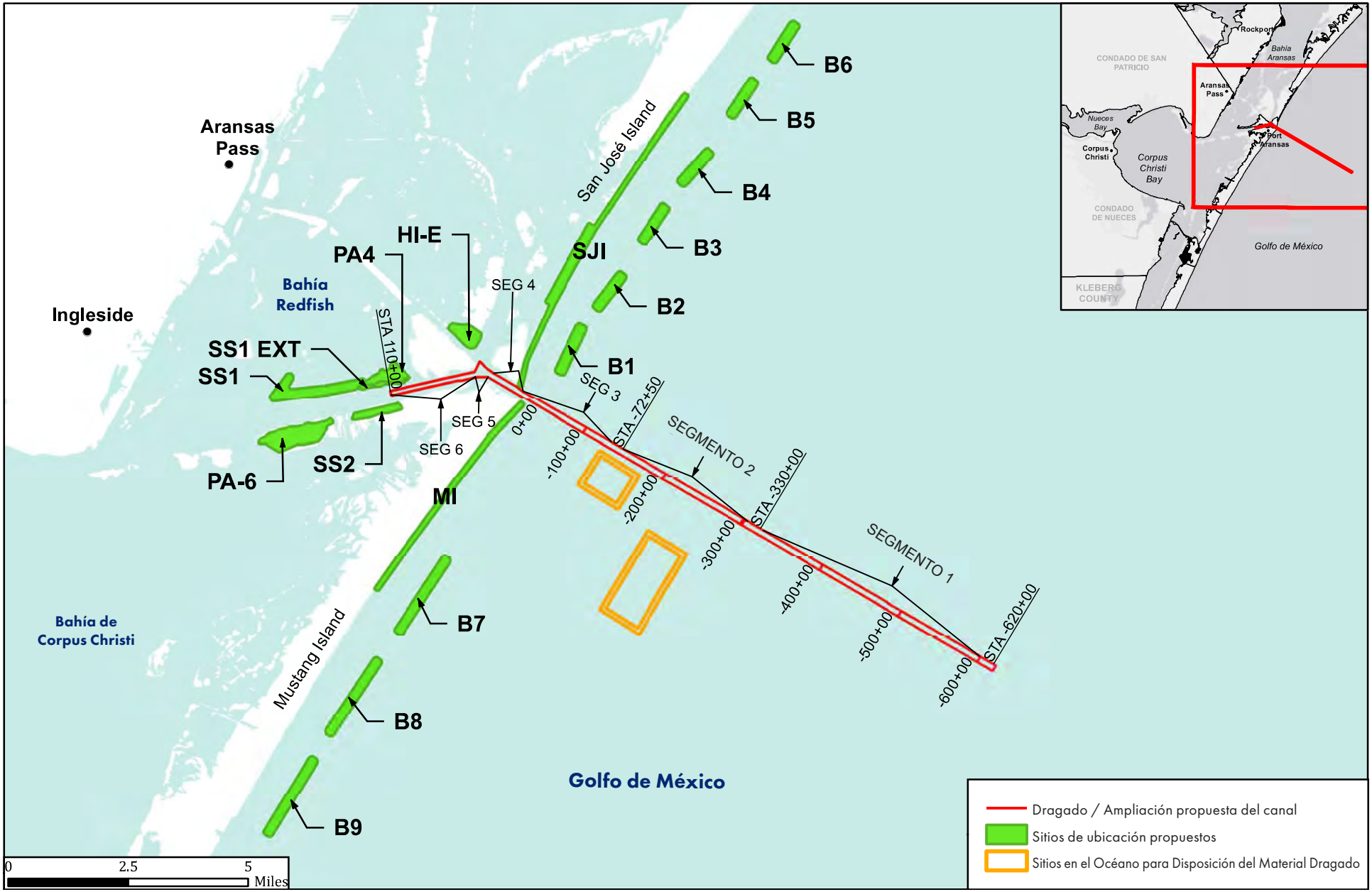
El USACE alienta a la participación pública para promover una comunicación abierta sobre los problemas relacionados con el Declaración de Impacto Ambiental. Además, se alienta la participación de agencias federales, estatales, y locales y otras organizaciones interesadas.

Las solicitudes pueden enviarse por correo postal o por correo electrónico a:

Mr. Jayson Hudson
USACE, Galveston District, Regulatory Branch
P.O. Box 1229
Galveston, Texas 77553-1229
Correo electrónico: SWG201900067@usace.army.mil

Todos los comentarios deben recibirse o tener estampado el matasellos con fecha del día lunes 25 de julio, 2022 o anterior.

CARACTERÍSTICAS DEL PROYECTO



Comment Form

Port of Corpus Christi Channel Deepening Project (SWG-2019-00067)
Public Meeting – 06/22/2022
Written Comment Form/Formulario de Comentarios Escritos

US Army Corps of Engineers
Galveston District

ARE YOU A PUBLIC OFFICIAL?/¿ES USTED UN FUNCIONARIO PÚBLICO?

❑ **NO**/NO ❑ **YES**/SÍ - **Position**/Puesto: _____

First and Last Name/Nombre y Apellido	**How did you learn about this public meeting?/**¿Cómo se enteró de esta reunión pública?
Mailing Address/Dirección de Envío	❑ **Mail**/Correo
City, State, Zip Code/Ciudad, Estado, Código Postal	❑ **Email**/Correo Electrónico
Email Address/Correo Electrónico	❑ **Newspaper Notice/**Aviso Periódico
Affiliation/Afiliación	❑ **Other (please explain)**/Otro (por favor de explicar) _____

How would you prefer to receive information about this project? / ¿Cómo prefiere recibir información sobre el proyecto?

❑ **Mail**/Correo ❑ **Email**/Correo Electrónico ❑ **Facebook/Twitter** ❑ **Website**/Sitio web

❑ **Other (please explain)**/Otro (por favor de explicar) _____

COMMENTS ***(Please make additional comments on the back, if needed.)***
COMENTARIOS *(Por favor hacer sus comentarios adicionales en la parte posterior.)*

This comment form may be turned in at the public meeting, mailed to the address on the back of this page, or emailed to: SWG201900067@usace.army.mil by July 25, 2022.

Este formulario de comentarios se puede entregar en la reunión pública, enviar a la dirección en la parte posterior de esta hoja, o enviar por correo electrónico antes del 25 de julio de 2022 a SWG201900067@usace.army.mil.

Mr. Jayson Hudson
USACE, Galveston District, Regulatory Branch
P.O. Box 1229
Galveston, Texas 77553-1229

Place postage here

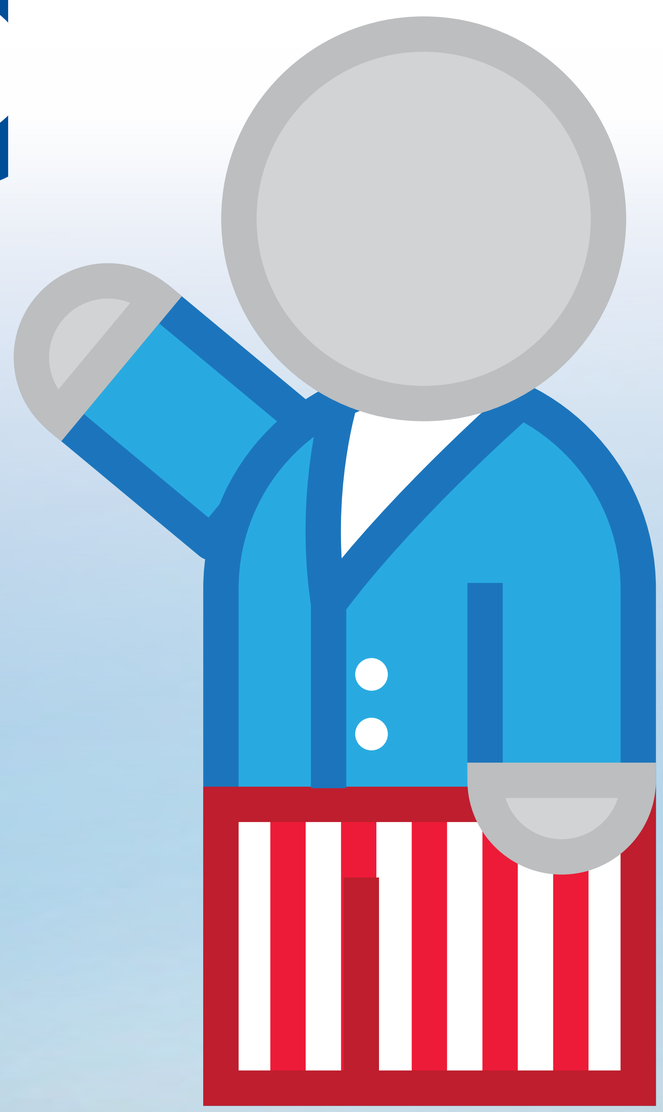
PCCA Channel Deepening Project
Mr. Jayson Hudson
USACE, Galveston District, Regulatory Branch
P.O. Box 1229
Galveston, Texas 77553-1229

Informational Exhibits

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

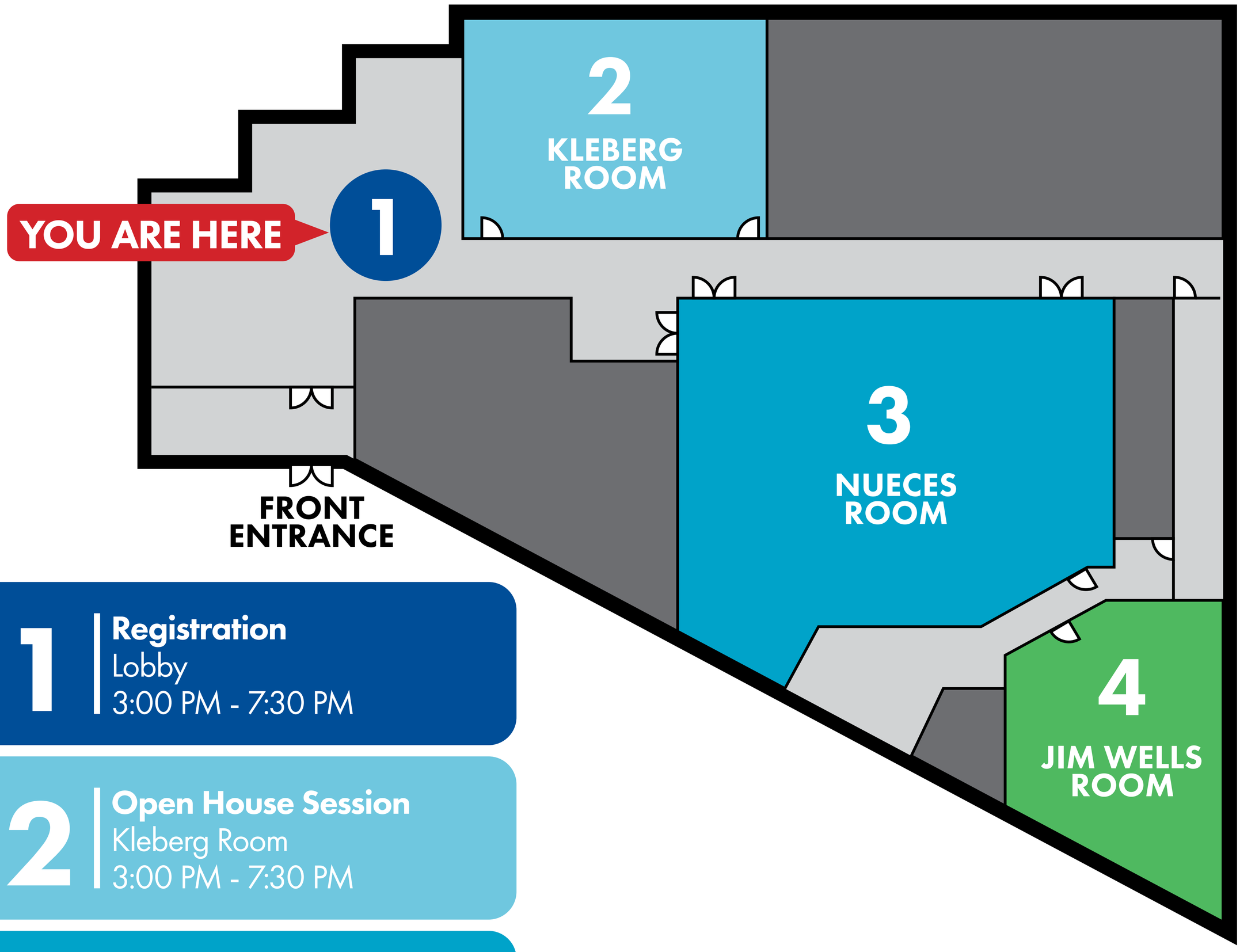
WELCOME TO THE PUBLIC MEETING



NAVIGATING THE PUBLIC MEETING

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT



1 | **Registration**
Lobby
3:00 PM - 7:30 PM

2 | **Open House Session**
Kleberg Room
3:00 PM - 7:30 PM

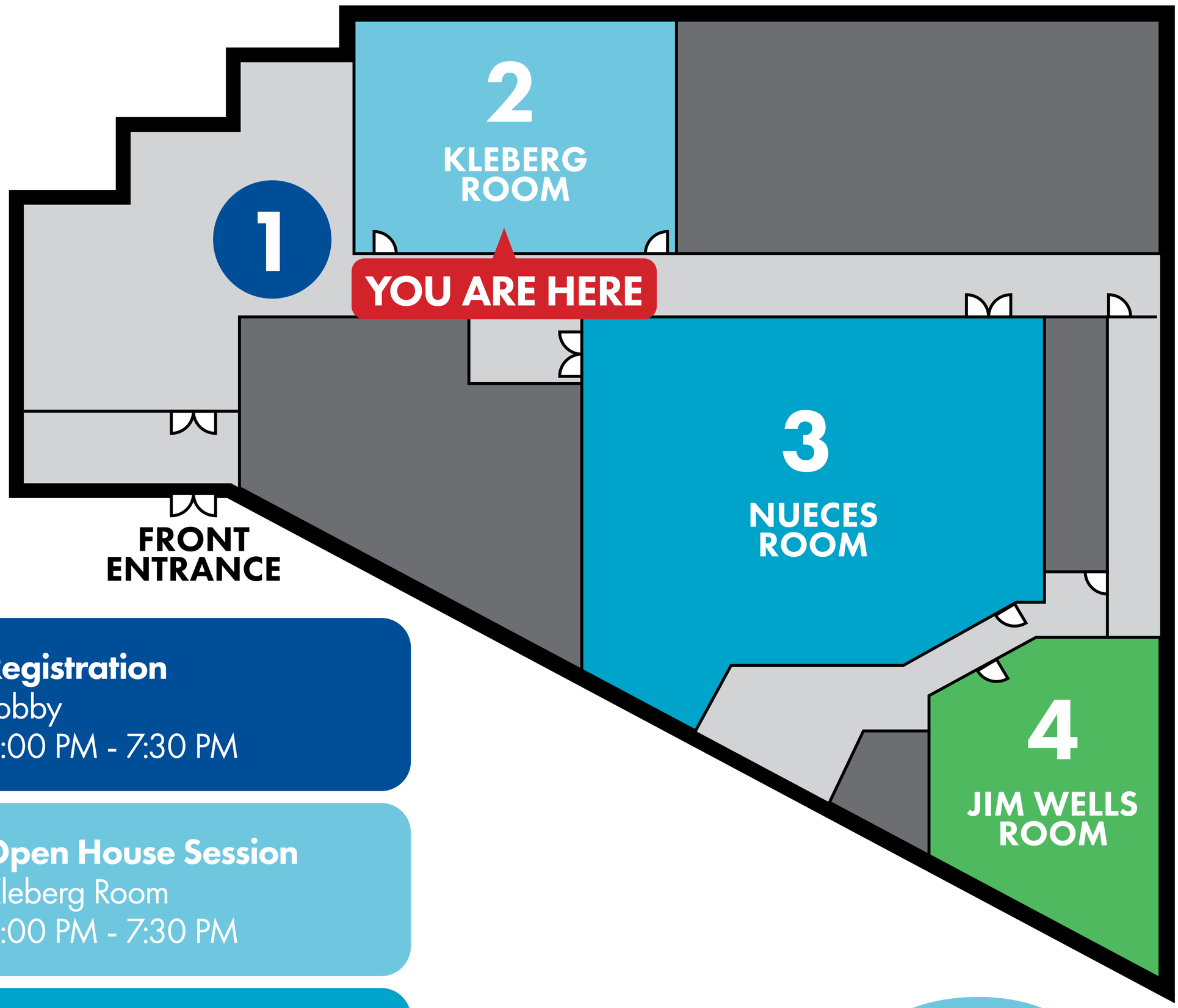
3 | **USACE & Proposed Project Presentations/ Public Comment Session**
Nueces Room
5:00 PM - 7:30 PM

4 | **Public Comment Room**
Jim Wells Room
3:00 PM - 7:30 PM

NAVIGATING THE PUBLIC MEETING

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT



1 | **Registration**
Lobby
3:00 PM - 7:30 PM

2 | **Open House Session**
Kleberg Room
3:00 PM - 7:30 PM

3 | **USACE & Proposed Project Presentations/ Public Comment Session**
Nueces Room
5:00 PM - 7:30 PM

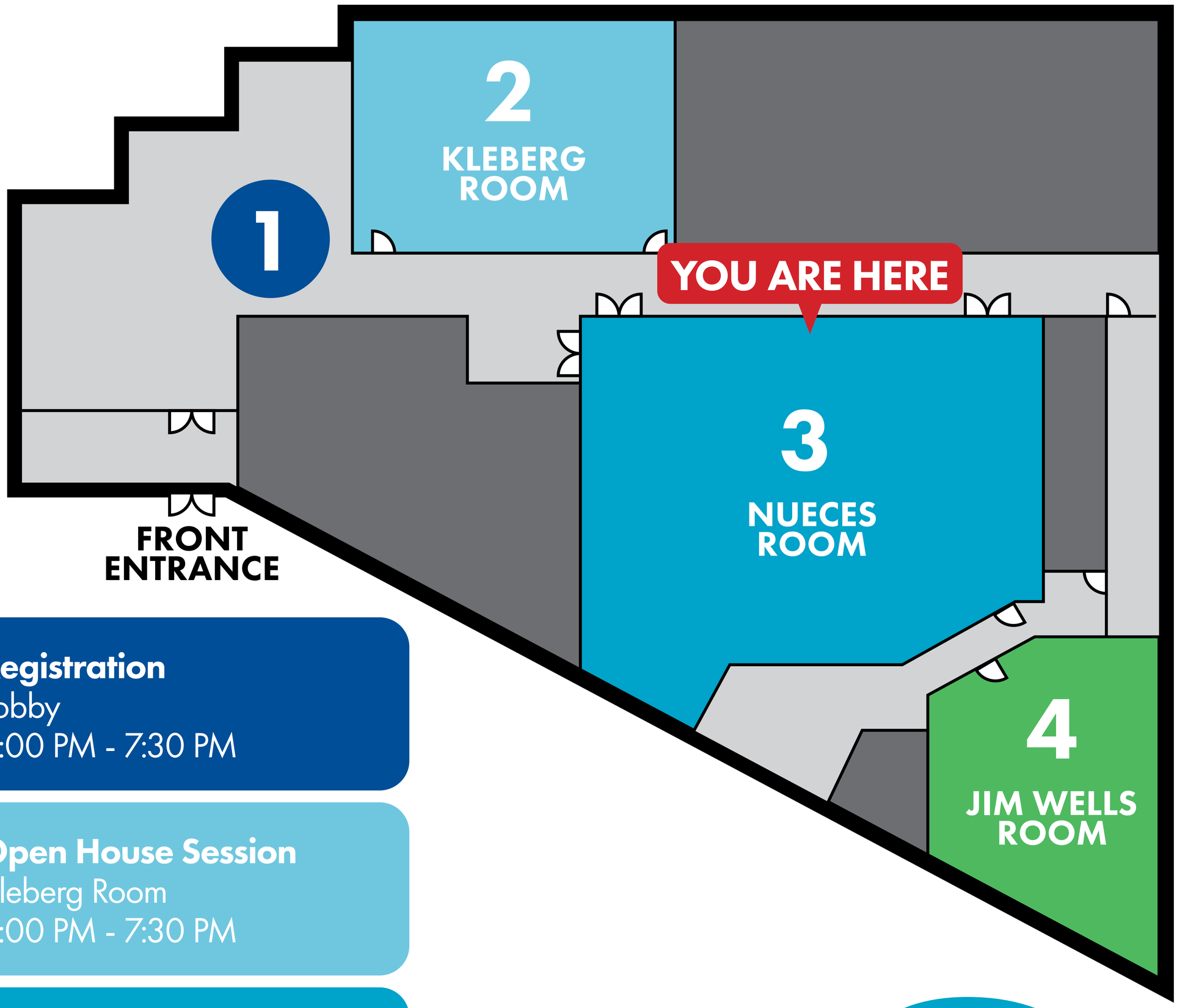
4 | **Public Comment Room**
Jim Wells Room
3:00 PM - 7:30 PM

ROOM 2

NAVIGATING THE PUBLIC MEETING

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT



1 | **Registration**
Lobby
3:00 PM - 7:30 PM

2 | **Open House Session**
Kleberg Room
3:00 PM - 7:30 PM

3 | **USACE & Proposed Project Presentations/ Public Comment Session**
Nueces Room
5:00 PM - 7:30 PM

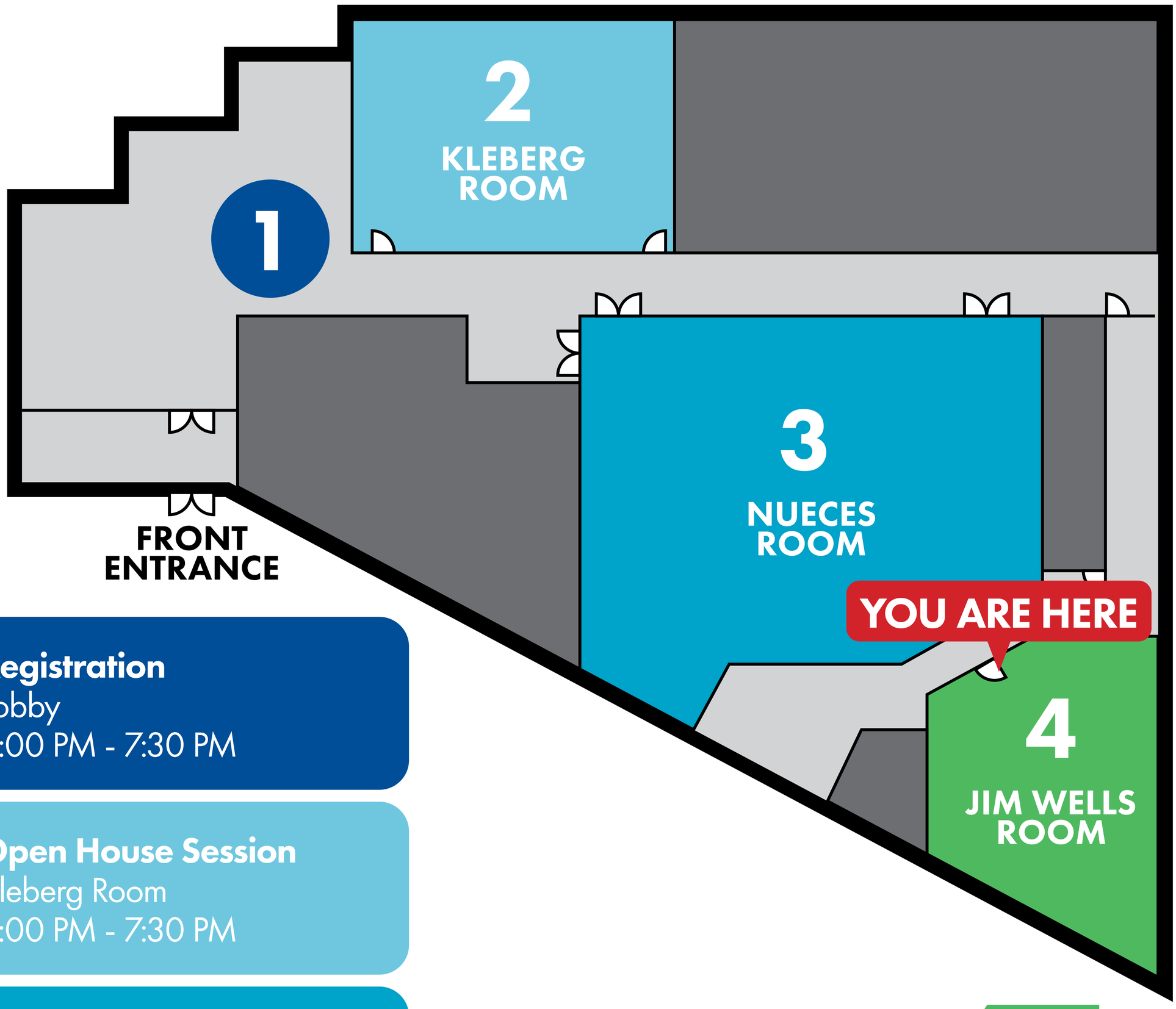
4 | **Public Comment Room**
Jim Wells Room
3:00 PM - 7:30 PM

ROOM **3**

NAVIGATING THE PUBLIC MEETING

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT



1 | **Registration**
Lobby
3:00 PM - 7:30 PM

2 | **Open House Session**
Kleberg Room
3:00 PM - 7:30 PM

3 | **USACE & Proposed Project Presentations/ Public Comment Session**
Nueces Room
5:00 PM - 7:30 PM

4 | **Public Comment Room**
Jim Wells Room
3:00 PM - 7:30 PM

ROOM 4

HOW TO PROVIDE COMMENTS

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

MAIL:

Mr. Jayson Hudson
USACE, Galveston District, Regulatory Branch
P.O. Box 1229
Galveston, Texas 77553-1229

EMAIL:

SWG201900067@usace.army.mil

All comments must be received or postmarked by Monday, July 25, 2022

WHAT IS THE PURPOSE OF THIS MEETING?

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

- Provide information about the proposed Action.
- Receive your comments and input on the Draft EIS.
- Provide an opportunity for you to subscribe to Project updates, and additional information.

HOW TO PROVIDE VERBAL COMMENTS

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

1. Please sign up to provide verbal comments here.

2. We will call your name when it is your turn.

3. State and spell your name for the court reporter.

4. Comments are limited to **3 minutes**.

PURPOSE & NEED

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

PURPOSE:

The U.S. Army Corps of Engineers has determined that the purpose of this Project is to safely, efficiently, and economically export current and forecasted crude oil inventories through the Corpus Christi Ship Channel via Very Large Crude Carriers.

NEED:

The Applicant has stated the the project is needed because Crude Oil inventories exported at the Port of Corpus Christi have increased from 280,000 barrels per day in 2017 to 1.65 million barrels in January 2020 with forecasts increasing to 4.5 million barrels per day by 2030.

WHAT IS AN EIS?

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

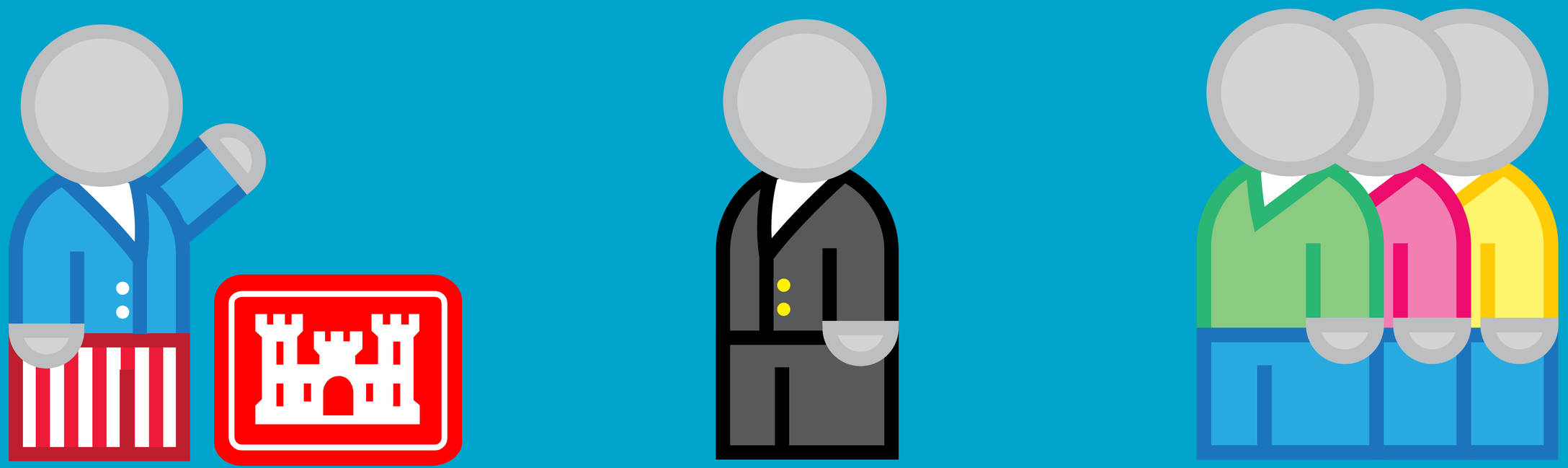
An **EIS** is an analysis prepared under the **National Environmental Policy Act (NEPA)** and includes a public participation component. A federal agency must prepare an EIS if it is proposing a major federal action that may significantly affect the quality of the natural and human environment to comply with NEPA.

NEPA established our country's national environmental policy in 1969 so that the environmental review process seeks to facilitate better informed decisions and involve citizens.

THE STUDY TEAM

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT



U.S. Army Corps of Engineers (the Lead Agency)

Port of Corpus Christi Authority (The Applicant)

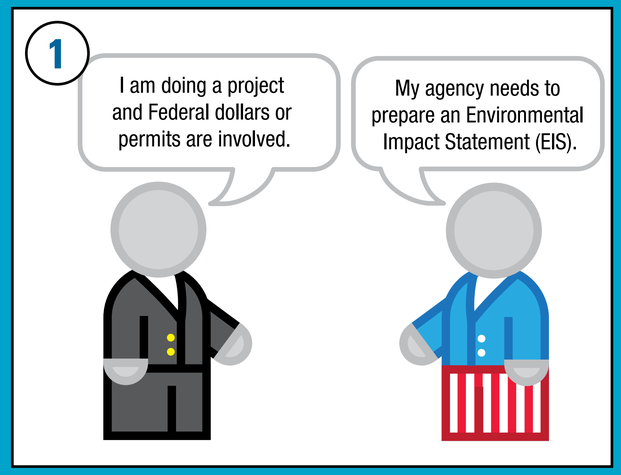
You
The Public and Local Stakeholders

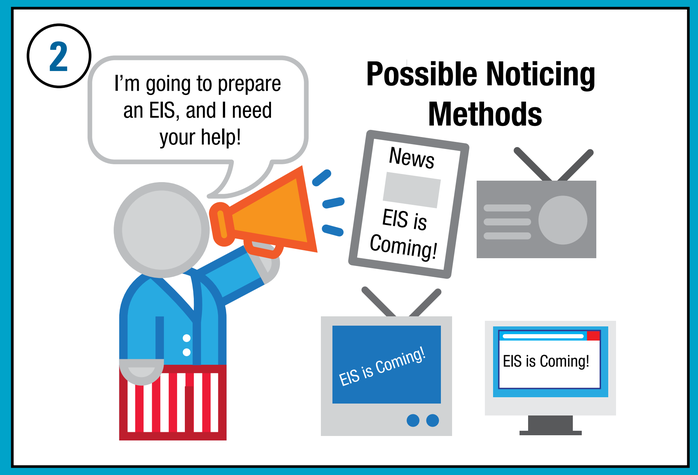
THE EIS PROCESS

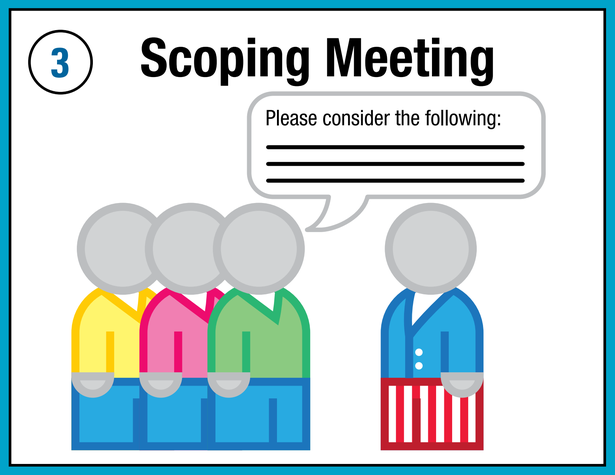
US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

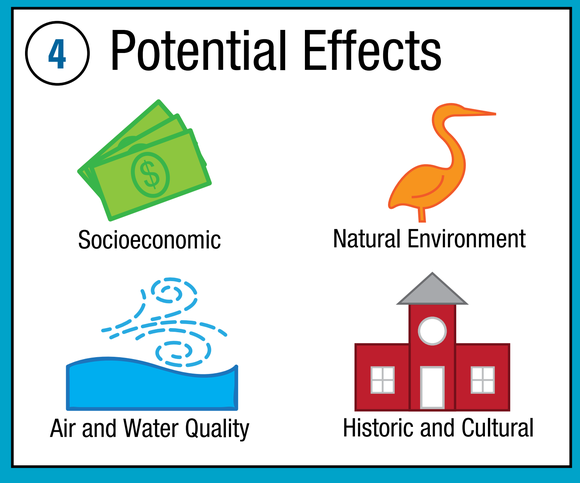
U.S. Army Corps of Engineers (the Lead Agency)

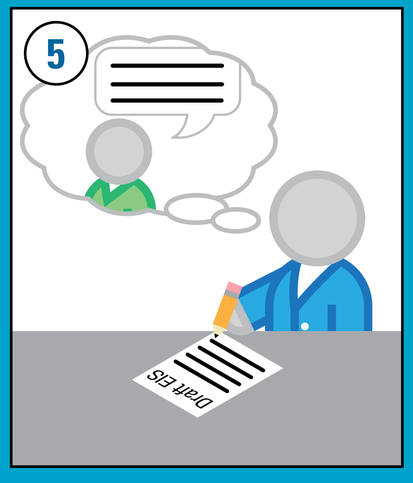


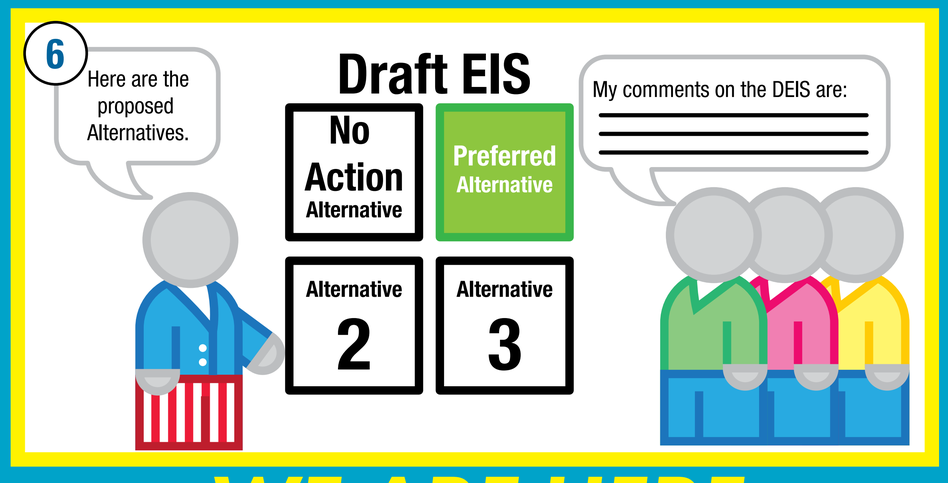




Port of Corpus Christi Authority (The Applicant)

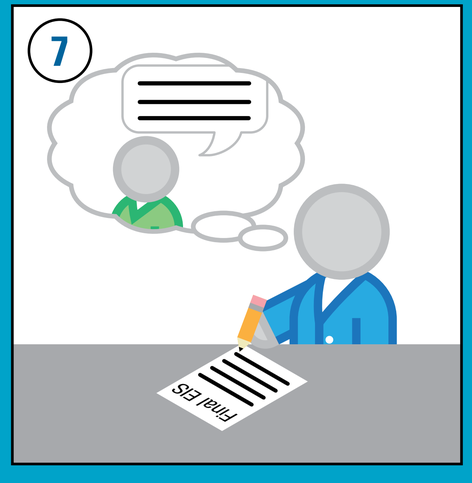


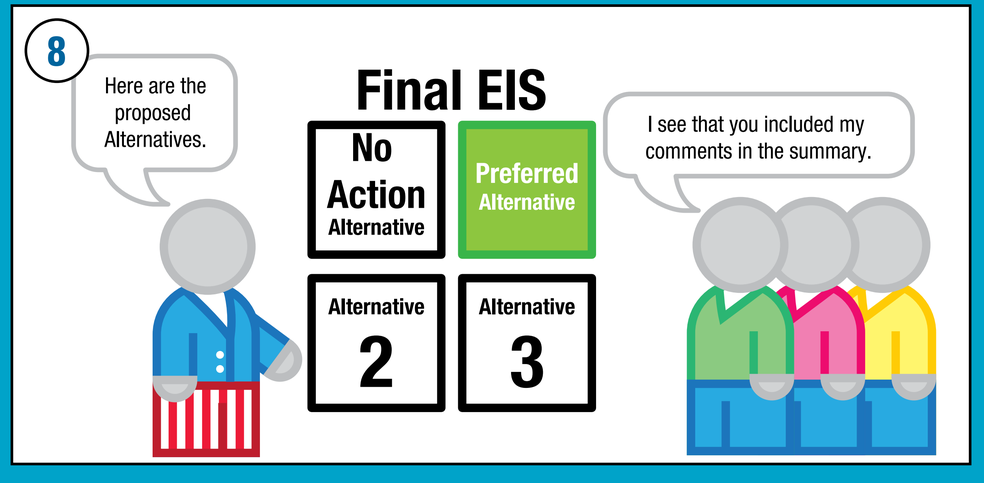


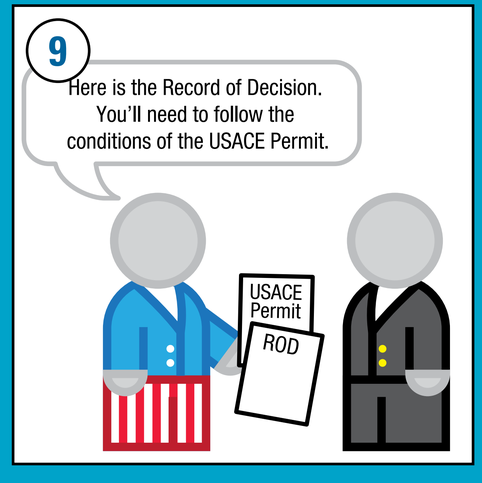


WE ARE HERE

You
The Public and Local Stakeholders







STUDY MILESTONES

US Army Corps of Engineers®
Galveston District

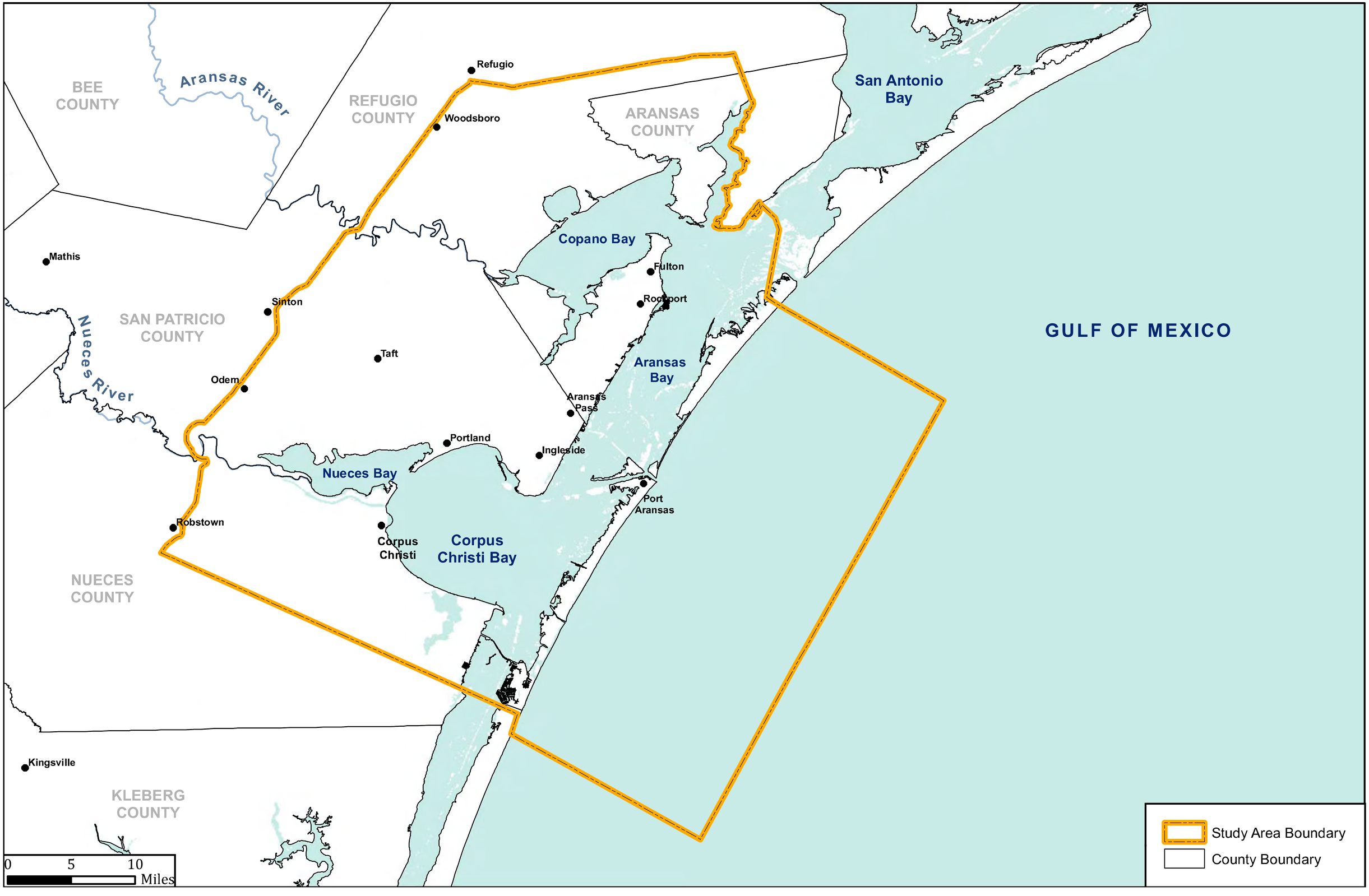
PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

Joint Public Notice	**Aug. 1, 2019**
Notice of Public Scoping Meeting	**May 27, 2020**
Virtual Public Scoping Meetings	**Mid June 2020**
EIS Scoping Report Updated	**Aug. 14, 2020**
Draft EIS Released	**June 10, 2022**
WE ARE HERE Draft EIS In-person Public Meeting	**June 22, 2022**
Draft EIS Comment Period End	**July 25, 2022**

STUDY AREA MAP

US Army Corps of Engineers®
Galveston District

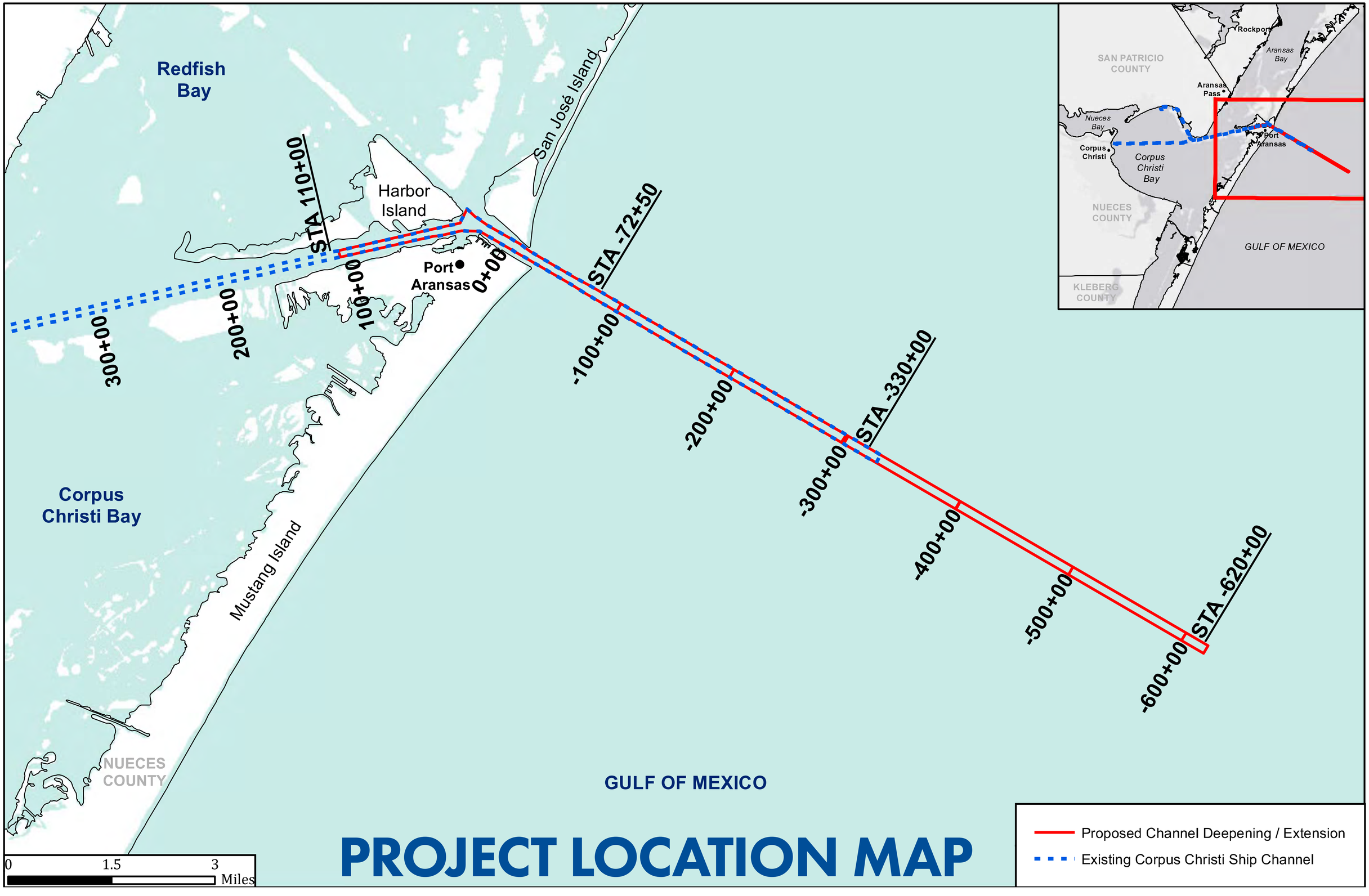
PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT



PROJECT LOCATION

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

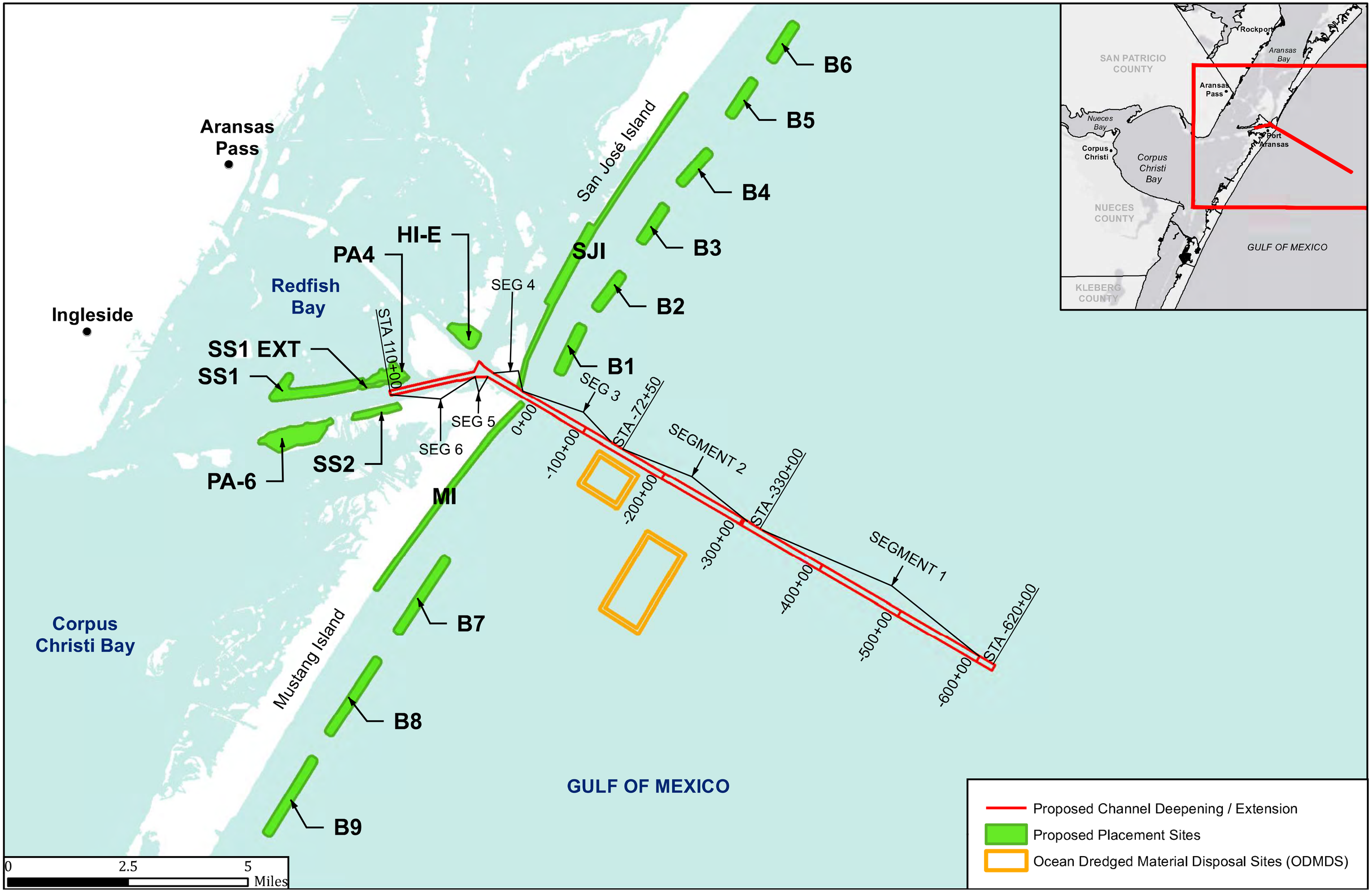


PROJECT LOCATION MAP

PROJECT FEATURES

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT



PLACEMENT SITES

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

Placement Site	Description	Purpose	Total Volume (cubic yards)
SS1	Restoring eroded shorelines	Restore eroded shoreline landmass and provide protection to Harbor Island seagrass area	2,793,000
SS2	Restore two shoreline breaches and landmass along Port Aransas Nature Preserve resulting from Hurricane Harvey. Would add land mass behind Federal Emergency Management Agency shoreline bulkhead project.	Restore shoreline washed out by Hurricane Harvey to protect Piping Plover sand flat Critical Habitat	250,000
SS1 Extension (PA4 Shoreline Restoration)	Reestablish eroded shoreline and land loss in front of PA4	Restore eroded shoreline and land loss; provide protection to Harbor Island seagrass. Raise levees for placement of new work material unsuitable for Beneficial Use (BU)	1,676,000
PA4 (Upland Placement)	Upland placement within PA4	No environmental benefit, material unsuitable for BU	2,861,400
HI-E	Bluff and shoreline land mass restoration with site fill on eastern Harbor Island	Restore eroded bluff and shoreline to historic profiles	1,824,800
PA6	Raise PA dike 5 feet and fill with 4 feet of new work material	No environmental benefit, material unsuitable for BU	1,796,400
SJI	Dune and beach restoration on San José Island	Restores dune washouts and several miles of beach profile that was washed away during Hurricane Harvey	4,000,000
B1–B9	Nearshore berms offshore of San José Island and Mustang Island	Nearshore berms within transport zone to indirectly nourish barrier islands	8,100,000
MI	Beach nourishment for Gulf side of Mustang Island	Mustang Island beach nourishment to enhance shoreline	2,000,000
New Work ODMDS	Place material in existing New Work Ocean Dredged Material Disposal Site (ODMDS)	No environmental benefit, material suitable for ocean placement	38,888,600

DREDGING

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

- Activities under the jurisdiction of the USACE would include dredging of navigable waters to extend the terminus of the authorized channel into the Gulf of Mexico, deepening, expanding, and improving the existing Corpus Christi Ship Channel, and beneficial use and placement of dredged material.
- Dredging under Applicant's Proposed Action Alternative would result in **46 million cubic yards** of new work material. **Dredging would be limited mostly to the existing Corpus Christi Ship Channel footprint.**

ALTERNATIVES ANALYSIS

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

An evaluation of alternatives to the proposed Action were also considered, including:

- A No Action alternative;
- Alternatives that would avoid, minimize, and compensate for impacts to the environment within the proposed Project footprint;
- Alternatives that would avoid, minimize, and compensate for impacts to the environment outside the footprint;
- Alternatives using alternative practices; and
- Other reasonable alternatives that will be developed through the EIS scoping process.

SHIP SIMULATIONS

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

- The ship simulations were conducted in November 2021 and February 2022. **Over 40 simulations were run**, including emergency scenarios that simulated various combinations of ship and tug failures.
- The use of these simulated tugs represented the operation of fully loaded Very Large Crude Carriers (VLCC's) for most environmental conditions.

Conclusion: *The proposed project's channel configurations with the underlying environmental conditions would be acceptable to safely operate fully loaded VLCC originating from the Harbor Island terminal.*

MODELED IMPACTS

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

SEDIMENT TRANSPORT

- Modeling of the Channel inside of the jetties predicted a 5 to 10 percent increase in in sedimentation in certain reaches.
- Modeling of the Outer Channel predicted that sedimentation increases from approximately 95,000 cubic yards per year to approximately 214,000 cubic yards per year, (2.25 times higher).
- Modeling channel sedimentation from New Work Ocean Dredged Material Disposal Site (ODMDS) predicted a maximum sedimentation increase of 1,200 cubic yards.

STORM SURGE EFFECTS

- Storm surge impact were modeled in and around Corpus Christi Bay with "planned future conditions" representing the proposed Action.
- Proposed Action would allow more water to enter the bay, resulting in increased storm surge water levels and slight increases in inundation extent (between 447 to 492 acres in small areas throughout the study area).
- Maximum elevation increase of storm surge compared to existing conditions is 3.5 inches. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island.
- Beach nourishment activities, including nourishment and nearshore berms, have the potential to offset erosion effects and attenuate waves energy. In addition, dune restoration may provide additional protection from wind and hurricane storm surge.

SALINITY

- Tidal prism changes from channel deepening increases the saltwater exchange between Corpus Christi and Nueces bays. This results in an increase in the average salinity for Nueces Bay.
- Modeling indicates that channel deepening could slightly decrease bay salinities, less than 1 ppt on average in the Corpus Christi Bay system.
- Activities associated with offshore placement and placement actions targeting beneficial use (BU) of dredged material are not anticipated to impact salinity levels in the project area.
- Localized impacts may occur in areas where new work material is used to develop or expand islands in Corpus Christi Bay. These impacts would be limited to short-term changes in salinity resulting from freshwater runoff during rain events.

MODELED IMPACTS

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

SHORELINE CHANGE

- No shorelines impacts resulting from channel dredging activities; beneficial use (BU) placement activities may result in localized impacts to shorelines.
- Two numerical models were used to assess nearshore berm stability and beach nourishment.
- In both models, dunes were stable and predicted profile changes with and without the nearshore berm are nearly identical, indicating that nearshore berms may have little influence on beach stability.
- A long-term beach nourishment simulation showed that it would mitigate on-going erosion in the area and would have a reasonable design life.

BATHYMETRY/TIDES/CURRENTS AND CIRCULATION

- Bathymetry
  - » Use of the New Work ODMDS results in a periodic bathymetry change over an area up to 1.36 square nautical miles. The site is dispersive, and the change would be temporary and within the planned and permitted boundaries.
- Tides
  - » Short-term modeling predicted tidal amplitude increases of about 11 percent in Redfish Bay, 8 percent in Corpus Christi Bay, 7 percent in Nueces Bay, and 3 percent at Rockport.
  - » Tidal amplitude at the channel inside the Port Aransas jetties has the largest increase, which is about 17 percent.
  - » No major change in tidal amplitudes in Aransas Pass jetty channel and the Outer Channel.
  - » Noticeable impact on the tidal range is limited to the navigation channel from Point Mustang to the inner basin.
- Currents and Circulation
  - » No major impact on currents in Corpus Christi Bay, Redfish Bay, and Nueces Bay.
  - » Mean current speed at Aransas Pass in the jetty channel reduced by about 0.213 feet per second and maximum current speed reduced by 0.614 feet per second.
  - » Current speed increased in the Corpus Christi Ship Channel from Port Aransas to Ingleside where the water depth remains unchanged.
  - » Current speed at the channel inside the Port Aransas jetties increased by about 0.09 to 0.03 feet per second, up to 0.36 feet per second.

SUMMARY OF IMPACTS

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

PHYSICAL IMPACTS

Resource	Channel Deepening (Applicant's Proposed Action Alternative)
Relative Sea Level Change	Gradual increase in sea level rise (SLR) on BU not expected to result in any major impacts on performance or operation of the channel
Water Quality	Material to be dredged suitable for offshore placement, no impacts from chemical contaminants anticipated; short-term suspension of nutrients during dredging and dredged material placement activities expected
Hypoxia	Localized and temporary lower dissolved oxygen (DO) expected during dredging in the water column; nutrients released in the water column during dredging may temporarily increase bacteria/ zooplankton resulting in lowered DO
Sediment Quality	Material to be dredged is suitable for placement; testing of sediments has concluded that no adverse environmental effects would be expected
Groundwater and Surface Water Hydrology	Localized temporary impacts associated with beach nourishment activities; actions targeting BU may change local hydrology temporarily during the marsh restoration and stabilization process
Energy and Mineral Resources	No direct impacts; provides additional capacity and transportation improvements for support of import/export of energy and mineral resources
Hazardous, Toxic, and Radioactive Waste	Regulated facilities and incident locations do not pose an environmental concern; all dredged material to be placed at beneficial use (BU) sites as allowable by EPA; increase in impacts resulting from deeper berths for handling petroleum products and other hazardous materials; risk of vessel spills reduced with product transfer at the Port
Air Quality	Impacts from construction emissions would be temporary that would be offset in 1 to 5 years for volatile organic compounds (VOC) and NOx by annual reductions of 18,405 tons VOC and 221 tons nitrogen oxides (NOx) from long-term positive impact of lightering reduction
Noise	Noise due to dredging would be similar to current maintenance dredging; placement of dredged material is not expected to pose adverse impacts; operations are not anticipated to change the current noise levels; vessel transit noise is not expected to increase

SUMMARY OF IMPACTS

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

ECOLOGICAL AND BIOLOGICAL IMPACTS

Resource	Channel Deepening (Applicant's Proposed Action Alternative)
Wetlands and Submerged Aquatic Vegetation	Turbidity impacts during construction would be temporary; submerged aquatic vegetation (SAV) occur at the proposed placement sites for BU: 3.32 acres at PA4 and 3.42 acres at HI-E; beneficial use (BU) actions may help protect SAV that could be exposed if shorelines continue to erode; open water areas would be converted tidal estuarine wetlands or SAV creating a more productive habitat
Estuarine Habitats and Fauna	Bay bottom habitat loss due to dredging and placement activities would occur; benthos would be affected until natural recovery occurs; temporary and localized turbidity impacts during construction and placement activities; slight increased probability of a petroleum spill; direct impacts to 0.10 acres oyster reef in HI-E are anticipated. 3.17 acres of oysters were mapped within a 500-foot buffer of PA sites that could be indirectly impacted; dredged material used beneficially has the potential to be more productive than the open water and bay bottom habitat what would be lost creating a positive benefit to the bay system
Invasive Species in Ballast Water	Vessel traffic expected to decrease that would reduce the overall risk
Wildlife Resources	Temporary and localized increases in turbidity and lower dissolved oxygen (DO) during dredging activities; reduced risk of lethal interactions with reduced vessel traffic; potential for larger ships/tugs to affect shoreline erosion, although modeling indicate minimal impacts; BU placement would positively impact wildlife, SS2 specifically intended to project Piping Plover Critical Habitat

SUMMARY OF IMPACTS

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

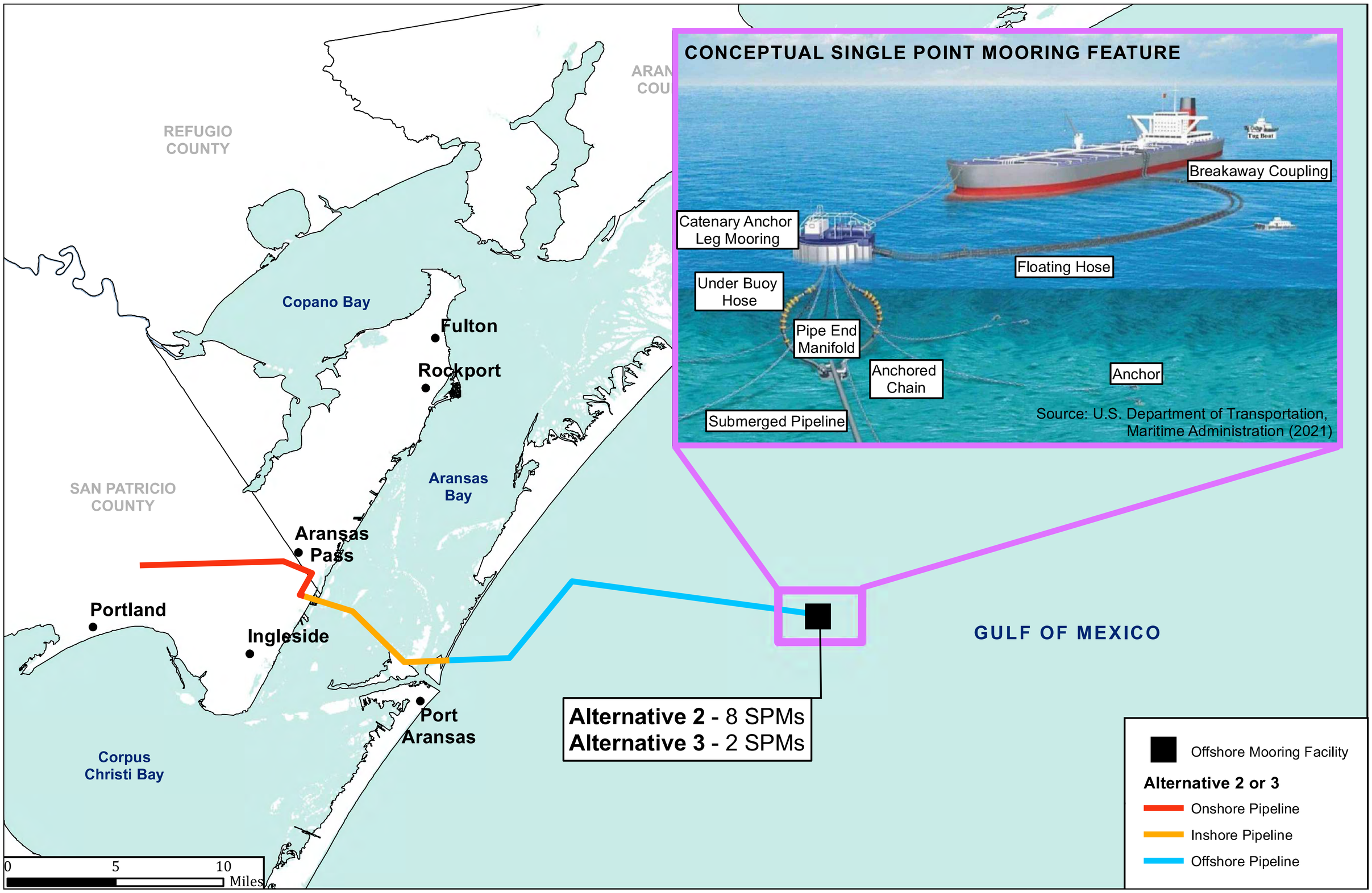
PROTECTED RESOURCE IMPACTS

Resource	Channel Deepening (Applicant's Proposed Action Alternative)
Protected Lands	Beneficial use (BU) would provide benefits to the Port Aransas Nature Preserve; decreased erosion from less vessel traffic may benefit areas; impacts described in the No-Action would continue
Threatened and Endangered Species	Temporary and localized increases in turbidity during dredging activities; dredged material placement may disturb birds; temporary disturbances during placement of material at BU sites; BU sites could provide long-term benefits by increasing shoreline habitat and protecting marshes; less vessel traffic would decrease potential strikes and noise disturbances
Essential Fish Habitat	Bay bottom habitat loss due to dredging and placement activities would occur; benthos would be affected until natural recovery occurs; temporary and localized turbidity impacts during construction and placement activities; slight increased probability of a petroleum spill; direct impacts to 0.10 acres oyster reef in HI-E are anticipated. 3.17 acres of oysters were mapped within a 500-foot buffer of PA sites and could be indirectly impacted; dredged material used beneficially has the potential to be more productive than the open water and bay bottom habitat what would be lost creating a positive benefit to the bay system
Migratory Birds	Temporary and localized increases in turbidity and lower dissolved oxygen (DO) during dredging activities; potential for larger ships/tugs to affect shoreline erosion, although modeling indicate minimal impacts; BU placement would positively impact wildlife, SS2 specifically intended to project Piping Plover Critical Habitat
Marine Mammals	Reduced ship traffic lessens the possibility of spills, vessel strikes, and noise disturbances; dredging and placement activities may temporarily disturb mammals and cause to alter routes during construction; placement for BU may cause mammals to avoid portions of foraging areas; potential for manatee to be impacted during dredging activities, can be avoided by using best management practices
Hazardous Wildlife Attractants on or Near Airports	BU project features involving beach/dune/shoreline restoration, nearshore berms, and shoreline stabilization, could create an increase in bird nesting and foraging habitat which could increase the number and species of birds associated with aircraft strikes
Cultural Resources	No impacts likely but an intensive survey is necessary to assess impacts to terrestrial and underwater archaeological resources; during channel dredging activities, potential impacts to three historic properties (41NU252, 41NU264, and 41NU292); during dredged material placement for BU, potential benefit to offshore sites; potential impact to two terrestrial sites (41AS91 and 41NU153)

OTHER ALTERNATIVES STUDIED

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT



The following alternatives were also studied as part of the Draft EIS:

- **Offshore Alternative:** The Corpus Christi Ship Channel would not be deepened. Multiple deep water port facilities capable of sustaining all projected oil exportation would be constructed.
- **Combined Inshore/Offshore:** The Corpus Christi Ship Channel would not be deepened. Very Large Crude Carrier vessels would be partially loaded at inshore facilities in Ingleside and Harbor Island then traverse the channel to the offshore facility to be fully loaded.

PROJECT DESCRIPTION

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

The proposed Action would

- Deepen a portion of the Corpus Christi Ship Channel beyond the current authorized channel depths of -54 feet and -56 feet mean lower low water to maximum depths of -79 feet and -81 feet mean lower low water
- Generate an estimated 46.3 million cubic yards of new work dredged material
- Extend the existing terminus of the authorized channel an additional 29,000 feet into the Gulf of Mexico to reach -80 mean lower low water
- Expand and straightening the existing Inner Basin at Harbor Island as necessary to accommodate Very Large Crude Carrier turning
- Place new work dredged material into beneficial use sites located in and around Corpus Christi and Redfish Bays
- Place dredged material on San Jose Island for dune restoration
- Place dredged material nearshore berms for beach to provide restoration along San Jose and Mustang Islands
- Transport new work dredged material to the Corpus Christi Expanded New Work Ocean Dredged Material Disposal Site

*The proposed Action **does not** include widening the channel. However, some minor incidental widening would be expected to meet the side slope requirements.*

PUBLIC INTEREST REVIEW

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

The USACE public interest review is the main framework for the overall evaluation of projects. The public interest review requires the careful weighing of all public interest factors relevant to each particular permit application. Thus, one specific factor (e.g., fish and wildlife values or economics) cannot by itself force a specific decision, but rather the decision represents the net effect of balancing all public interest factors, many of which are frequently in conflict.

The public interest review is used to evaluate applications under all authorities administered by the USACE. During the review of a permit application, the USACE evaluates the following public interest review factors:

- Conservation
- Economics
- Aesthetics
- General environmental concerns
- Wetlands
- Historic properties
- Fish and wildlife values
- Flood hazards
- Floodplain values
- Land use
- Navigation
- Shore erosion and accretion
- Recreation
- Water supply and conservation
- Water quality
- Energy needs
- Safety
- Food and fiber production
- Mineral needs
- Considerations of property ownership
- The needs and welfare of the people

AQUATIC RESOURCE IMPACTS

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

Summary of Potential Aquatic Resource Impacts (acres)

Project Component	Footprint	Open Water	Seagrass	Oysters	Flats/ Beach	Estuarine	Palustrine	Source
SS1	297.41	219.45	0.01	0	34.64	3.92	21.04	Applicant
SS2	45.21	13.74	0	0	24.20	1.25	11.25	Applicant
PA4	170.79	42.14	3.46	0	2.80	0.75	41.75	Applicant
HI-E	138.73	13.12	3.41	0.10	23.21	10.69	48.42	Applicant
SJI	592.85	163.29	0	0	199.01	0	58.76	Applicant
MI	362.08	205.58	0	0	124.11	0	0	Applicant
Channel Deepening/ Extension	1,182.33	1,182.33	–	–	–	–	–	NOAA (2010)
B1–B9	1,585.82	1,585.82	–	–	–	–	–	NOAA (2010)
New Work ODMDS	1,180.00	1,180.00	–	–	–	–	–	NOAA (2010)
TOTAL	**5,555.22**	**4,605.47**	**6.88**	**0.10**	**407.97**	**16.61**	**181.22**	

ENVIRONMENTAL IMPACTS

US Army Corps of Engineers®
Galveston District

PORT OF CORPUS CHRISTI CHANNEL DEEPENING PROJECT

AVOID • MINIMIZE • MITIGATE

Unavoidable Impacts (permanent or temporary): Impacts to essential fish habitat due to dredging and placement activities associated with the construction of the Proposed Action Alternative, including bottom dwelling aquatic species and fish.

Direct Impacts: Impacts due to inshore Placement Area construction; of open water/bottom habitat, tidal wetlands, freshwater wetlands, unconsolidated shorelines (tidal sand flats/algal flats/beach), seagrass, and oyster reef.

Indirect Impacts: Impacts to tidal wetlands and essential fish habitat due to temporary turbidity associated with dredging and placement activities for the construction of the Proposed Action Alternative.

WHAT IS MITIGATION?

Mitigation: projects intended to offset known unavoidable impacts to natural resources; creation of similar habitat to replace lost function.

The Mitigation Plan includes creation of wetlands and seagrass to compensate for direct and indirect impacts.

Effects Determination for Threatened and Endangered Species

Common Name	Effects Determination – USFWS
MAMMALS	
Sperm Whale	May affect, but not likely to adversely affect
West Indian Manatee	May affect, but not likely to adversely affect
FISH	
Giant Manta Ray	May affect, but not likely to adversely affect
BIRDS	
Piping Plover	May affect, but not likely to adversely affect
Red Knot (Rufa)	May affect, but not likely to adversely affect
Whooping Crane	May affect, but not likely to adversely affect
Eastern Black Rail	May affect, but not likely to adversely affect
REPTILES	
Green Sea Turtle	Likely to adversely affect
Hawksbill Sea Turtle	Likely to adversely affect
Kemp's Ridley Sea Turtle	Likely to adversely affect
Leatherback Sea Turtle	May affect, but not likely to adversely affect
Loggerhead Sea Turtle	Likely to adversely affect

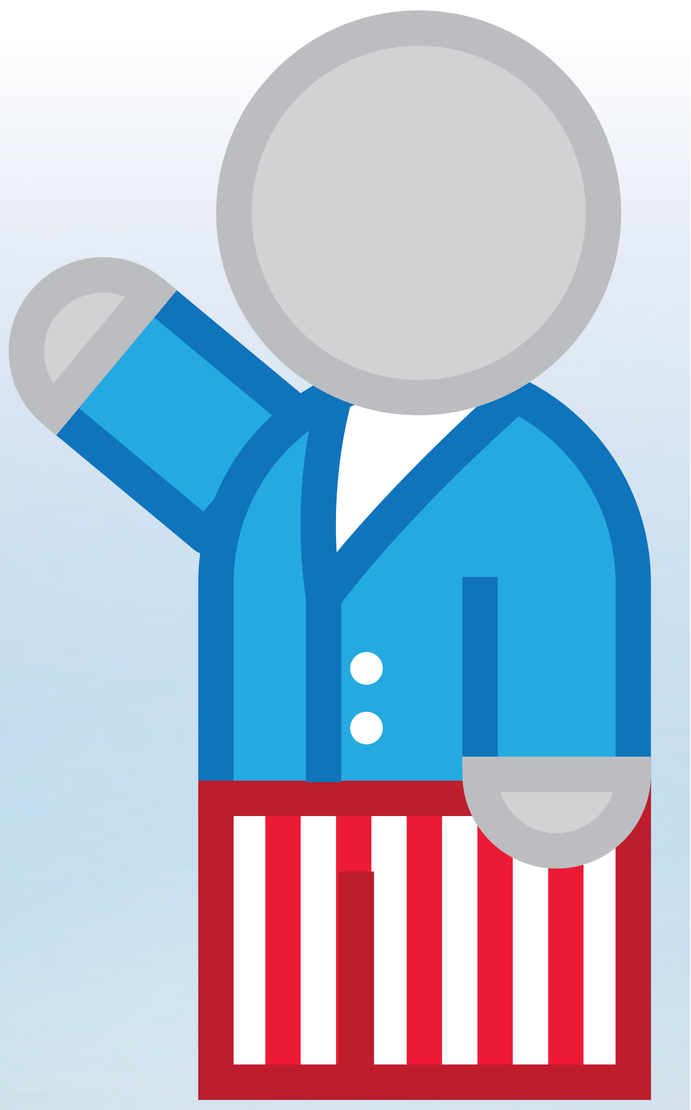
Exhibit Packet

Spanish Only

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

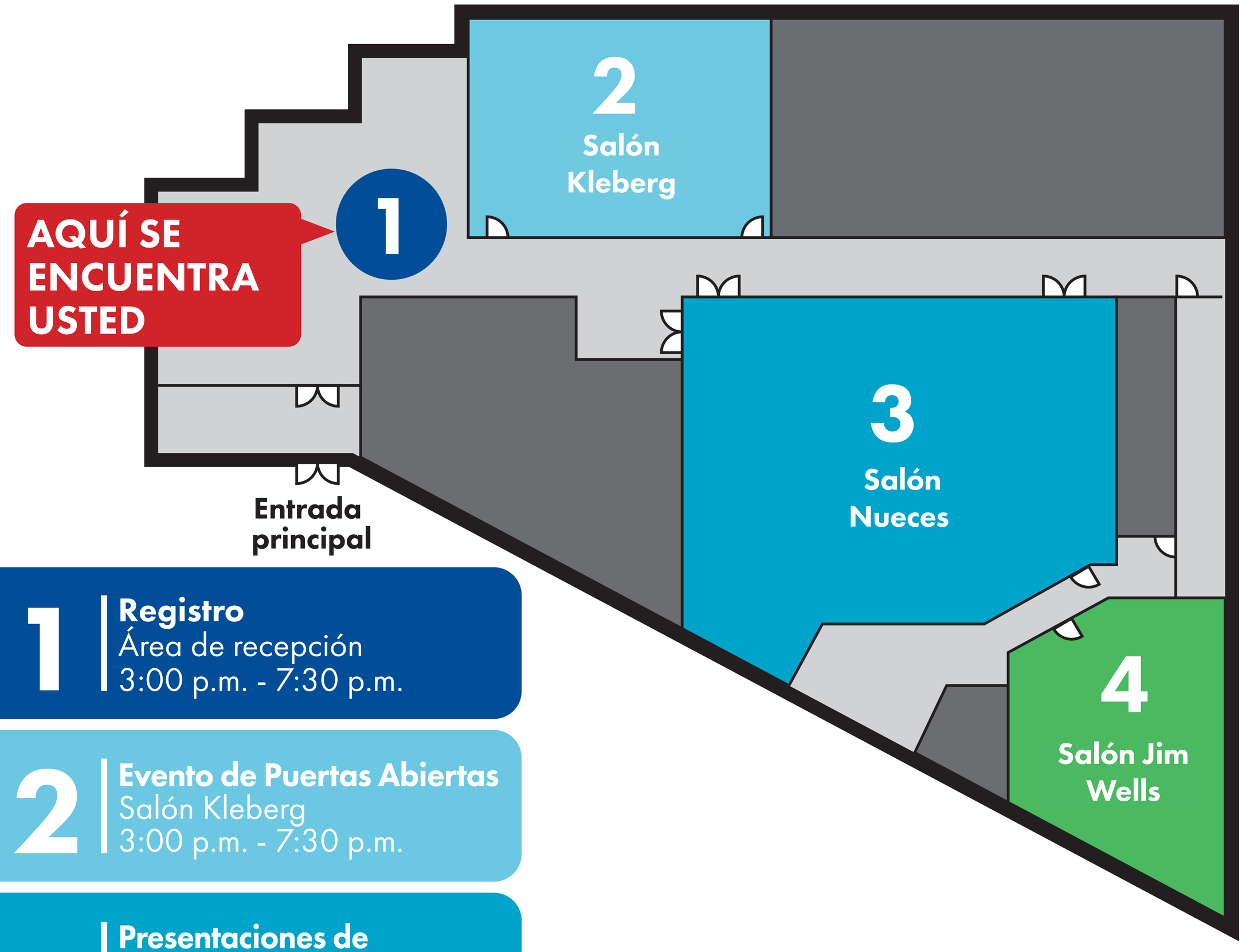
BIENVENIDOS A LA REUNIÓN PÚBLICA



NAVEGANDO POR LA REUNIÓN PÚBLICA

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI



1 | **Registro**
Área de recepción
3:00 p.m. - 7:30 p.m.

2 | **Evento de Puertas Abiertas**
Salón Kleberg
3:00 p.m. - 7:30 p.m.

3 | **Presentaciones de USACE y del Proyecto Propuesto/Sesión Pública para Comentarios**
Salón Nueces
5:00 p.m. - 7:30 p.m.

4 | **Salón para Comentarios del Público**
Salón Jim Wells
3:00 p.m. - 7:30 p.m.

NAVEGANDO POR LA REUNIÓN PÚBLICA

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

1 | **Registro**
Área de recepción
3:00 p.m. - 7:30 p.m.

2 | **Evento de Puertas Abiertas**
Salón Kleberg
3:00 p.m. - 7:30 p.m.

3 | **Presentaciones de USACE y del Proyecto Propuesto/Sesión Pública para Comentarios**
Salón Nueces
5:00 p.m. - 7:30 p.m.

4 | **Salón para Comentarios del Público**
Salón Jim Wells
3:00 p.m. - 7:30 p.m.

SALÓN 2

NAVEGANDO POR LA REUNIÓN PÚBLICA

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

1 | **Registro**
Área de recepción
3:00 p.m. - 7:30 p.m.

2 | **Evento de Puertas Abiertas**
Salón Kleberg
3:00 p.m. - 7:30 p.m.

3 | **Presentaciones de USACE y del Proyecto Propuesto/Sesión Pública para Comentarios**
Salón Nueces
5:00 p.m. - 7:30 p.m.

4 | **Salón para Comentarios del Público**
Salón Jim Wells
3:00 p.m. - 7:30 p.m.

SALÓN 3

NAVEGANDO POR LA REUNIÓN PÚBLICA

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

1 | **Registro**
Área de recepción
3:00 p.m. - 7:30 p.m.

2 | **Evento de Puertas Abiertas**
Salón Kleberg
3:00 p.m. - 7:30 p.m.

3 | **Presentaciones de USACE y del Proyecto Propuesto/Sesión Pública para Comentarios**
Salón Nueces
5:00 p.m. - 7:30 p.m.

4 | **Salón para Comentarios del Público**
Salón Jim Wells
3:00 p.m. - 7:30 p.m.

SALÓN 4

CÓMO PROPORCIONAR SUS COMENTARIOS

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

CORREO:

Mr. Jayson Hudson
USACE, Galveston District, Regulatory Branch
P.O. Box 1229
Galveston, Texas 77553-1229

CORREO ELECTRÓNICO:

SWG201900067@usace.army.mil

Todos los comentarios deben recibirse o tener estampado el matasellos con fecha del día lunes 25 de julio, 2022 o anterior

¿CUÁL ES EL PROPÓSITO DE ESTA REUNIÓN?

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

- Proporcionar información sobre la Acción propuesta.
- Recibir sus comentarios y opiniones acerca del borrador del EIS.
- Brindarle la oportunidad de suscribirse a las actualizaciones del Proyecto e información adicional.

CÓMO PROPORCIONAR SUS COMENTARIOS DE FORMA VERBAL

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

1. Regístrese aquí para proporcionar comentarios verbales.
2. Llamaremos su nombre cuando sea su turno.
3. Indique y deletree su nombre para el secretario del tribunal.
4. Los comentarios se limitan a **3 minutos**.

PROPÓSITO Y NECESIDAD

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

OBJETIVO:

El U.S. Army Corps of Engineers ha determinado que el propósito de este Proyecto es exportar de manera segura, eficiente y económica los inventarios de petróleo crudo actuales y previstos a través del Canal de Navegación de Corpus Christi mediante buques tanque petroleros de grandes dimensiones.

LA NECESIDAD:

El solicitante ha declarado que el proyecto se necesita debido a que los inventarios de petróleo crudo que se exporta desde el Puerto de Corpus Christi han aumentado de 280,000 barriles por día en 2017 a 1.65 millones de barriles en enero de 2020 con pronósticos de que aumentarán a 4.5 millones de barriles por día para 2030.

¿QUÉ ES UN EIS?

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

Un **EIS** es un análisis elaborado bajo la **Ley Nacional de Política Ambiental (NEPA)** e incluye un componente de participación pública. Una agencia federal debe preparar una EIS si está proponiendo una acción federal importante que pueda afectar significativamente la calidad del medio ambiente natural y humano para cumplir con la NEPA.

NEPA estableció la política ambiental nacional de nuestro país en 1969 para que el proceso de revisión ambiental busque facilitar decisiones mejor informadas e involucrar a los ciudadanos.

EL EQUIPO DE ESTUDIO

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

U.S. Army Corps of Engineers (Agencia al frente)

Autoridad del Puerto de Corpus Christi (Solicitante)

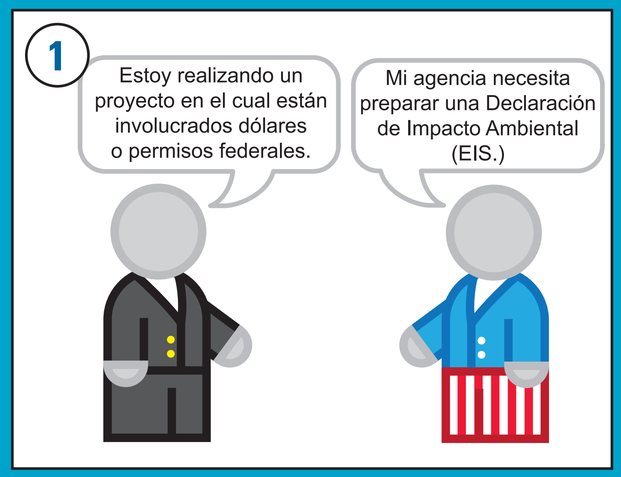
Tú
El público y las partes interesadas locales

EL PROCESO DE LA DECLARACIÓN DE IMPACTO AMBIENTAL

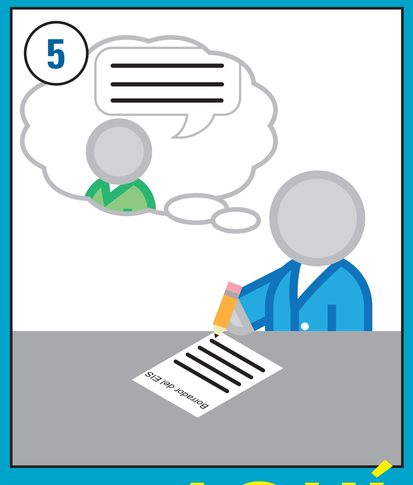
US Army Corps of Engineers®
Galveston District

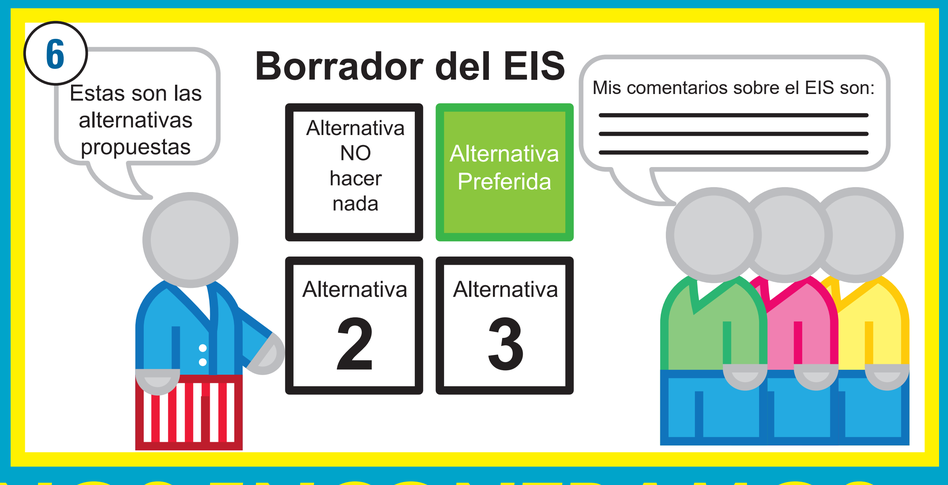
PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

U.S. Army Corps of Engineers (Agencia al frente)



Autoridad del Puerto de Corpus Christi (Solicitante)

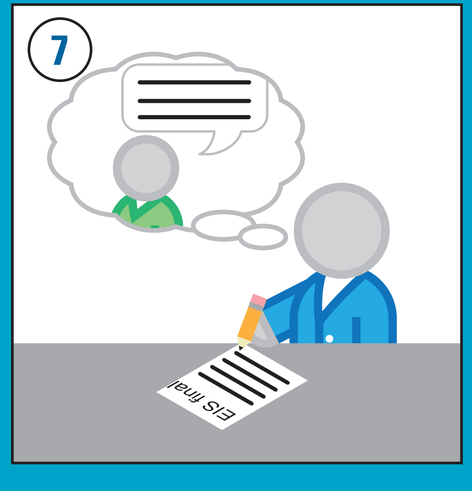


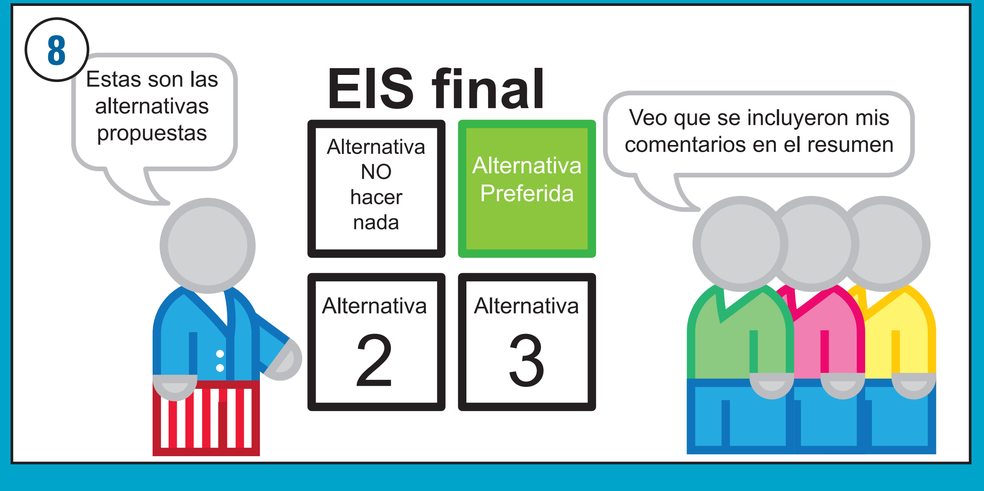


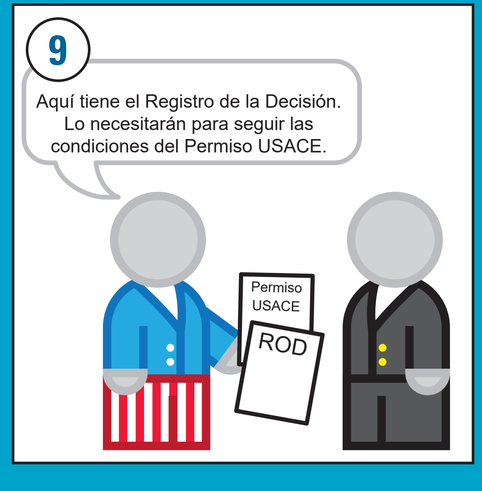
AQUÍ NOS ENCONTRAMOS

Tú

El público y las partes interesadas locales







HITOS DEL ESTUDIO

US Army Corps of Engineers®
Galveston District

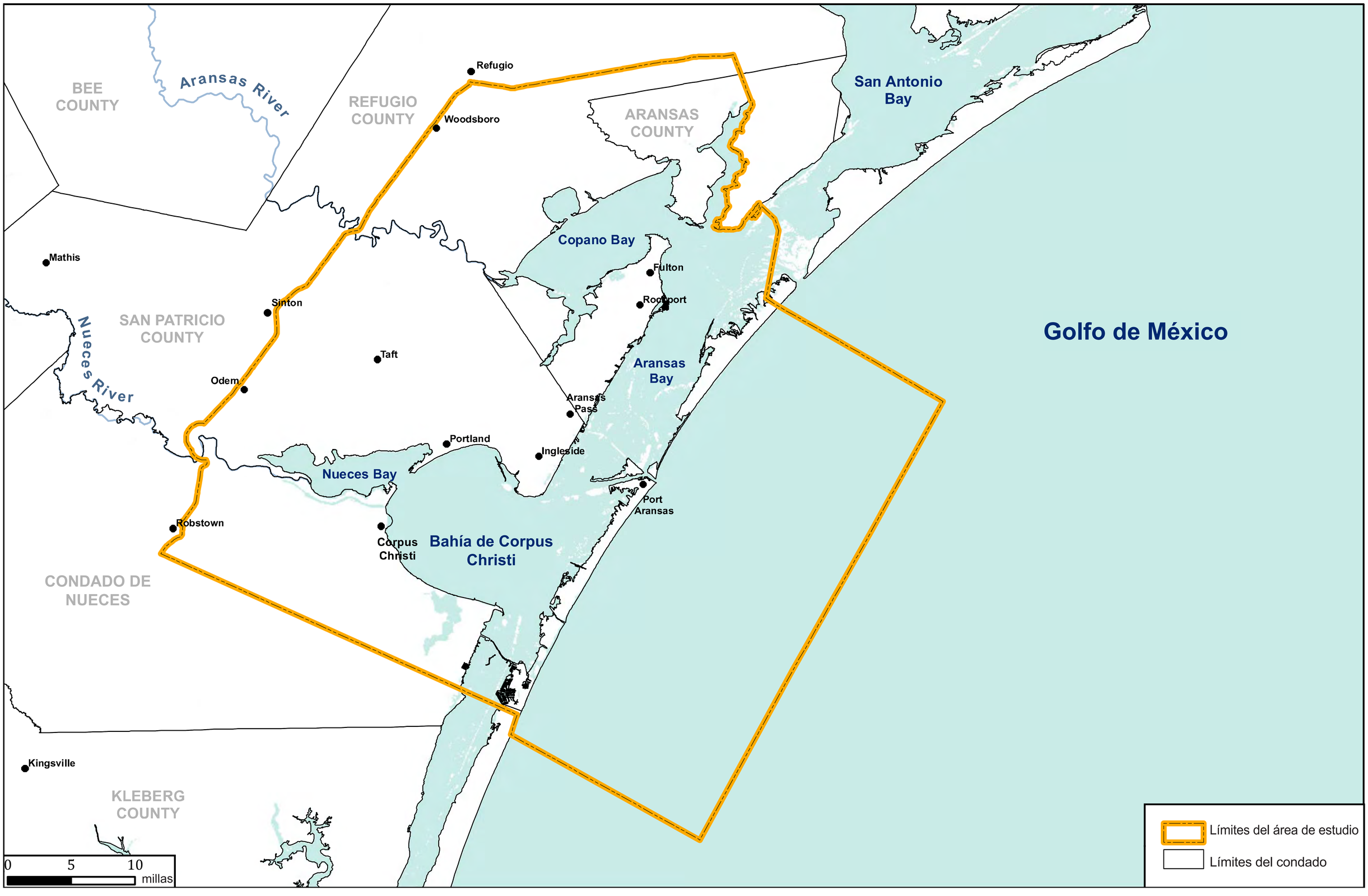
PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

Aviso público conjunto	**1 de agosto, 2019**
Aviso de reunión pública para definir alcance	**27/05/2020**
Reuniones públicas virtuales para definir alcance	**Mediados de junio, 2020**
Informe actualizado del alcance de EIS	**14 de agosto, 2020**
Publicación del borrador del EIS	**10/06/2022**
ESTAMOS AQUÍ Reunión pública presencial para presentar el borrador del EIS	**22/06/2022**
Fin del período de comentarios del borrador del EIS	**25/07/2022**

MAPA DEL ÁREA DEL ESTUDIO

US Army Corps of Engineers®
Galveston District

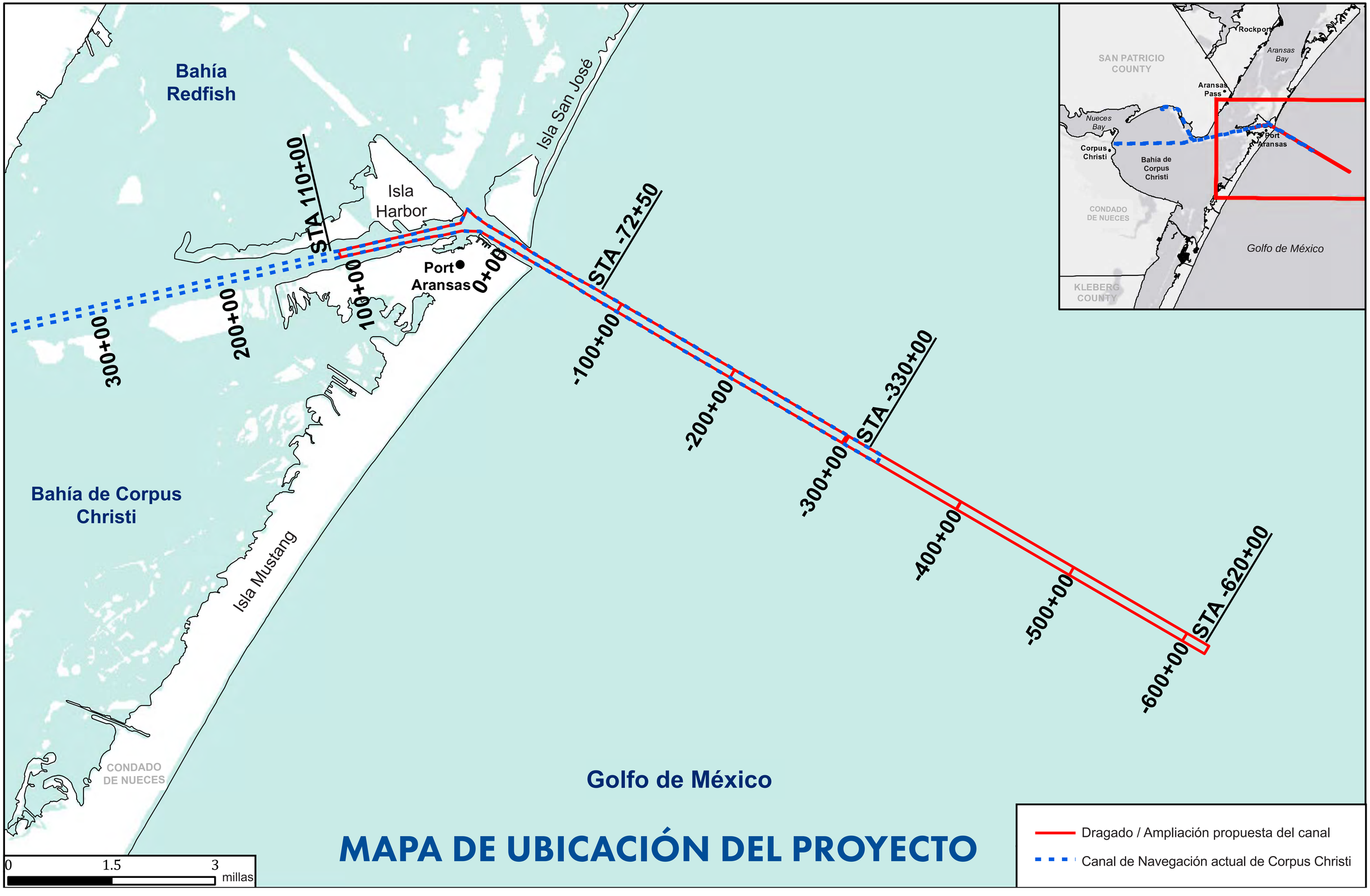
PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI



LOCALIZACIÓN DEL PROYECTO

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

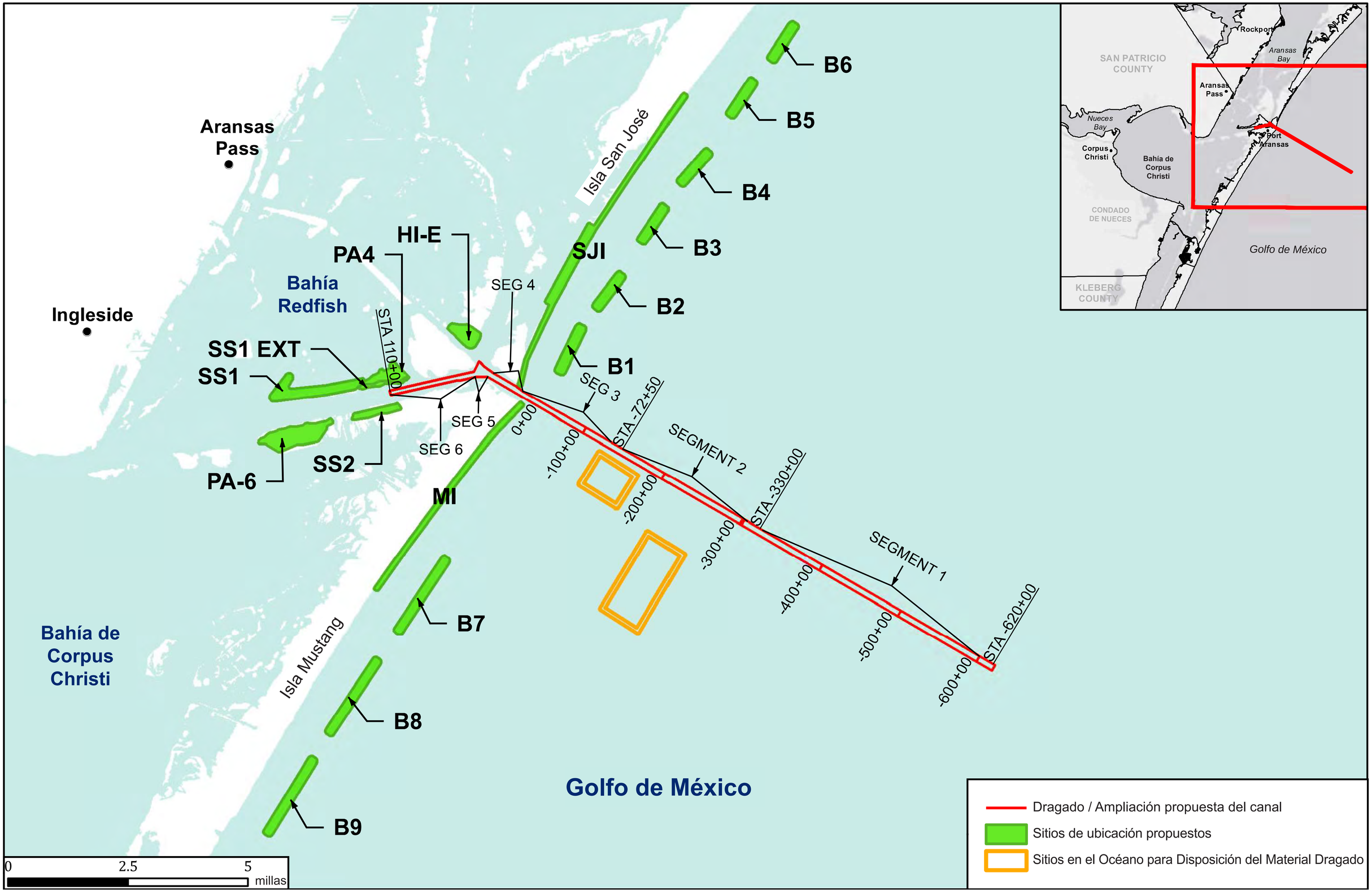


MAPA DE UBICACIÓN DEL PROYECTO

CARACTERÍSTICAS DEL PROYECTO

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI



SITIOS DE COLOCACIÓN

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

Sitio de colocación	Descripción	Propósito	Volumen total (yardas cúbicas)
SS1	Restauración de litorales erosionados	Restaurar la masa terrestre erosionada del litoral y brindar protección al área de las praderas marinas de Harbour Island	2,793,000
SS2	Restaurar dos brechas en la costa y masa de tierra a lo largo de la Reserva Natural de Port Aransas dañadas como resultado del huracán Harvey. Se agregaría masa de tierra detrás del proyecto de mamparo costero de la Agencia Federal para el Manejo de Emergencias.	Restaurar el litoral arrasado por el huracán Harvey para proteger la planicie arenosa que el hábitat crítico del frailecillo silbador	250,000
Extensión SS1 (Restauración del litoral PA4)	Restablecer el litoral erosionado y la pérdida de tierra frente a PA4	Restaurar la masa terrestre erosionada del litoral y brindar protección a las praderas marinas de Harbour Island Levantar diques para colocación de nuevo material de obra no apto para un mejor aprovechamiento (BU)	1,676,000
PA4 (Colocación en tierras altas)	Colocación en tierras altas dentro de PA4	Ningún beneficio ambiental, material inadecuado para BU	2,861,400
HI-E	Restauración de la masa terrestre de acantilados y litorales con relleno del sitio en el este de Harbour Island	Restaurar acantilados y costas erosionados a perfiles históricos	1,824,800
PA6	Elevara en 5 pies el dique PA 5 y rellenarlo con 4 pies de material de la nueva obra	Ningún beneficio ambiental, material inadecuado para BU	1796400
SJI	Restauración de dunas y playa en la isla San José	Restaura los deslaves de dunas y varias millas de perfil de playa que fueron arrasadas durante el huracán Harvey	4,000,000
B1–B9	Bermas costa afuera cercanas a la costa de la Isla San José y la Isla Mustang	Bermas cercanas a la costa dentro de la zona de transporte para nutrir indirectamente las islas de barrera	8,100,000
MI	Regeneración de las playas en el lado del golfo de la Isla Mustang	Regeneración de la playa de la Isla Mustang para mejorar el litoral	2,000,000
ODMDS de la obra nueva	Colocar el material en el nuevo sitio existente de disposición de materiales de dragado en el océano (ODDMS)	Ningún beneficio ambiental, material inadecuado para BU	38,888,600

DRAGADO

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

- Las actividades bajo la jurisdicción del USACE incluirían el dragado de aguas navegables para extender el término del canal autorizado hacia el Golfo de México, dragar, ampliar y mejorar el Canal de Navegación de Corpus Christi existente, y el uso beneficioso y la colocación de material dragado.
- El dragado bajo la Alternativa de Acción Propuesta del Solicitante resultaría en **46 millones de yardas cúbicas** de material de la nueva obra. **El dragado se limitaría principalmente a la huella existente del Canal de Navegación de Corpus Christi.**

ANÁLISIS DE ALTERNATIVAS

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

También se consideró una evaluación de alternativas a la acción propuesta, la cual incluye:

- Una alternativa de No ejercer acción;
- Alternativas que evitarían, minimizarían y compensarían los impactos al medio ambiente dentro de la huella del Proyecto propuesto;
- Alternativas que evitarían, minimizarían y compensarían los impactos al medio ambiente fuera de la huella;
- Alternativas utilizando prácticas alternativas; y
- Otras alternativas razonables que se desarrollarán a través del proceso de alcance de la declaración de impacto ambiental.

SIMULACIONES CON BUQUES

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

- Las simulaciones con buques se realizaron en noviembre de 2021 y febrero de 2022. **Se realizaron más de 40 simulaciones**, incluyendo escenarios de emergencia que simularon varias combinaciones de fallas de buques y remolcadores.
- El uso de estos remolcadores simulados representó la operación de buques tanque petroleros de grandes dimensiones (VLCC) completamente cargados para la mayoría de las condiciones ambientales.

Conclusión: *Las configuraciones de canales del proyecto propuesto con las condiciones ambientales subyacentes serían aceptables para operar de manera segura buques VLCC completamente cargados que zarpan de la terminal de Harbour Island.*

IMPACTOS MODELADOS

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

TRANSPORTE DE SEDIMENTOS

- El modelado del Canal dentro de los embarcaderos predijo un aumento del 5 al 10 por ciento en la sedimentación en ciertos tramos.
- El modelado del Canal Exterior predijo que la sedimentación aumenta de aproximadamente 95,000 yardas cúbicas por año a aproximadamente 214,000 yardas cúbicas por año (2.25 veces más).
- El modelado de la sedimentación del canal del sitio en el océano para la eliminación de material dragado en la nueva obra (ODDMS) predijo un aumento máximo de sedimentación de 1,200 yardas cúbicas.

EFECTOS DE MAREJADA CICLÓNICA

- El impacto de la marejada ciclónica se modeló en la Bahía de Corpus Christi y sus alrededores con "condiciones futuras planificadas" que representan la Acción propuesta.
- La acción propuesta permitiría que ingrese más agua a la bahía, lo que resultaría en un aumento de los niveles de agua de la marejada ciclónica y aumentos leves en la extensión de la inundación (entre 447 y 492 acres en áreas pequeñas en toda el área de estudio).
- El aumento máximo de elevación de la marejada ciclónica en comparación con las condiciones existentes es de 3.5 pulgadas. Se identificó un punto crítico de aumento de la elevación de la marejada ciclónica de 4 a 12 pulgadas adyacente a Harbor Island.
- Las actividades de regeneración de playas, incluidas la regeneración y las bermas cercanas a la costa, tienen el potencial de compensar los efectos de la erosión y atenuar la energía de las olas. Además, la restauración de las dunas puede brindar protección adicional contra el viento y las marejadas ciclónicas causadas por huracanes.

SALINIDAD

- Los cambios del prisma de marea debido a la profundización del canal aumentan el intercambio de agua salada entre las bahías de Corpus Christi y Nueces. Esto resulta en un aumento en la salinidad promedio de la Bahía Nueces.
- El modelo indica que el dragado del canal podría disminuir ligeramente la salinidad de la bahía, menos de 1 ppt en promedio en el sistema de la Bahía de Corpus Christi.
- No se prevé que las actividades asociadas con la colocación en alta mar y las acciones de colocación dirigidas al uso beneficioso (BU) del material dragado afecten los niveles de salinidad en el área del proyecto.
- Pueden ocurrir impactos localizados en áreas donde se utiliza material de la nueva obra para desarrollar o ampliar islas en la Bahía de Corpus Christi. Estos impactos se limitarían a cambios a corto plazo en la salinidad como resultado de la escorrentía de agua dulce durante los eventos de lluvia.

IMPACTOS MODELADOS

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

CAMBIO DE LITORAL

- No se contemplan impactos en los litorales como resultado de las actividades de dragado de canales; las actividades de colocación de uso beneficioso (BU) pueden tener como resultado impactos localizados en las costas.
- Se utilizaron dos modelos numéricos para evaluar la estabilidad de la berma cerca de la costa y la regeneración de la playa.
- En ambos modelos, las dunas eran estables y los cambios de perfil pronosticados con y sin la berma cercana a la costa son casi idénticos, lo que indica que las bermas cercanas a la costa pueden tener poca influencia en la estabilidad de la playa.
- Una simulación de alimentación de playa a largo plazo mostró que mitigaría la erosión en curso en el área y tendría una vida de diseño razonable.

BATIMETRÍA/MAREAS/CORRIENTES Y CIRCULACIÓN

- Batimetría
  - » El uso del ODMDS para obras nuevas da como resultado un cambio batimétrico periódico en un área de hasta 1.36 millas náuticas cuadradas. El sitio es dispersivo y el cambio sería temporal y dentro de los límites planificados y permitidos.
- Mareas
  - » El modelado a corto plazo predijo aumentos en la amplitud de las mareas de alrededor del 11 por ciento en Redfish Bay, 8 por cientot en Corpus Christi Bay, 7 por ciento en Nueces Bay y 3 por ciento en Rockport.
  - » La amplitud de las mareas en el canal dentro de los muelles de Port Aransas tiene el mayor aumento, que es de alrededor del 17 por ciento.
  - » No hubo cambios importantes en las amplitudes de las mareas en el canal del embarcadero de Aransas Pass y el canal exterior.
  - » El impacto notable en el rango de mareas se limita al canal de navegación desde Point Mustang hasta la cuenca interior.
- Corrientes y circulación
  - » No se contempla impacto importante en las corrientes en Corpus Christi Bay, Redfish Bay y Nueces Bay.
  - » La velocidad actual media en Aransas Pass en el canal del embarcadero se redujo en aproximadamente 0.213 pies por segundo y la velocidad actual máxima se redujo en 0.614 pies por segundo.
  - » La velocidad actual aumentó en el Canal de Navegación de Corpus Christi desde Port Aransas hasta Ingleside, donde la profundidad del agua permanece sin cambios.
  - » La velocidad actual en el canal dentro de los embarcaderos de Port Aransas aumentó entre 0.09 y 0.03 pies por segundo, hasta 0.36 pies por segundo.

RESUMEN DE LOS IMPACTOS

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

IMPACTOS FÍSICOS

Recurso	Dragado del Canal (Alternativa de Acción Propuesta por el Solicitante)
Cambio relativo del nivel del mar	No se espera que el aumento gradual en el aumento del nivel del mar (SLR) en BU resulte en un impacto importante en el rendimiento o la operación del canal
Calidad del agua	El material a ser dragado es adecuado para su colocación en alta mar, no se anticipan impactos de contaminantes químicos; se prevé suspensión a corto plazo de nutrientes durante el dragado y las actividades de colocación de material dragado
Hipoxia	Se espera que exista un menor oxígeno disuelto (DO) localizado y temporal durante el dragado en la columna de agua; los nutrientes liberados en la columna de agua durante el dragado pueden aumentar temporalmente las bacterias/zooplancton, lo que reduce el DO
Calidad del sedimento	El material a dragar es apto para su colocación; las pruebas de sedimentos han concluido que no se esperan efectos ambientales adversos
Hidrología de aguas subterráneas y superficiales	Impactos temporales localizados asociados con las actividades de regeneración de playas; las acciones dirigidas a BU pueden cambiar la hidrología local temporalmente durante el proceso de restauración y estabilización de la marisma
Recursos energéticos y minerales	Sin impactos directos; proporciona mejoras adicionales de capacidad y transporte para apoyar la importación/exportación de recursos energéticos y minerales
Residuos peligrosos, tóxicos y radiactivos	Las instalaciones reguladas y las ubicaciones de incidentes no plantean una preocupación ambiental; todo el material dragado se colocará en sitios de uso beneficioso (BU) según lo permita la EPA; aumento en los impactos resultantes de muelles más profundos para el manejo de productos derivados del petróleo y otros materiales peligrosos; riesgo reducido de derrames de buques durante transferencia de producto en el puerto
Calidad del aire	Los impactos de las emisiones de la construcción serían temporales y se compensarían en 1 a 5 años para los compuestos orgánicos volátiles (COV) y NOx con reducciones anuales de 18,405 toneladas de COV y 221 toneladas de óxidos de nitrógeno (NOx) del impacto positivo a largo plazo de la reducción de aligeramiento
Ruido	El ruido debido al dragado sería similar al dragado de mantenimiento actual; no se espera que la colocación de material dragado tenga impactos adversos; no se prevé que las operaciones cambien los niveles de ruido actuales; no se espera que aumente el ruido del tránsito de los buques

RESUMEN DE LOS IMPACTOS

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

IMPACTOS ECOLÓGICOS Y BIOLÓGICOS

Recurso	Dragado del Canal (Alternativa de Acción Propuesta por el Solicitante)
Humedales y vegetación acuática sumergida	Los impactos de turbidez durante la construcción serían temporales; la vegetación acuática sumergida (SAV) ocurre en los sitios de ubicación propuestos para BU: 3.32 acres en PA4 y 3.42 acres en HI-E; las acciones de uso beneficioso (BU) pueden ayudar a proteger el SAV que podría quedar expuesto si los litorales continúan erosionándose; las áreas de aguas abiertas se convertirían en humedales estuarinos de marea o SAV creando un hábitat más productivo
Hábitats estuarinos y fauna	Se produciría la pérdida del hábitat del fondo de la bahía debido a las actividades de dragado y colocación; los bentos se verían afectados hasta que se produzca la recuperación natural; pueden ocurrir impactos de turbiedad temporales y localizados durante las actividades de construcción y colocación; ligero aumento en la probabilidad de un derrame de petróleo; se anticipan impactos directos en 0.10 acres de arrecifes de ostras en HI-E. Se cartografiaron 3.17 acres de ostras dentro de una zona de amortiguamiento de 500 pies de sitios de PA que podrían verse afectados indirectamente; el material dragado utilizado de manera beneficiosa tiene el potencial de ser más productivo que el hábitat de aguas abiertas y el fondo de la bahía lo que se perdería creando un beneficio positivo para el sistema de la bahía
Especies invasoras en agua de lastre	Se espera que el tráfico de embarcaciones disminuya, lo que reduciría el riesgo general
Recursos de vida silvestre	Aumentos temporales y localizados en la turbidez y menor oxígeno disuelto (DO) durante las actividades de dragado; reducción del riesgo de interacciones letales con la reducción del tráfico de embarcaciones; potencial de que los buques/remolcadores de mayor tamaño afecten la erosión de la costa, aunque los modelos indican impactos mínimos; La colocación de BU tendría un impacto positivo en la vida silvestre, SS2 específicamente destinado a proyectar el hábitat crítico del frailecillo silbador

RESUMEN DE LOS IMPACTOS

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

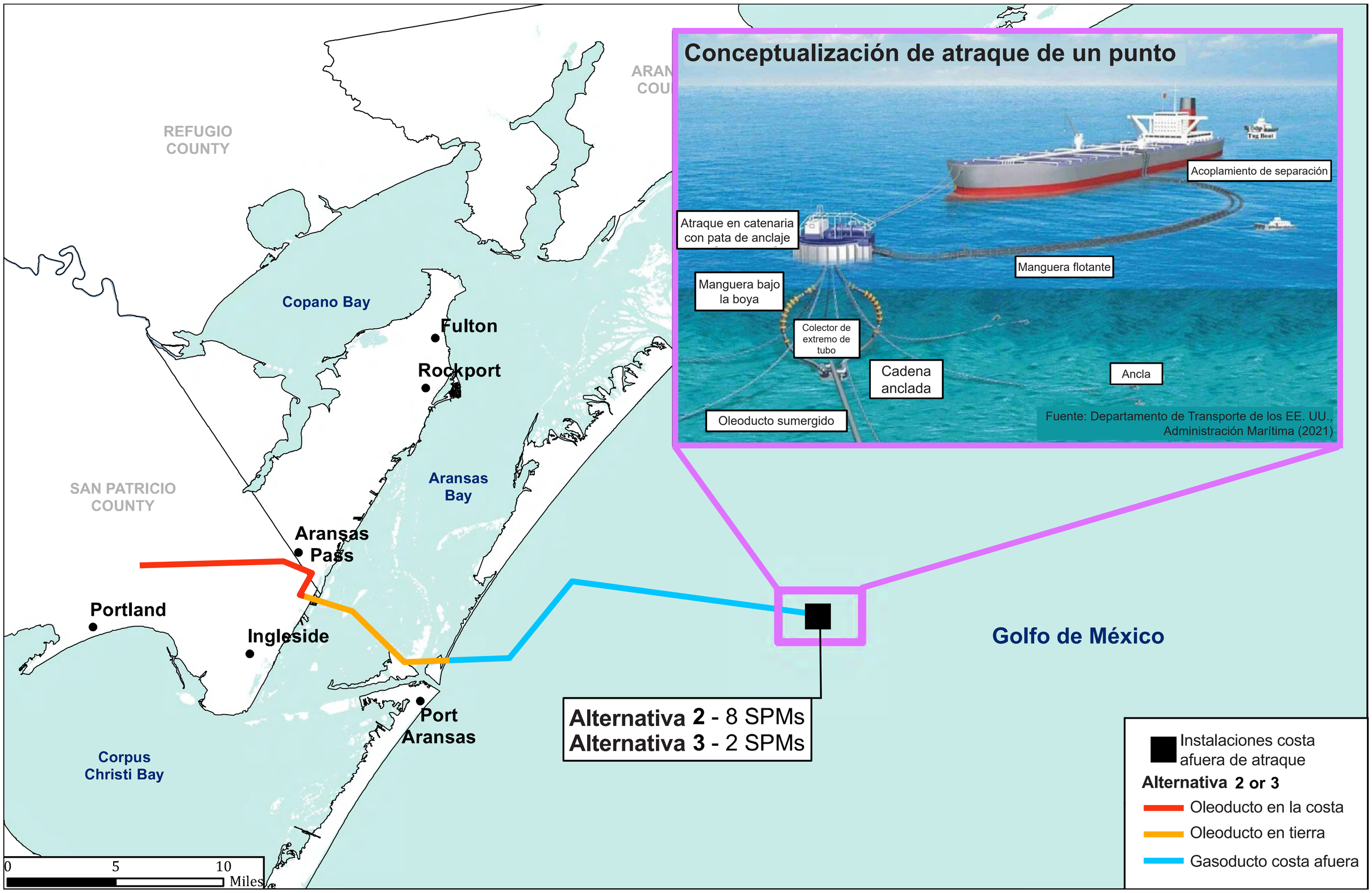
IMPACTOS DE LOS RECURSOS PROTEGIDOS

Recurso	Dragado del Canal (Alternativa de Acción Propuesta por el Solicitante)
Tierras protegidas	El uso beneficioso (BU) proporcionaría beneficios a la Reserva Natural de Port Aransas; la disminución de la erosión por un menor tráfico de embarcaciones puede beneficiar a las áreas; los impactos descritos en la opción de No tomar Acción continuarían
Especies amenazadas y en peligro de extinción	Aumentos temporales y localizados de turbidez durante las actividades de dragado; la colocación de material dragado puede molestar a las aves; se contemplan perturbaciones temporales durante la colocación de material en los sitios de BU; Los sitios BU podrían brindar beneficios a largo plazo al aumentar el hábitat costero y proteger las marismas; El menor tráfico de embarcaciones disminuiría las posibles huelgas y molestias por ruido
Hábitat importante de peces	Se produciría la pérdida del hábitat del fondo de la bahía debido a las actividades de dragado y colocación; los bentos se verían afectados hasta que se produzca la recuperación natural; pueden ocurrir impactos de turbiedad temporales y localizados durante las actividades de construcción y colocación; ligero aumento en la probabilidad de un derrame de petróleo; se anticipan impactos directos en 0.10 acres de arrecifes de ostras en HI-E. Se cartografiaron 3.17 acres de ostras dentro de una zona de amortiguamiento de 500 pies de sitios de PA que podrían verse afectados indirectamente; el material dragado utilizado de manera beneficiosa tiene el potencial de ser más productivo que el hábitat de aguas abiertas y el fondo de la bahía lo que se perdería creando un beneficio positivo para el sistema de la bahía
Aves migratorias	Aumentos temporales y localizados en la turbidez y menor oxígeno disuelto (DO) durante las actividades de dragado; potencial de que los buques/remolcadores de mayor tamaño afecten la erosión de la costa, aunque los modelos indican impactos mínimos; La colocación de BU tendría un impacto positivo en la vida silvestre, SS2 específicamente destinado a proyectar el hábitat crítico del frailecillo silbador
Mamíferos marinos	La reducción del tráfico de embarcaciones reduce la posibilidad de derrames, colisiones con embarcaciones y molestias por ruido; las actividades de dragado y colocación pueden perturbar temporalmente a los mamíferos y alterar las rutas durante la construcción; la colocación de BU puede hacer que los mamíferos eviten partes de las áreas de alimentación; la posibilidad de que el manatí se vea afectado durante las actividades de dragado se puede evitar mediante la aplicación de las mejores prácticas de manejo
Atrayentes peligrosos de vida silvestre en o cerca de aeropuertos	Las características del proyecto BU que involucran la restauración de playas/dunas/litorales, bermas cerca de la costa y estabilización de la costa, podrían crear un aumento en el hábitat de anidación y alimentación de aves, lo que podría aumentar el número y las especies de aves asociadas con las colisiones con aeronaves.
Recursos culturales	No se contemplan impactos, pero se necesita un estudio intensivo para evaluar los impactos en los recursos arqueológicos terrestres y submarinos; durante las actividades de dragado del canal, impactos potenciales a tres propiedades históricas (41NU252, 41NU264 y 41NU292); durante la colocación de material dragado para BU, beneficio potencial para sitios costa afuera; impacto potencial en dos sitios terrestres (41AS91 y 41NU153)

OTRAS ALTERNATIVAS ESTUDIADAS

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI



Las siguientes alternativas también fueron estudiadas como parte del Borrador del EIS:

- **Alternativa costa afuera:** El Canal de Navegación de Corpus Christi no se dragaría. Se construirían múltiples instalaciones portuarias de aguas profundas capaces de sustentar todas las exportaciones de petróleo proyectadas.
- **Combinación de operaciones en costa/marinas:** El Canal de Navegación de Corpus Christi no se dragaría. Los buques tanque petroleros de grandes dimensiones se cargarían parcialmente en las instalaciones costeras en Ingleside y Harbour Island y luego atravesarían el canal hasta la instalación costa afuera para llenarse por completo.

DESCRIPCIÓN DEL PROYECTO

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

La Acción propuesta sería

- Dragar una porción del Canal de Navegación de Corpus Christi más allá de las profundidades de canal autorizadas actuales de -54 pies y -56 pies bajamar promedio inferior hasta profundidades máximas de -79 pies y -81 pies significan bajamar promedio inferior
- Generar un estimado de 46.3 millones de yardas cúbicas de material de dragado de la nueva obra
- Ampliar el término existente del canal autorizado 29,000 pies adicionales hacia el Golfo de México para llegar a -80 de bajamar promedio
- Ampliar y enderezar la cuenca interior existente en Harbour Island según sea necesario para permitir el giro de buques tanque petroleros de grandes dimensiones
- Colocación del nuevo material de las obras de dragado en aguas territoriales de los Estados Unidos para uso en beneficio de sitios ubicados en las bahías de Corpus Christi y Redfish y sus alrededores
- Colocación de material dragado en Isla San José para la restauración de dunas
- Coloca bermas de material dragado cerca de la costa para brindar restauración a las playas a lo largo de las islas San José y Mustang
- Transportar el material de las nuevas obras de dragado al sitio de disposición de material de las nuevas obras de dragado de Corpus Christi

*La acción propuesta **no** incluye la ampliación del canal. Sin embargo, se esperaría algún ensanchamiento incidental menor para cumplir con los requisitos de pendiente lateral.*

REVISIÓN DE INTERÉS PÚBLICO

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

La revisión de interés público de USACE es el marco principal para la evaluación general de los proyectos. La revisión del interés público requiere sopesar cuidadosamente todos los factores de interés público relevantes para cada solicitud de permiso en particular. Por lo tanto, un factor específico (p. ej., los valores o la economía de los peces y la vida silvestre) no puede forzar por sí mismo una decisión específica, sino que la decisión representa el efecto neto de equilibrar todos los factores de interés público, muchos de los cuales están frecuentemente en conflicto.

La revisión de interés público se utiliza para evaluar las solicitudes bajo todas las autoridades administradas por el USACE. Durante la revisión de una solicitud de permiso, el USACE evalúa los siguientes factores de revisión de interés público:

- Conservación
- Economía
- Estética
- Preocupaciones ambientales en general
- Humedales
- Propiedades históricas
- Valores de peces y vida silvestre
- Peligros de inundación
- Valores de la llanura aluvial
- Uso de la tierra
- Navegación
- Erosión y acreción de la costa
- Recreación
- Abastecimiento y conservación de agua
- Calidad del agua
- Necesidades energéticas
- Seguridad
- Producción de alimentos y fibras
- Necesidades de minerales
- Consideraciones de la propiedad de bienes raíces
- Las necesidades y el bienestar de las personas.

IMPACTOS DE LOS RECURSOS ACUÁTICOS

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

Resumen de los impactos potenciales sobre los recursos acuáticos (acres)

Componente del proyecto	Huella	Aguas abiertas	Praderas marinas	Ostras	Llanuras/ Playa	Estuarino	Palustrino	Fuente
SS1	297.41	219.45	0.01	0	34.64	3.92	21.04	Solicitante
SS2	45.21	13.74	0	0	24.20	1.25	11.25	Solicitante
PA4	170.79	42.14	3.46	0	2.80	0.75	41.75	Solicitante
HI-E	138.73	13.12	3.41	0.10	23.21	10.69	48.42	Solicitante
SJI	592.85	163.29	0	0	199.01	0	58.76	Solicitante
MI	362.08	205.58	0	0	124.11	0	0	Solicitante
Dragado/ extensión del canal	1,182.33	1,182.33	–	–	–	–	–	NOAA (2010)
B1–B9	1585.82	1,585.82	–	–	–	–	–	NOAA (2010)
ODMDS de la obra nueva	1,180.00	1,180.00	–	–	–	–	–	NOAA (2010)
TOTAL	**5555.22**	**4,605.47**	**6.88**	**0.10**	**407.97**	**16.61**	**181.22**	

IMPACTOS AMBIENTALES

US Army Corps of Engineers®
Galveston District

PROYECTO DE DRAGADO DEL CANAL DEL PUERTO DE CORPUS CHRISTI

EVITAR • MINIMIZAR • MITIGAR

Impactos inevitables (permanentes o temporales): Impactos en el hábitat esencial de los peces debido a las actividades de dragado y colocación asociadas con la construcción de la Alternativa de acción propuesta, incluidas las especies acuáticas y los peces que habitan en el fondo.

Impactos directos: Impactos debido a la construcción del Área de Colocación costera; de aguas abiertas/hábitat del fondo, humedales de marea, humedales de agua dulce, costas no consolidadas (bajíos de arena/bajíos de algas/playa), pastos marinos y arrecifes de ostras.

Impactos indirectos: Impactos a los humedales de marea y hábitat esencial de peces debido a la turbidez temporal asociada con las actividades de dragado y colocación para la construcción de la Alternativa de Acción Propuesta.

¿QUÉ ES LA MITIGACIÓN?

Mitigación: proyectos destinados a compensar los impactos inevitables conocidos en los recursos naturales; creación de un hábitat similar para reemplazar la función perdida.

El Plan de Mitigación incluye la creación de humedales y pastos marinos para compensar los impactos directos e indirectos.

Determinación de efectos para especies amenazadas y en peligro de extinción

Nombre común	Determinación de Efectos – USFWS
MAMÍFEROS	
Cachalote	Puede afectar, pero no es probable que afecte adversamente
Manatí antillano	Puede afectar, pero no es probable que afecte adversamente
PECES	
Mantarraya gigante	Puede afectar, pero no es probable que afecte adversamente
AVES	
Frailecillo silbador	Puede afectar, pero no es probable que afecte adversamente
Playero rojizo (Rufa)	Puede afectar, pero no es probable que afecte adversamente
Grulla blanca	Puede afectar, pero no es probable que afecte adversamente
Burrito cuyano oriental	Puede afectar, pero no es probable que afecte adversamente
REPTILES	
Tortuga marina verde	Es probable que afecte negativamente
Tortuga carey	Es probable que afecte negativamente
Tortuga marina de Kemp's Ridley	Es probable que afecte negativamente
Tortuga laúd	Puede afectar, pero no es probable que afecte adversamente
Tortuga caguama	Es probable que afecte negativamente

Appendix C

Public Meeting Presentations

USACE Presentation

CORPUS CHRISTI SHIP CHANNEL DEEPENING PROJECT ENVIRONMENTAL IMPACT STATEMENT (SWG-2019-00067)

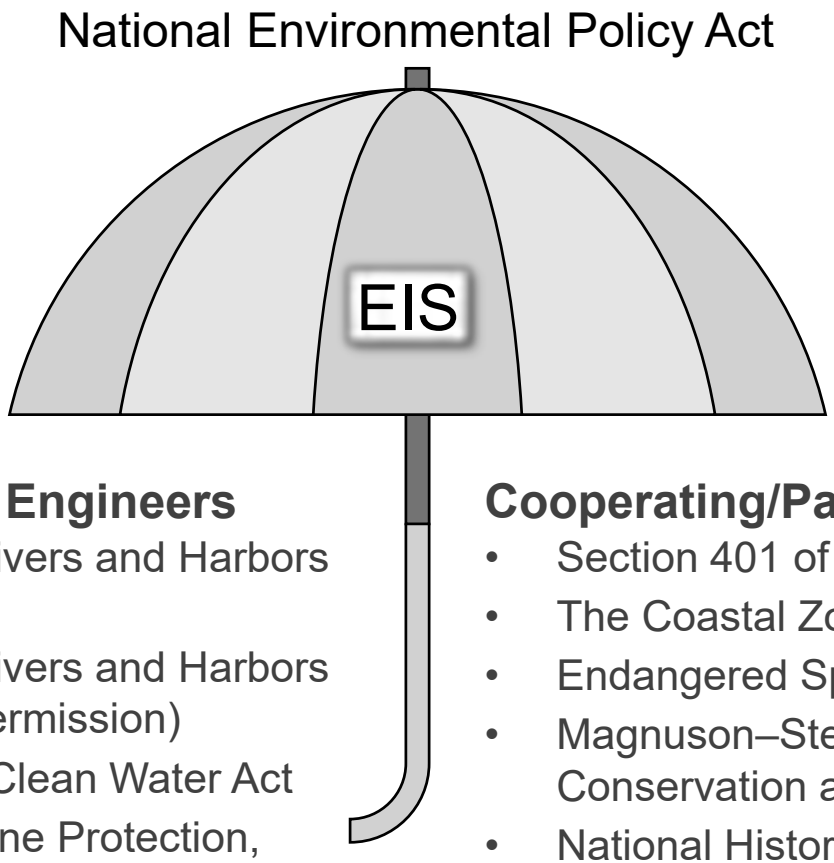
PUBLIC MEETING – JUNE 22, 2022

Jayson Hudson – USACE Regulatory Project Manager

US Army Corps of Engineers®

U.S.ARMY

APPLICABLE LAWS AND REGULATIONS



US Army Corps Of Engineers

- Section 10 of the Rivers and Harbors Act of 1899
- Section 14 of the Rivers and Harbors Act of 1899 (408 Permission)
- Section 404 of the Clean Water Act
- Section 103 of Marine Protection, Research and Sanctuaries Act

Cooperating/Participating

- Section 401 of the Clean Water Act
- The Coastal Zone Management Act
- Endangered Species Act
- Magnuson–Stevens Fishery Conservation and Management Act
- National Historic Preservation Act
- Title 41 of the Fixing America's Surface Transportation (FAST) Act

US Army Corps of Engineers

U.S.ARMY

EIS TEAM AND ROLES

Lead Federal Agency for NEPA and FAST-41

U.S. Army Corps of Engineers, Galveston District

Cooperating Agencies

Environmental Protection Agency

US Fish and Wildlife Service

National Marine Fisheries Service

US Coast Guard

Participating/Commenting Agencies

Texas Commission On Environmental Quality

Texas Parks and Wildlife Department

Texas Historical Commission

Texas General Land Office

Applicant

Port of Corpus Christi Authority

Environmental Impact Statement Contractor

Freese and Nichols, Inc.

US Army Corps of Engineers

U.S. ARMY

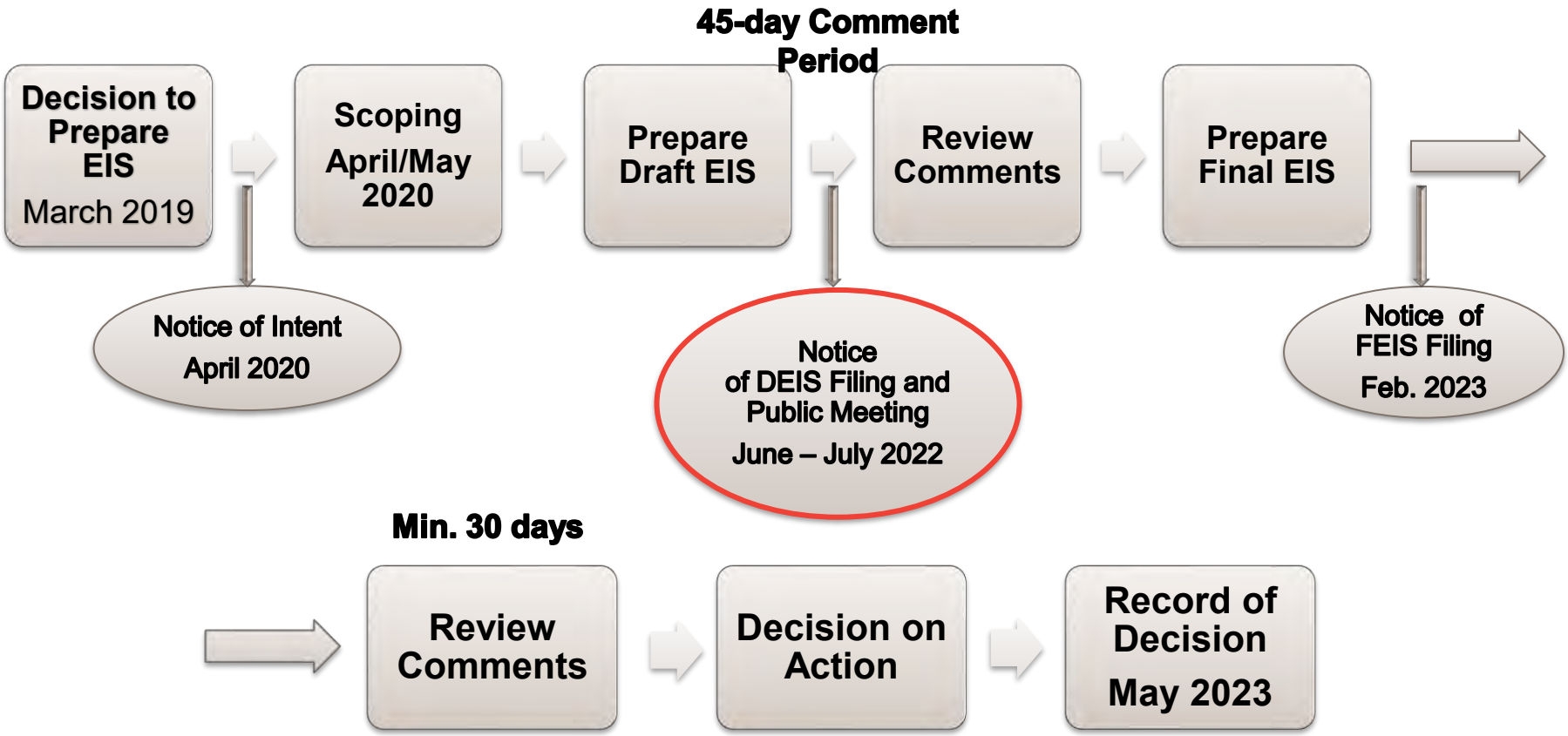
DESCRIPTION OF PERMIT TIMELINE

- Initial Application Received:
  - January 7, 2019
- Significance Determination (EIS)
  - March 6, 2019
- Revised Application Received:
  - June 5, 2019
- FPISC FAST 41 Designation:
  - June 18, 2019
- Initial Public Notice
  - August 1, 2019
- Purpose and Need Concurrence
  - March 4, 2020
- Notice of Intent
  - April 7, 2020
- Scoping Meetings & Comment Period
  - April & May 2020
- Notice of Availability of Draft EIS
  - June 10, 2022
- **Public Meeting & Comment Period**
  - **June/July 2022**
- Notice of Availability of the Final EIS
  - February 10, 2023
- Notice of Record of Decision
  - May 17, 2023

US Army Corps of Engineers

U.S.ARMY

ENVIRONMENTAL IMPACT STATEMENT PROCESS



US Army Corps of Engineers

SCOPING PROCESS

The overall goal is to define the scope of issues to be addressed in depth in the analyses that will be included in the EIS.

Environmental Concerns From Scoping:

- 228 comments addressing *environmental* concerns (mitigation, air/water quality, erosion, endangered species, migration etc.)
- 91 comments addressing *public involvement* concerns
- 87 comments regarding *alternatives* to the project
- 82 comments addressing *land use, recreation, and tourism* concerns
- 45 comment addressing the *purpose and need* for the project
- 44 comments addressing *navigation/transportation concerns*
- 25 comments addressing *dredging*
- 10 comments addressing *safety and security*
- 11 comments addressing *permit concerns and opposition to the project*
- 6 comments addressing *noise* concerns

US Army Corps of Engineers

U.S.ARMY

EIS CONTENT

- Chapter 1 Introduction, Purpose and Need
- Chapter 2 Proposed Action and Alternatives
- Chapter 3 Affected Environment
- Chapter 4 Environmental Consequences
- Chapter 5 Cumulative Effects
- Chapter 6 Mitigation
- Chapter 7 Environmental Impacts that Cannot Be Avoided
- Chapter 8 Irreversible or Irretrievable Commitments*
- Chapter 9 Short-term vs Long-Term Uses*
- Chapter 10 ID Preferred Alternative*
- Chapter 11 Permits and Approvals Required
- Chapter 12 Public Involvement*
- Chapter 13 List of Preparers
- Chapter 14 List of Recipients*
- Chapter 15 References

* Chapter Title Shortened for Slide

US Army Corps of Engineers

U.S.ARMY

SUPPORTING STUDIES AND REPORTS

- Appendix A - Permit Applications
- Appendix B - Public and Agency Coordination
- Appendix C - Dredge Materials Management Plan
- Appendix D -Endangered Species Act Biological Assessment
- Appendix E - Essential Fish Habitat Assessment
- Appendix F - Cultural Resources Baseline Summary
- Appendix G - Sediment Transport Model

US Army Corps of Engineers

U.S.ARMY

SUPPORTING STUDIES AND REPORTS

- Appendix H. Vessel Wake Analysis
- Appendix I. Hydrodynamic and Salinity Model Report
- Appendix J. MPRSA Section 103 Sampling and Analysis Plan
- Appendix K – Ship Simulation Report.
- Appendix L – Propeller Scour Study
- Appendix M – Underkeel Clearance Study
- Appendix N – Clean Water Act Section 404(b)(1) Evaluation
- Appendix O – Coastal Zone Management Consistency Determination
- Appendix P – Distribution List

US Army Corps of Engineers

U.S.ARMY

ALTERNATIVES ANALYZED IN THE DEIS (CHAPTERS 2-4)

In coordination with the Cooperating Agencies, and based on alternatives identified during scoping, the DEIS evaluates 4 alternatives-

- No Action
- Alternative 1 -Channel Deepening Alternative (Applicant's Proposed Action Alternative)
- Alternative 2 - Offshore Alternative
- Alternative 3 - Combined Inshore/Offshore

US Army Corps of Engineers

U.S.ARMY

NEXT STEPS

The comment period for the Draft EIS will close on **July 25, 2022.**

After close of the comment period on the DEIS, the Corp will analyze comments, conduct further analysis as necessary, and prepare the final EIS. The Final EIS is currently scheduled for release February 2023.

The Corps does not make a final permit decision in the Final EIS. The Record of Decision, or ROD, is scheduled for release in May 2023. The ROD will document the Corps decision to issue, issue with special conditions, or deny PCCA's permit application.

US Army Corps of Engineers

U.S.ARMY

HOW TO SUBMIT WRITTEN COMMENTS

Written comments regarding the Draft EIS scope should be addressed to:

Mr. Jayson Hudson
USACE, Galveston District
Regulatory Division
2000 Fort Point Road
Galveston, Texas 77550

Or

SWG201900067@usace.army.mil
Emailed comments, including attachments, should be provided in .docx, .pdf or .txt formats.

US Army Corps of Engineers

U.S.ARMY

PCCA Presentation

Port of Corpus Christi Authority

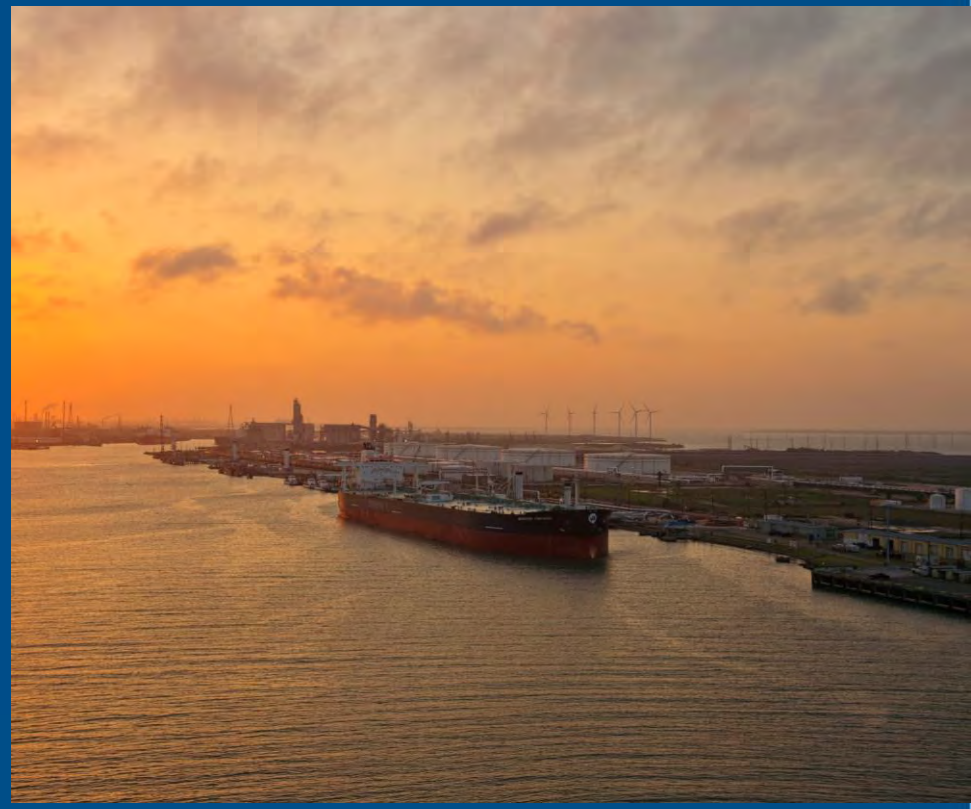
Public Meeting for the Draft Environmental Impact Statement

Presented by PORT CORPUS CHRISTI®

About The Port

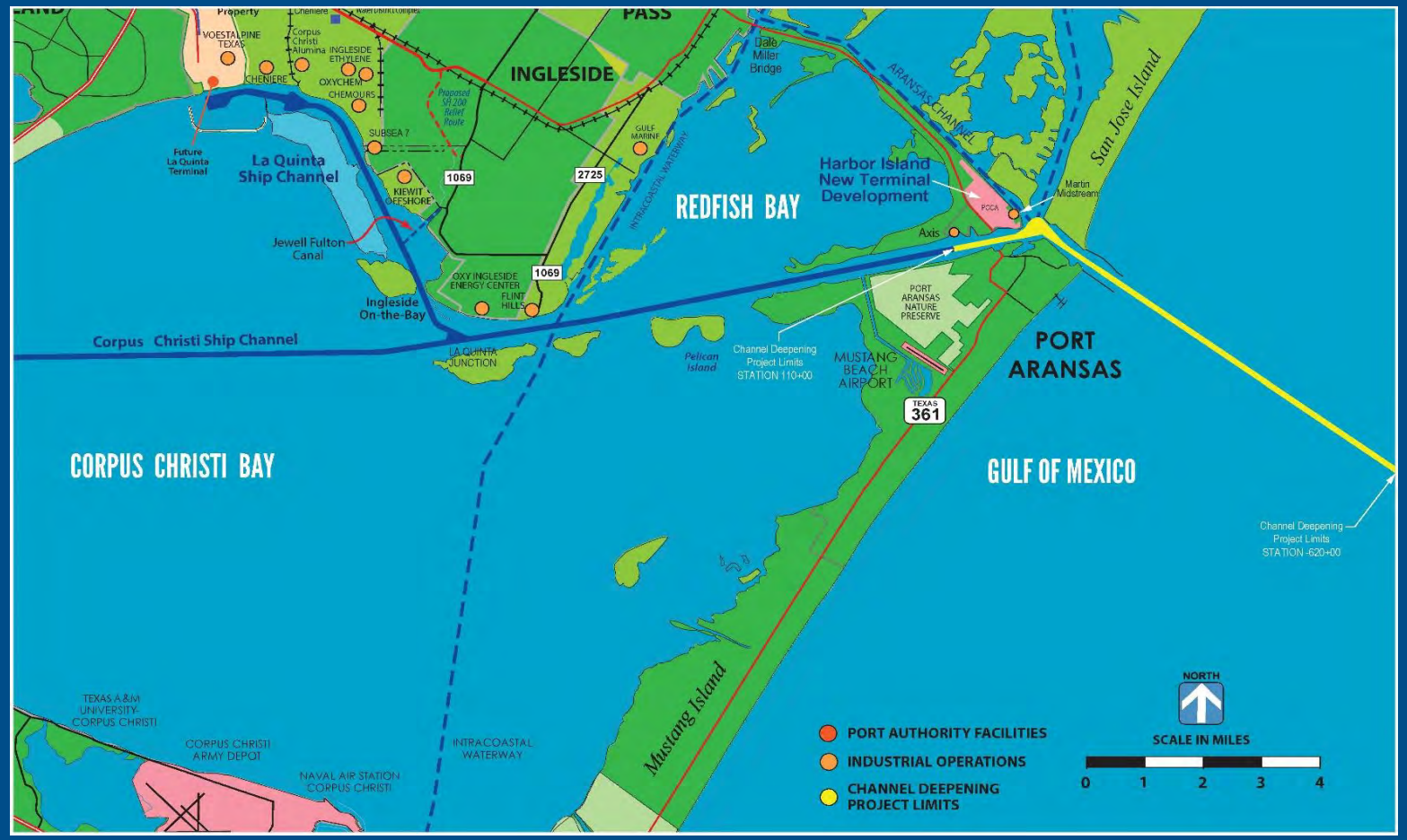
The Energy Port of the Americas

- Independent political subdivision of the State of Texas, governed by 7 commissioners
- Large industrial energy hub and gateway to global markets
- A landowner, a land developer, and a landlord
- Economic development agency specializing in P3s



PORT CORPUS CHRISTI®

Project Overview | Channel Deepening Project (CDP)



PORT CORPUS CHRISTI®

Economic Impact | Port of Corpus Christi Area (PCCA)

15.7M

2021 LNG total

Second-largest LNG export gateway in U.S.

167.3M

Total Tons in 2021

4.7% increase over prior record in 2020

94,700

Port-related Jobs in the Coastal Bend

Accounts for 21.9% of the metro area's labor force.

$400B

for U.S.

$327B

in goods value movements

$40B

for Texas

$6B

for Corpus Christi

Project Impact: $25 – $30B

PORT CORPUS CHRISTI®

A Commitment to Stewardship

Environmental Precepts

Air Quality

Reduce Emissions 15%

Climate Action

Reduce Emissions by 7.5%

Water Quality

Reduce Pollutants 10%

Resilience/
Climate Adaptation

Implement Life Cycle Assessment Tool on Port Capital Projects

Habitat

Create/Restore
50 Acres of Habitat

Soils & Sediments

Meet residential clean up standard

ISO 14001 CERTIFIED

GREEN MARINE

ENVIRONMENTAL MANAGEMENT SYSTEM

PORT CORPUS CHRISTI

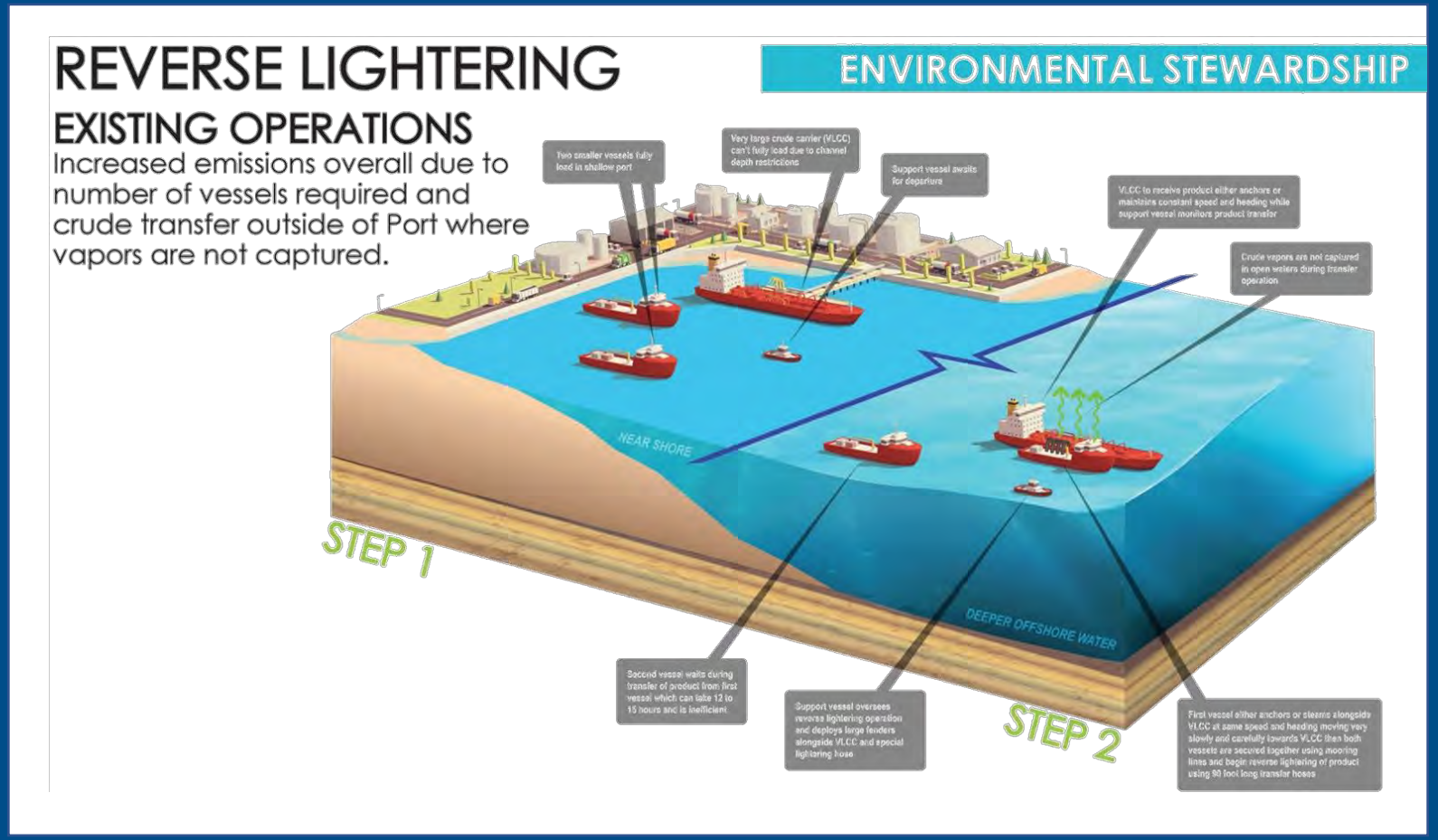
Project Overview | Channel Deepening Project

CDP information

- Deepen the Corpus Christi Ship Channel (CCSC) from Gulf of Mexico to Harbor Island
- Deepen the CCSC to allow safe navigation of fully loaded VLCCs
- Beneficial use and shoreline restoration with use of dredged material
- Eliminate reverse lightering

PORT CORPUS CHRISTI®

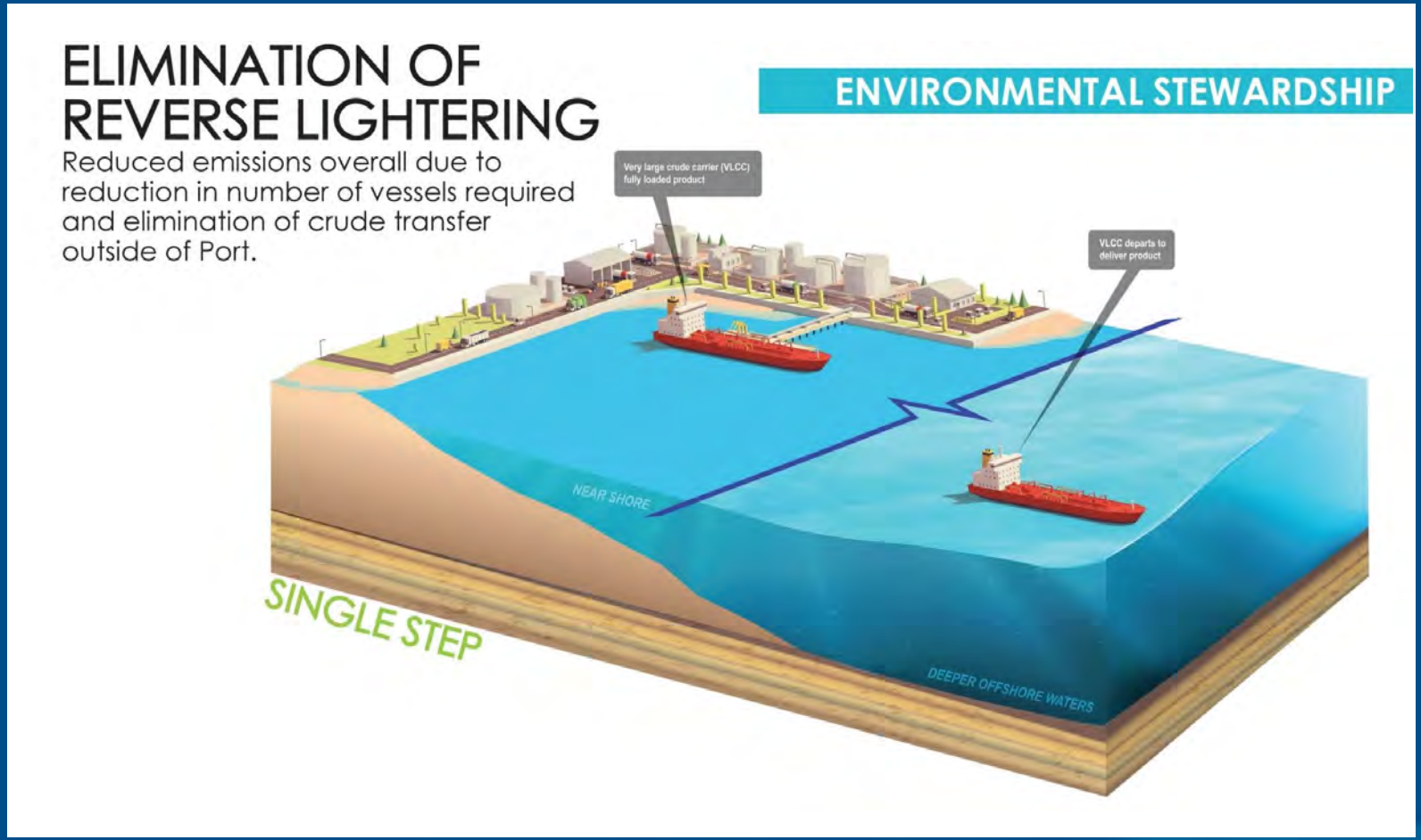
Reverse Lightering | Existing Operations



PORT CORPUS CHRISTI®

Reverse Lightering | Elimination

- 172 vessels were involved in reverse lightering in 2020
- This project will eliminate 295.9 tons of NOx, 816.3 tons of VOC's, and 16.3 tons of SOx (based on 2020 emissions inventory of lightering activities)



PORT CORPUS CHRISTI®

Engineering | Channel Deepening Project

Design vessel

- Selected design vessel represents 99% of active world VLCC fleet:
  - Length 1,116 feet
  - Beam: 197 feet
  - Calculated draft: 70.2 feet
- Maximum drafts assume cargo of low-density West Texas intermediate crude oil
- Used to determine minimum channel dimensions

PORT CORPUS CHRISTI®

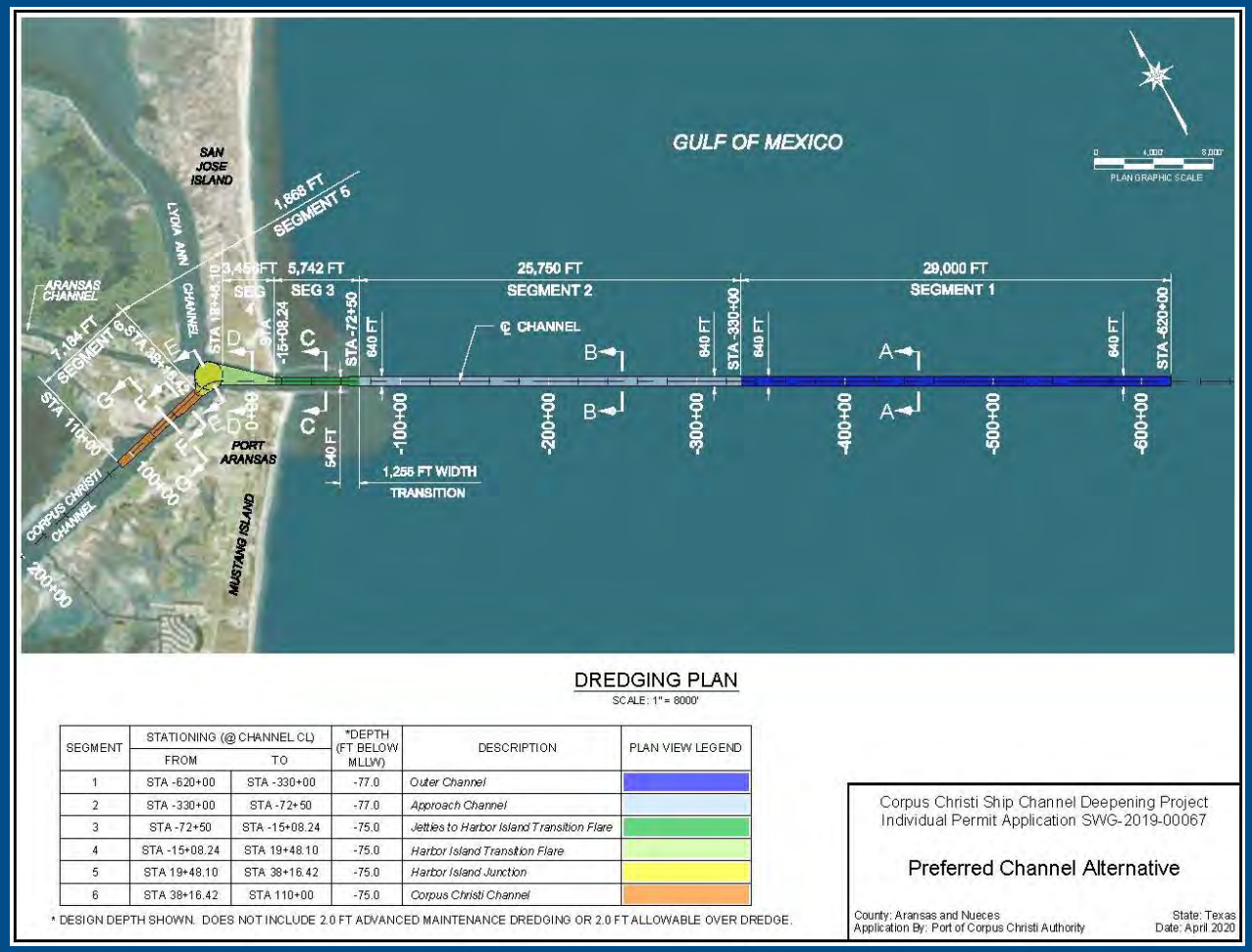
Engineering | Channel Deepening Project

Corpus Christi CIP 54 ft vs. CDP Channel dimensions

Description	Channel Segments			
	Segment 1 Outer Approach	Segment 2 Inner Approach	Segment 3 Between Jetties	Segment 3 Between Jetties
Authorized 54 ft. depth / CDP Channel Depth (ft. MLLW)	56 / 77	56 / 77	54 / 75	54 / 75
Authorized 54 ft. depth / CDP Channel Width (ft.)	700 / 640	700 / 640	600 / 540	Varies/Varies

PORT CORPUS CHRISTI®

Engineering | Channel Segments



DREDGING PLAN

SCALE: 1" = 8000'

SEGMENT	STATIONING (@ CHANNEL CL) FROM	TO	*DEPTH (FT BELOW MLLW)	DESCRIPTION	PLAN VIEW LEGEND
1	STA -620+00	STA -330+00	-77.0	*Outer Channel*	
2	STA -330+00	STA -72+50	-77.0	*Approach Channel*	
3	STA -72+50	STA -15+08.24	-75.0	*Jetties to Harbor Island Transition Flare*	
4	STA -15+08.24	STA 19+48.10	-75.0	*Harbor Island Transition Flare*	
5	STA 19+48.10	STA 38+16.42	-75.0	*Harbor Island Junction*	
6	STA 38+16.42	STA 110+00	-75.0	*Corpus Christi Channel*	

* DESIGN DEPTH SHOWN. DOES NOT INCLUDE 2.0 FT ADVANCED MAINTENANCE DREDGING OR 2.0 FT ALLOWABLE OVER DREDGE.

Corpus Christi Ship Channel Deepening Project
Individual Permit Application SWG-2019-00067

Preferred Channel Alternative

County: Aransas and Nueces
Application By: Port of Corpus Christi Authority

State: Texas
Date: April 2020

PORT CORPUS CHRISTI®

Engineering | Preferred Channel Dimensions

Segment	Stationing		Design Depth* (ft. MLLW)	Width (ft.)	Side Slopes H:V	Description	Dredge Volume (CY)
	Station Begin	Station End					
1	-620+00	-330+00	-77	640	640	Outer Channel	9,617,390
2	-330+00	-72+50	-77	640	640	Approach Channel	20,308,762
3	-72+50	-15+08.24	-75	540	540	Jetties to Harbor Island Transition Flare	2,105,041
4	-15+08.24	19+48.10	-75	540	540	Harbor Island Transition Flare	2,851,897
5	19+48.10	38+16.42	-75	540	540	Harbor Island Maneuvering Basin	2,951,614
6	38+16.42	110+00	-75	540	540	Corpus Christi Channel	4,020,764

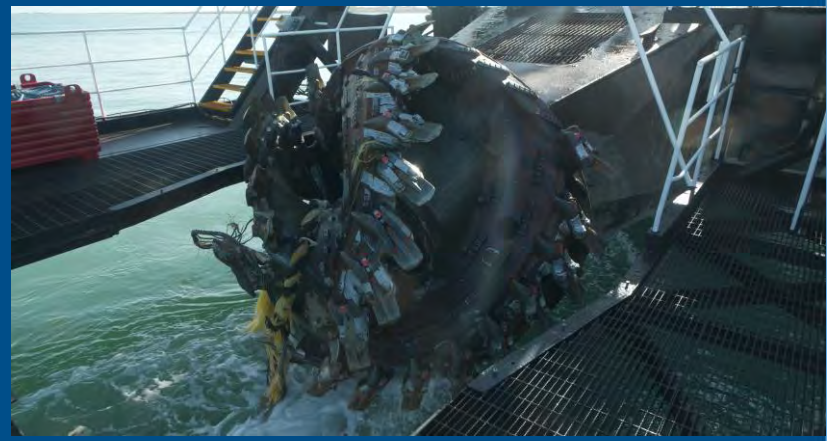
Total Dredge Volume: 41, 855, 468

PORT CORPUS CHRISTI®

Engineering | Channel Deepening Project

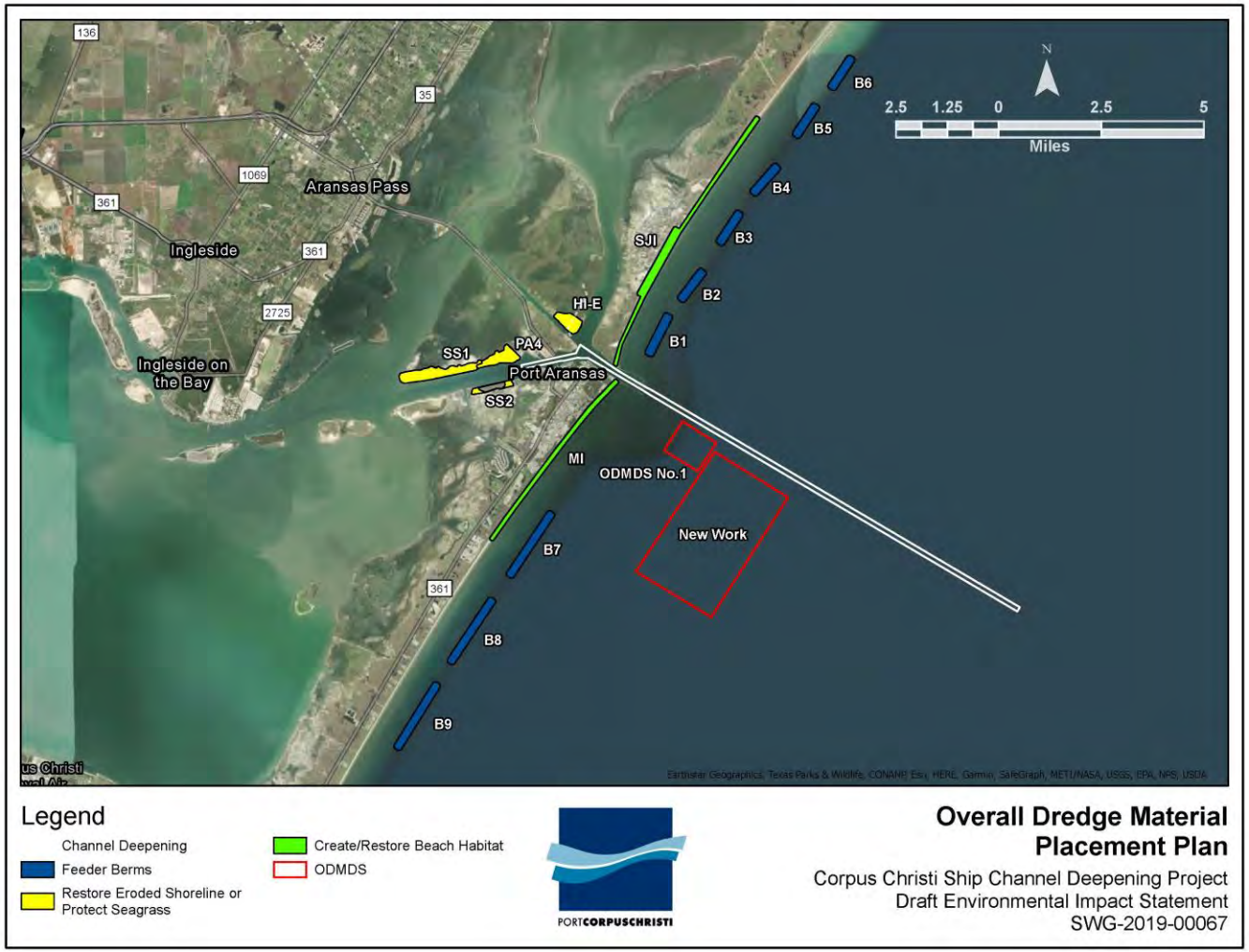
Dredged Material Management Plan

- With Coordination from the USACE, State and Federal Resource Agencies, the following inputs were used to develop the DMMP:
  - Use of existing PAs, existing BU sites, and existing ODMDS
  - Incorporating BU placement were feasible
  - Avoiding oyster reef, seagrass, wetlands, etc. as much as possible
  - Ecosystem or habitat-oriented where feasible



PORT CORPUS CHRISTI®

Dredged Material Management Plan View



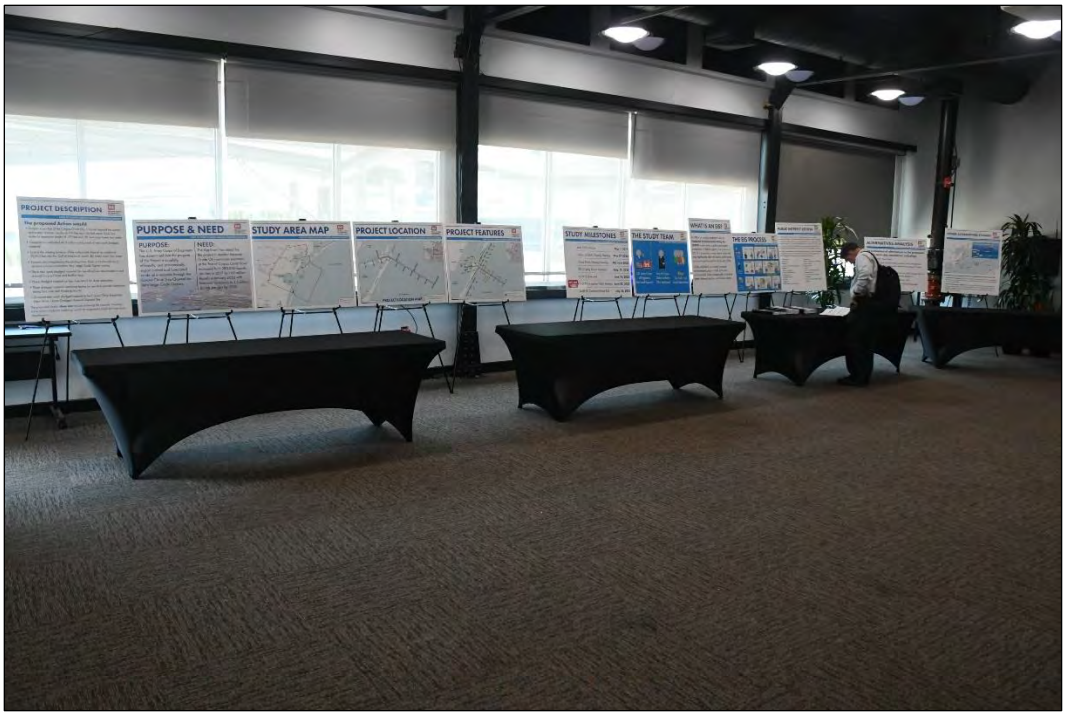
PORTCORPUSCHRISTI®

Thank You

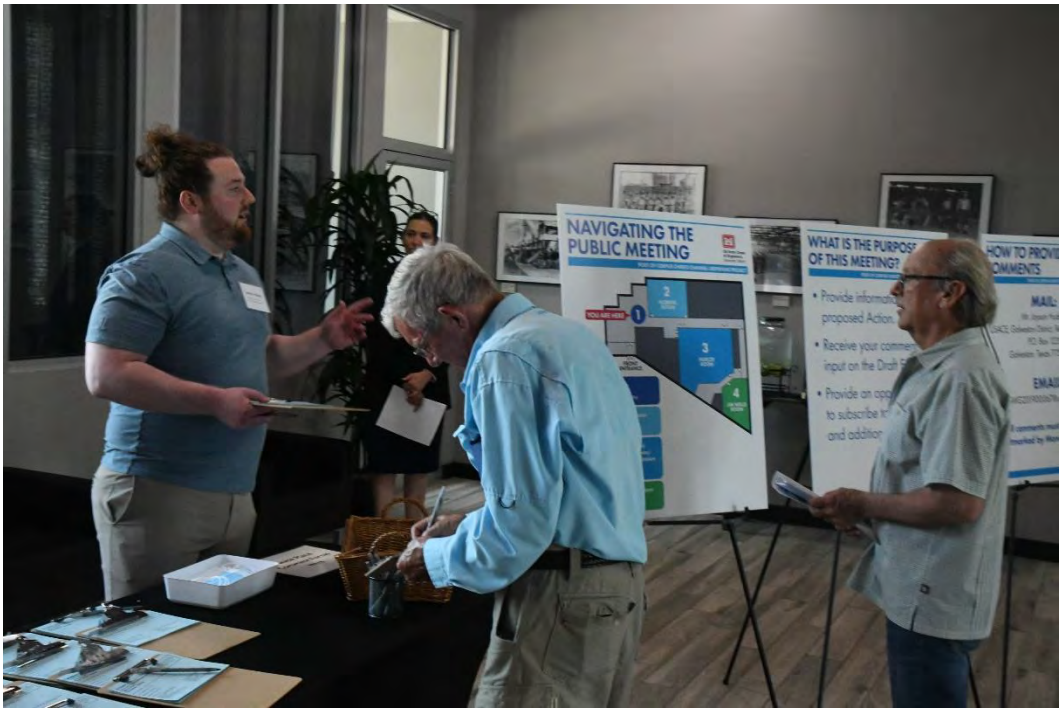
PORT CORPUS CHRISTI®

Appendix D

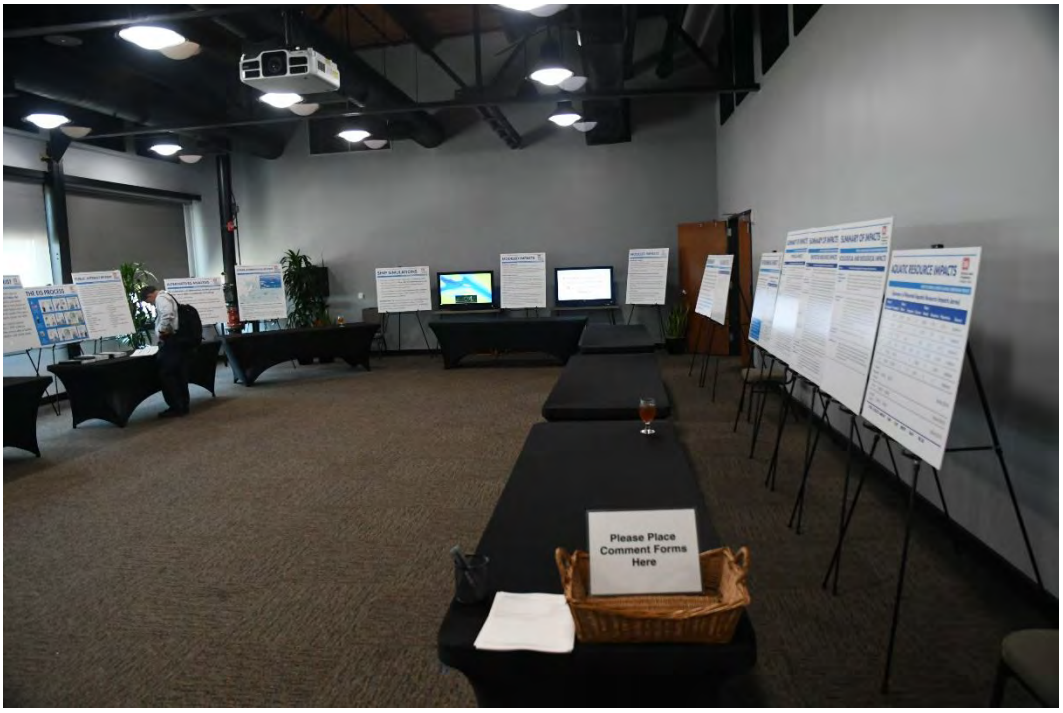
Public Meeting Photographs



A public meeting was held for the Port of Corpus Christi Authority Channel Deepening Project on June 22, 2022. The public meeting was held in a combined open house and town hall format.

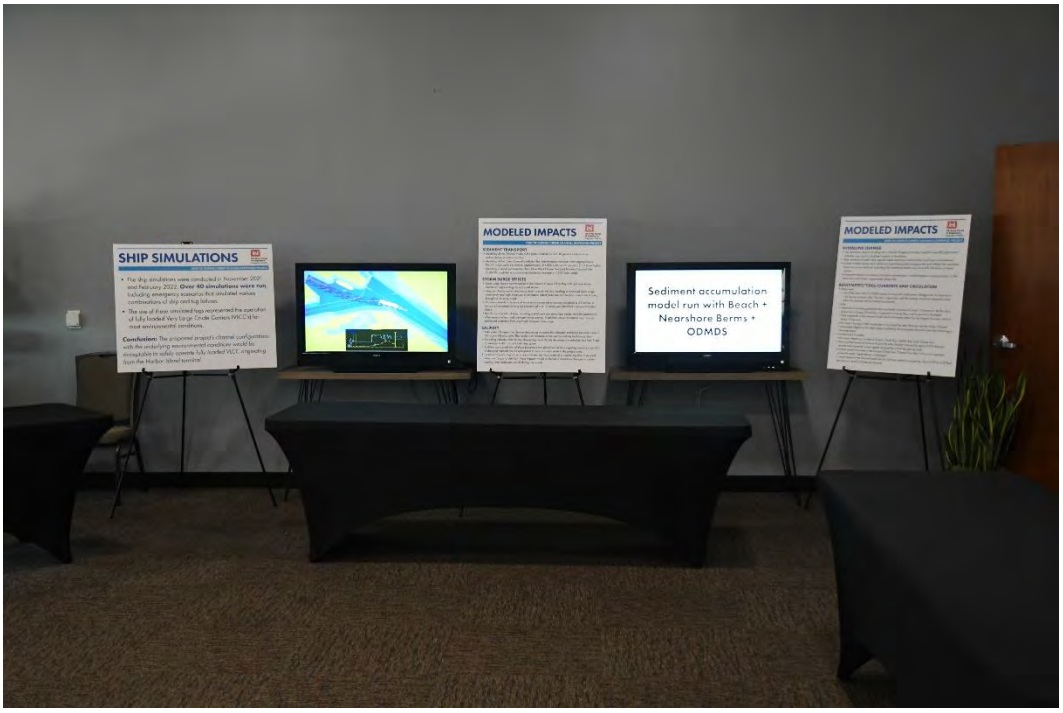


Upon arrival, attendees were asked to complete an attendee card and were provided with meeting materials including a project fact sheet, a “Navigating the Public Meeting” handout, and a comment form.



During the open house portion of the meeting, attendees were invited to view the informational display stations arranged around the meeting space. The informational display stations included information about the proposed Project, project Alternatives, and the EIS process

Attendees were encouraged to discuss the proposed Project with available project team representatives.



Attendees were also encouraged to view the ship simulation and modeled impact videos. These videos were played on a loop during the open house portion of the meeting.

At the conclusion of the open house, the U.S. Army Corps of Engineers (USACE), Galveston District provided an overview of the Draft EIS and information about the EIS process.

Following the USACE presentation, the Port of Corpus Christi Authority gave provided information about the proposed Project.

Following the formal presentations, attendees were provided the opportunity to offer verbal comments. Attendees wishing to provide verbal comments were required to sign up during meeting registration and were given three minutes to speak.

Appendix E

Comment Database

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
1	1	Freeman	Chet	[redacted]	5/25/22	Email	PC	NONE	Thanking USACE for Special Public Notice email.
2	1	McCune	Scott		5/25/22	Email	PC	DIRIMP	Concerned that the project has killed the spawning grounds for bait fish and that the mucky water over the flats kills fish and seagrass in protected areas.
2	2	McCune	Scott		5/25/22	Email	PC	SOCIO	Concerns about socioeconomic regulations on Speckled Trout from TPWD and CCA due to freeze damage (falsely) and that these fish are being choked by silt.
2	3	McCune	Scott		5/25/22	Email	PC	WAKE	Tugs churning water up water, damage from ships traveling at dangerous speeds with the prop wash on top of the dredge.
3	1	Rhem	Ben		5/25/22	Email	PC	NONE	Forwarding on the Special Public Notice email.
4	1	Fulton	Cathy		5/26/22	Email	PC	PUBMEET / OUT	Expressing concerns that the Public Meeting was not being held in Port Aransas and asking why is the meeting not being held in the community that will be impacted. Requested a change of venue to the Civic Center in Port Aransas.
5	1	King	Tammy		5/26/22	Email	PC	PUBMEET / OUT	Agrees with email from Cathy Fulton (May 26, 2022) on change of venue to the Civic Center in Port Aransas for the Public Meeting.
6	1	King	Tammy		5/26/22	Email	PC	PUBMEET / OUT	Agrees with email from Cathy Fulton (May 26, 2022) regarding a TCEQ meeting on air quality and about the location of the public meeting not supporting public participation.
7	1	Summerlin	Errol		5/27/22	Email	PC	NONE	Feels that people living in Port Aransas will be affected most by this project.
7	2	Summerlin	Errol		5/27/22	Email	PC	PUBMEET / OUT	Points out that the Applicant will proceed with building Harbor Island which will require constructing pipelines that go through Port Aransas and nearby communities, therefore expresses that two Public Meetings should be held, the one on June 22 and another one in Port Aransas; if only one Public Meeting is to be held then it should be conducted in Port Aransas.
8	1	Phelan	Chris		5/27/22	Email	PC	PUBMEET / OUT	Expressing concerns that the Public Meeting was not being held in Port Aransas. Requested a change of venue to Port Aransas.
9	1	Willhite	Paul		6/9/22	Email	PC	PUBMEET / OUT	Requests that the Public Meeting be moved to the Port Aransas Civic Center.
9	2	Willhite	Paul		6/9/22	Email	PC	P&N	The Ports plan to construct loading facilities at Harbor Island have fallen through as multiple investors have abandoned the project, therefore there is no need or customer support for this project.
9	3	Willhite	Paul		6/9/22	Email	PC	BUSITES	Port has not sufficiently studied where to dispose of the dredged material. Concerned about dredged material being used for beach nourishment that could spoil the beaches or the material being dumped in Ingleside like the 54-foot project and causing an eyesore.
9	4	Willhite	Paul		6/9/22	Email	PC	MITIG	Port has not done a sufficient study or proposed realistic mitigation for impacts to marine life.
10	1	Castillo	Elida		6/16/22	Email	PC	PUBMEET / OUT	Requested Spanish speakers at the public meeting.
11	1	Wysocki	Mark		6/15/22	Email	PC	PUBMEET / OUT	Expressing concerns that the Public Meeting was not being held in Port Aransas. Requested a change of venue to Port Aransas.
12	1	Loeb	Carol		6/17/22	Email	PC	PUBMEET / OUT	Expressing concerns that the Public Meeting was not being held in Port Aransas. Requested a change of venue to Port Aransas.
13	1	Robinson	Oscar		6/19/22	Email	PC	WAKE	Believes the larger ships will add to the already deterioration of the shoreline and sash our their property, therefore does not approve of the project.
14	1	Culpepper	Kay		6/20/22	Email	PC	PUBMEET / OUT	Expressing concerns that the Public Meeting was not being held in Port Aransas. Requested that any future Public Hearings be in Port Aransas.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
14	2	Culpepper	Kay	[redacted]	6/20/22	Email	PC	NOTSUP	Does not support the project being constructed.
14	3	Culpepper	Kay		6/20/22	Email	PC	DIRIMP	Concerned that the construction of the Harbor Island Marine Terminal and the channel deepening would completely change the ecosystem of the area. Specifically concerned about impacts to the Redfish Bay State Scientific Area and the Port Aransas Nature Preserve. Larger ships destroying seagrass by churning up sediments, impacts to larval fish, threatened and endangered species, birds, wetlands.
14	4	Culpepper	Kay		6/20/22	Email	PC	ANALY	Concerned that the increase in channel depth will dramatically change the water flow within the entire bay system and impact larval transport/migration.
14	5	Culpepper	Kay		6/20/22	Email	PC	STSURGE	Concerned the deepening would increase storm surge risks, as a greater volume of water would be moving into and out of the bays.
14	6	Culpepper	Kay		6/20/22	Email	PC	DIRIMP	Concerned about dredged material placement area impacts.
14	7	Culpepper	Kay		6/20/22	Email	PC	ALTS	Would like to see the project taken offshore.
15	1	Powers	Becky		6/20/22	Email	PC	NOTSUP	Does not support the project being constructed.
15	2	Powers	Becky		6/20/22	Email	PC	DIRIMP	Concerned that the project will be detrimental to the wetlands, water quality, conservation efforts (i.e. migration of birds), shoreline stabilization, fish, and wildlife.
15	3	Powers	Becky		6/20/22	Email	PC	SOCIO	Concerned the environmental impacts will negatively affect the economics (livelihood of people who live there) of the area.
16	1	Willhite	Christine		6/20/22	Email	PC	NOTSUP	Does not support the project being constructed.
16	2	Willhite	Christine		6/20/22	Email	PC	PUBMEET / OUT	Expressing concerns that the Public Meeting was not being held in Port Aransas. Requested a change of venue to Port Aransas.
16	3	Willhite	Christine		6/20/22	Email	PC	NONGEN	The Ports plan to construct loading facilities at Harbor Island have fallen through as multiple investors have abandoned the project, therefore there is no need or customer support for this project.
16	4	Willhite	Christine		6/20/22	Email	PC	BUSITES	Port has not sufficiently studied where to dispose of the dredged material. Concerned about dredged material being used for beach nourishment that could spoil the beaches or the material being dumped in Ingleside like the 54-foot project and causing an eyesore.
16	4	Willhite	Christine		6/20/22	Email	PC	BUSITES	Port has not sufficiently studied where to dispose of the dredged material. Concerned about dredged material being used for beach nourishment that could spoil the beaches or the material being dumped in Ingleside like the 54-foot project and causing an eyesore.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
16	5	Willhite	Christine	[redacted]	6/20/22	Email	PC	MITIG	Port has not done a sufficient study or proposed realistic mitigation for impacts to marine life.
17	1	Bennett	Craig		6/21/22	Email	PC	PUBMEET / OUT	Stating that 33 CFR 327.11(a) requires 30 days notice of a public hearing and the meeting on June 22 does not comply with the regulation. Requests another Public Meeting be scheduled and located in Port Aransas.
18	1	Chandler	Julia		6/21/22	Email	PC	DIRIMP	Concerned about the impacts to the environment .
19	1	Chandler	Julia		6/21/22	Email	PC	DIRIMP	Concerned about the impacts to the environment and the people.
20	1	Guenther	Valerie		6/21/22	Email	PC	NOTSUP	Does not support the project being constructed.
20	2	Guenther	Valerie		6/21/22	Email	PC	DIRIMP	Concerned that the project could have irreversible consequences.
20	3	Guenther	Valerie		6/21/22	Email	PC	ALTS	Should take the operation offshore.
21	1	Bonner	Caitlin		6/22/22	Email	PC	DIRIMP	Concerned about the ecological impacts the project will cause.
22	1	Brown	Noelle		6/22/22	Email	PC	DIRIMP	Concerned about the ecological damage the dredging will cause along the coast.
22	2	Brown	Noelle		6/22/22	Email	PC	DIRIMP	Concerned about the high probability of oil contamination to the region.
22	3	Brown	Noelle		6/22/22	Email	PC	NOTSUP	Does not support the project being constructed.
23	1	Masten	Kathryn		6/22/22	Email	PC	PUBMEET / OUT	Asking the USACE if a recording of the Public Meeting will be available as they are unable to attend.
24	1	Brown	Mercy		6/23/22	Email	PC	DIRIMP	Concerned about the ecological damage the dredging will cause along the coast.
24	2	Brown	Mercy		6/23/22	Email	PC	DIRIMP	Concerned about the high probability of oil contamination to the region.
24	3	Brown	Mercy		6/23/22	Email	PC	DIRIMP	Concerned that actions like this force forward climate collapse.
25	1	Welch	Matt		6/23/22	Email	NGO	SUPPORT	Registering support of the Port's efforts to expand their LNG capabilities and thanking the USACE for continuing to support the responsible growth of our energy infrastructure in the region.
26	1	Shaw	Bryan		6/22/22	Email	PC	SUPPORT	Supports the Port's effort to ensure continued growth and success.
27	1	Laskowski	Jack		6/25/22	Email	PC	NOTSUP	Does not support the project being constructed.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
27	2	Laskowski	Jack	[redacted]	6/25/22	Email	PC	DIRIMP	Concerned about the ecological damage the dredging will cause along the coast.
27	3	Laskowski	Jack		6/25/22	Email	PC	DIRIMP	Concerned about the toxic pollution and oil spills that will be dumped into the ocean.
28	1	Stuart	Brett		6/26/22	Email	PC	SUPPORT	Recognizes that dunes are eroding and would like to see the project done quickly to improve the dune and beach erosion would be a plus for the environment.
29	1	Trevino	Rafaell		6/26/22	Email	PC	DIRIMP	Concerned about the impact the project will have on animals and marine life in the bay and beaches.
29	2	Trevino	Rafaell		6/26/22	Email	PC	SOCIO	Concerned the project will negatively impact the fishing and tourist industry.
29	3	Trevino	Rafaell		6/26/22	Email	PC	DREDMAT	Concerned that the large dredged material mounts with toxic dredge spoil will impact animals and marine life and find its way into the food and water supply.
29	4	Trevino	Rafaell		6/26/22	Email	PC	NOTAPP	Water system infrastructure needs to be updated to improve water quality in our country.
30	1	Bass	Ellen		6/28/22	Email	PC	DIRIMP	Does not feel the Port has studied the long term impact of a deeper channel.
30	2	Bass	Ellen		6/28/22	Email	PC	WAKE	Does not feel the Port has studied the long term impact of what larger vessels will do to deteriorate the shoreline along the ship channel. Questions if the USACE has studies this impact.
30	3	Bass	Ellen		6/28/22	Email	PC	BUSITES	Concerned about the possibility of littering the shoreline with dredge spoil.
30	3	Bass	Ellen		6/28/22	Email	PC	BUSITES	Concerned about the possibility of littering the shoreline with dredge spoil.
30	4	Bass	Ellen		6/28/22	Email	PC	SOCIO	Concerned about the long term impact on the tourism industry.
31	1	Masten	Kathryn		6/29/22	Email	PC	PUBMEET / OUT	Request a 3 month extension to review the DEIS due to the length and complexity of the DEIS and the delayed fulfillment of the public information request submitted to the Applicant. Commenter submitted a Public Information Request to the Applicant on June 9 for specific studies that they did not receive. Copy of the request attached to comment letter.
32	1	Flucke	Alex		6/30/22	Email	PC	NOTSUP	Does not support the project being constructed.
32	2	Flucke	Alex		6/30/22	Email	PC	ALTS	Believes that the best option is the No-Action Alternative.
33	1	Hart	Jeffery		6/30/22	Email	PC	DIRIMP	The DEIS does not address all of the environmental impacts from facilities needed to carry out this project's stated purpose and without a proper listing and examination of all adverse impacts, a valid comparison of this project to other alternatives cannot be done.
33	2	Hart	Jeffery		6/30/22	Email	PC	P&N	To accomplish the stated purpose, the CDP is designed to serve the Harbor Island terminal which currently does not exist and is problematic and highly controversial having substantial adverse environmental impacts. The Port's CDP alone cannot accomplish its stated purpose. The CDP and the Harbor Island Terminal are completely interdependent parts of a singular project. And a third project also needs to be completed, Axis Midstream. A complete DEIS, that includes all three projects, must be prepared as required by NEPA.
33	3	Hart	Jeffery		6/30/22	Email	PC	CUMUL	The DEIS does not include many of the environmental impacts the complete VLCC project (all 3 project considered together) will cause.
33	4	Hart	Jeffery		6/30/22	Email	PC	CUMUL	The DEIS lacks substantive discussion of cumulative impacts from a complete VLCC project (all 3 project considered together).
33	5	Hart	Jeffery		6/30/22	Email	PC	CUMUL	Some of the impacts from the interdependent parts of the VLCC project are not just additive but magnified when considered together (i.e. increased risk to navigation and public use of the waters in the vicinity of Harbor Island).
33	6	Hart	Jeffery		6/30/22	Email	PC	P&N	The DEIS should be supplemented to include and properly address all of the impacts from the complete VLCC project.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
34	1	King	James	[redacted]	7/6/22	Email	PC	P&N	The two VLCC terminals on either side of the ferry are absent from any of the DEIS analysis.
34	2	King	James		7/6/22	Email	PC	BUSITES	Concerns about the dredged material being placed on one of the most popular beaches in Texas. Does not support any placement on beaches, dunes, or offshore.
34	2	King	James		7/6/22	Email	PC	BUSITES	Concerns about the dredged material being placed on one of the most popular beaches in Texas. Does not support any placement on beaches, dunes, or offshore.
35	1	King	James		7/6/22	Email	PC	ALTS	Believes the USACE is determining alternatives without any actual knowledge of crude oil management and availability to the Corpus Christi area currently or in the future. Uses Alternative 2 an example and states that the crude oil terminals in the Inner Harbor and at various existing facilities will not allow for 4.5 million barrels per day to be available to the Port. This number, provided by the Port, is not realistic and too high. The alternatives analysis lacks any real connection to reality and there is no terminal designed and no inclusion of that facility in the DEIS that makes it not follow Federal laws.
35	2	King	James		7/6/22	Email	PC	ALTS	Alternative 3 has no connection with crude oil management. Need to include industry and other sources outside what the Port says as you are designing false alternatives that are not based in reality.
35	3	King	James		7/6/22	Email	PC	CUMUL	Add some science that came out of the desal contested case on Harbor Island.
36	1	Sohl	Walter		7/6/22	Email	PC	NOTSUP	Does not support the project being constructed.
37	1	Stuck	Cindy		7/6/22	Email	PC	BUSITES	Concerned with the proposed dredged material placement on the beach. Believes this will not work with the Coastal Management Plan used by the city. Will the material be sandy or clay?
37	1	Stuck	Cindy		7/6/22	Email	PC	BUSITES	Concerned with the proposed dredged material placement on the beach. Believes this will not work with the Coastal Management Plan used by the city. Will the material be sandy or clay?
37	2	Stuck	Cindy		7/6/22	Email	PC	BUSITES	Would like to know what the green areas on the figure (figure showing the proposed placement areas) are. Concerned that the proposed dredging plan is going to impact the beaches.
38	1	Bass	Sid		7/8/22	Email	PC	ALTS	Wants the VLCC loaded offshore and not dredging the ship channel.
39	1	Brown	Tosh		7/8/22	Email	PC	NOTSUP	Does not support the project being constructed.
40	1	Hill	Gerald		7/8/22	Email	PC	NOTSUP	Does not support the project being constructed.
41	1	Pena	Dara		7/8/22	Email	PC	BUSITES	Does not want dredged material being placed on the beaches.
41	1	Pena	Dara		7/8/22	Email	PC	BUSITES	Does not want dredged material being placed on the beaches.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
42	1	Schlabach	Cliff	[redacted]	7/8/22	Email	PC	ALTS	Wants the Port to accomplish the loading of VLCC's offshore and not by deepening the channel. Deny the permit.
43	1	Tarkington	Eddie		7/8/22	Email	PC	NOTSUP	Does not support the project being constructed.
43	2	Tarkington	Eddie		7/8/22	Email	PC	DIRIMP	Concerned about the environmental impacts.
44	1	Halloran	Maria		7/9/22	Email	PC	DREDMAT	Concerned about toxic dredged material being placed in Mustang and San Jose islands.
44	1	Halloran	Maria		7/9/22	Email	PC	DREDMAT	Concerned about toxic dredged material being placed in Mustang and San Jose islands.
44	2	Halloran	Maria		7/9/22	Email	PC	DIRIMP	Concerned that the project would have significant implications for the environment considering the proximity to Redfish Bay, increasing the risks of oil spills, air pollution, flooding, storm surge, silting of seagrass and endangering wildlife surrounding it.
44	3	Halloran	Maria		7/9/22	Email	PC	NOTSUP	Does not support the project being constructed and instead support clean energy, renewable energy, and energy efficiency measures.
45	1	Hodges	Laurie		7/10/22	Email	PC	NOTSUP	Does not support the project being constructed.
45	2	Hodges	Laurie		7/10/22	Email	PC	DREDMAT	Concerned about placing dredged materials on the beach and how that may harm the coastline.
45	2	Hodges	Laurie		7/10/22	Email	PC	DREDMAT	Concerned about placing dredged materials on the beach and how that may harm the coastline.
46	1	McAllister	Taddy		7/10/22	Email	PC	GEN	There is no way you will dig the ship channel to 80 feet and make it stay dredged.
46	2	McAllister	Taddy		7/10/22	Email	PC	BUSITES	People do not want dredged spoil on San Jose and Mustang islands. Do not want the material offshore either as it will end up back on the beach.
46	2	McAllister	Taddy		7/10/22	Email	PC	BUSITES	People do not want dredged spoil on San Jose and Mustang islands. Do not want the material offshore either as it will end up back on the beach.
46	3	McAllister	Taddy		7/10/22	Email	PC	DIRIMP	Concerns as to what dredged material offshore would do to marine life.
46	4	McAllister	Taddy		7/10/22	Email	PC	NOTSUP	Does not support the project being constructed.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
46	5	McAllister	Taddy	[redacted]	7/10/22	Email	PC	ALTS	An offshore monobouy would solve the Port's wish to expand by exporting more oil.
47	1	Moore	Myfe		7/10/22	Email	PC	NOTSUP	Does not support the project being constructed.
48	1	Fulton	Cathy		7/11/22	Email	PC	PUBMEET / OUT	Requesting a 45 day extension for the comment period on the DEIS.
48	2	Fulton	Cathy		7/11/22	Email	PC	NONGEN	The USACE is not reviewing the information the Port submitted. The DEIS needs to be peer reviewed.
48	3	Fulton	Cathy		7/11/22	Email	PC	SOCIO	The socioeconomics section is based on data no associated with Port Aransas or Nueces County, but for Aransas Pass and surrounding areas.
48	4	Fulton	Cathy		7/11/22	Email	PC	PUBMEET / OUT	Requests the Public Meeting be held in Port Aransas.
49	1	Stockton	Rick		7/11/22	Email	PC	P&N	Request that the Channel Deepening project, file number SWG-2019-00067, the Axis Midstream Terminal project, file number SWG-2018-00789, the PCCA Desalination Plant project, TCEQ Permit No. WQ0005253000, Lone Star Ports Air Quality Permit project. SOAH Docket no, 582-20-3438, and the Harbor Island Terminal Facility project, file number SWG-2019- 00245 all be considered as one big environmental problem.
49	2	Stockton	Rick		7/11/22	Email	PC	DIRIMP	Concerned about the environmental impacts (threatened and endangered species, water quality, wetlands) the project would cause and that the reports from Triton state that there are unavoidable impacts.
49	3	Stockton	Rick		7/11/22	Email	PC	ALTS	Consider Alternative 2 to avoid the negative impacts the proposed project will have.
49	4	Stockton	Rick		7/11/22	Email	PC	DIRIMP	The proposed laying of pipeline (big 48”) across the ICW and Red Fish bay will impact the seagrass vegetation, the thousands of living organisms, including the endangered species, for decades to come. It will also ruin recreational fishing for decades to come.
49	5	Stockton	Rick		7/11/22	Email	PC	DREDMAT	The dredging and the contaminants will disrupt/destroy the life cycles of numerous marine life that use the waterway to maintain their species survival.
49	5	Stockton	Rick		7/11/22	Email	PC	DREDMAT	The dredging and the contaminants will disrupt/destroy the life cycles of numerous marine life that use the waterway to maintain their species survival.
49	6	Stockton	Rick		7/11/22	Email	PC	DREDMAT	The dredge materials from the bay, Harbor Island and the Channel will spread contaminated materials to other wetlands and beaches.
49	6	Stockton	Rick		7/11/22	Email	PC	DREDMAT	The dredge materials from the bay, Harbor Island and the Channel will spread contaminated materials to other wetlands and beaches.
49	7	Stockton	Rick		7/11/22	Email	PC	DIRIMP	The proposed VLCC vessels will be huge in the small area around Harbor Island and Port Aransas. The noise, lights, and congestion will affect all residents and visitors to Port Aransas.
49	8	Stockton	Rick		7/11/22	Email	PC	FERRY	These VLCC vessels will displace a gigantic amount of water in the small area around Port Aransas. The effect on the ferry system will be devastating, yet no one has talked about it.
49	9	Stockton	Rick		7/11/22	Email	PC	FERRY	These giant LVCC vessels, according to Appendix K: Ship Simulation, will take up so much room that recreational boating will be dangerous and the Ferry system will be halted causing tremendous backups.
49	10	Stockton	Rick		7/11/22	Email	PC	DIRIMP	The dredging itself, will pose a threat to the wetlands, bays and the whole marine ecosystem.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
49	11	Stockton	Rick	[redacted]	7/11/22	Email	PC	CUMUL	Axis Midstream Terminal project, Lone Star Ports project, and the Harbor Island Terminal Facility project, if allowed, will destroy Port Aransas tourism with noxious odors, and harmful polluting gases.
50	1	Waycuilis	John		7/11/22	Email	PC	NOTSUP	Does not support the project being constructed.
50	2	Waycuilis	John		7/11/22	Email	PC	DIRIMP	The effects on the Port Aransas and Mustang Island marine environment will be significantly negative due to the likely resulting increase in turbidity of bay side waters, and the deposition of spoils (containing organic matter-containing sediments) off of our beaches.
50	3	Waycuilis	John		7/11/22	Email	PC	SOCIO	This project will have a disproportionately negative and long-term impact on the Port Aransas & Mustang Island businesses and communities with little to no compensating factors. Tourism, fishing and environmental preservation are sustainable and a huge asset to individuals and families in Texas and beyond.
51	1	Bauer	Hanna		7/13/22	Email	PC	NOTSUP	Does not support the project being constructed.
51	2	Bauer	Hanna		7/13/22	Email	PC	ALTS	Supports the offshore alternatives.
52	1	Clayton	Tony		7/13/22	Email	PC	NOTSUP	Does not support the project being constructed.
52	2	Clayton	Tony		7/13/22	Email	PC	ALTS	Supports the offshore alternatives.
53	1	Clayton	Traci		7/13/22	Email	PC	NOTSUP	Does not support the project being constructed.
53	2	Clayton	Traci		7/13/22	Email	PC	ALTS	Supports the offshore alternatives.
54	1	Fulton	Cathy		7/13/22	Email	PC	PUBMEET / OUT	Does not feel that 45 days to review the DEIS is enough.
54	2	Fulton	Cathy		7/13/22	Email	PC	NONGEN	Port is continuing to deceive the public by hiding studies that must be included to make the application complete.
54	3	Fulton	Cathy		7/13/22	Email	PC	NONGEN	The DEIS should be withdrawn, finished and released again for a real public review and not worry about FAST41 timelines and hiding important information.
55	1	Howell	Helen		7/13/22	Email	PC	DIRIMP	Concerned about the ecosystem around Port Aransas and Gulf of Mexico and that we have to pay attention to the scientific data, i.e. that plankton produce 50% of oxygen on Earth and global warming destroying the ocean.
56	1	Watkins	Dan		7/13/22	Email	PC	NOTSUP	Does not support the project being constructed as does not want the damage to the beaches or economy.
57	1	Clayton	Kari		7/14/22	Email	PC	BUSITES	Opposed to having dredged material placed offshore and along beaches in Port Aransas.
57	1	Clayton	Kari		7/14/22	Email	PC	BUSITES	Opposed to having dredged material placed offshore and along beaches in Port Aransas.
57	2	Clayton	Kari		7/14/22	Email	PC	ALTS	Supports the offshore mooring alternative.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
58	1	Cutrer	Betsie	[redacted]	7/14/22	Email	PC	DIRIMP	Dredging will ruin Port Aransas, creating a greater risk for spills and toxic pollution that will kill marine life and endanger people.
59	1	Dailey	Lucia		7/14/22	Email	PC	PUBMEET / OUT	Requesting a 90 day extension for the comment period on the DEIS to allow the public to adequately review the DEIS.
59	2	Dailey	Lucia		7/14/22	Email	PC	PUBMEET / OUT	Requesting in-person Public Meeting be held in the communities that would be most impacted by the project as the only one so far was at a location difficult for most residents to participate.
60	1	Ice	Lauren		7/14/22	Email	NGO	ANALY	Several of the appendices do not include a complete analysis: Appendix F (Cultural Resources), Appendix J (analysis of Dredged Material, and Appendix N (404(b)(1) analysis). Without completed analysis it is premature to ask the public to submit complete comments on the DEIS. The community should be adored an opportunity to review the complete appendices before having to form their comments.
60	2	Ice	Lauren		7/14/22	Email	NGO	PUBMEET / OUT	Documents that were relied on and referenced in the DEIS have not been made available to the public, despite an open records request to the Port. The public must have access to these documents, to determine whether the Draft EIS is based on reliable and credible data.
60	3	Ice	Lauren		7/14/22	Email	NGO	PUBMEET / OUT	The location of the June 22 Public Meeting was not convenient for those most likely impacted by the project. Robust community engagement requires convening more than one public meeting, at more than one location. An extension of the comment deadline would allow the Port and the USACE to engage in the type of robust community discussion that is necessary and desired by the community.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
60	4	Ice	Lauren	[redacted]	7/14/22	Email	NGO	PUBMEET / OUT	Request that the deadline to submit comments on the DEIS be extended 60 days from the date which the draft appendices are completed, and all referenced documents are made available to the public.
60	5	Ice	Lauren		7/14/22	Email	NGO	PUBMEET / OUT	Requests that the USACE hold additional public meetings during the extended comment deadline to reach the impacted communities in San Patricio, Nueces, and Aransas counties.
61	1	Moore	Jane		7/14/22	Email	PC	FERRY	Concerned that the VLCCs will disrupt the flow of ferry traffic can cause extended ferry waits and harm the safety of residents and tourists getting off the island in the event of an emergency.
62	1	Serna	Ana Patricia		7/14/22	Email	PC	PUBMEET / OUT	Impossible to read the DEIS in such a short period of time.
63	1	Wysocki	Mark		7/14/22	Email	PC	T&E	The endangered turtle population in the subject section of the ship channel will be decimated. The turtles are just starting to recover from the jetty repairs completed after hurricane Harvey. How many other sensitive or endangered species will be impacted by the initial and future maintenance dredging?
63	2	Wysocki	Mark		7/14/22	Email	PC	BUSITES	Following the last channel deepening project, clay was washing up on beach in Port Aransas as the spoil was dumped off shore. We are facing a lot more volume with this project, and more likely to encounter clay given the increased depth of dredging. We do not want that on our beaches.
63	2	Wysocki	Mark		7/14/22	Email	PC	BUSITES	Following the last channel deepening project, clay was washing up on beach in Port Aransas as the spoil was dumped off shore. We are facing a lot more volume with this project, and more likely to encounter clay given the increased depth of dredging. We do not want that on our beaches.
63	3	Wysocki	Mark		7/14/22	Email	PC	NAV	Concerned that turning around VLCCs on either side of the Ferry would cause additional marine traffic congestion.
63	4	Wysocki	Mark		7/14/22	Email	PC	STSURGE	Storm Surge is going to increase at Port Aransas as a result of deepening the channel, and also in the Bay. We should not compound that problem.
63	5	Wysocki	Mark		7/14/22	Email	PC	ALTS	There are more appropriate alternatives, i.e. offshore.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
64	1	Wysocki	Mark	[redacted]	7/14/22	Email	PC	PUBMEET / OUT	Would like the USACE to consider holding another meeting in Port Aransas where the citizens most directly impacted live.
65	1	Dailey	William		7/15/22	Email	PC	PUBMEET / OUT	Would like the public comment period extended for an additional 90 days.
66	1	Kollaja	Mallory		7/16/22	Email	PC	PUBMEET / OUT	Requesting an extension of the public comment period.
66	2	Kollaja	Mallory		7/16/22	Email	PC	PUBMEET / OUT	Requesting a public meeting be held in Port Aransas.
66	3	Kollaja	Mallory		7/16/22	Email	PC	SOCIO	DEIS Chapter 3, page 98 and 100, places Port Aransas in Aransas County, when it is located in Nueces County.
67	1	Serna	Encarnacion		7/16/22	Email	PC	NONE	Supporting the comments provided by Cathy Fulton in an email dated July 14, 2022, 4:48 PM.
68	1	Ehmann	Jo Ann		7/17/22	Email	PC	NOTSUP	Does not support the project being constructed.
68	2	Ehmann	Jo Ann		7/17/22	Email	PC	ALTS	The transporting and loading can be handled offshore without the various hazards and problems that will arise in the Port Aransas area.
68	3	Ehmann	Jo Ann		7/17/22	Email	PC	NAV	The project will further congest the area and impede normal ship and road traffic in the area of the ferry.
68	4	Ehmann	Jo Ann		7/17/22	Email	PC	SOCIO	Feels the citizens and visitors will be impacted, i.e. tourism, water recreation. These could be adversely impacted causing financial impact to many local communities.
68	5	Ehmann	Jo Ann		7/17/22	Email	PC	DIRIMP	The environmental impacts would be significant with the increased large ships berthing in the immediate area of the main ship channel entrance and the time to load the ships and get them in and out of the proposed docks.
68	6	Ehmann	Jo Ann		7/17/22	Email	PC	WAKE	With the tidal impacts of the movement of water and the additional movement caused by the increased ship traffic in and around the channel entrance would be a negative to the region.
68	7	Ehmann	Jo Ann		7/17/22	Email	PC	BUSITES	Where is all the dredge to be place. It is a problem in most areas now, the constant dredging to keep the channel to the depth is now in most areas. There is only so much dredge placement area available.
69	1	Fulton	Cathy		7/14/22	Email	PC	PUBMEET / OUT	Inquiring where all the previously submitted comments on the project are and asking why the USACE is not disclosing those comments. The DEIS is again incomplete.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
69	2	Fulton	Cathy	[redacted]	7/14/22	Email	PC	PUBMEET / OUT	Would like to know why none of the previous comments are addressed in the DEIS.
69	3	Fulton	Cathy		7/14/22	Email	PC	BUSITES	Concerned that the USACE is glossing over all the concerns about dredged material placement claiming the "beneficial dredged" placement will make all of the long-term impacts go away.
69	4	Fulton	Cathy		7/14/22	Email	PC	BUSITES	Does not want dredged material being placed on the beaches or offshore.
69	4	Fulton	Cathy		7/14/22	Email	PC	BUSITES	Does not want dredged material being placed on the beaches or offshore.
70	1	King	James		7/14/22	Email	PC	P&N	With no new pipeline projects capable of bringing crude oil to Corpus Christi having been announced, proposed, or in any stage of permitting how does the 4.5MM bpd export estimate become achievable when current pipeline capacity is 2.4MM bpd? The Port is proposing that POCCA exports could grow to 4.5MM bpd in 2030 from 1.63MM bpd in 2021. Current pipeline capacity to POCCA is 2.4MM bbls so they are saying 2 new (1MM bpd) pipelines would get 4.5MM bbls to Corpus by then? Also what about the other Industries share in Inner Port, Ingleside, and Blue Water. It is a false premise to consider 4.5 bpd. Undermines the entire Permit and EIS.
70	2	King	James		7/14/22	Email	PC	ALTS	Alternative 3 (2.4.1) states that some inshore berthing would be required at Harbor Island and Ingleside to partially fill VLCC which would then go to the offshore SPM to fully load. The question is if the VLCC could fully load at the SPM why would it make the trip in shore to partially load at Harbor Island or Ingleside?
70	3	King	James		7/14/22	Email	PC	P&N	Why is the Harbor Island Terminal not included in the study nor the pipelines that would be required to supply the oil?
70	4	King	James		7/14/22	Email	PC	ALTS	Why is there not an alternative that reflects the current capabilities of the Port and an incremental SPM project for the potential production growth?
71	1	Loring	Lynn		7/17/22	Email	PC	PUBMEET / OUT	Residents and visitors to Port Aransas have not been provided information about the project.
71	2	Loring	Lynn		7/17/22	Email	PC	DIRIMP	Concerned the project will destroy the ecosystem and placement of dredged material clouding the water.
71	3	Loring	Lynn		7/17/22	Email	PC	FERRY	Concerned about the ferry operation and delays that would occur and how that will impact many workers that depend on the ferry to get to and from work. Also visitors coming to Port Aransas having to wait even longer to get to the island.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
72	1	Walton	Shelia	[redacted]	7/17/22	Email	PC	FERRY	Concerned about the ferry delay for berthing and unberthing and how that will impacts tourists and locals.
72	2	Walton	Shelia		7/17/22	Email	PC	WAKE	The following comments are regarding Appendix H (Vessel Wake Analysis) of the DEIS: Executive Summary: What is low speed and who will enforce the low speed?
72	3	Walton	Shelia		7/17/22	Email	PC	WAKE	Executive Summary: Rapid drawdown can create strong currents in harbor inlets.
72	4	Walton	Shelia		7/17/22	Email	PC	NAV	Executive Summary: The traffic numbers would change (increase) due to "the planned Axis and Harbor Island terminals" are not yet built. Where are these ships currently going? So it will increase ship traffic not decrease or no change.
72	5	Walton	Shelia		7/17/22	Email	PC	WAKE	Executive Summary: What are the localized changes? What is considered "not significant"?
72	6	Walton	Shelia		7/17/22	Email	PC	GEN	Executive Summary: The sediment that is displaced must go somewhere. Is segments 4,5 and 6 on Figure 1.1 page 1 not part of the federal navigation channel?
72	7	Walton	Shelia		7/17/22	Email	PC	WAKE	Page 3, Figure 1.3 Primary Waves Illustrations: Their small scale illustrations is showing wave breaking at the shoreline. Most of the primary waves break prior to shoreline which produces a lot of energy when hitting the shoreline.
72	8	Walton	Shelia		7/17/22	Email	PC	WAKE	Page 5, Funwave Numerical Model: Per USACE: FUNWAVE is the fully nonlinear Boussinesq-type phase resolving numerical wave model capable of solving complex nearshore wave induced coastal processes within intermediate and shallow water regimes. What is nearshore? What depth is intermediate and shallow?
72	9	Walton	Shelia		7/17/22	Email	PC	WAKE	Page 5, Capping Water Depth for Modeling: Funwave cannot model anything >50ft deep. Using a 15ft depth cap for secondary wave action when the water in that area is >45ft. How can the modeling give a realistic representation.
72	10	Walton	Shelia		7/17/22	Email	PC	WAKE	Page 6, XBeach Modeling Illustration: The illustration only shows 8 profiles not 9. What will the ship hydrodynamic effects be on ships docked and loading pipe connectors at Enbridge? Motion caused by primary and secondary waves over time can weaken the connectors/pipes. We have seen secondary waves turn from one ship turn another sideways. If Enbridge can feel effects of the hydrodynamics, it would stand to reason that IOB shoreline will also feel these effects.
72	11	Walton	Shelia		7/17/22	Email	PC	WAKE	Page 8, Vessel Dimensions for Modeling: Supposedly the VLCC that will be using this deeper channel will have a draft of 68ft. The modeling that they are using is for VLCC with a draft of 52ft thereby minimizing the vessel hydrodynamics effects. The report is saying that "at times" the smaller VLCC draft is used to due to channel being shallow when in fact the channel will be deeper
72	12	Walton	Shelia		7/17/22	Email	PC	WAKE	Page 11, Pilot Workshop: Pilots saying outbound transit speed of 10.5 knots unrealistic. Baird capped the mean at 8.1 and used that for wake analysis. VLCC come out of POCC at times >11 knots.
72	13	Walton	Shelia		7/17/22	Email	PC	WAKE	Page 12, Primary Wave Estimate: 8 knots (capped speed) will have waves a little over a foot. 12 knots (data from AIS) was actually used in the table verifying that the ships do go faster than 8 knots and can produce primary waves anywhere from 4-5 feet which can cause damage to property/boats, people by either drawing it in or the wave energy that is produced
72	14	Walton	Shelia		7/17/22	Email	PC	WAKE	Page 13, Secondary Wave Estimate: 1-2 ft waves will have an impact on smaller recreational vessels and will also generate a force when hitting the shoreline.
72	15	Walton	Shelia		7/17/22	Email	PC	WAKE	Page 19, Annualized Bed Change: Pelican Island will have erosion even with armoring and is localized. The primary and secondary waves will create erosion to all shorelines not just Pelican Island since the VLCC will be traveling the full channel.
72	16	Walton	Shelia		7/17/22	Email	PC	WAKE	Page 19, Annualized Bed Change: Stronger primary and secondary waves will put more force on the seagrass. Uprooting or killing the grass due to turbidity
72	17	Walton	Shelia		7/17/22	Email	PC	WAKE	Page 25, Annual Shoreline Change Estimates: Unrealistic how 6 extra VLCC transits will not have effect on shoreline.
72	18	Walton	Shelia		7/17/22	Email	PC	WAKE	Page 26, Annual Shoreline Change Illustration 6.3: FWOP not showing on any graphs.
72	19	Walton	Shelia		7/17/22	Email	PC	WAKE	Page 27, Conclusions: The conclusion states "As a result, the primary wave is the predominant driver for bed and shoreline change." But section 6.3 phrased it as "Differences in he shoreline change estimates for the FWOP and FWP scenarios are negligible with no observable difference in the annual result". Contradicting bed/shoreline change to negligible change. EIS p244 vol 1 Alternative 1 However, larger vessels like VLCCs going through the CCSC would produce larger wakes, which could degrade shoreline Critical Habitat for Piping Plover. However, vessel wake analysis conducted 4.0 ENVIRONMENTAL CONSEQUENCES (*NEPA REQUIRED) 4-63 by Baird (2022b; Appendix H) indicate that the CDP would have minimal impacts to the shorelines along the CCSC. contradicting

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
72	20	Walton	Shelia	[redacted]	7/17/22	Email	PC	WAKE	Page 27, Conclusions: Phrased as "A general recession trend is observed in analysis of historical shoreline positions and the annual shoreline change modeling, and no discernable increase in the recessional trend as a result of the project could be identified" The "trend" is also relevant to erosion not caused naturally. EIS p241-242 vol1 Alternative 1 Larger vessels such as VLCCs going through the CCSC with their tugboats may affect shoreline erosion and degrade or reduce the amount of shoreline for use by birds and terrestrial wildlife. However, vessel wake analysis conducted by Baird (2022b; Appendix H) indicate that the CDP would have minimal impacts to the shorelines along the CCSC...conflicting
73	1	Englishbee	Jenessa		7/18/22	Email	PC	ALTS	Urges the Port to protect Port Aransas by supporting clean and renewable energy, and energy efficiency measures, instead of harming our environment by aiding the deepening of the Corpus Christi Ship Channel.
74	1	Fleer	Laurene		7/18/22	Email	NGO	PUBMEET / OUT	Requesting copies of three reports: Montgomery and Bourne (2018); EPA/USACE (2008 and 2018).
75	1	Fulton	Cathy		7/14/22	Email	PC	NONE	We are handing out a 1-page flyer. I gave some to Dan and am copying more. I have sent in 5 letters thus far. Today is a big letter, the joke of the reverse-lightering claims.
76	1	Fulton	Cathy		7/14/22	Email	PC	ANALY	Commenter provides a figure from Volume III of the DEIS page 927 (Ship Simulation Report), adding a number of landmarks that will be impacted by the project. Adding that this figure is incorrect and missing information.
76	2	Fulton	Cathy		7/14/22	Email	PC	FERRY	Expressing concerns about the ferry and how the project will impact ferry operations. Concerned that the workforce taking the ferry to and from work will be impacted. Concerned tourists coming for summer will have extremely long wait times.
76	3	Fulton	Cathy		7/14/22	Email	PC	NONGEN	The DEIS is not complete and should be withdrawn, corrected, and peer reviewed before a decision can be made.
77	1	Harper	Cecilia		7/18/22	Email	PC	DIRIMP	Concerned about the environmental impacts this project could have with the placement of dredged material and how this will adversely affect the balance of wildlife in the area.
77	2	Harper	Cecilia		7/18/22	Email	PC	ALTS	Load the VLCC's offshore, this is safer.
78	1	Jordan	Makya		7/18/22	Email	PC	DIRIMP	Concerned about the environmental impacts the project will have on wildlife and people who live on the coast.
79	1	King	James		7/18/22	Email	PC	NONE	Commenting on an email from Cathy Fulton (re: DEIS and the ferry system) that her letter was good and that people can comment as much as they want.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
80	1	King	Tammy	[redacted]	7/18/22	Email	PC	NONE	Commenting on an email from Cathy Fulton (re: DEIS and the ferry system) that her letter was good.
81	1	Middlebrooks	Jordyn		7/18/22	Email	PC	NOTSUP	Asking elected officials to withdraw support for the project and support renewable energy and energy efficiency measures instead.
81	2	Middlebrooks	Jordyn		7/18/22	Email	PC	DIRIMP	Concerned about the potential to dredge toxic waste and place it on Mustand Island and St Joe's beaches causing harm for the environment and people who live there. This would increase the risk and realistically the amount of oil spills, air pollution, flooding, and storm surge, putting the safety of our communities, animals, and ecosystems at risk.
81	3	Middlebrooks	Jordyn		7/18/22	Email	PC	PUBMEET / OUT	Historically, there has been a violation of the rights of Indigenous people, particularly, the Karankawa people who have sacred artifacts and land in "Corpus Christi". Land developments, such as the Enbridge infrastructure expansion, violate the rights of the Karankawa people and harm both the land & ocean due to the toxicity of manufacturing & creating energy through fossil fuels. I am asking that you also ask for informed consent from the Indigenous People of the Coastal Bend such as the Karankawa people.
82	1	Moore	Jane		7/18/22	Email	PC	NOTSUP	Does not support the project being constructed.
82	2	Moore	Jane		7/18/22	Email	PC	DIRIMP	Concerned the dredging will create hazards to the local beaches, bays and marine life.
83	1	Fulton	Cathy		7/19/22	Email	PC	NOTSUP	Sending a blurb that sent via email and social media about the project and lack of concern and bias against the public.
83	2	Fulton	Cathy		7/19/22	Email	PC	PUBMEET / OUT	Expressing concern that the USACE only extended the public comment period 18 days not because the public requested it but because of the studies that were withheld from the DEIS. The public cannot possibly get through all the information in the 33 baseline studies released in this timeframe.
83	3	Fulton	Cathy		7/19/22	Email	PC	PUBMEET / OUT	Requesting a public meeting be held in Port Aransas or Aransas Pass.
83	4	Fulton	Cathy		7/19/22	Email	PC	PUBMEET / OUT	The DEIS is grossly incomplete and fails to acknowledge the over 15,000 comments received by the public. None of the comments sent are noted in the DEIS.
86	1	Barnett	Mary Kay		7/19/22	Email	PC	NOTSUP	Does not support the project being constructed.
86	2	Barnett	Mary Kay		7/19/22	Email	PC	DIRIMP	Concerned about the environmental impact to sea life.
86	3	Barnett	Mary Kay		7/19/22	Email	PC	SOCIO	Concerned about the impact to fishing and tourism which Port Aransas depends upon.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
86	4	Barnett	Mary Kay	[redacted]	7/19/22	Email	PC	NAV	Concerned it would badly constrain vessel traffic in the narrow channel and present an oil spill hazard.
86	5	Barnett	Mary Kay		7/19/22	Email	PC	ALTS	Build offshore.
87	1	Fulton	Mary			VM		PUBMEET / OUT	Commenter concerned that the comments received previous to the Draft EIS were not referenced in the document.
88	1	Houston	Robert		7/19/22	Email	FED	ALTS	It is unclear how the Port's preferred alternative will be reconciled with the requirement to identify a least environmentally damaging practical alternative, as part of the CWA Section 404 permitting process, which is referenced in the Draft EIS and in Appendix N - 404(b)(1) Guidelines Evaluation. The Draft EIS has identified alternatives, other than the PCCA's proposed action alternative, that could result in fewer direct impacts to aquatic resources. As identified, both the offshore single point mooring alternative and the inshore/offshore combination alternative result in fewer impacts and are comparable to the no action alternative. As stated in the Draft EIS, the USACE will consider all comments received during the comment period to assist in determining whether to issue, modify, condition or deny any permit for the proposed Action. Please address this alternative selection concern under Section 404 in the Final EIS.
88	2	Houston	Robert		7/19/22	Email	FED	MITIG	There are concerns with the Port's no mitigation approach without further evaluation to quantify the benefits of the proposed beneficial use activities to ensure appropriate in-kind replacement of impacted resources. Recommend the Port attempt to quantify future without project versus future with project estimates of aquatic resource functions using available habitat evaluation procedures or other applicable analysis to quantify placement site benefits. Until such time project benefits can be quantitatively identified, it is unclear whether adequate benefits to resources will be provided to offset aquatic impacts as described in the dredged material management plan. The quantification of benefits derived from the proposed beneficial use placement sites should be demonstrated along with requirements to ensure the likelihood of success and long-term sustainability with adaptive management as necessary.
88	3	Houston	Robert		7/19/22	Email	FED	MITIG	If the beneficial use approach continues to be pursued, we recommend the proposed beneficial use areas be monitored for ecological success to ensure anticipated benefits are achieved. As proposed, temporal losses of aquatic resource function would occur given the placement of dredged material in seagrasses or wetlands is a permanent impact. These temporal losses should be addressed as part of the forementioned habitat evaluation procedures. We again note that it appears other alternatives are identified and exist that would impact significantly fewer aquatic resources and limit the need for mitigation and/or beneficial use to offset those impacts. Please clarify and fully address this concern in the Final EIS.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
88	4	Houston	Robert	[redacted]	7/19/22	Email	FED	DIRIMP	Community concerns have been expressed regarding the evaluation impacts to salinity and tidal amplitude. The magnitude of salinity and tidal amplitude changes are modeled; however, limited conclusions are drawn as to the impacts of these changes upon aquatic resources. It is unclear as to the basis for the determination that the minor change in salinity identified by modeling would not be expected to result in impacts.
88	5	Houston	Robert		7/19/22	Email	FED	WET	Similarly for tidal amplitude, concerns associated with the modeled increase in tidal amplitude that may result near Harbor Island appear to have been discounted even though the change may be ecologically significant for that specific area.
88	6	Houston	Robert		7/19/22	Email	FED	ANALY	Sediment transport modeling associated with the nearshore berm components do not clearly support the merits of beneficial use as it is stated the nearshore berm has little influence on beach stability. The berms being subject to erosion and sediment loss do not necessarily equate to ecological benefit. EPA recommends modeling estimate sediment utilization by the ecosystem to further support these proposed beneficial use components. To address these concerns EPA asks that the Final EIS address whether it is appropriate to base the effectiveness of the proposed nearshore berms based only upon the monitoring of the ecological success of the adjacent beaches. Please clarify and fully address this concern in the Final EIS.
88	7	Houston	Robert		7/19/22	Email	FED	PUBMEET / OUT	Pursuant to NEPA, the USACE is required to comply with Executive Order 13175, Consultation and Coordination with Indian Tribal Governments. A discussion related to coordination and consultation with Indian Tribal Governments was not provided in the Draft EIS. EPA recommends that the Final EIS describe the process and outcome of government-to-government consultation between the USACE and each of the tribal governments within the project area, issues that were raised (if any), and how those issues were addressed in the selection of the proposed alternative. Please fully address this concern in the Final EIS.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may paraphrased or summarized)
		Last Name	First Name						
88	8	Houston	Robert	[redacted]	7/19/22	Email	FED	SOCIO	EPA recommends that the USACE evaluate the totality of the project adverse environmental impact, especially air emission and noise to minority and low-income populations, and any indirect cumulative impacts contributed and associated with other major federal actions in the project vicinity such as the Harbor Bridge Project, a major Federal Highway Administration and TxDOT Highway Project within the affected project area. Please fully address this concern in the Final EIS.
88	9	Houston	Robert		7/19/22	Email	FED	AIR	The Final EIS should recognize that all Non-Road Engines be certified as in compliance with the EPA Tier 4 regulations found at 40 CFR Parts 89 and 1039, which includes new and in-use nonroad compression-ignition engines. Additionally, should any land-clearing activities occur which result in the use of open burning to dispose of woody debris, coordination should be conducted with the TCEQ to determine air quality conditions such as atmospheric inversions prior to performing open burning activities, and consider any expected air quality/ visibility impacts to Class I Federal Areas identified in 40 CFR Part 81, Subpart D. This also includes assurance that all project personnel are educated and made familiar with the requirements of the Dust Control Plan. Please fully address this concern in the Final EIS.
90	1	McQueen	Neil		7/20/22	Email	NGO	NOTSUP	Does not support the project being constructed.
90	2	McQueen	Neil		7/20/22	Email	NGO	DIRIMP	Increased oil production and exports will exacerbate the impacts of climate change as that oil is combusted.
90	3	McQueen	Neil		7/20/22	Email	NGO	DIRIMP	The Coastal Bend region is situated on a low-lying coast subject to coastal erosion and hurricanes so we have reason to be concerned about sea level rise and the growing risk of stronger hurricanes. It is ironic that the very facilities that may benefit from the ability to export more oil if the channel is deepened will stand a greater chance, due to their efforts, of being heavily damaged by a hurricane made more powerful by climate change.
90	4	McQueen	Neil		7/20/22	Email	NGO	CUMUL	If the Harbor Island facility is built, there will also be greater potential for oil spills in close proximity to sensitive natural habitats like Redfish Bay where Gulf species rely upon clean water and abundant seagrasses to thrive.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
90	5	McQueen	Neil	[redacted]	7/20/22	Email	NGO	ANALY	Concerned that the proposed dredge spoils marked as B1 in Figure 2-1 in Volume 1 of draft EIS will smother the sand bars on the north side of the Aransas Channel jetties that cause the Gulf swells to form into rideable waves and urge the Port and USACE to find an alternate site for the spoils. The addition of spoils in that location could ruin surfing on San Jose Island for years.
90	6	McQueen	Neil		7/20/22	Email	NGO	DREDMAT	Concerned that sedimentary materials that differ from the existing fine grained beach sand may be deposited in nearshore waters both north and south of the channel. This occurred as a result of a 2011 beach renourishment project in which the Brownsville Ship Channel was dredged, and balls of clay were introduced onto the beach on South Padre Island.
90	6	McQueen	Neil		7/20/22	Email	NGO	DREDMAT	Concerned that sedimentary materials that differ from the existing fine grained beach sand may be deposited in nearshore waters both north and south of the channel. This occurred as a result of a 2011 beach renourishment project in which the Brownsville Ship Channel was dredged, and balls of clay were introduced onto the beach on South Padre Island.
90	7	McQueen	Neil		7/20/22	Email	NGO	SOCIO	Port Aransas' economy relies heavily upon tourism and business owners should not have to deal with a loss of business due to a miscalculation resulting in undesirable beach conditions.
91	1	King	James		7/20/22	Email	PC	P&N	With no new pipeline projects capable of bringing crude oil to Corpus Christi having been announced, proposed, or in any stage of permitting how does the 4.5MM bpd export estimate become achievable when current pipeline capacity is 2.4MM bpd? The Port is proposing that POCCA exports could grow to 4.5MM bpd in 2030 from 1.63MM bpd in 2021. Current pipeline capacity to POCCA is 2.4MM bbls so they are saying 2 new (1MM bpd) pipelines would get 4.5MM bbls to Corpus by then? Also what about the other Industries share in Inner Port, Ingleside, and Blue Water. It is a false premise to consider 4.5 bpd. Undermines the entire Permit and EIS.
91	2	King	James		7/20/22	Email	PC	ALTS	Alternative 3 (2.4.1) states that some inshore berthing would be required at Harbor Island and Ingleside to partially fill VLCC which would then go to the offshore SPM to fully load. The question is if the VLCC could fully load at the SPM why would it make the trip in shore to partially load at Harbor Island or Ingleside?
91	3	King	James		7/20/22	Email	PC	P&N	Why is the Harbor Island Terminal not included in the study nor the pipelines that would be required to supply the oil?
91	4	King	James		7/20/22	Email	PC	ALTS	Why is there not an alternative that reflects the current capabilities of the Port and an incremental SPM project for the potential production growth?

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
92	1	Plunkett	Julie	[redacted]	7/20/22	Email	PC	PUBMEET / OUT	Commenter is not happy that the Public Meeting was held in Corpus Christi. Feels that this is a lack of concern/ discrimination for those who are disabled and cannot travel long distances to have their opinions heard. Requests that more meetings be held in the areas most affected.
92	2	Plunkett	Julie		7/20/22	Email	PC	PUBMEET / OUT	The public does not have time to review the additional documents that were uploaded regarding the DEIS.
92	3	Plunkett	Julie		7/20/22	Email	PC	PUBMEET / OUT	Unhappy that the public meeting took place during the summer when people are traveling and unable to attend.
92	4	Plunkett	Julie		7/20/22	Email	PC	PUBMEET / OUT	Requests an extension to the comment period beyond August 9 to give the public more time to comment.
93	1	Nelson	John		7/21/22	Email	FED	P&N	The DEIS should adequately demonstrate that the Applicant's preferred alternative is the least environmentally damaging alternative to meet the stated purpose and need. The Project is expected to result in increases in large vessel traffic, tidal amplitude, storm surge, salinity, turbidity, shoreline propeller scour, maintenance dredging, and inshore oil spill risk. These increases could negatively impact threatened and endangered species, migratory birds, wetlands, and seagrass. The FWS agrees that the use of suitable dredged material to renourish beaches and restore eroded habitats can be beneficial; however, these benefits may not outweigh irreversible damage that the Project could potentially cause.
93	2	Nelson	John		7/21/22	Email	FED	ALTS	The DEIS states that the presence of offshore ports in Alternatives 2 and 3 would reduce or eliminate the need for Very Large Crude Carriers (VLCC) to enter the CCSC and reverse lightering offshore. However, in 2020, the PCCA became the leading crude oil exporter in the U.S. and crude oil exports are forecasted to increase 1600% by 2030 (https://www.portcorpuschristiprojects.com/deepening-project/market-demand/). Construction of the new Harbor Bridge in Corpus Christi is scheduled to be completed in 2024, allowing VLCCs to enter the Inner Harbor. Given the increased market demand and possible accessibility to the Inner Harbor, large vessels could potentially still opt to enter the CCSC for partial loading.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
93	3	Nelson	John	[redacted]	7/21/22	Email	FED	ALTS	A VLCC can take 48 to 60 hours to fully load from a deepwater port. A single point mooring buoy offshore may lead to long wait times, resulting in some vessel operators opting for partial loading from the CCSC and reverse-lightering offshore. Suggest providing an analysis of the potential impacts from increased vessel traffic throughout the CCSC under each alternative.
93	4	Nelson	John		7/21/22	Email	FED	CUMUL	The USFWS is concerned that cumulative effects of increased salinity from the Project, periods of drought, climate change, and effluent from multiple proposed desalination plants, could result in a significant change in the distribution and species composition of seagrass and lower trophic level organisms in Redfish, Corpus Christi, Aransas, and Nueces bays. This change would affect threatened and endangered species and migratory birds that feed, breed, nest, and roost in these estuaries. Recommends expanding upon the cumulative impacts analysis to further examine potential increases in salinity.
93	5	Nelson	John		7/21/22	Email	FED	ANALY	The USGS is concerned that the effects of channel deepening on salinity in Baffin Bay and connecting waters behind Padre Island and Laguna Madre have not been adequately addressed. This area is a rare, hypersaline environment, and its ecology possibly could be impacted if an increase in lesser saline water from Corpus Christi Bay is forced southward. Recommends adding language on the potential increase of salinity in the southern lagoons or expand the model boundaries for analysis to include southern hypersaline areas.
93	6	Nelson	John		7/21/22	Email	FED	SOCIO	**Section 3.5 Socioeconomic Conditions:** This section states that the Region of Influence (ROI) for socioeconomic analysis includes the three counties of Nueces, Aransas, and San Patricio. However, Section 3.5.4, Environmental Justice, considers only block census tracts within a project area much smaller than the ROI or the DEIS' study area. The Department understands that the project area represents an area of resources more directly impacted; however, we recommend analyzing indirect and cumulative impacts throughout the DEIS' study area. For example, if seagrass and low trophic level organisms are affected by turbidity, salinity changes, tidal amplitude, or other Project effects, then fishing and viewshed resources would likely be affected beyond just the project area.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
93	7	Nelson	John	[redacted]	7/21/22	Email	FED	ANALY	**Appendix I (Hydrodynamic and Salinity Modeling Study):** This section provides a description of model data inputs. This includes evaporation data from NOAA climate stations. On page 44 of Appendix I an explanation is provided for the use of "daily evaporation measured at the USGS gage at Mathis". The USGS does not collect evaporation data at stations near Mathis. The Department suggests revising to reflect NOAA Station: MATHIS 4 SSW, TX US with Network:ID GHCND:USC00415661.
93	8	Nelson	John		7/21/22	Email	FED	DREDMAT	**Appendix J (Sampling Analysis Plan):** Results of sediment characterizations and toxicity tests were not provided in the DEIS. The FWS requests the opportunity to review and provide comments and recommendations in coordination with the EPA and TCEQ when the report becomes available.
93	9	Nelson	John		7/21/22	Email	FED	DREDMAT	**Appendix J (Sampling Analysis Plan):** This section includes as its own Appendix A the USACE Final EIS for previous channel improvement work titled Corpus Christi Ship Channel, Texas Channel Improvement Project, dated April 2003. Section 4.6.1, page 158 appears to erroneously use USGS for the abbreviation of the US Coast Guard versus the more appropriate USCG in discussion of shipping channel regulations. The Department suggests that a statement or errata be included in Appendix J to address the erroneous reference to the USGS.
94	1	Dial	Pamela		7/21/22	Email	PC	DIRIMP	Concerned that the project would cause immense environmental damage ruining the fishing and tourism industries on which Port Aransas depends.
94	2	Dial	Pamela		7/21/22	Email	PC	DIRIMP	Concerned that the project would cause immense environmental damage to the critical breeding grounds and habitat for species and fish populations will be drastically reduced.
94	3	Dial	Pamela		7/21/22	Email	PC	ALTS	Are there no alternatives offshore in a less environmentally sensitive area?
94	4	Dial	Pamela		7/21/22	Email	PC	SOCIO	Concerned that real estate will be devalued, development stagnate, and jobs lost for fishermen.
94	5	Dial	Pamela		7/21/22	Email	PC	DIRIMP	Concerned the project would badly constrain vessel traffic and present an oil spill hazard.
94	6	Dial	Pamela		7/21/22	Email	PC	FERRY	Concerned the project would cause delays in the ferry for commuters to the island and hurt local businesses.
95	1	Findley	Julie		7/21/22	Email	PC	PUBMEET / OUT	Requests the public comment period be extended.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
95	2	Findley	Julie	[redacted]	7/21/22	Email	PC	DIRIMP	Concerned about the effect of deepening and dredged material disposal on the estuarine environment.
95	3	Findley	Julie		7/21/22	Email	PC	ANALY	Concerned about what effect a deeper channel will have on the hydrology of Aransas Pass.
96	1	Graffigna	Jim		7/21/22	Email	PC	ALTS	Urge the USACE not to allow a turning basin on Harbor Island.
96	2	Graffigna	Jim		7/21/22	Email	PC	ALTS	The technology has been available for decades to load/ offload offshore to buoys at much lower cost and no harm to the visitors and residents of Port Aransas.
97	1	Hager	Cecilia		7/21/22	Email	PC	DIRIMP	Concerned that the project will cause damage to the communities, estuarine habitats, and beaches.
98	1	Burnett	Mary		7/22/22	Email	PC	FERRY	Does not want the project to be built next to the ferry landing. This would increase the long lines during tourist season and interfere with local businesses ability to get goods onto the island.
99	1	Francis	Jeff		7/22/22	Email	PC	DIRIMP	Concerned about the environmental impacts the project will have on the passes (Aransas Pass) and along the Texas coast as they are environmentally critical to several species that are economically and recreationally important.
99	2	Francis	Jeff		7/22/22	Email	PC	DIRIMP	Concerned that the large amounts of dredged material will reduce water clarity during operations as well as impact the area.
99	3	Francis	Jeff		7/22/22	Email	PC	DIRIMP	Concerned about the environmental impacts large-scale oil spills from increased ship traffic and increased capacity of ships entering would have.
99	4	Francis	Jeff		7/22/22	Email	PC	SOCIO	Concerned that industrialization of the ship channel imperils the current economic engine fueled by tourism and out recreation in the area.
99	5	Francis	Jeff		7/22/22	Email	PC	SOCIO	Concerned about the cultural use of the ship channel, nearshore habitats, and estuary are invaluable to the residents of the this area.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
99	6	Francis	Jeff	[redacted]	7/22/22	Email	PC	ALTS	Suggest offshore terminals for filling ships be used as an alternative solution.
100	1	Krug	Gayle		7/22/22	Email	PC	DIRIMP	The result of the project would be devastating to Port Aransas and the environment.
100	2	Krug	Gayle		7/22/22	Email	PC	FERRY	Concerned about the ferry wait for people commuting to work.
101	1	Landingham	B.J. (Bob)		7/22/22	Email	PC	ALTS	Place the terminal offshore.
102	1	Turner	Ryan		7/22/22	Email	NGO	NONE	Reply to Surfrider letter asking if the letter was ready to share.
103	1	Walsh	Susan		7/22/22	Email	PC	DIRIMP	Concerned about the environmental effects dredging would have on marine life, animal life on land, and humans.
103	2	Walsh	Susan		7/22/22	Email	PC	PUBMEET / OUT	Requests that the comment period be extended by 90 days to allow everyone to have input.
103	3	Walsh	Susan		7/22/22	Email	PC	PUBMEET / OUT	Request a Public Meeting in Port Aransas so the people affected by this project can ask questions and provide feedback.
103	4	Walsh	Susan		7/22/22	Email	PC	ALTS	Please hold the Port responsible for providing current environmental studies and research showing the best alternatives to maintain the current needs to protect fragile ecosystems and maintain clean beaches which are important to the people who live in this area and the million of Texans and other visitors who come to this area every year.
104	1	Yates	Mike and Lil		7/22/22	Email	PC	NOTSUP	Does not support the project being constructed.
105	1	Branscomb	Margo		7/23/22	Email	PC	BUSITES	Opposed to the proposed placement of dredged material on the Port Aransas beach and offshore along the shoreline due to the negative impacts.
105	1	Branscomb	Margo		7/23/22	Email	PC	BUSITES	Opposed to the proposed placement of dredged material on the Port Aransas beach and offshore along the shoreline due to the negative impacts.
105	2	Branscomb	Margo		7/23/22	Email	PC	ALTS	Offshore terminal/pipeline is the only possibility.
105	3	Branscomb	Margo		7/23/22	Email	PC	SOCIO	Concerned it would impact tourism.
106	1	Cobern	Joshua		7/23/22	Email	PC	ALTS	Ask to consider the offshore oil port option.
106	2	Cobern	Joshua		7/23/22	Email	PC	DIRIMP	Concerned about the environment being destroyed and unrecoverable. There is a very small margin for what could truly be an acceptable loss when considering altering/destroying local habitat and other ecosystem. The Port may be withing that margin but the ecosystems are not.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
107	1	Feuerborn	James	[redacted]	7/23/22	Email	PC	ALTS	Opposed to the location of the VLCC turning basin being adjacent to the ferry landings. This plan would permanently disrupts the lives of Port Aransas residents, fishing, ferry traffic, tourism, etc.
107	2	Feuerborn	James		7/23/22	Email	PC	PUBMEET / OUT	Requesting the comment period be extended at least 90 days.
107	3	Feuerborn	James		7/23/22	Email	PC	PUBMEET / OUT	Requesting at least two more Public Meeting be held, on in Port Aransas and one in Aransas Pass.
108	1	Moore	Myfe		7/23/22	Email	PC	NOTSUP	Does not support the project being constructed.
109	1	Welch	Stacey		7/23/22	Email	PC	NOTSUP	Does not support the project being constructed.
109	2	Welch	Stacey		7/23/22	Email	PC	FERRY	Believes the inconvenient and traffic congestion at the ferry will cause negative impacts to Port Aransas.
110	1	Brown	Wavel		7/24/22	Email	PC	FERRY	Concerned about the impact the project will have on the ferry system, making the daily drive take hours, cutting of a large number of residents and tourists, leaving 361 as the only unsafe and almost unusable option.
110	2	Brown	Wavel		7/24/22	Email	PC	DIRIMP	Concerned about the damage that will be done to the environment with changes made to fish and wildlife habitat.
110	3	Brown	Wavel		7/24/22	Email	PC	ALTS	Does not understand the avoidance of looking at alternatives.
111	1	Chandler	Melony		7/24/22	Email	PC	WET	Concerned about the damage to grass beds if the project moves forward. These are critical to the quality of the environment. Concerned that dredging will cause silt to cover the grass beds killing them. These are vital for healthy fisheries habitat for bay fish and offshore species.
111	2	Chandler	Melony		7/24/22	Email	PC	WAKE	Believe the speed of the ships coming through the jetties making their way into the Port has increased over the years, causing erosion along the banks. There is no need for the excessive speed and hope fines can be assessed to the vessels that are coming through there too fast and causing damage.
111	3	Chandler	Melony		7/24/22	Email	PC	ALTS	There has to be another location you can look at that can be expanded.
111	4	Chandler	Melony		7/24/22	Email	PC	T&E	Concerned what it may do to the endangered whooping crane as they uses this habitat and water quality in the bays is critical for the blue crabs in their diet.
111	5	Chandler	Melony		7/24/22	Email	PC	NOTSUP	Opposed to any group or individual, intentionally destroying vital habitat in the coastal bend from Rockport to Aransas Pass, to Port Aransas, or anywhere for that matter.
111	6	Chandler	Melony		7/24/22	Email	PC	PUBMEET / OUT	Requests an extension of the comment period and to hold a Public Meeting in Port Aransas.
112	1	Holt	Dan		7/24/22	Email	PC	PUBMEET / OUT	Requesting an additional 90 days to review the additional reports that were added.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may paraphrased or summarized)
		Last Name	First Name						
113	1	LaCivita	Jacob	[redacted]	7/24/22	Email	PC	P&N	If over the course of the coming years and decades there is a high likelihood we will export less oil as a nation and consume less oil as a planet, why would we embark on a project designed to INCREASE the ability to do something we're trying to limit?
113	2	LaCivita	Jacob		7/24/22	Email	PC	ALTS	The more prudent approach would be to leave the channel at the current depth under the realization the need for fully loaded VLCCs is more likely to decline than increase, and the funding of dollars and manpower for this project is better utilized elsewhere
114	1	Orr	Bill		7/24/22	Email	PC	PUBMEET / OUT	Requesting a 90 day extension of the comment period and a public meeting in Port Aransas.
114	2	Orr	Bill		7/24/22	Email	PC	FERRY	Feels the project would complicate transportation with fully loading VLCCs on both sides of the ferry landing.
114	3	Orr	Bill		7/24/22	Email	PC	DIRIMP	Concerned about the sensitive marine areas if the project is permitted.
115	1	Orsinger	Jana		7/24/22	Email	PC	PUBMEET / OUT	Requesting a 90 day extension of the comment period and a public meeting in Port Aransas.
115	2	Orsinger	Jana		7/24/22	Email	PC	FERRY	Feels the project would complicate transportation with fully loading VLCCs on both sides of the ferry landing.
115	3	Orsinger	Jana		7/24/22	Email	PC	DIRIMP	Concerned about the sensitive marine areas if the project is permitted.
116	1	Sears	Judy		7/24/22	Email	PC	FERRY	Concerned about the impact the project would have on the ferry and taking tourists and workers to and from Port Aransas. Feels this would destroy the town.
117	1	Yokum	Shellie		7/24/22	Email	PC	FERRY	Concerned the project will disrupt the ferry making it difficult for workers and tourists.
118	1	Brown	Wavel		7/25/22	Email	PC	PUBMEET / OUT	Request a public meeting in Port Aransas and an extension of 90 days for the public comment period.
119	1	Curtiss	Jen and Gene		7/25/22	Email	PC	PUBMEET / OUT	Request a public meeting in Port Aransas and an extension of 90 days for the public comment period.
120	1	Daffin	Michael		7/25/22	Email	PC	PUBMEET / OUT	Request a 90 day extension for the public comment period.
121	1	Fox	Joyce		7/25/22	Email	PC	PUBMEET / OUT	Request a 90 day extension for the public comment period.
122	1	Fox	Joyce		7/25/22	Email	PC	PUBMEET / OUT	Requests a meeting be held so residents can respond.
123	2	Lacy	Michelle		7/25/22	Email	PC	DREDMAT	Concerned about potentially toxic dredge spoil.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
123	2	Lacy	Michelle	[redacted]	7/25/22	Email	PC	DREDMAT	Concerned about potentially toxic dredge spoil.
123	3	Lacy	Michelle		7/25/22	Email	PC	DIRIMP	Concerned about degradation of natural areas and resources in the placement areas.
123	4	Lacy	Michelle		7/25/22	Email	PC	WAKE	Concerned about increased erosion and property damage from increased ship sizes and traffic.
123	5	Lacy	Michelle		7/25/22	Email	PC	FERRY	Concerned about interruption of ferry services due to proximity of oil terminal and turning basin.
123	6	Lacy	Michelle		7/25/22	Email	PC	DIRIMP	Concerned about increased risk of spills and pollution.
123	7	Lacy	Michelle		7/25/22	Email	PC	NOTAPP	Concerned about chronic health issues associated with oil and gas facilities.
123	8	Lacy	Michelle		7/25/22	Email	PC	NOTAPP	Concerned about risks associated with locating oil storage facility in a storm surge prone area.
124	1	Lassiter	Jim		7/25/22	Email	PC	FERRY	Concerned about the wait times for the ferry as a result of the project. Longer wait times will be unacceptable shutting down transportation in and out of the city.
124	2	Lassiter	Jim		7/25/22	Email	PC	ALTS	Loading of the ships offshore is a much better solution than creating the terminal to be located on Harbor Island.
125	1	Mendoza	Dulce		7/25/22	Email	PC	NOTSUP	Does not support the project being constructed.
126	1	Sears	Judy		7/25/22	Email	PC	NAV	If this project is built would it not be limiting the access to Port Aransas to one way only? How would this work in emergency situations like Hurricanes?
126	2	Sears	Judy		7/25/22	Email	PC	FERRY	Concerned about the ferry.
127	1	Shepperd	John		7/25/22	Email	NGO	ALTS	An offshore terminal that would serve VLCCs and load them via underwater pipelines is a clear and reasonable alternative that better protects the environment. Specifically the Bluewater Texas Terminals. This offshore project can accomplish the same goals sought by the Port with much less risk to the beaches, bays, and estuaries that bring hundreds of thousands of visitors to Port Aransas each year. Because this offshore terminal will accommodate VLCCs, significantly expand the export capacity of the area, and accomplish the same goals as the Port's proposed Harbor Island development, it is a reasonable alternative that negates the need for the Port's proposed dredging permit. Therefore, we request the USACE deny the permits that would allow the industrial development of Harbor Island to continue.
128	1	Scott	Suzanne		7/25/22	Email	NGO	P&N	This project is one of several related projects PCCA is proposing that make up a single and complete project, including a planned loading terminal and desalination plant in the Harbor Island area. We are concerned that analyzing and reviewing these projects separately may not take into account the broad suite of environmental and economic impacts associated with them. PCCA's planned channel deepening project, loading terminal and desalination plant, if built, could significantly impair the ecology and economy of a large part of the Texas Gulf Coast.
128	2	Scott	Suzanne		7/25/22	Email	NGO	DIRIMP	Concerned that the proposed CDP and related loading terminal and subsequent vessel traffic will have unanticipated impacts on the hydrodynamics of the area and on species recruitment and use of the area, including impacts to recreationally and commercially important species, changes in current and erosion patterns, and increased shoreline loss associated with storms and hurricane such as flooding and storm surge (Valseth and Dawson, 2022).
128	3	Scott	Suzanne		7/25/22	Email	NGO	P&N	The PCCA has not only requested a permit to deepen Aransas Pass, but also to construct a $1 billion loading terminal facility on 200 acres of Harbor Island allowing oil tankers (very large crude carriers or VLCCs) to enter Aransas Pass and transport millions of gallons of crude oil per day through the pass for export to overseas markets.
128	4	Scott	Suzanne		7/25/22	Email	NGO	CUMUL	The dredging, construction of facilities, and subsequent shipping traffic associated with the project will unquestionably transform this pivotal environmental area. Some of the many potential negative effects include degradation to water quality and subsurface habitats; disruptions of animal migrations and activities due to shipping, noise, and lighting; and potential oil spills or other contamination incidents from ships or pipelines (Buskey 2018).

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
128	5	Scott	Suzanne	[redacted]	7/25/22	Email	NGO	CUMUL	Also of concern is PCCA's proposal to construct a saltwater desalination plant at Harbor Island to provide water for planned industrial facilities. As currently conceived, the plant would discharge nearly 100 million gallons per day of highly saline effluent into the ship channel, which connects Aransas Pass and Corpus Christi Bay and serves as a migration route for marine life. This could significantly alter the salinity in the channel and threaten faunal resources over a large part of the central and lower Texas coast.
128	6	Scott	Suzanne		7/25/22	Email	NGO	DIRIMP	Any adverse impacts to the ecological health of the bay system will impact recreation and commercial fishing in the area as well as the public perception of the health of the bay, all of which could reduce the benefit to the community from the tourism and fishing industries.
128	7	Scott	Suzanne		7/25/22	Email	NGO	ALTS	Suggest that the USACE request that PCCA explore other alternatives, such as an offshore terminal, that could be constructed with less potential for destructive effects on the long-term economic and ecological health of the central coast.
129	1	Serna	Encarnacion		7/28/22	WC	PC	CUMUL	Concerned that this project and the other projects being done (export terminals) will cause both significant temporary and permanent damage on Harbor Island and surrounding islands including Port Aransas.
129	2	Serna	Encarnacion		7/28/22	WC	PC	SOCIO	Concerned that people living in this area will be affected and people who make a living from the islands, including tourism, will see severe damage to their way of life.
129	3	Serna	Encarnacion		7/28/22	WC	PC	NONGEN	Does not feel that the Port and preparers of the EIS have told the truth with the information and have presented it is a negligent and fraudulent way.
129	4	Serna	Encarnacion		7/28/22	WC	PC	DIRIMP	Concerned the project will have a devastating impact on Corpus Christi Bay and the estuarine system.
129	5	Serna	Encarnacion		7/28/22	WC	PC	DIRIMP	Concerned the island and residents will be impacted as a result of the project.
129	6	Serna	Encarnacion		7/28/22	WC	PC	AIR	Concerned about air quality during construction and during operation when the VLCC get loaded with pumps, tanks, and pipelines that will never be operated or repaired properly.
129	7	Serna	Encarnacion		7/28/22	WC	PC	NOTAPP	Commenter does not support exporting crude oil from the US to other countries.
129	8	Serna	Encarnacion		7/28/22	WC	PC	PUBMEET / OUT	Does not believe the review period for the DEIS was appropriate.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
129	9	Serna	Encarnacion	[redacted]	7/28/22	WC	PC	ANALY	Feels the study is weak and does not reflect an in -depth research study needed for the general public to accept is validity and approve with the negative environmental impacts it will have.
129	10	Serna	Encarnacion		7/28/22	WC	PC	PUBMEET / OUT	The project under FAST-41 is supposed to improve the timeliness, predictability, and transparency of the process. Does not feel that this is the case and that rather benefits the Port by pushing the project forward without doing the proper analysis.
129	11	Serna	Encarnacion		7/28/22	WC	PC	PUBMEET / OUT	Does not believe the USACE and Port are being transparent when the public meeting was held on Port property in Corpus Christi and the short timeframe for the public to review the DEIS.
129	12	Serna	Encarnacion		7/28/22	WC	PC	GEN	Regarding concurrence of the overall purpose with the Cooperating Agencies, who are the Cooperating Agencies?
129	13	Serna	Encarnacion		7/28/22	WC	PC	PUBMEET / OUT	Please provide me and all the people who attended the public meeting and the general public with a letter stating: a.) who they are, b.) what exactly were they consulted on, c.) what exactly they agreed on, d.) what exactly did they disagree on, and f.) what did they acquiesced on?
129	14	Serna	Encarnacion		7/28/22	WC	PC	ALTS	The alternative left out and not considered is combining of all existing and proposed stations into one or two sites only, instead of granting rights and approving terminals for all. Terminals: Enbridge, Flint Hills, Buckeye, Cherniere LNG Exporter, and Bluewater.
129	15	Serna	Encarnacion		7/28/22	WC	PC	P&N	Does not believe the Port can safely execute this project. Provides examples if accidents that have occurred.
129	16	Serna	Encarnacion		7/28/22	WC	PC	ALTS	Does not believe the project will eliminate reverse lightering.
129	17	Serna	Encarnacion		7/28/22	WC	PC	NOTSUP	Believes that the forecast of 4,500,000 barrels per day is greed by these large companies and that the project must be aborted immediately.
129	18	Serna	Encarnacion		7/28/22	WC	PC	DIRIMP	Feels that critical issues were not studied like subsidence of existing structures and man-made foundations located in the vicinity of the dredging. All areas are geological sandbar formation where dredging would cause subsidence.
129	19	Serna	Encarnacion		7/28/22	WC	PC	NONGEN	There is no mentions indicating and committing to the proper and adequate compaction with heavy equipment of the dredged material to provide some degree of reduction in erosion.
129	20	Serna	Encarnacion		7/28/22	WC	PC	ALTS	The Port does not commit to the construction of bulkheads/ concrete walls internal to the gigantic proposed ditch; throughout the length of this proposed foot print 13 miles or so. Or on the adjacent formations to protect on-land structures.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
129	21	Serna	Encarnacion	[redacted]	7/28/22	WC	PC	ALTS	On page v Volume I the EIS states "The no action alternative does not include improvements presented under the Applicants Proposed Action Alternative. Therefore, annual maintenance dredging to the CCSC would continue as scheduled" I say this comment is a spin and a lie because the proposed project does not provide any improvements. This comment is inserted here to create an illusion or mirage that the no-action alternative is bad because sediment distribution, and short-term sedimentation would continue and the proposed alternative of dredging the channel would eliminate this.
129	22	Serna	Encarnacion		7/28/22	WC	PC	ANALY	On page v Volume I the EIS states "Modeling of the Inner Channel indicates that Shoaling rates with the Applicant's Proposed Action alternative were comparable to that with the No-Action Alternative" but then the paragraph goes to say that the model did predict a 5 to 10 percent increase in sedimentation. This is a contradiction from one statement to the next. Requests the Port have a meeting with members of the community to explain the modeling.
129	23	Serna	Encarnacion		7/28/22	WC	PC	ANALY	On page vi Volume I the EIS states "Modeling of Applicant's Proposed Action Alternative indicates that channel deepening is unlikely to change mean water levels in the bay." but then in the same paragraph the EIS goes to say that the model did predict an increase, but that the increase only was less than 0.79 inches. This is a contradiction from one statement to the next. Requests the Port have a meeting with members of the community to explain the modeling. Concerned that some houses on Ingleside on the Bay already experience flooding especially when the VLCCs go by at higher speeds than allowable. No one enforces the speed. What will the true predicted gain in water level be on these houses?
129	24	Serna	Encarnacion		7/28/22	WC	PC	CUMUL	The EIS fails to consider cumulative impacts that would be created by these monster-sized desalination plants with its gargantuan volumetric rates being lifted from the Bay and the high salinity ones proposed to be returned to the same Bay as the recipient water body. There are currently 7 proposed: PCCA La Quinta Channel and Harbor Island; City of Corpus Christi La Quinta Channel and Inner Harbor; Corpus Christi Polymers Inner Harbor; Seven Seas Harbor Island; and City of Ingleside Poseidon on IOB shoreline. The EIS leaves out the two La Quinta Channel ones.
129	25	Serna	Encarnacion		7/28/22	WC	PC	STSURGE	The EIS says the project would allow more storm surge intensifying the velocity and increasing water levels and that with beach nourishment and the nearshore berms erosion would be offset and wave energy would be attenuated. Does not believe the results and requests the Port have a meeting with members of the community to explain the modeling.
129	26	Serna	Encarnacion		7/28/22	WC	PC	DIRIMP	Water and Sediment Quality: Need to prove that the potential impacts of turbidity, DO, and salinity would only be localized and transient.
129	27	Serna	Encarnacion		7/28/22	WC	PC	AIR	The dredging is being done for VLCC to load hydrocarbons that would be coming from tank farms, pumping stations, and pipelines, that would emit very large quantities of air pollutants. Fail to mention this and thus neglect to include cumulative/aggregate impacts that would be produced by ancillary equipment.
129	28	Serna	Encarnacion		7/28/22	WC	PC	DIRIMP	Admits noise will increase significantly both temporarily and permanently, what will be the impact on the nearby communities?
129	29	Serna	Encarnacion		7/28/22	WC	PC	DIRIMP	Believes that the larger vessels and increased traffic will permanently increase turbidity thus decreasing DO impacting seagrass and marine fauna.
129	30	Serna	Encarnacion		7/28/22	WC	PC	EFH	EFH study is not complete and stating that turbidity would likely be temporary is a lie. Does not mention the lethality/mortality rates of all key marine organisms that live the areas affected by the proposed placement areas. No mention of fish surveys to determine quantities of marine species that would be affected by dredging and increased ship traffic and larger ships.
129	31	Serna	Encarnacion		7/28/22	WC	PC	SOCIO	Concerned how marine fauna would adversely affect socioeconomic and financial impacts on other industries way of life.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
129	32	Serna	Encarnacion	[redacted]	7/28/22	WC	PC	CULRES	**Cultural Resources:** 1) Who were the agencies that reviewed and commented? What were their findings? 2) Were there any documents from agencies confirming the claims/conclusions made by the USACE/Port? 3) Assume an intensive survey was necessary, Appendix F is just an extensive literature search and therefore the claims and conclusions lace credibility.
129	33	Serna	Encarnacion		7/28/22	WC	PC	NONGEN	USACE already lacks sufficient credibility with people and entities that are directly affected by other dredging projects. Example, USACE and MODS were sued by several tribal organizations, triggered by them putting at risk a sacred Karankawa site where over 39,000 archaeological artifacts were found.
130	1	Strelcheck	Andrew		7/28/22	WC	FED	EFH	The USACE should provide a revised EFH assessment to the NMFS HCD for review. The assessment should clarify, delineate, and quantify impacts to EFH by all habitat types (low tidal marsh, high tidal marsh, tidal mud flats, algal mats, and mangroves) at each of the proposed PAs.
130	2	Strelcheck	Andrew		7/28/22	WC	FED	MITIG	The USACE should provide clarification on the proposed in-kind compensatory mitigation to offset those impacts to each EFH by habitat type (low tidal marsh, high tidal marsh, tidal mud flats, algal mats, and mangroves) within all proposed PAs.
130	3	Strelcheck	Andrew		7/28/22	WC	FED	MITIG	The USACE should provide clarification as to where additional shallow water habitat will be created to offset tidal wetland impacts and SAV habitat besides what is presented in PAs SS1 and SS2.
130	4	Strelcheck	Andrew		7/28/22	WC	FED	MITIG	The USACE should identify the in-kind compensatory mitigation for direct and secondary EFH impacts (seagrass and oyster reef habitat) resulting from the proposed activities. The NMFS HCD recommends the USACE consider a mitigation compensatory ratio of 3:1 for SAV and 1:1 for oyster reef habitats. The NMFS HCD also requests the EFH mitigation plan be coordinated with us prior to issuance of the revised EFH assessment. To avoid additional mitigation for temporal impacts, the NMFS HCD also recommends the USACE consider requiring implementation of the mitigation plan concurrent with channel construction activities.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
130	5	Strelcheck	Andrew	[redacted]	7/28/22	WC	FED	EFH	The USACE should include a quality assurance plan outlining expected EFH and barrier island shoreline restoration goals, success criteria, and monitoring protocols in the revised EFH assessment.
130	6	Strelcheck	Andrew		7/28/22	WC	FED	EFH	The USACE should also include a comprehensive adaptive management plan to determine long-term EFH impacts following construction and operation of the proposed project components in the revised EFH assessment
130	7	Strelcheck	Andrew		7/28/22	WC	FED	BA	A definitive statement on the specific types of dredges to be used and the specific times of the year each dredge type will be used. This information should be consistent with any proposed conservation measures such as seasonal dredging windows.
130	8	Strelcheck	Andrew		7/28/22	WC	FED	BA	An expanded discussion on the information pertaining to cutterhead dredges used in colder months referenced in Dickerson and Piatkowski (2017) and Ramirez et al. (2017). Further, depending on this expanded discussion, consideration of proactive (versus reactive) relocation trawling activities in colder months should be examined as a potential conservation measure.
130	9	Strelcheck	Andrew		7/28/22	WC	FED	BA	A detailed table listing Galveston District dredging projects from 1995 through 2021 that includes not only the number of sea turtle takes by species via dredges, but additional information including dredging duration (days of work), cubic yards dredged during each project, and data on relocation trawling activity–including numbers of turtles identified by species captured–is required.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
130	10	Strelcheck	Andrew	[redacted]	7/28/22	WC	FED	BA	A table documenting sea turtle stranding numbers by species in the lower Texas coast, or in Nueces, San Patricio, and Aransas Counties.
131	1	Vise	Ryan		8/3/22	WC	STATE	AIR	In accordance with the general conformity regulations in 40 CFR Part 93, this proposed action was reviewed for air quality impact. The proposed action is located in Nueces County, which is currently designated as attainment/unclassified for the National Ambient Air Quality Standards for all six criteria air pollutants. General conformity requirements do not apply.
131	2	Vise	Ryan		8/3/22	WC	STATE	SUPPORT	We are in support of the project. The environmental assessment addresses issues related to surface and groundwater quality.
131	3	Vise	Ryan		8/3/22	WC	STATE	GEN	Any debris or waste disposal should be at an appropriately authorized disposal facility.
132	1	–	–		7/25/22	WC	PC	PUBMEET / OUT	Request a 90 day extension for the public comment period and to hold a Public Hearing in Port Aransas.
133	1	Garza	Sarah		8/5/22	WC	PC	CULRES	PCCA provided USACE Terrestrial Archeological Survey Report on March 23, 2022, and it was not included or represented in the DEIS. PCCA still anticipates providing the Marine Archeological Survey Report to USACE later this month.
133	2	Garza	Sarah		8/5/22	WC	PC	SOCIO	The Socioeconomic section misrepresented local municipality jurisdictions thereby misrepresenting the socioeconomic statistics for the region.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
133	3	Garza	Sarah	[redacted]	8/5/22	WC	PC	NAV	Additional discussion is requested on the results of the ship simulations and the decision to not include the ship simulations from November 2021.
133	4	Garza	Sarah		8/5/22	WC	PC	GEN	**Executive Summary.** Acronym for Port is represented in three different ways and not consistent on the first page.
133	5	Garza	Sarah		8/5/22	WC	PC	GEN	**Acronyms and Abbreviations.** CCP should be CPP Coordinated Project Plan. Revise and move into alphabetical order.
133	6	Garza	Sarah		8/5/22	WC	PC	GEN	**Section 1.0. Port of Corpus Christi Authority.** • Page 1-5 does have Authority in the name. Page 1-1 defines the Port of Corpus Christi Authority as PCCA or Applicant. • Page 1-5 defines PCCA as Port. If this is for the historical section only, that should be called out; however, on page 1-8 PCCA is referred to as Port - this is outside of the historical section. Please be consistent. • Page 1-9 WOTUS already defined - just use acronym here.
133	7	Garza	Sarah		8/5/22	WC	PC	GEN	**Proposed Action and Alternatives:** • Page 2-5 refers to 40 CFR but this is not in the references. Page 2-5 • Section 2.2.2 says deepening the CCSC to -79. This should be -77 as in section 2.2.1. • Page 2-9 cutterhead hydraulic pipeline "dredged" should say dredges. • Pages 2-10 and 2-11 Section 2.2.4 reads maintenance material would be mostly placed in the CC New Work ODMDS? • Page 2-12 Section 2.3.2 Alternative 2 states..."would include an array of SPM" indicate the number. same for Alternative 3, provide the number.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
133	8	Garza	Sarah	[redacted]	8/5/22	WC	PC	GEN	**Affected Environment, page 3-22.** CDP should be defined as the channel deepening project in the introduction.
133	9	Garza	Sarah		8/5/22	WC	PC	GEN	**Freshwater Inflow, page 3-27.** Specify "global" sea level rise and changes in "local" freshwater inflow
133	10	Garza	Sarah		8/5/22	WC	PC	GEN	**Noise, page 3-44.** "The main sound sources for the offshore potion of the channel include periodic infrequent channel maintenance dredging, more daily ocean-going vessels transit would be the main sound sources, and ambient wind- and wave-generated noise."- misspelled & sounds strange overall (3-45 middle). Page 3-52, section 3.2.12.3, Port of Long Beach is not a good comparison for noise generated from Port operations as they are a container port and PCCA moves bulk liquids, suggest a more comparable port for noise. Underwater noise section - should find a study closer to Texas for a reference instead of long beach California (they are the Pacific ocean and we are the Gulf, very different waters that affect underwater ambient noise levels).
133	11	Garza	Sarah		8/5/22	WC	PC	GEN	**Wetlands, page 3-54.** "Currents carry nutrients to the oysters and sediment and waste are filtered from the water by the oyster." - could be re-written.
133	12	Garza	Sarah		8/5/22	WC	PC	GEN	**Protected Resources, page 3-72.** "They were historically hunted but nowadays face threats such as collisions with vessels, habitat degradation, and reduced prey abundance from overfishing" (3-77)- not sure if we should change the word.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
133	13	Garza	Sarah	[redacted]	8/5/22	WC	PC	CULRES	**Cultural Resources, page 3-90.** PCCA provided USACE Terrestrial archaeological survey results that were not included in the DEIS this survey should be included in the final EIS.
133	14	Garza	Sarah		8/5/22	WC	PC	CULRES	**Cultural Resources, page 3-93.** At the bottom of Page 3-93 there is a sentence that concern me. It reads: " However, intensive survey is necessary to determine with certainty how a proposed action might impact submerged cultural resources."
133	15	Garza	Sarah		8/5/22	WC	PC	SOCIO	**Socioeconomics, Section 3.5.** • The City of Port Aransas is not located in Aransas County, verify this did not skew the statistics for this section. • Entire section: Review all table data and call out information pertaining to county statistics due to the above misconception (what cities are being considered for Aransas & Nueces Co.). • Page 3-98 last paragraph: per capita income of Aransas Co. ($31,780) does not appear to be higher than the State of Texas ($32,206) but is mentioned to be. • Page 3-100 first paragraph: call out information language is unclear and doesn't specify which Co. is being discussed. • Page 3-100 last paragraph: language in second sentence unclear. • Page 3-101 last paragraph: Hispanic/Latino stats for Nueces and San Pat Co. seem to be reversed compared to data in table 3-27. • Page 3-105: The City of Port A info is included in the Aransas Co. subsections Police and Fire. • Page 3-107 2nd to last paragraph: 4th sentence on North beach location is unclear. Also same page, the second paragraph under Section 3.5.2.2.1, "One of the major economic factors is this area is tourism." First is should be "in". • Page 3-111 Existing Zoning & Land Use: Paragraph hops between info on Port A and Aransas Pass. Language unclear.
133	16	Garza	Sarah		8/5/22	WC	PC	NAV	**Navigation, page 3-117.** DEIS states the ferry runs several times a day when in fact the ferry runs hourly, during peak season, the ferry runs almost continuously, DEIS should be updated to reflect the current schedule. The simulation demonstrated that 120Hp rotor tugs are to the pilots' liking, PCCA will still enact limitations on environmental conditions regards the power of configuration of tugs. PCCA agrees with the studies that the proposed tugs will allow safe to safely move in and out of Harbor Island.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
133	17	Garza	Sarah	[redacted]	8/5/22	WC	PC	DIRIMP	**Relative Sea Level Change, page 4-14.** "In summary, readily anticipated changes can be made in the existing and new placement areas and placement actions targeting BU operations and maintenance to adjust for gradual increase in sea level rise." This sentence is hard to follow. In general the entire proceeding paragraph is hard to follow. Speaking to the effects of RSLR on placement areas and BU separately would help.
133	18	Garza	Sarah		8/5/22	WC	PC	WET	Wetlands and SAV, page 4-45. Unvegetated shorelines are not estuarine wetlands.
133	19	Garza	Sarah		8/5/22	WC	PC	DIRIMP	Estuarine Habitats and Fauna, page 4-50. Dagger Island will not be protected under the CDP.
133	20	Garza	Sarah		8/5/22	WC	PC	DIRIMP	**Wildlife Resources, page 4-58 and 4-59.** CDP may affect shoreline despite Baird 2022b study?
133	21	Garza	Sarah		8/5/22	WC	PC	DIRIMP	**Protected Resources, page 4-60.** • CDP may affect shoreline despite Baird 2022b study? (4-60 & 63). • Wouldn't limiting hopper dredge to December-March present a greater impact on resident turtles with potential stunning events/lower motility in colder water (4-62) resuspension of legacy contaminants indicates the dredge sampling showed contaminants which conflict with previous statements about preliminary sampling results (4-62) . • SS2 would protect Red knot (not designated) habitat as well (4-68)

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
133	22	Garza	Sarah	[redacted]	8/5/22	WC	PC	CULRES	**Cultural Resources, page 4-73.** • Same similar sentence here: "The reviewing agencies commented that the proposed CDP was not likely to affect non-archaeological historic-age cultural resources, but an intensive survey was necessary to assess certain project component's impacts on terrestrial and underwater archaeological resources." HOW DO THESE SENTENCES AFFECT THE SCOPE OF WORK OF THE SURVEYS OR THE DOCUMENT DEVELOPMENT SCHEDULE IF ADDITIONAL EXTENSIVE SURVEYS ARE REQUIRED? • At the bottom of page 4-73, there is a sentence reading:" The discussion below is incomplete because it does not include findings and recommendations related to the presence/ absence" WHAT DOES THIS SENTENCE MEANS? IS THE SESSION INCOMPLETE? • The first paragraph in section 4.3.2.1 contradictory paragraph in section 5.4.12.
133	23	Garza	Sarah		8/5/22	WC	PC	SOCIO	**Socioeconomics, page 4-83.** Third paragraph - "In the long term, the deepening of the CCSC would allow for the transit of VLCCs to deepwater berths on Harbor Island. These ships are larger than ships that currently transit the VLCC and may adversely impact the viewshed of the residents who live near the channel. There is expected to be a long-term beneficial impact to air quality and a long-term reduction in noise due to reduced lightering of Suezmax vessels." The second sentence has a incorrect grammar (red text) and incorrect statement since VLCCs have been transiting the CCSC going to Ingleside since 2018.
133	24	Garza	Sarah		8/5/22	WC	PC	NAV	**Navigation, page 4-89.** • Second full paragraph on page 4-89 has a type-o, "This potential outcome if further reinforced by the fact Suezmax vessels meet…" Should be "is". • Second paragraph on page 4-90 also has a type-o, "Vessels maneuvers to assess…" Remove "s" on vessels. • Same paragraph, last sentence states scouring that may occur at this location can be mitigated with placement of armor protection. Is this on the north or south side and won't this be mitigated with Harbor Island east BU?
133	25	Garza	Sarah		8/5/22	WC	PC	CUMUL	**Cumulative Impacts, page 5-4.** • Should explicitly state what phase of review each project is in (i.e. USACE review, authorized project, constructed, etc.) • Section 5.3.2.5 states that dredging of 70ac of the bay bottom would not impact endangered species, the DEIS should be revised to make a statement consistent with other determination effects on turtles from dredging large areas. • La Quinta Terminal permit is incorrectly represented as a container terminal despite the permit being modified for a multi-purpose dock and now constructed as a bulk materials and bulk liquids/RO-RO dock (5-10). • Mitigation is not proposed with Harbor Island (5-12). • TxDot Ferry section does not detail a proposed project, all other projects in the section are proposed, underway or recently constructed (5-20). • Harbor Island and La Quinta Desal facilities are 50 MGD and 30 MGD proposed facilities, respectively, not 10 MGD and 30 MGD as stated on page 5-22.
133	26	Garza	Sarah		8/5/22	WC	PC	CUMUL	**Cumulative Impacts, page 5-23.** Page 5-23 section 5.4.1 paragraph 2. Confusing sentence - please check. "Any changes in commercial or recreational traffic can resulting…."

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
133	27	Garza	Sarah	[redacted]	8/5/22	WC	PC	CUMUL	**Cumulative Impacts, page 5-34.** Unclear statement about the wetland impacts was made, the statement should be revised that all direct wetland impacts would be from BU not dredging (5-34)
133	28	Garza	Sarah		8/5/22	WC	PC	CUMUL	Table 5-15 is missing a #3 in the project group column
133	29	Garza	Sarah		8/5/22	WC	PC	CUMUL	A table would be good to summarize where CEA are potentially anticipated
133	30	Garza	Sarah		8/5/22	WC	PC	GEN	Page 7-1 paragraph 4. First sentence speak to birds, third sentence leaves them out.
133	31	Garza	Sarah		8/5/22	WC	PC	GEN	Rules and Regs are cited, but not referenced in reference section.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
133	32	Garza	Sarah	[redacted]	8/5/22	WC	PC	GEN	Page 12-3 " Strawbridge PCCA.....Garza PCCA's" they should both read the same.
133	33	Garza	Sarah		8/5/22	WC	PC	GEN	Mott McDonald, Triton, PCCA should be added to the list of preparers as they are all referenced as contributors in the DEIS.
133	34	Garza	Sarah		8/5/22	WC	PC	GEN	Formatting not consistent - spacing and author name entries. None of the regulations cited within the document are referenced.
134	1	Mayorya	Elizabeth		8/3/22	WC	PC	DIRIMP	Concerned about how the project will negatively affect marine life.
135	1	Wyatt	Lesvie		8/3/22	WC	PC	DIRIMP	Concerned about how the project will negatively affect the environment.
136	1	Robles	Odiha		8/3/22	WC	PC	DIRIMP	Concerned about how the project will negatively affect the environment.
137	1	Villamerz	Tiffany		8/3/22	WC	PC	NOTAPP	Project will not increase the resiliency of existing hurricane risk.
138	1	Alonso	Jessica		8/3/22	WC	PC	NOTAPP	Project will not increase the resiliency of existing hurricane risk.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
139	1	Hernandez	Dora	[redacted]	8/3/22	WC	PC	NOTSUP	The project will not benefit the public.
140	1	Villarreal	Rosalinda		8/3/22	WC	PC	NOTSUP	Does not support the project being built.
141	1	Hernandez	Rebecca		8/3/22	WC	PC	NOTSUP	Does not support the project being built.
142	1	Baldaramos	Celina		8/3/22	WC	PC	NOTSUP	Does not support the project being built.
143	1	Luna	Victoria		8/3/22	WC	PC	NOTSUP	More stagnant water and unnecessary increase in taxes.
144	1	Figueroe	Eva		8/3/22	WC	PC	NOTSUP	Does not support the project being built.
145	1	Dailey	Lucia		8/6/22	Email	PC	P&N	Concerned that by not combining this project with the Axis Midstream and Harbor Island terminals that lesser amount of scrutiny is achieved as the other project are not requiring an EIS.
145	2	Dailey	Lucia		8/6/22	Email	PC	P&N	Commenter says that an Ingleside facility employee said that was doubtful that partially loaded outbound VLCCs at Ingleside could top off at Harbor Island and potentially reduce or eliminate reverse lightering.
145	3	Dailey	Lucia		8/6/22	Email	PC	CUMUL	Raising concerns about all three projects and the amount of dredged material they will all produce and that the other two (Axis Midstream and Harbor Island) are not requiring an EIS.
145	4	Dailey	Lucia		8/6/22	Email	PC	CUMUL	Desalination project on Harbor Island will have serious, cumulative, and permanent impacts from more saline, dredging, construction, and dredged material placement.
145	5	Dailey	Lucia		8/6/22	Email	PC	ANALY	Believes the model prediction of 5-10 percent increase in sedimentation in certain reaches could be underestimated. Aerial photos show massive plumes of sediment being pushed into waterways by tugs positioning VLCCs into berths. This would likely add to sediment load, and increase turbidity far into the channel.
145	6	Dailey	Lucia		8/6/22	Email	PC	ANALY	Concerned that the potential for a 17 percent increase in tidal amplitude would have a negative impact on the residential areas, businesses, ferry landings, nature preserve.
145	7	Dailey	Lucia		8/6/22	Email	PC	CUMUL	Concerned about the increase in salinity the modeling predicts and how this along with other factors, i.e. desalination, drought, reduced freshwater inflow, sea level rise, will impact the ecosystem.
145	8	Dailey	Lucia		8/6/22	Email	PC	CUMUL	Concerned that the increase in salinity of 3 ppt and the desalination discharge will push oysters to the brink.
145	9	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	Surprised that RSLR at the tide gauge nearest the project (NOAA gauge 8774770) showed 0.23 inches per year.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
145	10	Dailey	Lucia	[redacted]	8/6/22	Email	PC	DIRIMP	"Except for impacts associated with dredging, surface water quality trends would not be altered by any of the alternatives." Except for impacts associated with 46,300,000 cubic yards of dredging… what might those be?
145	11	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	Would increased algal activity, hypoxia, and higher salinity levels from desalination discharges be more likely to cause "Red Tides"? Those are "localized and temporary, but devastating to marine life, birds, wildlife, human health, and not too good for tourism, either.
145	12	Dailey	Lucia		8/6/22	Email	PC	DREDMAT	Concerned that the water and sediment quality data used (1980-2002) to conclude impacts is outdated.
145	12	Dailey	Lucia		8/6/22	Email	PC	DREDMAT	Concerned that the water and sediment quality data used (1980-2002) to conclude impacts is outdated.
145	13	Dailey	Lucia		8/6/22	Email	PC	DREDMAT	Concerned that the testing of the sediments as described in the Sampling Analysis Plan is currently being done by the Port. Shouldn't this be done by a third-party?
145	14	Dailey	Lucia		8/6/22	Email	PC	DREDMAT	Serious questions regarding sediment quality for placement other than in the ODMDS and it is important to scrutinize sediment quality for disposal at BU sites and how it would impact the ecosystem. This could be a violation of the Clean Water Act and NEPA.
145	14	Dailey	Lucia		8/6/22	Email	PC	DREDMAT	Serious questions regarding sediment quality for placement other than in the ODMDS and it is important to scrutinize sediment quality for disposal at BU sites and how it would impact the ecosystem. This could be a violation of the Clean Water Act and NEPA.
145	15	Dailey	Lucia		8/6/22	Email	PC	CUMUL	Permanent and cumulative water quality impacts are likely if all three projects are permitted.
146	1	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	Groundwater and Surface Water Hydrology: Table 2-3 on page 2-9 seems to total about 17,201,600 cubic yards of material to be placed on shorelines, beaches, and upland areas as part of this project. The impacts may be "localized" since they would be in different areas, but because of the total volume, the clay content, and the fact that the sites are adjacent to waterways, the impact on groundwater and surface hydrology could be substantial.
146	2	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	Soils-ES, page vii. Chapter 4-section 4.1.4.3.2. "Only beach quality sands from the CCSC should be placed as direct beach nourishment at locations previously breached by Hurricane Harvey." This should be changed to "Only beach quality sands from the CCSC WILL be placed as direct beach nourishment on Mustang and San Jose' Islands. Placing dredge spoils with varying amounts of clay on sand beaches would have extremely negative effects on human, bird, and marine life, especially the nesting of turtles, some threatened and some endangered.
146	3	Dailey	Lucia		8/6/22	Email	PC	P&N	The project is designed to serve one entity alone but then discusses other projects, i.e. the –54 foot project, Harbor Island Terminal. Not likely that VLCC could top off at Harbor Island reducing or eliminating reverse lightering - according to an Ingleside facility employee.
146	4	Dailey	Lucia		8/6/22	Email	PC	GEN	Nowhere in the first 16 chapters of this document is there any mention of how this project might be funded. If the intent is to involve taxpayer funds, this should be stated clearly. This would be a serious omission of facts. Not in the public interest!
146	5	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	Concerned that if the channel were deepened, Harbor Island would be more at risk than it is now, and the facilities farther up at Ingleside. In addition, contaminated soils on Harbor Island could be disturbed, dredged, or deposited elsewhere if the Port carries out the other projects they envision there.
146	6	Dailey	Lucia		8/6/22	Email	PC	CUMUL	The permit for a desalination plant discharging 95,600,000 gallons per day of brine and waste chemicals into the ship channel is a future threat that also needs to be addressed by more than a paragraph in Chapter 5.
146	7	Dailey	Lucia		8/6/22	Email	PC	CUMUL	Concerned that the assumption in the EIS is that the Harbor Island and Axis Midstream projects have been constructed and that their impacts are not included in the EIS.
146	8	Dailey	Lucia		8/6/22	Email	PC	AIR	Air emissions presented on Table 4-11 on page 4-33 are concerning, considering that much of the dredging would be next to popular spaces with heavy public use, i.e. city and county parks, fishing jetties, beaches, and adjacent to the ferry landing, where people often spend long periods of time.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
146	9	Dailey	Lucia	[redacted]	8/6/22	Email	PC	AIR	Operational Emissions, on page 4-35, section 4.1.9.2.3 reads, “The impact assessment focused on the change in lightering activity.” However, lightering does not occur in downtown Port Aransas, it is done out in the Gulf. Once again, no VLCC’s or Suezmax tankers are now loading at Harbor Island. The air quality impacts are presently from vehicles, ferries, recreational and tour boats, and passing vessels of all sorts. It’s not clear to me if table 4-14 and table 4-15 are presenting the amount of emissions from VLCC’s positioning, idling, and berthing at Harbor Island and the tugboats assisting them. I’m hoping that someone can figure this out. Unlike many descriptions in this DEIS, these emissions at Harbor Island would be “localized and permanent”!!
146	10	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	Disagrees with the conclusions of the noise impacts and says that different section say different things: ES, Page viii; Chapter 4, section 4.1.10.1, page 4-38; Section 4.1.10.2.4; Chapter 2, page 2-10, in section 2.2.3; Chapter 4, Sections 4.1.10.2.1 and 4.1.10.2.2; Section 4.1.10.2.3.
147	1	Branscomb	Margo		8/6/22	Email	PC	PUBMEET / OUT	Concerned that only one Public Meeting was scheduled and why it was held in Corpus Christi. Request two more meetings, one in Port Aransas.
147	2	Branscomb	Margo		8/6/22	Email	PC	PUBMEET / OUT	Why only 2 weeks were added to review the additional documents that were provided. Request more time to review the DEIS.
147	3	Branscomb	Margo		8/6/22	Email	PC	NONE	I request an attitude change that recognizes that this project directly impacts me.
148	1	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	Section 4.2.2.2.2, page 4-50 states, “Dredging and placement activities conducted under Alternative 1 (Applicant’s Proposed Action) would directly affect the estuarine habitats and fauna in the study area.” Actually, Alternative 1 would affect estuarine habitats and fauna in the PROJECT area, causing a much more “localized” and higher impact than on the entire “study area”.
148	2	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	Concerned about the impact acreages listed in Table 4-17, page 4-44 and the Executive Summary, page ix, and that together they total over 4,500 acres of impacted area.
148	3	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	Page 4-50 to 4-55 gives information on the Applicant’s Proposed Action Alternative’s effects on “Ecological and Biological Resources”. It’s difficult to separate these, in “the real world”, but especially in this DEIS. Much of the information cited, published from 1973- 2005, is of a generic nature, and doesn’t account for the combination of ALL these “cumulative effects” in very specific, very “localized” areas. A “Summary of Impacts” Table 4-21, pgs 4-92 to 4-100, lists, but tends to minimize them by also claiming they would be “temporary’. This proposed project is expected to take 5 years. Its combination of multiple impacts over multiple years in multiple close proximity locations of one interrelated system would have permanent and devastating effects.
149	1	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	Invasive Species in Ballast Water, page ix: “Under the Applicant’s Proposed Action Alternative, most VLCC ballast water exchanges would be located around Axis and Harbor Island, increasing the risk of introducing invasive species.”The Executive Summary fails to note the proximity to the nursery grounds of the bays, wetlands and seagrasses, as well as the “tidal toll road” through this spot. Releases in this strategic location would endanger ALL the bays in this system- from St. Charles and Copano to Aransas, Redfish, Nueces, Corpus Christi, and the Laguna Madre.
149	2	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	Page 4-57, There are some assumptions to ballast water impacts that may prove wrong: lightering may still be required; and partially loaded VLCC’s may NOT top off at Harbor Island. What is clear is that Alternative 2 greatly reduces the risk by releasing the ballast waters well offshore, where they would rarely impact the Corpus Christi Bay ecosystem.
149	3	Dailey	Lucia		8/6/22	Email	PC	T&E	Wildlife Resources- ES page x and Chapter 4, section 4.24.2, page 4-58. Concerned about the impacts to sea turtles due to vessel traffic. Commenter does not believe that the project would reduce the amount of vessel traffic.
149	4	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	Commenter does not believe that the project would reduce the amount of vessel traffic and believes this is a deliberate deception in the document. Believes the project would allow a larger number of larger vessels to export more oil faster compounding the effects of climate change and all the other negative impacts in the DEIS causing more damage to habitats.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
149	5	Dailey	Lucia	[redacted]	8/6/22	Email	PC	WAKE	Page 4-58 and 4-59 read, ”Larger vessels such as VLCC’s going through the CCSC with their tugboats may increase shoreline erosion and degrade or reduce the amount of shoreline for use by birds and terrestrial wildlife.” This has already been the case along the ship channel from Ingleside to Harbor Island for decades!
149	6	Dailey	Lucia		8/6/22	Email	PC	MITIG	While it is stated that the BU of dredged material is proposed to increase beach and wetland habitat and reduce shoreline erosion. What isn’t noted here are any plans for vegetation on dredge spoils to match that which would be buried.
149	7	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	All the information on sediment quality seems to relate to offshore placement, with no comments on testing or standards for onshore placement in or near beaches, wetlands, or estuaries. Even if no HTRW is present, that doesn’t make it good for establishing habitat, however, it could possibly provide protection to shorelines and other areas.
149	8	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	**Protected Lands- ES, page x, and page 4-60. Commenter concerned about:** • Added storm surge and shoreline development would result from the CDP under a No-Action, Applicant’s Proposed Action, or Onshore/Offshore alternative. • Indirect impacts to the “Redfish Bay State Scientific Research Area”, the “Mission-Aransas National Estuarine Reserve” and the “Port Aransas Nature Preserve.” • Omitted is the possibility that Texas Audubon may hold some conservation easements on Harbor Island, “protected lands” that could well be impacted by developments there. • VLCC producing larger wakes which could degrade critical habitat for piping plover • Increased risk of spills with larger vessels • Incidental spills and runoff at several Harbor Island operations not included in the DEIS.
149	9	Dailey	Lucia		8/6/22	Email	PC	T&E	**Threatened and Endangered Species-ES pg x, and Chap 4, pg 4-61. Commenter concerned about:** • Does not mention the proposed alternatives plans are for dredging on a massive scale • Omits information on the amount of maintenance dredging • The 5 years to complete the project and 20 years or longer of maintenance dredging does not have "temporary" impacts. • Leaves out impacts from other Harbor Island Projects in the alternatives • Ignores impacts from increased vessel size and activity, VLCC/tugs are constantly stirring up sediments increasing turbidity • Section 4.2.5.2.2, page 4-62 have mixed messages on the effects on piping plovers and red knots
150	1	Dailey	Lucia		8/6/22	Email	PC	EFH	**Appendix E,** page 4-3, 4.1.2. Commenter wants the first paragraph of this section rewritten and provides suggested revision.
150	2	Dailey	Lucia		8/6/22	Email	PC	EFH	Concerned that the impacts are described as temporary and short-lived until construction is complete. Construction is expected to take 5 years working 20 hours per day, 7 days per week therefore does not believe the impacts are temporary. And maintenance dredging would continue with increased impacts, equaling less fish.
150	3	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	Commenter feels that the DEIS is not forthcoming with the impacts between the Executive Summary and Appendix E- Page 4-8, Section 4.2.4.
150	4	Dailey	Lucia		8/6/22	Email	PC	CUMUL	The discharge of 95,600,000 gallons PER DAY of brine and waste chemicals from a Port of Corpus Christi desalination facility on Harbor Island could definitely impact these “localized” reefs.
150	5	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	Concerned the loss of oyster reef would affect other species as described in Chapter 3, page 3-63.
151	1	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	**Migratory Birds and Marine Mammals.** Concerned that the 20 hours a day, 7 days a week for 5 years the project would take to construct would cause long-term impacts and not temporary as stated.
151	2	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	**Marine Mammals and Sea Turtles.** Does not believe that noise caused by the project would by temporary and localized, but rather permanent.
151	3	Dailey	Lucia		8/6/22	Email	PC	DIRIMP	Changes in salinity, only tolerances for oysters have been noted to this point, what about other species?

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
152	1	Fulton	Cathy	[redacted]	8/6/22	Email	PC	PUBMEET / OUT	Request an extension to the DEIS review period and a public meeting held in Port Aransas and Aransas Pass.
152	2	Fulton	Cathy		8/6/22	Email	PC	P&N	Misleading/incorrect claim, Applicants Purpose and Need Statement in Section 1.5.1 (first paragraph page 1-8). Does not believe the CDP is going to reduce lightering for entities past Harbor Island. The Ingleside area terminals are 10 miles past Port Aransas and Inner Harbor 20 miles further up and refers lightering would continue. These companies are not just going to stop.
152	3	Fulton	Cathy		8/6/22	Email	PC	DIRIMP	Believes only the Port benefits from the channel deepening and they want to develop contaminated property on Harbor Island for an export terminal, essentially cutting off upstream suppliers while doing permanent, not temporary damage to the marine environment.
152	4	Fulton	Cathy		8/6/22	Email	PC	NONE	Commenter cites information from public testimony on June 14, 1994.
152	5	Fulton	Cathy		8/6/22	Email	PC	NONE	Commenter cites information from the USACE letter to the Port on February 19, 2019 regarding the interdependency of the CDP, Harbor Island Facility, and Axis Midstream. Neither of the applications are complete at this time and states the Axis application is make believe since the contract was revoked so questions must be asked.
152	6	Fulton	Cathy		8/6/22	Email	PC	P&N	Cites Section 1.5.1, page 1-8 last paragraph and states it is intended to confuse everyone by mixing the 56-foot channel and proposed. The bond money and primary baker dropping out of the project and the USACE knew, questioning who the Port customers will be for this project.
152	7	Fulton	Cathy		8/6/22	Email	PC	P&N	Cites Section 1.5.1, page 1-9 last paragraph and wants to know about the congestion for all marine traffic. Questioning if the Port does not have a right to shut down marine traffic, public highway.
152	8	Fulton	Cathy		8/6/22	Email	PC	ANALY	What happens to all stakeholder operations when there's a failure in the turning or berthing of a VLCC? The failure rate for ship simulations was almost 10%. In all failures, the ship ran aground on granite jetty rock. Without a doubt, the hull would be ruptured causing a massive oil spill, what happens to marine traffic then? Talk about delays, not to mention the environmental disaster!
152	9	Fulton	Cathy		8/6/22	Email	PC	ANALY	The Ship Simulation Report seems very fabricated to make the turning of ships work. To get it to work a tug boat was designed, but does not exist. Virtual, non-reality computer simulations are acceptable to the USACE and allowed in 33 CFR 320?
152	10	Fulton	Cathy		8/6/22	Email	PC	ANALY	Says that contrary tides and currents were not included in Baird's H&H study - the model of the water currents presented at the public meeting - and are not mentioned or depicted in the models.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
152	11	Fulton	Cathy	[redacted]	8/6/22	Email	PC	ANALY	Concerned that a 3 ppt salinity increase in the channel will increase the salinity in the Redfish Bay Scientific Area. This pass is the only one in the area, 3 ppt would cause impacts to most larvae and more damage to oyster populations. Attached USACE testimony from the SOAH hearing and various studies.
152	12	Fulton	Cathy		8/6/22	Email	PC	PUBMEET / OUT	USACE provided the public an unrealistic 45 days to review the DEIS, gave an additional 18 days only because of adding additional documents.
152	13	Fulton	Cathy		8/6/22	Email	PC	BUSITES	DEIS claims the BU placement and most impacts to be temporary. The DEIS is grossly inadequate and fails to adhere to 33 CFR 320, the Clean Water Act, and NEPA requirements.
153	1	Halioua	Linda		8/6/22	Email	PC	FERRY	Concerned about the wait time for the ferry for folks commuting to and from for work and how that could impact businesses.
153	2	Halioua	Linda		8/6/22	Email	PC	DIRIMP	Concerned about the environmental impacts.
154	1	Maquire	Charles		8/6/22	Email	PC	NONE	Acknowledging receipt of email was cc'd on from Cathy Fulton on August 6, 2022, 2:58PM.
155	1	Holt	Joan		8/7/22	Email	PC	PUBMEET / OUT	Requests an extension of the DEIS review period to allow for more time to review the added amendments.
155	2	Holt	Joan		8/7/22	Email	PC	PUBMEET / OUT	Because Port Aransas will be significantly impacted by Alternative 1, requests a special hearing be held in Port Aransas before the FEIS.
156	1	Gardiner	Pat		8/7/22	Email	PC	NONGEN	Feels the plan is based on special commercial interests and ignores the common interests for work only for themselves and their profits.
156	2	Gardiner	Pat		8/7/22	Email	PC	DIRIMP	Concerned that Corpus Christi Bay and surrounding estuary will be negatively impacted.
156	3	Gardiner	Pat		8/7/22	Email	PC	STSURGE	Concerned about the increased risk to property and residents during the hurricanes and will be a burden that will increase the rising insurance costs and the burden of petrochemical pollution due to exacerbated flooding as seen during Harvey and the Houston Ship Channel.
156	4	Gardiner	Pat		8/7/22	Email	PC	DREDMAT	Concerned about the proposed use of dredged material and potential contaminants that would not be safe for adding to local beaches and waterways and that could cause issues to the ecosystem and people swimming in the water.
156	4	Gardiner	Pat		8/7/22	Email	PC	DREDMAT	Concerned about the proposed use of dredged material and potential contaminants that would not be safe for adding to local beaches and waterways and that could cause issues to the ecosystem and people swimming in the water.
156	5	Gardiner	Pat		8/7/22	Email	PC	DIRIMP	Concerned about potential water quality, air quality, bay health, and way of life, and an deadly diseases now that we fear from pollution exposure.
156	6	Gardiner	Pat		8/7/22	Email	PC	PUBMEET / OUT	Requests action taken that will give experts in experts in the marine ecology, air quality, weather, local cancer and birth defect rates, and other pertinent issues more time to study the real effects of this project.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
156	7	Gardiner	Pat	[redacted]	8/7/22	Email	PC	PUBMEET / OUT	Requests Public Meetings in Port Aransas and Aransas Pass and more time to review the DEIS.
157	1	Gardiner	Pat		8/7/22	Email	PC	DIRIMP	Provides a report by Ward and Armstrong (1997, https://www.cbbep.org/publications/virtuallibrary/CCBNEP-23.pdf) that would like reviewed for the project.
157	2	Gardiner	Pat		8/7/22	Email	PC	ANALY	Requests input from scientists who have worked in the study area.
157	3	Gardiner	Pat		8/7/22	Email	PC	PUBMEET / OUT	Consider coming to Port Aransas, Aransas Pass, and including more local residents in the discussions about the project.
158	1	Fulton	Cathy		8/7/22	Email	PC	WAKE	Attached photos of VLCC and LNG ship wakes. Believes the Vessel Wake Analysis waters down vessel wakes and the effects to shorelines.
159	1	Fulton	Cathy		8/7/22	Email	PC	NONE	Attached Remand Closing Document from the second contested case hearing with SOAH in April 2022 regarding pollution our public waters with brine discharge, there is information related to water quality, channel currents, Port Aransas economy, marine life, etc. Attached a white paper from Dr. Buskey that explains in plain terms the problems estuarine dependent larvae encounter to survive travel through the ship channel.
159	2	Fulton	Cathy		8/7/22	Email	PC	PUBMEET / OUT	I wish to remind you, you stated at the June 16, 2022 meeting that multiple comments can be submitted and all comments will be read and considered.
159	3	Fulton	Cathy		8/7/22	Email	PC	GEN	Need extensions on all applications concerning Harbor Island in the city limits of Port Aransas: CDP SWG-2019-00067, Harbor Island SWG-2019-00245, and Axis Midstream SWG-0019-00789.
159	4	Fulton	Cathy		8/7/22	Email	PC	ALTS	Support an offshore SPM. Do not support exporting oil off Harbor Island because of potential impacts to the marine fisheries.
159	5	Fulton	Cathy		8/7/22	Email	PC	DIRIMP	Harbor Island is a critical juncture of 3 channels: the ship channel, Aransas Channel, and Lydia Ann Channel; called the "Ecological Hotspot" due to primary larval flow from the Gulf to Redfish Bay, concerned about the impacts the project will have on the ecosystem.
159	6	Fulton	Cathy		8/7/22	Email	PC	SOCIO	The Port Aransas economy is almost solely based on tourism. Concerned the project will impact fish and wildlife that people come here for.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
159	7	Fulton	Cathy	[redacted]	8/7/22	Email	PC	GEN	Believes the only people who will benefit the CDP are the Port, Lone Star Ports, and Axis Midstream. The people of Port Aransas will get nothing.
159	8	Fulton	Cathy		8/7/22	Email	PC	DIRIMP	Concerned about the contamination on Harbor Island.
159	9	Fulton	Cathy		8/7/22	Email	PC	STSURGE	Concerned how a hurricane would impact an oil export facility on Harbor Island.
159	10	Fulton	Cathy		8/7/22	Email	PC	P&N	Request the permit application be denied and asks that the lease agreements with the Carlyle Group and Lone Star Ports be looked into.
159	11	Fulton	Cathy		8/7/22	Email	PC	PUBMEET / OUT	Request that the communities concerns be addressed with a true, actual response and not a list of statistics.
159	12	Fulton	Cathy		8/7/22	Email	PC	NOTAPP	Have over 22,000 signatures against the proposed heavy industrial develop for crude oil export and a desalination facility, that will dump 96,500,000 gallons per day, hypersaline water, into the ship channel.
160	1	Phelan	Chris		8/8/22	Email	PC	PUBMEET / OUT	Have sent numerous comments via registered mail to your post office box listed in regards to the dredging at the Port of Corpus Christi. It has come to our attention that they have not been received by you. Can you pick up these comments so we can get confirmation. Response from USACE stating that they are receiving comments at that PO Box and have reviewed all the comments received but there were none from For the Greater Good or Chris Phelan.
161	1	Araiza	Isabel		8/6/22	Email	PC	PUBMEET / OUT	Request a contested hearing.
161	2	Araiza	Isabel		8/6/22	Email	PC	DIRIMP	Concerned the CDP will destroy the bays and ecosystem.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
161	3	Araiza	Isabel	[redacted]	8/6/22	Email	PC	NAV	Concerned about increase traffic on the channel.
161	4	Araiza	Isabel		8/6/22	Email	PC	SOCIO	Concerned about impacts to small local businesses and families that live here.
162	1	Fulton	Cathy		8/8/22	Email	PC	ALTS	DEIS Section 2.3.1, 3rd paragraph. This applies to inshore terminals too. All the same procedures including maintenance and inspection will be required. The same issues with delays and contracts will also apply.
162	2	Fulton	Cathy		8/8/22	Email	PC	P&N	DEIS Section 2.3.1, 3rd and 4th paragraphs. Does not feel the number add up and it would be 64 VLCC loads per month. Is the applicant claiming the nonexistent terminal on Harbor Island could service 64 VLCC's per month? A very generous hypothetical would be the terminal could load 30 VLCC's/month, which equates to 2,000,000 bpd, not 4.5 million bpd. Where is this projected 4.5 million bpd originating? I personally think it is someone throwing darts. Are the other established facilities' exports factored into the 4.5 bpd? What about the supply from the Bluewater project, is it factored into the 4.5 million bpd?
162	3	Fulton	Cathy		8/8/22	Email	PC	ALTS	Feels the scope of Alternative 2 is skewed and misrepresents the reality of present and future conditions. The Port's projections of 4.5 million bpd for export oil appears to factor in all possible exports from operators, but hogs the numbers for itself. How would 8 SPMs be operated? Is the POCCA proposing to own and lease them? What about cost analysis and comparison to other alternatives? Since Alternative 1, 2 and 3 would require public money, how much are we talking?
162	4	Fulton	Cathy		8/8/22	Email	PC	PUBMEET / OUT	Request more time be added to the review period and to have Public Meetings in both Port Aransas and Aransas Pass.
163	1	Dailey	Lucia		8/8/22	Email	PC	CULRES	Does not believe the DEIS is addressing potential indirect impacts of the project (increases in tidal amplitude, salinity, and storm surge) to the Lydia Ann Lighthouse.
164	1	Dailey	Lucia		8/8/22	Email	PC	SOCIO	DEIS Chapter 3, on pages 3-97, 3-98, 3-100, 3-102, 3-105, 3-110, and 3-111. Without any notice to, or consent of the residents, the authors have relocated the City of Port Aransas from Nueces County to Aransas County. In addition, they have blurred the boundaries between the cities of Corpus Christi, Port Aransas and Aransas Pass on Mustang and Harbor Islands with confusing language on pages 3-110 and 3-111.
164	2	Dailey	Lucia		8/8/22	Email	PC	SOCIO	In Chapter 4, page 4-79 under "Land Use" It states "Areas closest to the channel include a mix of maritime industry, Port-related properties, and undeveloped areas." Notably omitted is residential, commercial, recreational, and nature preserve areas.
164	3	Dailey	Lucia		8/8/22	Email	PC	SOCIO	Section 3.5.3.2.2, page 3-111, for all intents and purposes, the Nature Preserve does share a border of much less than 100 feet from the CCSC. Once again, the does not present a clear picture of the REAL impact this project would have on the REAL economic driver of the Region of Influence - TOURISM.
164	4	Dailey	Lucia		8/8/22	Email	PC	SOCIO	Chapter 3, page 3-107 - information isn't up to date or represent real facts. Are the authors considering all tourist activity from King Ranch to Padre Island, Port Aransas, Aransas Pass, Rockport, and Fulton as Corpus Christi tourism? Should present more recent data.
164	5	Dailey	Lucia		8/8/22	Email	PC	SOCIO	The negative effects this proposed project would have on fishing, boating, ecotourism, beachgoers, and seafood consumption are NOT addressed in the Executive Summary, DEIS Chapter 3, or Chapter 4.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
165	1	Dailey	Lucia	[redacted]	8/8/22	Email	PC	NAV	Stating that no adverse impacts are expected under the Applicants Proposed Action Alternative. Taking into account the two marine terminals included in the NO-Action (page 4-87), Applicant's Proposed Action (page 4-89) and Inshore/Offshore Alternatives (page 4-91), this is a gross miscalculation or outright misinformation. When exports are expected to increase how can there be no increase in vessel traffic?
165	2	Dailey	Lucia		8/8/22	Email	PC	NAV	Does not believe that turning and hauling huge ships into berths next to the ferry in "nominally sufficient" width channels will disrupt ferry traffic less than lightering ships at Harbor Island, which does not currently happen, and is only included for comparison.
165	3	Dailey	Lucia		8/8/22	Email	PC	CUMUL	Concerned about the 36 percent tidal range change with the cumulative impacts.
165	4	Dailey	Lucia		8/8/22	Email	PC	MITIG	Concerned that dredged material is not actually beneficial and the Port is not proposing mitigation.
165	5	Dailey	Lucia		8/8/22	Email	PC	PUBMEET / OUT	Believes the USACE has done a poor job with coordination and public involvement. Does not like the Scoping meetings were held as Zoom meetings and that the only Public Meeting was not in Port Aransas. Also does not like that the comment period was only extended 2 weeks.
165	6	Dailey	Lucia		8/8/22	Email	PC	PUBMEET / OUT	Suggests reviewers ask the USACE record all citizen comments they have received concerning the oil terminals proposed for Harbor Island and the CDP projects.
166	1	Keller	Max		8/8/22	Email	PC	BUSITES	How will USACE and Port manage dredging activities and the position and placement of the "spoils" around and on Port Aransas beaches?
166	2	Keller	Max		8/8/22	Email	PC	PUBMEET / OUT	Request that another Public Meeting be held in Port Aransas.
167	1	Love	Hope		8/8/22	Email	PC	FERRY	Concerned about the impact to the ferry the project would have. Thinks the system will be shut down and that would impact businesses and schools.
168	1	Bradburn	Mike		8/8/22	Email	PC	FERRY	Concerned about the impacts to the ferry the project would have; its impacts on emergency vehicles, traffic backups and further emissions being released as a result.
168	2	Bradburn	Mike		8/8/22	Email	PC	ALTS	Wants the project located to an area that would not have impacts to the ferry.
169	1	Dailey	Lucia		8/8/22	Email	PC	CUMUL	Concerned about how the 36 percent increase in tidal range would impact the Aransas Pass Light Station District, also known as the Lydia Ann Lighthouse.
169	2	Dailey	Lucia		8/8/22	Email	PC	PUBMEET / OUT	Hope the reviewing agencies receive a record of all the comments made regarding the proposed CDP, the proposed oil terminals, and public meetings.
170	1	Speegle	Ryan and Gaylann		8/8/22	Email	PC	FERRY	Concerned about the impacts to the ferry the project would have; its traffic backups due to shutdown, impacting jobs and businesses.
170	2	Speegle	Ryan and Gaylann		8/8/22	Email	PC	ALTS	Wants the project located to an area that would not have impacts to the ferry.
171	1	De Young	Roberta		8/8/22	Email	PC	FERRY	Concerned about the impacts to the ferry the project would have; its traffic backups due to shutdown, impacting jobs and businesses.
172	1	Powell	Susan and Gentry		8/8/22	Email	PC	FERRY	Concerned about the impacts to the ferry the project would have; negatively impacting the coming and goings of residents and tourists.
172	2	Powell	Susan and Gentry		8/8/22	Email	PC	BUSITES	Opposed the proposed ODMDS and placement sites due to the negative impact on the ecosystem and ultimately on tourism.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
173	1	Gardiner	George	[redacted]	8/8/22	Email	PC	DIRIMP	Concerned about the negative environmental impacts on Corpus Christi Bay, seagrass, and estuaries.
173	2	Gardiner	George		8/8/22	Email	PC	DIRIMP	Concerned about the oyster business that was once thriving before being poisoned by zinc.
173	3	Gardiner	George		8/8/22	Email	PC	DREDMAT	Concerned that dredging will bring up organic and inorganic pollutants that would impact the placement sites. Attached a study regarding pollution following Hurricane Harvey.
173	3	Gardiner	George		8/8/22	Email	PC	DREDMAT	Concerned that dredging will bring up organic and inorganic pollutants that would impact the placement sites. Attached a study regarding pollution following Hurricane Harvey.
173	4	Gardiner	George		8/8/22	Email	PC	PUBMEET / OUT	Request Public Meetings be held in Port Aransas and Aransas Pass.
174	1	Marco	Sally		8/8/22	Email	PC	STSURGE	Concerned about the storm surge if the channel is dredged that deep.
174	2	Marco	Sally		8/8/22	Email	PC	FERRY	Concerned about the impact to the ferry, traffic will be a mess.
174	3	Marco	Sally		8/8/22	Email	PC	BUSITES	Concerned about placing dredged materials on the beach.
174	3	Marco	Sally		8/8/22	Email	PC	BUSITES	Concerned about placing dredged materials on the beach.
175	1	Gentile	Patrizia		8/8/22	Email	PC	FERRY	Concerned about the impact to the ferry traffic and interruptions will create delays and backup traffic for miles, could impact businesses with people trying to get to their jobs.
175	2	Gentile	Patrizia		8/8/22	Email	PC	DIRIMP	Any accidental oil spill would be an ecologic disaster for the whole CC Bay, and negatively affect the City of Port Aransas.
175	3	Gentile	Patrizia		8/8/22	Email	PC	BUSITES	Concerned about dredged material being placed on beaches that would ruin the attractiveness of the vacation town.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
175	3	Gentile	Patrizia	[redacted]	8/8/22	Email	PC	BUSITES	Concerned about dredged material being placed on beaches that would ruin the attractiveness of the vacation town.
175	4	Gentile	Patrizia		8/8/22	Email	PC	ALTS	Offshore loading should be considered.
176	1	Adamek	Charles and Erinn		8/8/22	Email	PC	NOTSUP	Does not support the project and believes it will endanger human life and impact the economy.
177	1	Milloy	Ross		8/8/22	Email	PC	NAV	Concerned about the maritime safety issues because of the geographical situation.
177	2	Milloy	Ross		8/8/22	Email	PC	DIRIMP	Concerned about the ecological and environmental damage to sea life and the economy.
177	3	Milloy	Ross		8/8/22	Email	PC	SOCIO	Concerned the project will not benefit local residents and impact tourism and the sports fishing industry.
177	4	Milloy	Ross		8/8/22	Email	PC	ALTS	Move this facility offshore.
178	1	French	Laura		8/8/22	Email	PC	NONE	Email did not contain any comments.
179	1	Cibulka	Kodi		8/8/22	Email	PC	FERRY	Concerned the ferry will be impacted.
179	2	Cibulka	Kodi		8/8/22	Email	PC	BUSITES	Does not want clay placed on the beaches.
179	2	Cibulka	Kodi		8/8/22	Email	PC	BUSITES	Does not want clay placed on the beaches.
180	1	Phillips	Lia		8/8/22	Email	PC	FERRY	Concerned the ferry will be impacted by the project; impact emergency vehicle access, back ups on the highway, and add emissions to the environment.
181	1	Hinojosa	Juan "Chuy"		8/8/22	Email	CD	SUPPORT	Expressing support of this project and ask that the Port receive favorable consideration.
182	1	Johnson	Kim		8/8/22	Email	PC	FERRY	Opposed to the project are requests it be relocated to an area that would not impact the highway, ferry, and community.
183	1	Foster	Felicia		8/8/22	Email	PC	DIRIMP	Opposed to the project as it will negatively impact the beaches, workers, and wildlife.
184	1	Philastre	Joseph		8/8/22	Email	PC	DIRIMP	Concerned about the environmental impacts the project will have, including recreational and commercial fishing.
184	2	Philastre	Joseph		8/8/22	Email	PC	BUSITES	Concerned about depositing dredged material on beaches and in close proximity offshore and the environmental impacts this will have.
184	2	Philastre	Joseph		8/8/22	Email	PC	BUSITES	Concerned about depositing dredged material on beaches and in close proximity offshore and the environmental impacts this will have.
184	3	Philastre	Joseph		8/8/22	Email	PC	SOCIO	Concerned the local economy and tourism will be impacted as a result of the project.
185	1	Speegle	Gaylann		8/8/22	Email	PC	FERRY	Concerned about the impacts to the ferry the project would have; its impacts on emergency vehicles, traffic backups and further emissions being released as a result.
186	1	Speegle	Gaylann		8/8/22	Email	PC	FERRY	Concerned about the impacts to the ferry the project would have; its impacts on emergency vehicles, traffic backups and further emissions being released as a result.
187	1	Beninga	Susie		8/8/22	Email	PC	DIRIMP	Concerned the project will cause an increase risk of spills, cause erosion and damage to land, storm surge and tidal inlets will have negative impacts, altered composition of the water will harm marine life, negative impacts to threatened and endangered species.
187	2	Beninga	Susie		8/8/22	Email	PC	SOCIO	Concerned that tourism, fishing, transportation, tourism, and employment will be impacted.
187	3	Beninga	Susie		8/8/22	Email	PC	FERRY	Concerned about the impact to the ferry; traffic, workers unable to get to work, businesses suffering.
187	4	Beninga	Susie		8/8/22	Email	PC	ALTS	An offshore terminal can accomplish the transfer of crude oil without the major devastation of the current project.
188	1	O'Neil	Mattalyn		8/8/22	Email	PC	FERRY	Concerned about the negative impact to the ferry for workers, tourists, and businesses.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
189	1	Fregoso	Francisco	[redacted]	8/8/22	Email	PC	DIRIMP	Concerned the project will destroy the estuaries.
190	1	Parkinson	Blanca		8/8/22	Email	PC	PUBMEET / OUT	Requests two more Public Meetings be held in Port Aransas, and Aransas Pass.
191	1	Foster	Will		8/8/22	Email	PC	NOTSUP	Does not support the project being built.
192	1	Parkinson	Blanca		8/8/22	Email	PC	NOTSUP	Does not support the project being built.
192	2	Parkinson	Blanca		8/8/22	Email	PC	PUBMEET / OUT	Request a Public Meeting be held in Port Aransas or Aransas Pass.
192	3	Parkinson	Blanca		8/8/22	Email	PC	PUBMEET / OUT	Provide the public ample time to review the volumes of EIS pertaining to this project.
192	4	Parkinson	Blanca		8/8/22	Email	PC	BUSITES	Provide the public with answers from experts regarding dredged material placement and the effects those will have on the surrounding communities.
192	4	Parkinson	Blanca		8/8/22	Email	PC	BUSITES	Provide the public with answers from experts regarding dredged material placement and the effects those will have on the surrounding communities.
193	1	Barreiro	Myra		8/8/22	Email	PC	FERRY	Concerned about the impacts to the ferry the project would have; its impacts on emergency vehicles and traffic backups as a result.
194	1	Maynard	Colby		8/8/22	Email	PC	FERRY	Concerned about the impacts to the ferry the project would have; its impacts on emergency vehicles and traffic backups as a result.
195	1	Parkinson	Blanca		8/8/22	Email	PC	PUBMEET / OUT	The USACE provided the public with an incorrect address to which the community could mail in comments. Feels the USACE has little regard for people's time and participation.
195	2	Parkinson	Blanca		8/8/22	Email	PC	PUBMEET / OUT	Requests a Public Meeting be held in Port Aransas or Aransas Pass.
195	3	Parkinson	Blanca		8/8/22	Email	PC	BUSITES	Especially concerning are the issues regarding the lack of analysis of the 35 borings for toxic metal content or for hazardous organic toxins, and the Port's and USACE's lack of clear plans for placement of dredge spoils, volume of dredge spoils, and effects of that placement on area beaches used by many for recreational purposes.
195	3	Parkinson	Blanca		8/8/22	Email	PC	BUSITES	Especially concerning are the issues regarding the lack of analysis of the 35 borings for toxic metal content or for hazardous organic toxins, and the Port's and USACE's lack of clear plans for placement of dredge spoils, volume of dredge spoils, and effects of that placement on area beaches used by many for recreational purposes.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
196	1	Krueger	Jo	[redacted]	8/8/22	Email	PC	DIRIMP	Concerned about the negative impacts to Corpus Christi, Red Fish, and Aransas bays and how the hydrology of the pass will impact water quality harming the ecosystem.
196	2	Krueger	Jo		8/8/22	Email	PC	SOCIO	Concerned tourism will be impacted.
196	3	Krueger	Jo		8/8/22	Email	PC	T&E	Concerned about harming Whooping Crane expanding critical habitat and impacts to their food source.
196	4	Krueger	Jo		8/8/22	Email	PC	BUSITES	Concerned that dredged material is being used "beneficially" and that it only degrade the ecosystem.
196	4	Krueger	Jo		8/8/22	Email	PC	BUSITES	Concerned that dredged material is being used "beneficially" and that it only degrade the ecosystem.
196	5	Krueger	Jo		8/8/22	Email	PC	ALTS	Wants the project taken offshore.
196	6	Krueger	Jo		8/8/22	Email	PC	WAKE	Concerned that larger ships will damage the shoreline along the channel.
196	7	Krueger	Jo		8/8/22	Email	PC	STSURGE	Concerned that the deeper channel will create a larger volume of water during storm surge that would add to flooding in the region. Deepening creates vulnerability to hurricane impacts.
196	8	Krueger	Jo		8/8/22	Email	PC	DIRIMP	Concerned larger ships will pose more risks to oil spills that would threatened the estuaries.
196	9	Krueger	Jo		8/8/22	Email	PC	SOCIO	Concerned about what the project will do to the local economy, fishing, tourism, etc.
196	10	Krueger	Jo		8/8/22	Email	PC	PUBMEET / OUT	A video Public Meeting is no substitute for in-person. Delay the project until we can have proper input.
197	1	Osborn	David		8/8/22	Email	PC	DIRIMP	Concerned the project would cause immense environmental damage.
197	2	Osborn	David		8/8/22	Email	PC	SOCIO	Concerned the project would endanger the fishing and tourism industries.
197	3	Osborn	David		8/8/22	Email	PC	NAV	Concerned the project would constrain vessel traffic in the channel leading to oil spill hazards.
197	4	Osborn	David		8/8/22	Email	PC	ALTS	Wants the project taken offshore.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
198	1	Liberto	Rick	[redacted]	8/8/22	Email	PC	NOTSUP	Opposes the project and feels it would destroy everything that is so special about this place.
198	2	Liberto	Rick		8/9/22	Email	PC	SOCIO	The project will create major disruptions for our harbor, and our restaurants and nightly activities will be overwhelmed with light pollution that takes away from your experience.
199	1	Ellwood	James		8/9/22	Email	PC	FERRY	Concerned about the impacts to the ferry the project would have; its on tourism, businesses, and employees, and folks trying to get on and off the island.
200	1	Ewing	Stephanie		8/9/22	Email	PC	FERRY	Concerned about the impacts to the ferry the project would have; its impacts on emergency vehicles, traffic backups and further emissions being released as a result.
201	1	McKee	Eric		8/9/22	Email	PC	FERRY	Concerned about the impacts to the ferry the project would have; traffic shut downs, schools, businesses, commuters.
202	1	Visser	Eileen		8/9/22	Email	PC	MITIG	Concerned about mitigating the negative impacts of the project.
202	2	Visser	Eileen		8/9/22	Email	PC	DIRIMP	Concerned that we state minor adverse impacts to benthos and fish…. But these impacts would be temporary (page 7-1, Section 7). Believes this is a hopeful statement and that it is unsubstantiated.
202	3	Visser	Eileen		8/9/22	Email	PC	MITIG	Dredged material placement will not enhance local habitat quality despite the possibility of erosion over time without additional material. Does not believe placing sediments create functional habitat. Feels that the restitution for the ecological impacts has been dismissed entirely. Commenter provides an example of the Port of Grays Harbor (1990) where the USACE was sued. This project open the USACE up to a similar lawsuit and the required mitigation for multiple species impacted by the dredging.
203	1	McInnish	Susie		8/9/22	Email	PC	SOCIO	Concerned this will mean the end to businesses and force families to move off the island which will ruin the school district.
203	2	McInnish	Susie		8/9/22	Email	PC	FERRY	Concerned the project will impact the ferry, causing major delays in assessing the waterway which would be a detriment for fishing guides and customers as well as other businesses on the island.
204	1	Anderson	Sandra		8/9/22	Email	PC	FERRY	Concerned about the impacts to the ferry the project would have; its impacts on emergency vehicles, traffic backups and further emissions being released as a result.
205	1	Lindskog	Jon		8/9/22	Email	PC	DIRIMP	Concerned the project will be harmful to the residents and tourists in Port Aransas.
206	1	Bentley	Robert		8/9/22	Email	PC	DIRIMP	Opposed to the project and concerned it would be a detriment to the people and environment of the area.
207	1	Flynn	Frannie		8/9/22	Email	PC	NOTSUP	Does not support the project being built.
208	1	Branscomb	Margo		8/9/22	Email	PC	ALTS	Wants the project taken offshore.
208	2	Branscomb	Margo		8/9/22	Email	PC	DIRIMP	Did not include any details regarding the polluted water and soil that would be removed. It has not changed since when it was declared highly toxic.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
208	3	Branscomb	Margo	[redacted]	8/9/22	Email	PC	ALTS	There are two births so there should be two turning circles.
208	4	Branscomb	Margo		8/9/22	Email	PC	ALTS	Where will the newly designed larger tugs be birthed when they are not guiding a ship?
208	5	Branscomb	Margo		8/9/22	Email	PC	FERRY	The turning basin is going to interfere with ferry operations. Concerned about the already existing long wait lines and the people that use the channel that will be denied access. Could cause issues during an emergency with only 2 ways off the island.
208	6	Branscomb	Margo		8/9/22	Email	PC	FERRY	Concerned the deep channel will destabilize the ferry landing.
208	7	Branscomb	Margo		8/9/22	Email	PC	SOCIO	Concerned about the impact on Port Aransas that include visual quality, tourism, real estate, and community. Should be required to include the economic impact on the area, what will happen to the value of homes.
209	1	Plunkett	Julie		8/9/22	Email	PC	PUBMEET / OUT	Requests the USACE follow their guidelines and allow the public ample time to review the documents, two Public Meetings held after 120 days have passes since the final release of the DEIS. One meeting at 10AM in Port Aransas or Aransas Pass and the other in late afternoon in the location not selected for the morning meeting. Requests a 90 day extension of the comment period.
209	2	Plunkett	Julie		8/9/22	Email	PC	FERRY	Explain how TxDOT has reviewed and approved the proximity of the VLCC berths.
209	3	Plunkett	Julie		8/9/22	Email	PC	ALTS	Commenter does not like all the permits in and around Port Aransas and Harbor Island and says it is the responsibility of the USACE to find a reason to agree with these project, but only after exhausting any and all other alternatives such as taking it offshore.
209	4	Plunkett	Julie		8/9/22	Email	PC	PUBMEET / OUT	Did not like that the Scoping Meetings were held virtually and felt they discriminated against those who are not technically savvy.
209	5	Plunkett	Julie		8/9/22	Email	PC	FERRY	The ferry traffic will be disrupted and endanger the lives of the citizens of the state of Texas.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
209	6	Plunkett	Julie	[redacted]	8/9/22	Email	PC	NOTAPP	Need to realize that the Port keeps stating that Harbor Island historical use was the same as they are proposing today, this is false.
209	7	Plunkett	Julie		8/9/22	Email	PC	P&N	All proposed permits should be handled as one and their environmental impacts be combined. Concerned that the impacts to the Redfish Bay Scientific Research Area, Aransas Channel, Gulf of Mexico, CCSC, Lydia Ann Channel are not being considered for all three projects.
209	8	Plunkett	Julie		8/9/22	Email	PC	WET	Concerned about impacts to wetlands, cites information on wetlands from 33 CFR 320.4(4).
209	9	Plunkett	Julie		8/9/22	Email	PC	T&E	Concerned about the impacts to whooping cranes as a result of the project and asks the USACE to do a detailed EIS to address the BU site SS2 that will receive dredged material. Concerned about the impacts to piping plovers, sea turtles, red know, manatee and the impacts to those.
209	10	Plunkett	Julie		8/9/22	Email	PC	CUMUL	Keeping all three projects separate does not show cumulative impacts.
209	11	Plunkett	Julie		8/9/22	Email	PC	DIRIMP	Concerned about contaminants that still remain on Harbor Island.
209	12	Plunkett	Julie		8/9/22	Email	PC	WAKE	Concerned about the vessel wakes the larger VLCCs will produce and how that will impact recreational boats in the channel.
209	13	Plunkett	Julie		8/9/22	Email	PC	CUMUL	Commenter concerned about the impacts the desalination plant will have if the project is approved.
209	14	Plunkett	Julie		8/9/22	Email	PC	BUSITES	Concerned about the location of dredged material.
209	14	Plunkett	Julie		8/9/22	Email	PC	BUSITES	Concerned about the location of dredged material.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
209	15	Plunkett	Julie	[redacted]	8/9/22	Email	PC	PUBMEET / OUT	Would like to remind the USACE that we were told that all comments made in 2019 to current would be considered before rendering a decision. If in fact you do not grant another Public Hearing, I respectfully submit these comments that are lacking in completion due to time constraints.
210	1	Cook	Marilyn		8/9/22	Email	PC	FERRY	Concerned that the ferry is already overloaded with traffic leading to long wait times. Port Aransas is too small to have this by the ferry and in the channel so close.
210	2	Cook	Marilyn		8/9/22	Email	PC	DIRIMP	Concerned about the environmental impacts.
211	1	Rhem	Benjamin		8/9/22	Email	NGO	ALTS	Points out that the Port admits that there is a least environmentally damaging practical alternative that would require virtually no dredging and therefore would have less adverse impact on the aquatic ecosystem. Appendix N (404(b)(1) Evaluation) does not contain an evaluation of the LEDPA. The Final EIS must include an evaluation of the project alternatives in the context of the least environmentally damaging discharges if it is to demonstrate compliance with the 404(b)(1) Disposal Site Guidelines. The Project's purposes can be achieved with an offshore terminal which would have significantly less adverse impacts from the discharge of dredge and fill materials. Even if an offshore terminal would result in some discharges of dredged or fill material in ocean waters, it would have significantly less adverse impact on the aquatic ecosystem than the proposed discharges from the deepening of the channel and dredging of 17.1 million cubic yards of clay and 29.2 million cubic yards of sand. The Final EIS must fully address this.
211	2	Rhem	Benjamin		8/9/22	Email	NGO	DREDMAT	**Analysis of Dredged Material.** Section 4.1.4, the Draft EIS discusses the potential impact on water and sediment quality. Yet, the Corps has decided not to analyze whether impacts from chemical contaminants such as heavy metals, synthetic organic compounds, and nutrients, may occur due to dredging activities associated with the Channel Deepening Project. Instead, it appears the Corps' intends to rely on analyses conducted 20-42 years ago. The Draft EIS states that "measurable impacts from chemical contaminants such as heavy metals, synthetic organic compounds, and nutrients are not expected to occur with dredging activities associated with [the Applicant's Proposed Action Alternative]." This is not supported by the record.
211	3	Rhem	Benjamin		8/9/22	Email	NGO	DIRIMP	Analysis of Dredged Material. The Draft EIS fails to mention that Harbor Island was previously the site of Exxon and Fina bulk fluids export facilities, including tank farms, petroleum pipelines, loading and unloading facilities, and docks. According to documents obtained from the RRC, there are at least three areas on the former Exxon site where the most recent analysis found total petroleum hydrocarbons ("TPH") in excess of 10,000 mg/kg. (Information is included along with citations. The information is also attached to the letter. Refer to letter for specifics.) This information demonstrates that the dredged material from the Harbor Island area is not suitable for disposal in compliance with the Disposal Site Guidelines. Neither the Applicant nor the Port have conducted any analysis to determine if contamination from these sites or other industrial activities may have impacted potential dredge material for the CDP. The FEIS should fully evaluate anticipated dredged materials and should specifically explain to the public how the RRC can determine that the disposal of contaminated soil from Harbor Island would lead to pollution, yet the Corps can claim that "measurable impacts… are not expected" from dredged material immediately adjacent to Harbor Island. No such statement can credibly be made absent a full evaluation of the soils in the channel that will be dredged, and the DEIS does not reflect such an evaluation. The Draft EIS contains no explanation of what changed since the EPA's original comments that would make the information provided by the Applicant sufficient to allow the Corps to make a legally defensible permit decision. Was the Application changed? Did the Applicant supply additional information that was not in the Application? Was further testing conducted? The Final EIS should explain in detail how the Applicant has met the legal standards required under EPA's Disposal Site Guidelines, in light of EPA's prior concerns.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
211	4	Rhem	Benjamin	[redacted]	8/9/22	Email	NGO	P&N	The USACE did not conduct an independent analysis of the project need. DEIS assumes the need for the Axis and Harbor Island terminal and assumes that Applicant's statements about the need for the project are correct without providing substantive analysis. The USACE must make an independent analysis, as required per 33 CFR 320.4(a)(2), of the public interest and public need for the project. To make that determination, the Corps must consider the reasonably foreseeable impacts of each proposed activity and its intended use, and this consideration must reflect "all those factors which become relevant in each particular case," including general environmental concerns, wetlands, fish and wildlife, food production, and the needs and welfare of the people. Greenhouse gas emissions, climate change, and the public's use of natural resources plainly fit within these factors. The Final EIS should include the information relied upon by the Corps in its independent analysis, and a detailed discussion of such analysis, that reflect full consideration of whether the Project will be in the public interest.
211	5	Rhem	Benjamin		8/9/22	Email	NGO	NONGEN	Permit to be denied if not in compliance with 404 Guidelines. EPA has already noted that it is unclear whether the information provided by the Applicant "will sufficiently enable the Corps to make a legally defensible permit decision in regard to compliance with the [EPA's 404(b)(1) Guidelines for the Specification of Disposal Sites for Dredged or Fill Material]." As noted previously, the Corps should explain how the EPA's concerns were specifically rectified and what changes were made that would allow any conclusion that the Application is sufficient for legally defensible permit decision.
211	6	Rhem	Benjamin		8/9/22	Email	NGO	AIR	The Corps' public interest review does not appear to have considered emissions and climate impacts from upstream oil production and downstream combustion. The Corps' regulations expressly direct it to consider the "reasonably foreseeable" impacts of the Project's intended use— transporting crude oil. There is no doubt that the dredging is designed to allow the greater production and shipping of oil. The Corps fails to explain why emissions from the increased production of oil are not reasonably foreseeable impacts of transporting oil from producers to users.
211	7	Rhem	Benjamin		8/9/22	Email	NGO	ALTS	The USACE should consider less impactful alternatives. Because the Project is not water dependent, "practicable alternatives that do not involve special aquatic sites are presumed to be available, unless clearly demonstrated otherwise." It does not appear the Corps has taken into consideration such practical alternatives that do not involve special aquatic sites. Each and every one of the proposed alternatives involve impacts to special aquatic sites. Not only has the Corps failed to even consider these alternatives, but the Corps has failed to rebut the presumption laid out in its own regulations, that such practical alternatives which do not involve a discharge into special aquatic sites will have a less adverse impact on the aquatic ecosystem. In the Final EIS, the Corps must more fully evaluate the practical alternatives. To comply with its own regulations, the Corps must justify any approval of the Applicant's Proposed Action Alternative, given the number of practical alternatives which do not involve a discharge into special aquatic sites and which will have a less adverse impact on the aquatic ecosystem. Currently, the Draft EIS does not contain such an analysis.
211	8	Rhem	Benjamin		8/9/22	Email	NGO	CUMUL	**Salinity.** Desalination facilities discussed in the cumulative impacts, on page 5-21 state 20 million gallons per day facility proposed on Harbor Island. This statement is incorrect, the Port's proposed desalination facility will discharge an average of 96 million gallons of brine wastewater per day. This fact is undisputed and is reflected in the record of the state agency proceeding for which the desalination wastewater discharge permit is being sought. Furthermore, the Port's draft permit from the Texas Commission on Environmental Quality would allow to discharge a maximum of 110 million gallons per day of brine wastewater. The Final EIS should evaluate the cumulative impacts of the CDP, as well as the desalination facilities, on salinity within the Corpus Christi Ship Channel and surrounding bays using the actual permitted amount of brine waste water discharge.
211	9	Rhem	Benjamin		8/9/22	Email	NGO	NAV	**Safety and Additional Public Interest Impacts.** The statement that the channel will be limited to one-way traffic when a VLCC would fill shows a misunderstanding of what actually will occur. In order to meet the increased demand, this safety solution proposed by the USACE really would limit the channel to one-way traffic when VLCCs are filling, the Corpus Christi Ship Channel would effectively be limited to one way traffic permanently. Whether it is one way into Corpus Christi Bay, or one way to the Gulf, surely this is not a practical solution.
211	10	Rhem	Benjamin		8/9/22	Email	NGO	FERRY	The Final EIS must include a detailed analysis and modeling that demonstrates operating time impacts to ferry service from VLCC ingress, docking, loading, and egress. The Draft EIS provides a narrative discussion, but lacks substantive analysis. The Draft EIS states that the duration of typical VLCC docking operations at other berths within CCSC are estimated at 30 minutes. Where does this information come from? How much longer will ferry traffic have to wait in line to use the ferry? How much longer will ferry transport take? If ship traffic is limited to one-way traffic when VLCCs are filling, how will that impact ferry transport? The Draft EIS simply does not evaluate this, but it is a critical element of the impact of the dredging proposal. Therefore, the Final EIS must address it in detail.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
211	11	Rhem	Benjamin	[redacted]	8/9/22	Email	NGO	SOCIO	The FEIS should more fully address the potential impacts to tourism and fishing from dredging and the transport of VLCCs through the ferry path. The DEIS fails to discuss how the channel deepening and the transport of VLCCs will address each of those. Any impacts to ferry operations have the potential to significantly impact tourism. These considerations must be evaluated more fully, as they are clear public interest factors
211	12	Rhem	Benjamin		8/9/22	Email	NGO	NAV	The DEIS does not contain a thorough risk assessment of all of the potential risks associated with VLCCs coming through a narrow channel routinely used by the public. The Final EIS must contain a more detailed and full risk assessment evaluating all potential risks associated with the presence of such large vessels coming through a narrow channel relied upon for tourism and fishing.
211	13	Rhem	Benjamin		8/9/22	Email	NGO	P&N	Disagree that the CDP, Harbor Island Terminal, and Axis projects are not a single and complete project and request the USACE re-evaluate whether these should be considered a single and complete project. Request that the Corps provide specific details as to what changed from its initial conclusion that the three Projects should be considered a single and complete project to its position today where they are being treated as a separate projects and only one – the CDP – is even being required to conduct and EIS. Commenter provides additional information on why these projects are dependent upon each other and related and must be evaluated as one. See comment letter. Regardless of whether the Corps considers the projects a “single and complete” project, there can be no reasonable disagreement that the other two projects are dependent upon, and will flow from, the approval of the dredging project. Therefore, the impacts of those projects are a “reasonably foreseeable” result of any approval of the dredging project. Thus, the Corps must consider the impacts of the other two projects. If the Corps fails to include such a full evaluation of all three projects, the Corps should explain why it is not considering the impacts of the three projects.
211	14	Rhem	Benjamin		8/9/22	Email	NGO	P&N	In its application the Port considers, alternatives to the CDP, which include two offshores options. Interestingly, when making the argument that the two offshore options (addressed in more detail below) are somehow more environmentally damaging than a project directly within a sensitive bay system complex made up of Corpus Christi, Aransas, and Redfish Bays (the “Bay Systems”), the Port considers environmental impacts from other related facilities. Examples: new pipelines, spillage, higher vapor and CO2 emissions. Agree with the Port that related and interdependent projects should be considered as part of the EIS evaluation. Thus, when the Port suggests that the location of pipeline construction, contamination related to spills, and air quality impacts from terminal operations should be considered in the evaluation of the offshore options, that same logic should also apply when evaluating the Port preferred alternative proposed by the application. If all related necessary activities are considered when evaluating the impact of alternatives, they must also be considered when evaluating this application and the related necessary activities. Thus, the impacts of the pipeline construction related to the Axis Project, the impacts of air quality emissions from loading and unloading at the Harbor Island, the impacts of Channel Deepening and dredged material placement, and the proximity of these facilities to population centers and sensitive estuarine features should also be evaluated together.
212	1	Pecore	Dan		8/9/22	Email	PC	PUBMEET / OUT	Requests an extension on the comment period and to hold a Public Meeting in Port Aransas.
213	1	Krueger	Jo		8/9/22	Email	PC	P&N	Unless the other project are included (Harbor Island and Axis) this is a project to nowhere and this application is incomplete according to USACE guidelines.
213	2	Krueger	Jo		8/9/22	Email	PC	FERRY	Impacts to traffic and ferry operations on state highway 361, namely further traffic delays due to VLCC operations for turning, maneuvering and docking. Impacts to ferry landings on both sides of the ship channel and possible undermining to the stability of those landings.
213	3	Krueger	Jo		8/9/22	Email	PC	DIRIMP	Oil/chemical spills in and around Redfish Bay State Scientific area and around ferry landing.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
213	4	Krueger	Jo	[redacted]	8/9/22	Email	PC	ALTS	Emergency evacuation in the event of explosions or chemical releases. There are only 2 ways off the island and one route is the ferry system, which would shut down in a catastrophic event, leaving only 1 route off the island. An event like an explosion on a busy summer weekend could threaten tens of thousands of people.
213	5	Krueger	Jo		8/9/22	Email	PC	P&N	Wants a better study with real research to be conducted on the Port's overreaching projections for oil export, especially given the significant highs/lows of Texas oil market.
213	6	Krueger	Jo		8/9/22	Email	PC	SOCIO	True projections on impacts to the tourist-based economy of Port Aransas. The Port pays ZERO property and sales tax, ZERO. Port Aransas will not receive compensation from a facility on Harbor Island and there is no export tax on oil. Port Aransas businesses supply thousands of jobs based on tourism;
213	7	Krueger	Jo		8/9/22	Email	PC	CUMUL	There is no mention of the desalination plant the Port plans to build. The brine discharge of 95,600,000 gallons/day would be in the ship channel directly located where VLCCs would be docked. This can’t be ignored in the EIS.
213	8	Krueger	Jo		8/9/22	Email	PC	T&E	Impacts to all threatened and endangered species, as well as their habitats, along with seagrass beds and wetlands, must be factored.
213	9	Krueger	Jo		8/9/22	Email	PC	SOCIO	Short and long-term impacts to the health and well being of Port Aransas residents.
214	1	Preston	Jamie		8/9/22	Email	PC	DIRIMP	Concerned about the impacts to wildlife and the economy and impacting the health and wellbeing of residents.
214	2	Preston	Jamie		8/9/22	Email	PC	FERRY	The interruption of the ferry service would significantly impact the workers on both sides, from restaurant workers to teachers; people come across the ferry from North Padre to Aransas Pass.
214	3	Preston	Jamie		8/9/22	Email	PC	DIRIMP	Erosion damages, spills, pollution and the well documented chronic health issues related to oil and gas industry facilities will be imminent with the approval of this build.
214	4	Preston	Jamie		8/9/22	Email	PC	SOCIO	Concerned about the negative impacts from reduced fishing, shrimping, and bay fishing tours that could end generations of blue collar jobs.
215	1	Hatch-Tiedmann	Jean		8/9/22	Email	PC	FERRY	The ferry traffic is already extremely busy, and interruptions caused by VLCC maneuvering would create intolerable delays and back up traffic for miles.
215	2	Hatch-Tiedmann	Jean		8/9/22	Email	PC	DIRIMP	Any accidental oil spill would be an ecologic disaster for the whole Corpus Christi Bay, and negatively affect the City of Port Aransas.
215	3	Hatch-Tiedmann	Jean		8/9/22	Email	PC	BUSITES	Concerned about dredged being placed on the beaches and would ruin the attractiveness of this vacation town.
215	3	Hatch-Tiedmann	Jean		8/9/22	Email	PC	BUSITES	Concerned about dredged being placed on the beaches and would ruin the attractiveness of this vacation town.
215	4	Hatch-Tiedmann	Jean		8/9/22	Email	PC	ALTS	Consider taking it offshore.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
216	1	Moore	Jane	[redacted]	8/9/22	Email	PC	DIRIMP	Concerned about the impacts to tourists, residents, ship channel traffic, ferry, and emergency vehicles.
216	2	Moore	Jane		8/9/22	Email	PC	BUSITES	Concerned about the dredged material that will wash up on their beaches.
216	2	Moore	Jane		8/9/22	Email	PC	BUSITES	Concerned about the dredged material that will wash up on their beaches.
217	1	Krueger	Jo		8/9/22	Email	PC	FERRY	Concerned about how everyone that uses the ferry will be impacted. If all maritime traffic is suspended during an arrival or departure of a VLCC this would halt ferry traffic for long periods.
217	2	Krueger	Jo		8/9/22	Email	PC	NONGEN	DEIS is not complete and should be withdrawn, corrected, and peer reviewed. The USACE is being paid to fast track this permit.
218	1	Thompson	Polly		8/9/22	Email	PC	PUBMEET / OUT	Requests a Public Meeting in Port Aransas.
219	1	Nye	Julie		8/9/22	Email	PC	PUBMEET / OUT	Requests an extension of the comment period and to hold a Public Meeting in Port Aransas.
219	2	Nye	Julie		8/9/22	Email	PC	DIRIMP	Increases in turbidity and silting will destroy seagrasses and aquatic habitat, impacting commercial and recreational fishing and birding.
219	3	Nye	Julie		8/9/22	Email	PC	DIRIMP	Project and maintenance dredging creates noise, smells, and light pollution, increases sedimentation, displaces wildlife, and impacts communities.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
219	4	Nye	Julie	[redacted]	8/9/22	Email	PC	ANALY	Coastal communities will experience increased flooding, storm surge, and ship wakes, with 492 acres (unknown location) being "inundated".
219	5	Nye	Julie		8/9/22	Email	PC	MITIG	300 acres of wetlands, seagrasses, and shorelines will be destroyed in Redfish Bay - with no plans for mitigation or compensation.
219	6	Nye	Julie		8/9/22	Email	PC	BUSITES	5,000 acres of benthic habitat near Mustang and St. Jose Island beaches will be covered by dredge material, affecting sport fishing.
219	7	Nye	Julie		8/9/22	Email	PC	CUMUL	Increased salinity in the bays will add to brine discharges from costly desalination plants (one on Harbor Island just approved by TCEQ).
219	8	Nye	Julie		8/9/22	Email	PC	BUSITES	46 million cubic yards of dredged spoil will be placed on Mustang and San Jose Islands beaches, just offshore in the Gulf, and in Redfish Bay.
219	9	Nye	Julie		8/9/22	Email	PC	FERRY	Up to 4 VLCCs at a time will be fully-loaded with crude oil at Harbor Island, causing ship congestion and ferry delays.
219	10	Nye	Julie		8/9/22	Email	PC	SOCIO	There is no cost information or socioeconomic justification for this taxpayer funded project. How does the public benefit exactly?
219	11	Nye	Julie		8/9/22	Email	PC	DIRIMP	Bigger hazardous, toxic, and radioactive waste spills, explosions, and accidents more likely with full onshore loading of VLCCs (very large crude carriers).
219	12	Nye	Julie		8/9/22	Email	PC	BUSITES	Port of Corpus Christi touts "beneficial use" (BU) of potentially toxic dredge (spoil islands) to protect eroding shorelines from climate change, which is being worsened by industrialization and "channelization" (channel deepening that has already occurred).
219	12	Nye	Julie		8/9/22	Email	PC	BUSITES	Port of Corpus Christi touts "beneficial use" (BU) of potentially toxic dredge (spoil islands) to protect eroding shorelines from climate change, which is being worsened by industrialization and "channelization" (channel deepening that has already occurred).

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
219	13	Nye	Julie	[redacted]	8/9/22	Email	PC	AIR	Instead of enabling the transition to clean energy, this project will increase fossil fuel emissions that cause global warming.
219	14	Nye	Julie		8/9/22	Email	PC	NONE	If approved, the project will pave the way for further deepening, widening, and lengthening - with more and bigger ships and petroleum industries.
219	15	Nye	Julie		8/9/22	Email	PC	AIR	Significant disruption in terms of noise and air pollution from dredging - once deepened, the dredging will go on in perpetuity.
219	16	Nye	Julie		8/9/22	Email	PC	WAKE	Increased ship traffic and larger ships with deeper drafts will cause more erosion from ship wakes and more air pollution.
219	17	Nye	Julie		8/9/22	Email	PC	DIRIMP	Magnitude of catastrophes will increase due to ship collisions, explosions, or terrorist acts that involve fully-loaded VLCCs (very large crude carriers).
219	18	Nye	Julie		8/9/22	Email	PC	STSURGE	Increased levels of storm surge and speed of currents will worsen impacts of tropical storms and flooding events.
219	19	Nye	Julie		8/9/22	Email	PC	BUSITES	Build up of spoil islands from potentially toxic sediment will obstruct views and mix with beach sand, affecting tourism at Port Aransas.
219	19	Nye	Julie		8/9/22	Email	PC	BUSITES	Build up of spoil islands from potentially toxic sediment will obstruct views and mix with beach sand, affecting tourism at Port Aransas.
219	20	Nye	Julie		8/9/22	Email	PC	NONE	Even more petrochemical facilities will locate in Corpus Christi Bay, further harming air and water quality in the Coastal Bend.
220	1	McMurray	Pedro		8/9/22	Email	PC	DIRIMP	Concerned about the impact the project will have on the environment.
221	1	McMurray	Chrishna		8/9/22	Email	PC	AIR	Concerned about project causing asthma-causing pollutants.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
221	2	McMurray	Chrishna	[redacted]	8/9/22	Email	PC	DIRIMP	Concerned about the impact the project will have on fish and wildlife.
222	1	Hernandez	Veronica		8/9/22	Email	PC	DIRIMP	Concerned about the impact the project will have on fish and wildlife.
223	1	Ledford	Traci		8/9/22	Email	PC	DIRIMP	Concerned about the impact the project will have on fish and wildlife.
224	1	Ramirez	Mary		8/9/22	Email	PC	DIRIMP	Increase exposure to toxic dumps and explosions.
225	1	Ritchie	Mary		8/9/22	Email	PC	NONE	Offering help on the project.
226	1	Ritchie	Theresa		8/9/22	Email	PC	NONE	Want to keep the coast clean.
227	1	Parsons	David		8/9/22	Email	CITY	DREDMAT	Any dredged spoils placed upon our beaches by law must pass a strict minerology match as approved by both the State of Texas as well as our city council. There will be no exceptions for this requirement.
227	1	Parsons	David		8/9/22	Email	CITY	DREDMAT	Any dredged spoils placed upon our beaches by law must pass a strict minerology match as approved by both the State of Texas as well as our city council. There will be no exceptions for this requirement.
227	2	Parsons	David		8/9/22	Email	CITY	FERRY	The council is absolutely opposed to any ferry operations delays due to dredging, no matter how short a duration.
227	3	Parsons	David		8/9/22	Email	CITY	NONGEN	Council is absolutely opposed to any restrictions being placed on boaters due to dredging.
227	4	Parsons	David		8/9/22	Email	CITY	NONGEN	Deepening of the ship channel will most definitely cause channel slope erosion over time. The deepening should have zero net impacts to our shoreline facilities both public and private.
227	5	Parsons	David		8/9/22	Email	CITY	STSURGE	The deepening of the channel should have zero impacts increasing storm surge impacts to the city. We demand that channel projects should all provide for improved storm surge protection, not worsening.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
227	6	Parsons	David	[redacted]	8/9/22	Email	CITY	DIRIMP	The deepening should have zero impacts to the natural environment and to the entire fisheries community.
228	1	Holt	Joan		8/9/22	Email	PC	SOCIO	Chapter 3.5 Socioeconomic Conditions data needs to be reanalyzed. The proposed project (Alt 1 in the EIS) is in the Port Aransas City limits in Nueces County. Tourism is the 2nd largest private employer in the Coastal Bend, 2nd only to the health industry. There were mistakes on p 3-98 saying that ….in Aransas County, which Port Aransas is located within. Tables 3-25, and 3-27 show that Port Aransas is in Aransas Co. This same issue based on county may affect all the tables, compromising the economic data.
228	2	Holt	Joan		8/9/22	Email	PC	NOTAPP	Concerned about the visual changes from an industrial complex within the city.
228	3	Holt	Joan		8/9/22	Email	PC	AIR	Concerned about air quality degradation and light and noise pollution.
228	4	Holt	Joan		8/9/22	Email	PC	DIRIMP	Concerned about habitat degradation that would result from dredging (construction and maintenance) and spoil on beaches.
228	5	Holt	Joan		8/9/22	Email	PC	BUSITES	MI is not needed since that part of beach is accreting and has already replaced losses from Harvey, additionally it would interfere with year-round use by the public.
228	6	Holt	Joan		8/9/22	Email	PC	STSURGE	Increased surge and water elevation is predicted to be a gain of 3.5 inches in a Cat 4 Hurricane, inundating an area up to 492 acres. “In addition, a hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island.” Which is in Port Aransas. These changes are guaranteed to increase flooding in Port Aransas that would affect homes and businesses.
228	7	Holt	Joan		8/9/22	Email	PC	DIRIMP	Concerned about increased incidences of oil and chemical spills that accompany filling and moving VLCCs.
228	8	Holt	Joan		8/9/22	Email	PC	WAKE	Concerned about increased Ship and tugboat wake due to increased size of vessels, in a narrow channel.
228	9	Holt	Joan		8/9/22	Email	PC	FERRY	Concerned about increased ferry waits times, a serious problem for the workers commuting to Port Aransas who work in the service industry (restaurants, bars, shops that support tourism). Why was this not considered since the current ship traffic already causes delays: turning and docking VLCCs will take even more time than a passing ship.
228	10	Holt	Joan		8/9/22	Email	PC	ALTS	Alternative 2 is the only alternative that will not suppress the economy.
228	11	Holt	Joan		8/9/22	Email	PC	EFH	The Applicant’s Proposed Action Alternative 1 would directly affect vast acreages of estuarine habitat, fauna, and Essential Fish Habitat in the project area, with corresponding negative impacts on populations in the entire study area.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
228	12	Holt	Joan	[redacted]	8/9/22	Email	PC	DIRIMP	"Alternative 1 would result in permanent loss of open-bay bottom habitat. … Since impacts would be temporary…". Define temporary. Do you have scientific evidence to back this up?
228	13	Holt	Joan		8/9/22	Email	PC	DIRIMP	Impacts to fisheries and habitats should not be considered temporary with construction dredging occurring 20 hours per day, 7 days per week for 5 years then maintenance dredging every 2 years. Many of these species are “short-lived”; interrupting their life cycle multiple times, and/or for extended periods of time, will result in declines in their populations. There is no way that current populations of fish and shellfish can be maintained with Alternative 1 and will have major impacts on the economy, recreational and commercial fishing. Maintenance dredging will generate additional material and add to that, changes in the seagrass habitats particularly in Lydia Ann Channel, due to increased sedimentation from dredging, and the VLCCs and their Tugboats. This sediment would be moved by tides into seagrass nursery habitats.
228	14	Holt	Joan		8/9/22	Email	PC	DIRIMP	USACE (2003) found that CCSC material in the project area is sufficient to be used for BU, however, USACE 1978 reported significant levels of cadmium, mercury, and zinc. Maps showed the movement and similar scenario could occur in the turning and docking basin at Harbor Island. The importance of measuring the sediment toxicity load in dredged soils, as well as the toxicity of sediment that is proposed to be removed from Harbor Island for the VLCC Docking facility should be emphasized.
228	15	Holt	Joan		8/9/22	Email	PC	DIRIMP	Recommend an analysis of the effects of heavy metals (and other pollutants that may be identified in the final EIS) on the larval and post larval stages of those species known to depend upon the channel for transport into the bays. A Professor at UTMSI in Port Aransas, Kristen Nielsen Bridges is a toxicologist who investigates the effects of heavy metals on early life stages of marine organisms. She might be available to conduct such an analysis.
229	1	Summerlin	Errol		8/9/22	Email	PC	PUBMEET / OUT	Request to extend the comment period so a thorough review can be done.
229	2	Summerlin	Errol		8/9/22	Email	PC	PUBMEET / OUT	Request another Public Meeting be held in Port Aransas or Aransas Pass.
229	3	Summerlin	Errol		8/9/22	Email	PC	P&N	Flaw in the DEIS is not including the impacts of the construction of the marine terminals on Harbor Island. The applicant’s stated need for the proposed channel deepening is to meet current and forecasted demand for U.S. produced crude oil. The purpose of PCCA’s Proposed Alternative is to facilitate onshore loading of VLCCs. Onshore loading will only occur after the marine terminals are built.
229	4	Summerlin	Errol		8/9/22	Email	PC	FERRY	Concerned about the impact the project will have on the ferry when the VLCC's are berthing.
229	5	Summerlin	Errol		8/9/22	Email	PC	NAV	Concerned about the closing of the ship channel when the VLCC's are berthing.
229	6	Summerlin	Errol		8/9/22	Email	PC	P&N	Impacts of the marine terminals will not be short-term and must be considered fully in the DEIS.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
230	1	Maxwell	Janie	[redacted]	8/9/22	Email	PC	FERRY	Concerned about the impact the project will have on the ferry; traffic delays and backups, commuters trying to get to their jobs.
230	2	Maxwell	Janie		8/9/22	Email	PC	DIRIMP	Concerned that accidental oil spills would be an ecological disaster for the bay and negatively affect Port Aransas.
230	3	Maxwell	Janie		8/9/22	Email	PC	BUSITES	Concern that dredges will be positioned in proximity of the beaches and will ruin the attractiveness of this vacation town.
230	3	Maxwell	Janie		8/9/22	Email	PC	BUSITES	Concern that dredges will be positioned in proximity of the beaches and will ruin the attractiveness of this vacation town.
230	4	Maxwell	Janie		8/9/22	Email	PC	ALTS	Offshore loading should be considered.
231	1	Nye	Patrick		8/9/22	Email	NGO	PUBMEET / OUT	Requests Public Meetings in Port Aransas, Rockport, and Aransas Pass to fulfill the USACEs obligation to explain the DEIS and request the comment period be extended until all of the DEIS documents are finalized.
231	2	Nye	Patrick		8/9/22	Email	NGO	P&N	**Purpose and Need (see comment letter for specific examples and citations provided).** Applicants purpose is short-sighted and misaligned with climate change and the health and welfare of the people. Points out that the 2003 DIS included oil imports, agriculture, and container ship terminals. It is forecast that electric vehicles could take greater percentages of global sales. President Biden is considering limiting fossil fuel exports, how does this incorporate into the purpose? And the new climate bill that just passed on August 7?
231	3	Nye	Patrick		8/9/22	Email	NGO	P&N	**Purpose and Need (see comment letter for specific examples and citations provided).** How can the Applicant's need "to meet current and forecasted demand…" when their own data forecasts no such information only 18 months ago (info from Port's slide show shown)? Was the DEIS of over 3000 pages, initiated under an alternate narrative? Is the deepening to 80’ at Harbor Island the true Purpose of the permit or does the Port plan to issue multiple permits to deepen the ship channel to Ingleside and later into the Inner Harbor? What additional data is missing from the DEIS related to the “Purpose” and future uses? Shouldn’t all applicants forecast information be included in the DEIS? Today, on August 9, 2022, Enbridge is scheduled to present its proposal of Blue Hydrogen at Ingleside City Council. Shouldn’t this new industry and its ramifications be included in the DEIS?

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
231	4	Nye	Patrick	[redacted]	8/9/22	Email	NGO	P&N	**Purpose and Need (see comment letter for specific examples and citations provided).** See Oil Prices Chart below illustrating the short-term duration of higher crude oil prices followed by dramatic price declines. How can the purpose be justified using today's crude pricing when the project would not even be built for 5-10 years later? The G-7 ministers met May 18-19, 2022 where the U.S. agreed to stop spending tax dollars to support international fossil fuel projects. How can the project's "Purpose" be in opposition to global fossil fuels phase out projections necessary to meet climate change goals? Does the project costs and risks warrant the short-term vision for a Purpose that will contribute to global climate change and RSLC? What is the WTI crude oil price that is necessary that keeps this project viable? What volumes of oil coming through pipelines to Harbor Island are needed for a viable Purpose? Is the true Purpose of the permit REALLY for only two VLCC terminals on a dredging project or is there more information that the applicant has not told the public? This Purpose and Need is for a project so unprecedented in scope with such a tremendous unpredictable outcome for the public. The current 54' channel depth has not been fully evaluated as to its affects on tides and storm surge since it has yet to be completed. How can accurate modeling be accomplished with limited data points? WTI price fluctuations are highly variable and rarely projected accurately, the Purpose and Need cannot be justified using this argument.
231	5	Nye	Patrick		8/9/22	Email	NGO	P&N	**Purpose and Need (see comment letter for specific examples and citations provided).** Even more uncertainty for the Purpose is the major concern for WTI crude prices are earthquakes in west Texas due to fracking. If the Permian Basin was to shut down their disposal wells, a collapse of the oil production would certainly take place creating a serious risk to a consistent flow of oil volumes enough to accommodate not only oil exports but U.S. refining capacities.
231	6	Nye	Patrick		8/9/22	Email	NGO	P&N	Pipeline capacity, pipeline to Harbor Island permitting are succinct issues and begs the question of Alternative 3, how does the DEIS answer the following statement: "With no new pipeline projects capable of bringing crude oil to Corpus Christi having been announced, proposed, or in any stage of permitting, how does the 4.5MM bpd export estimate become achievable when current pipeline capacity is 2.4MM bpd? The Port is proposing that PCCA exports could grow to 4.5MM bpd in 2030 from 1.63MM bpd in 2021. Current pipeline capacity to PCCA is 2.4MM bbls so they are saying 2 new (1MM bpd) pipelines would get 4.5MM bbls to Corpus by then? Also, what about the other Industries share in Inner Port, Ingleside, and Blue Water. It is a false premise to consider 4.5 bpd? These questions undermine the entire Permit and DEIS."
231	7	Nye	Patrick		8/9/22	Email	NGO	P&N	How would the export oil plans for Port Lavaca that would take up oil slated for the Purposed Corpus Christi oil pipeline capacity?
231	8	Nye	Patrick		8/9/22	Email	NGO	P&N	Why is the Harbor Island Terminal not included in the study nor the pipelines that would be required to supply the oil? Axis Midstream oil pipeline that would be going through Redfish Bay State Scientific Area is already a hotly contested issue. Are there assurances that any pipeline would reach Harbor Island and supply the Purpose?
231	9	Nye	Patrick		8/9/22	Email	NGO	ALTS	Alternative 3 (2.4.1) states that some inshore berthing would be required at Harbor Island and Ingleside to partially fill VLCC which would then go to the offshore SPM to fully load. The question is, if the VLCC could fully load at the SPM why would it make the trip in shore to partially load at Harbor Island or Ingleside?

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
231	10	Nye	Patrick	[redacted]	8/9/22	Email	NGO	NONGEN	How are the economics projections for the VLCC facilities evaluated with so many uncertainties? How does the DEIS address cost overruns like those that have happened for many USACE projects? Commenter provides examples of USACE projects that have failed.
231	11	Nye	Patrick		8/9/22	Email	NGO	DIRIMP	What assurances does the Coastal Bend have, given the fatalistic DEIS approach, that climate change and RSLC will occur, that this unique project would not enhance catastrophic ecological events upon the public? - commenter cites information from Cathy Fulton.
231	12	Nye	Patrick		8/9/22	Email	NGO	STSURGE	Why is this subject the one of least investigated by the DEIS? What was learned in the investigation that would protect safety, property and welfare of people that was omitted? Rapid withdrawing of storm surge waters would also create greater erosion potential and is not discussed in detail in the DEIS. Would be helpful to include the NOAA storm surge map of potential inundation. Does the DEIS address the potential pollution impact if the tank farm is washed away and the overall threat to the area? Given that larger storm surges are in the Coastal Bend history with surges as high as 16.01', shouldn't the threat of a catastrophic environmental pollution issue outweigh the short-term defined purpose?
231	13	Nye	Patrick		8/9/22	Email	NGO	STSURGE	**Comments of Storm Surge Effects datums on Figure 3-5 is dated 2016.** Why is this map only showing a few storms through 2016? Should not the DEIS provide datums for other named storms that have affected the region including Hurricane Harvey and tropical storms/hurricanes through 2021? Is the DEIS trying to hide this vital information? Will the DEIS include Hurricane Allen that had many barrier island wash-over events? A similar storm could wash away property all along Padre Island (Padre) and Mustang Island (MI). Why does the DEIS completely ignore discussions on storm surge effects for Rockport, Fulton, Aransas Pass, Padre Island including Port Aransas and North Padre, Ingleside on the Bay, North Beach and Flour Bluff? What about tropical storms surge data? Ingleside on the Bay had two events of ~4' in 2020! What erosion and damage estimates for Ingleside on the Bay would be caused by vessel traffic during storm surges? Was Ingleside on the Bay omitted from the DEIS on purpose? Ingleside on the Bay had a hurricane surge of 11.39' and yet not included in the risks associated with the deeper, 70.2% larger channel opening that would increase the velocity of storm surge. Why? Shouldn't the DEIS include all tropical and hurricane storm surges within the area associated with the deepening? Hurricane Harvey had a USGS survey water mark of 6.4' near Port Aransas. Why does the DEIS exclude other visual storm surge surveys of Hurricane Harvey in their report?
231	14	Nye	Patrick		8/9/22	Email	NGO	GEN	**Section 3.3.5.1 Protected Lands** – The DEIS has left off Ingleside Cove Sanctuary, and Redfish Bay State Scientific Areas. Why were these significance protected areas left out of the DEIS? What will be done to protect these areas now and if this project is allowed?
231	15	Nye	Patrick		8/9/22	Email	NGO	GEN	**Section 3.4 Shoreline Change** – Why does the map not include years through 2021? In the year 2020, multiple high tidal events occurred. What data has been collected to include the 54' ship channel depth and erosional affects?

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
231	16	Nye	Patrick	[redacted]	8/9/22	Email	NGO	SOCIO	**Section 3.5 Socioeconomic Conditions** – This section is flawed in that it does not include Ingleside on the Bay, a community that will be directly affected by tide increases, vessel traffic and storm surges. What plan does the DEIS have for IOB as it relates to the deepening effects?
231	17	Nye	Patrick		8/9/22	Email	NGO	WAKE	What about damage models for ship traffic wakes? Why are models of fully loaded VLCC with drafts of 68’ included to Ingleside terminals in the DEIS? Is this a future project not included in the DEIS? What about wake effects along IOB and the CCSC? What about La Quinta wake effects to property owners? How does the model include small watercraft endangerment issues?
231	18	Nye	Patrick		8/9/22	Email	NGO	NONGEN	Vessel dimensions used in the vessel wake analysis were a draft of 68 feet. There are no lightering agreements in place with Flint Hills as per public meeting. Why does the DEIS keep using this argument when it does not make economic sense? Was this at the insistence of the POCC? How can this statement be included in the DEIS for emissions when there are no facts?
231	19	Nye	Patrick		8/9/22	Email	NGO	ANALY	Since we do not have long term data on the effects of the 54' depth on tides, storm surges and erosional processes, how accurate are the models for 80' if they do not have data 54’? What do the tide gauges in CC Bay at Enbridge Ingleside pier and Lexington indicate about tide predictions now that most of the ship channel has been deepen to 54'?
231	20	Nye	Patrick		8/9/22	Email	NGO	DIRIMP	Does the DEIS recognize that impacts are occurring in the form of seagrasses lost in Redfish Bay and Ingleside on the Bay from vessel traffic? Google maps and my personal witness of these areas, documents the staggering loss of seagrasses and deep scarring resulting from vessel wakes.
231	21	Nye	Patrick		8/9/22	Email	NGO	BUSITES	Beneficial use (BU) areas have yet to be proven to be a reliable form of mitigation given that the materials used are silty and clayey and will continue to muddy the water. Where does the DEIS prove that BU is a viable seagrass habitat and not solely as another disposal area of dredge materials?
231	21	Nye	Patrick		8/9/22	Email	NGO	BUSITES	Beneficial use (BU) areas have yet to be proven to be a reliable form of mitigation given that the materials used are silty and clayey and will continue to muddy the water. Where does the DEIS prove that BU is a viable seagrass habitat and not solely as another disposal area of dredge materials?

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may paraphrased or summarized)
		Last Name	First Name						
231	22	Nye	Patrick	[redacted]	8/9/22	Email	NGO	DIRIMP	RLSC is an erosional event in passive margins along the Gulf Coast. How many feet of Padre and SJI have been lost (retreated) over the past 10, 20, 30,40 and 50 years? How are these compared to the modeling and RSLC forecasts? Are the models forecasting for erosion WHEN the project would be scheduled to be completed? What is the erosional forecast for shorelines along Redfish Bay, IOB, Ingleside Cove Sanctuary, Lydia Ann Channel and adjacent waters? Do the models include shoreline erosion utilizing data for an increase in tropical storms, hurricanes and the accompanying storm surges? How are the spoil islands shorelines along the CCSC contributing to channel maintenance for future erosion modeling? What happens to the silt and clay as it is suspended in the water column and how does it affect seagrass beds over time?
231	23	Nye	Patrick		8/9/22	Email	NGO	ANALY	Would the dredge spoil offshore of Port Aransas move northward and into the proposed ship channel based upon sediment accumulations on the southside of the Jetty and the current flow?
231	24	Nye	Patrick		8/9/22	Email	NGO	WET	Where does the DEIS show the effects of seagrasses and marsh habitat loss as a result of the dredging project?
231	25	Nye	Patrick		8/9/22	Email	NGO	WAKE	Vessel Wake cites Schiereck 1993 – POCC has the more recent Mott MacDonald study dated 1/13/2020 that discusses vessel wakes that has not been cited in this DEIS. See Figure D below. Why is this important study omitted from the DEIS? What other vessel studies by the POCC and USACE have NOT been included in the DEIS? Why has Ingleside on the Bay been omitted from the DEIS concerning vessel wake studies? Why only short-term modeling for wake effect? Why doesn't the DEIS study include long-term wake effect modeling that includes RSLC? What effects will larger, more frequent vessel traffic have on tidal measurements and erosion along the CCSC?
231	26	Nye	Patrick		8/9/22	Email	NGO	ANALY	DEIS predicts the tidal increase of 0.79 inches in Redfish Bay, an increase of 11%. What are the tidal increases in Ingleside on the Bay and Ingleside Cove utilizing data from the deepening to 54'? Are your models including the Lexington and Enbridge pier tide gauges? Does the modeling include the tidal changes resulting from the newly dredged large spoil island in Redfish Bay? (Photo taken 7/2022)? Where is the modeling for tidal and storm surge currents when narrowing of the POCC channel in Redfish Bay? Wouldn't the tidal and storm surges project further into Corpus Christi Bay? Are vessel wakes expected to elongate this spoil parallel to the ship channel? Would this longer-term effect change tidal/storm surge modeling?
231	27	Nye	Patrick		8/9/22	Email	NGO	ANALY	Figure 4.1 in the DEIS is flawed, shows no effect to Aransas Bay toward Rockport and Fulton. Water depths going north behind SJI are much shallower, having a nearly no circulation on the north end. Aransas Bay would logically have a greater impact from tidal flows (as does Corpus Christi Bay) given the depth of Lydia Ann Channel (15-25') and the proximity to the project. Would not the least resistance of tidal flow go towards - Lydia Ann and La Quintal Channels thus changing the model numbers for all modeled sites? Furthermore, Flour Bluff/Laguna Madre is ~16.5 miles away and received a higher tidal range than Aransas Bay located only 5.5 miles from the project! Is this a deliberate error by the Port to prevent all affected parties from participating in comments? What other mistakes have been made on the tidal table as it concerns Rockport, Fulton, Aransas Pass, City by the Sea, Bahia Bay, Ingleside Cove and IOB? Models were derived from a higher tide event over a few days. During King Tides and storm surges, what are the predicted water levels at the modeled sites and how was this calculated? Why is Aransas Bay only nominally mentioned in the DEIS? What does short-term modeling and Secondary long-term modeling mean? Is RSLC with the great tidal velocities including erosional processes included? Are the models utilizing recent data from the 54' deepening'? How can the DEIS know what to input in the 80' deepening modeling if data hasn't been collected and included in the evaluation for the deeper 54' channel depth?

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
231	28	Nye	Patrick	[redacted]	8/9/22	Email	NGO	ANALY	Figure 4-4 - Rockport and Aransas Bay are included in the evaluation, but data is cut off. Why was the data cut off at Aransas Bay for the DEIS? Why wasn't the tide gauge at Port Ingleside utilizes for the DEIS study? - see comment letter for additional information
231	29	Nye	Patrick		8/9/22	Email	NGO	ANALY	Data is flawed given the depth behind SJI and depth of Aransas Bay that would have received higher tidal flows. QUESTIONABLE MAPPING IN ARANSAS BAY. Should the DEIS find another contractor to map the ranges since this is purported to be Baird's own mapping tool and has omitted the northern area of the affected area? - see comment letter for additional information
231	30	Nye	Patrick		8/9/22	Email	NGO	ANALY	Saltwater intrusion based upon RSLC and wakes from larger, more frequent vessels would change the coastal vegetation and thus impact birds and aquatic life that relies on this habitat. What salinity projections does the USACE have since the POCC has approval for a desalination facility at Harbor Island? Are the desalination discharge of brine numbers for La Quinta and Inner Harbor included in the salinity models? Has the TWPD and USFWL commented on this potentially catastrophic issue of saltwater intrusion and how is the DEIS addressing any concerns? Dr. Kirk Cammarata's study on seagrasses near IOB, reported a notable higher salinity measurement from prop wash as deeper channel waters would have higher salinity levels. Has the DEIS measured salinities at different depths within the CCSC? Having this data may affect your salinity models.
231	31	Nye	Patrick		8/9/22	Email	NGO	CUMUL	What has the DEIS done to calculate the cumulative effects of salinity? How could the DEIS state that this is not a probable impact of the project given that desalination is actively being pursued within the Coastal Bend and project area?
231	32	Nye	Patrick		8/9/22	Email	NGO	DIRIMP	The USACE makes and excellent point in that climate extremes will occur. How does the DEIS justify the effects that an oil export facility would increase greenhouse gas emissions and contribute to climate change? Would not this be a perfect opportunity for the USACE to change course and develop a plan to protect the Coastal Bend instead of creating direct impacts limited to a short-term goal of oil exports and greater climate greenhouse gases emissions? Isn't the USACE involved in the Ike Dike near Galveston? The $ 31 billion Ike Dike was recently passed by the Senate to protect the upper Texas Coast. Why is this project that services the fossil fuel industry be prioritized instead of the Coastal Bend residents? What plans does the USACE have for the Coastal Bend communities long term protection from RSLC since the USACE ignores climate change damaging effects with the DEIS? Why does the DEIS have a fatalistic view of the future and yet promote the exact causes for climate change with this fossil fuel project? What is the tipping point for a "go, no go" for the project as more climate data becomes available? *See comment letter for additional information.*
231	33	Nye	Patrick		8/9/22	Email	NGO	DIRIMP	USACE's sea level data is distorted and averages for the past 40 years instead of utilizing the inflection point of the upward curve of rising sea levels since the year 2000. What would be the projected RSLC utilizing the inflection point of the upward curve of rising sea levels since the year 2010? What are the RSLC predictions for Port Aransas, Fulton, City by the Sea, Bahia Bay, Aransas Pass, Ingleside on the Bay, Ingleside Cove Sanctuary, Portland shoreline, North Beach and Flour Bluff? What changes would be made to the permit if the RSLC calculated in the next few years to be in the High range? Would the USACE halt the permit and focus on the Priorities of People instead of fossil fuel industry? *See comment letter for additional information.* Cites a Mott MacDonald 2020 study regarding RSLR impacts to Ingleside on the Bay.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
231	34	Nye	Patrick	[redacted]	8/9/22	Email	NGO	ANALY	Did the DEIS model sedimentation, storm surge and tidal influences using the High 2.54' in 20 and 50 years?
231	35	Nye	Patrick		8/9/22	Email	NGO	WAKE	Ingleside on the Bay Vessel Wake – Commercial vessels pass through the CCSP and La Quinta daily. With higher tidal velocities, larger vessels, the erosion and damage to property is greatly enhanced. DEIS fails to identify these issues nor mentions IOB in their wake model. Boats have been overturned, waves wash up on porches and siltation from retreating wakes fill in canals at IOB.
231	36	Nye	Patrick		8/9/22	Email	NGO	DIRIMP	**4.1.3.3 Severe Storms and Hurricanes** - DEIS expects a 30% increase in potential storm damage by 2100. Published in the journal of Science Advances April 27. 2022, storms could double by 2050. Please update your DEIS. https://tucson.com/weather/intense-hurricanes-and-typhoons-could-double-by-2050-in-nearly-all-regions-of-worldscientists/ article_9551e44b-b279-5c2f-b091-b547e8339a0c.html
231	37	Nye	Patrick		8/9/22	Email	NGO	STSURGE	4.1.3.4 Storm Surge Effects - USACE states that barrier islands and coastal wetlands…are prone to future erosion, fragmentation and loss resulting from continued coastal development. Are the future impacts of the deepening of channel to 80', included in this statement? "Impacts related to storm surge exacerbate these existing stressors and can result in major changes to barrier island shorelines." Channel deepening will cause higher tidal velocities, greater tidal increases as well as storm surge. How does this project align with the USACE Mission statement helping to reduce disaster risk and prioritizing people?
231	38	Nye	Patrick		8/9/22	Email	NGO	STSURGE	4.1.3.4.1 HRI Modeling - What the definition of "ongoing dredging project conditions"? What year was the modelingby HRI conducted? What parameters were used in the modeling? Are there other models reviewed by USACE or Baird and will you provide them? Whom at Baird did the analysis? What is their educational background and area of focus for storm surge? Given the wide variability of storm/hurricane directions, intensity, surge parameters and tidal influences, how can the DEIS justify that the HRI modeling of using only two synthetic storms to evaluate Corpus Christi Bay? What direction, speed are the synthetic storm paths? What are the effects if two or more consecutive (same year) hurricanes strike the Coastal Bend area with the project in place? Should not the modeling include large surges that wash over the barrier island and the contributing effects of the project? Did the models include Hurricane Ike type storm for comparisons in the modeling? The $ 31b Ike Dike was recently passed by the Senate to protect the upper Texas Coast. Why is this project that services the fossil fuel industry be prioritized instead of the Coastal Bend residents? *Comment continued on next row.*
231	38	Nye	Patrick		8/9/22	Email	NGO	STSURGE	The DEIS has provided tidal tables for different areas impacted by the project. Why has the DEIS left out a table for storm surge impacts for Rockport, Fulton, Aransas Pass, Padre Island including Port Aransas and North Padre, IOB, North Beach and Flour Bluff areas? Will the table include RSLC over the next 5, 10, 15, 20 and 50 year periods?

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
231	39	Nye	Patrick	[redacted]	8/9/22	Email	NGO	DIRIMP	Concerned the degradation of water quality due to silt plumes (*see comment letter for figures*) and how that will impact seagrass in the area. Cites a TPWD 2019 letter that expresses concerns regarding indirect and cumulative adverse effects to seagrass in the area. USACE has done nothing to protect the seagrasses in the area. How do you guarantee that the CWA and the CAA laws will be followed, and violators will be prosecuted instead of ignored? Based upon the Water Quality section in the DEIS, would the USACE include a seagrass study conducted along the shoreline from Enbridge to Ingleside on the Bay by Dr. Kirk Cammarata TAMUCC? Mention of prop wash at Harbor Island in the DEIS is downplayed by the proposed modeling and there is a correlation between loss of seagrasses and ship docking operations. Why has the USACE ignored the impact of vessel prop wash siltation on coastal waters? Provides examples of siltation from prop wash and PA over flow. Is this the status quo for the USACE's operations? What other agencies would be involved in addressing these violations and assessing penalties? Who would intercede to assess mitigation for loss of seagrasses? Are you aware that the Port filed an injunction for this violation? Who is responsible for enforcing the CWA for this violation? Does the USACE keep track of the seagrass loss as a result of their permit approvals? What assurances do we have that enforcement of dredging permit guidelines and adherence to the CWA will be followed? Why has USACE not followed the CWA?
231	40	Nye	Patrick		8/9/22	Email	NGO	ANALY	Sediment transport modeling (Figure 4.1) shows high sediment suspension in an area that is mitigation for seagrass lost for the USACE Enbridge Pier. Will the USACE reverse its stance to utilize this area for seagrass mitigation? How can the Port utilize this area for seagrass mitigation knowing all along the high sediment load? What does "above average wind" in the modeling mean as it is compared to historical data? What was the scaling factor numbers and how were they calculated? Have there been other models run since 2015 over 7 years ago? Given climate change, there are predictions of higher winds due to dryer conditions, more numerous and powerful storms. How was this information included in the long-term modeling? Was RSLC included in the modeling?
231	41	Nye	Patrick		8/9/22	Email	NGO	ANALY	High suspended sediments are known to bury seagrasses and prevent growth and in some cases kill off seagrasses. Did the POCC disclose this critical information to USACE, TPW and Enbridge for SWG 1995-02221? The POCC leased 20 acres for Seagrass Mitigation License exactly at this location along the Portland shoreline to Enbridge (MODA) for January As part of the DEIS for this permit, how does this blatant oversight affect the EPA, USFWL, and TPW in their evaluation of this permit? The DEIS states that much of the data was supplied by the POCC. How was the seagrasses data qualified by other agencies for the DEIS?
231	42	Nye	Patrick		8/9/22	Email	NGO	DIRIMP	**Sediment Quality:** Because testing of sediment quality is extremely important, why not use a third party to analyze the biological testing of sediment instead of the USACE permit stakeholder? Does the Port edit the data before releasing to the DEIS? When will the data be released and shouldn't all the data be included instead of piece-meal? What about testing the sediment after the dredge spoil is in the containment dikes?
231	43	Nye	Patrick		8/9/22	Email	NGO	AIR	**Emissions from Construction Equipment:** Could the dredges be equipped to reduce emissions? What type of fuels are being used and are they low in sulfur? Since these emissions are estimated could the DEIS actually measure for assurances that the public is protected? See comment letter for figures shown on Particulate Matter (PM). Wouldn't PM be subject to air emissions contribution for the DEIS? Have these been tested and where are the results?
231	44	Nye	Patrick		8/9/22	Email	NGO	AIR	**Operational Emissions:** DEIS states: "For VLCCs originating at Ingleside, Alternative I would eliminate the lightering if those terminals made arrangements with Harbor Island terminals to top off light-loaded VLCCs instead of continuing lightering or using offshore SPMs to top off." This statement is false. Where are the agreements for lightering? Flint Hills was asked during a Public Meeting on July 13, 2022 about lightering, they flatly said this was not in their plans. This issues is a major reason for the VLCC terminal at Harbor Island and yet unsupported in the DEIS.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
231	45	Nye	Patrick	[redacted]	8/9/22	Email	NGO	AIR	Construction of the VLCC terminal at Harbor Island would create greater VOC emissions of 23,559 tons instead of zero VOC emissions. Given climate change risks with fossil fuels, greenhouse gases and potential oil spills, the Alternative 2 could be denied.
231	46	Nye	Patrick		8/9/22	Email	NGO	AIR	Vapor recovery units (VRU) are well documented to show incomplete vapor combustion to remove harmful emissions especially in the Ingleside area. Are VRU's impact to the residents of Pt. Aransas considered in the DEIS?
231	47	Nye	Patrick		8/9/22	Email	NGO	DIRIMP	Has the USACE measured the noise level from multiple tugboats plus the pumps and VRUs at the Ingleside Facility? Where in the DEIS is data actually measured instead of estimated? What about prop wash siltation? What about erosion and property damage at IOB?
231	48	Nye	Patrick		8/9/22	Email	NGO	DIRIMP	Please review TCEQ complaints of oil spills, noise, light pollution, emissions and silt disbursement from the dredging activities near Ingleside on the Bay, Texas 2020, 2021 and 2022. Why does this section only cover noise not the direct impact of dredging?
231	49	Nye	Patrick		8/9/22	Email	NGO	WET	Do you agree that seagrasses are being covered by dredging silt in Redfish Bay along Dagger Island? Lack of enforcement of the permit requirements are well documented for years along IOB. Oil spills, from dredging operations is certainly an impact and there have been multiple oil spills along the IOB shoreline as shown in Figure A 4.1.10.2.1 (*see comment letter*).
231	50	Nye	Patrick		8/9/22	Email	NGO	WET	The DEIS fails to mention the impact from silt plumes covering seagrasses in Redfish Bay State Scientific Area. A series of figures will document our concerns with this oversight. Why isn't silt plume and seagrass degradation not included in the DEIS? Why dredge curtains were not deployed in the spoil being dumped in Redfish Bay on the north side of the ship channel? *See comment letter for figures and additional information regarding this comment.*
231	51	Nye	Patrick		8/9/22	Email	NGO	WET	Figure in comment letter that shows the a silt plume impacting seagrass along Dagger Island and into the Redfish Bay Scientific Area creation of BU. Clearly a violation of the CWA as seagrasses are buried in silt. When will the USACE take responsibility for these activities and what are the mitigation processes? Is the Port responsible for these actions as they have environmental staff that should be monitoring this activity? Is this BU silt plume potential damages reported in the DEIS for the channel deepening? Contrary to DEIS reporting that the plume only travels 0.75 miles, these photos indicate at least 6 miles of plume along CCSC, Dagger Island and all the way to Port Aransas Causeway! Is this the stewardship of the USACE we can expect for this permitted project? Is BU calculated utilizing the entire dredge spoil island? What about ship wakes erosion?

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
231	52	Nye	Patrick	[redacted]	8/9/22	Email	NGO	DIRIMP	Does the DEIS have seagrass maps of established seagrass meadows prior to any dredging activity in Redfish Bay? Google Map dated 1/2011 Figure D 4.1.10.2.1 (*see comment letter*), shows seagrasses on both sides of ship channel. What data does the DEIS and USACE for pre and post dredge spoil in Redfish Bay? What mitigation is planned for the loss of seagrasses in this area? Was this dredging operation occurring during cold weather months when sea turtles and manatees were more vulnerable? THESE ARE IMPORTANT QUESTIONS FOR THE PUBLIC TO UNDERSTAND AS THE PAST HISTORY OF DREDGING AND SPOIL DISPOSAL ARE CLEARLY VIOLATIONS OF THE CLEAN WATER ACT AND DEDGRADATION OF THE ECOSYSTEMS. Where is the mitigation for the loss of the seagrass meadows? Is this the same practice that USACE will utilize for the deepening permit? What government agency will investigate past practices and release to the public their findings? How can anyone accept the proposed deepening with these oversights by USACE?
231	53	Nye	Patrick		8/9/22	Email	NGO	NONGEN	Who will govern the agencies responsible for violations from dredge spoil disposal on fragile and protected ecosystems?
231	54	Nye	Patrick		8/9/22	Email	NGO	DIRIMP	The USACE has ignored seagrass protection as it pertains to the Enbridge Pier Permit SWG-1995-02221 as well as failed to respond to complaints from maintenance dredging overflow on Berry Island. What assurances does the public have that rules for seagrass protection will be enforced? What type of penalties will be assets from the damage done along Dagger Island, RBSSA, Ingleside on the Bay and Berry Island seagrasses loss? Turbidity does not cease as erosion to spoil islands continues from ship wakes and tides. How does the DEIS qualify this statement with examples along islands and spoil islands near the ship channel? What affects are noted by seagrass maps, studies and agency's reports? NMFS disagrees with DEIS assessment. "However, those impacts are expected to be temporary with the long-term objective of protecting and expanding these habitats.". Placement of dredged material in SAV or wetlands is a permanent impact. (Brian Rosegger - Environmental Compliance Marine Habitat Resource Specialist Contractor with ERT in support of NOAA Fisheries Directorate Office U.S. Department of Commerce)
231	55	Nye	Patrick		8/9/22	Email	NGO	DREDMAT	Comments on Sediment Transport Modeling (Section 2.1.3 and figs 2.8 and 2.11). Sediment Data has been incorrectly evaluated and provides false information to the DEIS based upon USACE Unified Soil Classification. Are the 2015 sediment samples the most recent data? I am an eyewitness that had observed coring along the ship channel much more recently and asking why these samples are not included in the DEIS? Does the Port have them and not releasing the information? Why are the samples missing from BU area in Redfish Bay towards Ingleside on the Bay as shown on Figure 2.8 while the coring from Redfish Bay towards Port Aransas are in shorter intervals? Do you agree that Figure 2.11 is an averaging and gross generalization of silt content based upon limited number of samples depicted in Figure 2.8? Should this mapping be corrected with more recent boring samples that were taken along the ship channel? Have these sediment samples been evaluated for toxic metals and chemicals as they are prone to become air borne?
231	55	Nye	Patrick		8/9/22	Email	NGO	DREDMAT	Comments on Sediment Transport Modeling (Section 2.1.3 and figs 2.8 and 2.11). Sediment Data has been incorrectly evaluated and provides false information to the DEIS based upon USACE Unified Soil Classification. Are the 2015 sediment samples the most recent data? I am an eyewitness that had observed coring along the ship channel much more recently and asking why these samples are not included in the DEIS? Does the Port have them and not releasing the information? Why are the samples missing from BU area in Redfish Bay towards Ingleside on the Bay as shown on Figure 2.8 while the coring from Redfish Bay towards Port Aransas are in shorter intervals? Do you agree that Figure 2.11 is an averaging and gross generalization of silt content based upon limited number of samples depicted in Figure 2.8? Should this mapping be corrected with more recent boring samples that were taken along the ship channel? Have these sediment samples been evaluated for toxic metals and chemicals as they are prone to become air borne?

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
231	56	Nye	Patrick	[redacted]	8/9/22	Email	NGO	ANALY	Commenter feels there are major flaws with the Fugro 2019 Geotechnical Data, specifically how this information will be used for dredge spoil. Specific examples and information are given in the comment letter. *See comment letter for additional information.* The net affect of this error is that dredge spoil contains more silt and clay than postulated in the DEIS and would suspend in the water column over a period of years, not months. Based upon the enormous volume of dredge spoil, plumes of muddy water will cover beaches, seagrasses and marshes time and time again. Offshore of MI and SJI ponding of muds would occur in the low energy swales between sand bars eventually to be re-worked during storms and high wave events and deposit on beaches. The barrier island sand ecosystem would be altered. Dredge spoil sediments would affect the beaches and bays for years, a 404 CWA violation in the making.
231	57	Nye	Patrick		8/9/22	Email	NGO	ANALY	Also flawed is the lack of sieve analyses for a majority of the borings. See example as shown above for BH-22. Although stratum descriptions of the cores are documented, the tables report of only two samples of the % passing #200 sieve. Does the DEIS recognize this error? Why was this incredibly import aspect of the dredge spoil overlooked? Was this some sort of deception on the part of the applicant or Fugro? What ethics parameters are utilized for this contractor and other contractors used in the DEIS? What is important here is that data conclusively shows that silts and clay and will be highest percentage of material throughout the dredging spoil deposits. The Fugro report fails the basic sediment classification and brings into questions other studies and models. *See comment letter for additional information.* USACE Soil Classification Plates 4 and 5 illustrate the Grain Size Group on a curved graph. Even BH-21 and BH-22 to not meet the criteria for SP designation and be of the poorer classification SM. This elevates the silt and clay percentages above sand percentages as proposed. This is a fatal flaw of the DEIS.
231	58	Nye	Patrick		8/9/22	Email	NGO	WET	Wetland loss is expect to continue and yet the DEIS makes no effort to curb this loss but only increases its likelihood with this project. Does this project with the stated increase in tidal and storm surge flows provide additional assurances that the impacts of RSLC and effects on the ecosystem are guaranteed? The ecosystems begin with seagrasses, the nurseries that provide the protection of larvae and provides habitat for the food chain. How does turbidity affect oxygen concentrations in the water given that seagrasses use photosynthesis?
231	59	Nye	Patrick		8/9/22	Email	NGO	WET	The DEIS states that wetland loss would increase with hydrology alterations and SLC. USACE Dredging operations would continue to have an impact on aquatic communities. What impact has the current dredging to 54' had on the aquatic communities and how is this documented? How does the USACE prepare for these events to protect the Coastal Bend after the project is constructed? Why is this project more important than preserving and adapting to the anticipated dangers of erosion, SLR and loss of habitat?
231	60	Nye	Patrick		8/9/22	Email	NGO	DIRIMP	Ingleside Cove Sanctuary is not listed and has not been included in tidal studies, storm surge and wake affect caused by vessels. Enbridge maintenance dredging caused a huge plume of silt that covered seagrasses in the Sanctuary. When will the USACE include this valuable ecosystem in its DEIS study? Wake displacement from vessels is causing surges within the canals and along La Quinta shoreline at IOB. RSLC will increase the likelihood of erosion and loss of property as well as habitat loss. How does the USACE intend to protect Ingleside Cove Sanctuary?
231	61	Nye	Patrick		8/9/22	Email	NGO	DIRIMP	Silt plumes from dredging and vessels docking have already caused loss of seagrass meadows in IOB and Redfish Bay. How can the public trust an agency that does not enforce its permitted requirements? The DEIS states that "fish are motile". Since dredging is year around, will the USACE protect the larvae phases of fish and invertebrates? Dr. Edward J. Buskey UTMI reminds us that planktonic larvae have weak swimming skills and are too small to migrate back into nurseries on their own. With high tidal velocities, higher turbidity from dredging and ship traffic, what are the mortality rates expected for this project?

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
231	62	Nye	Patrick	[redacted]	8/9/22	Email	NGO	CUMUL	"The permit indicated that seagrass present in the west slip area would not be disturbed." This statement is untrue. USACE accepted this MODA permit (SWG-1995-02221) that is for building a second pier over seagrasses and wetlands. This statement insinuates that only maintenance dredging to be performed and completely ignoring the seagrass degradation data. Documentation by TAMUCC Dr. Kirk Cammarata has presented his findings that there is a net loss of seagrasses adjacent to and extending towards IOB since the study began in December 2020. Here are some of Dr. Cammarata's findings. Does the USACE disagree with the images provided in the study? How long has the USACE been aware of the impact to seagrasses west of Enbridge? *See comment letter for additional information.*
231	63	Nye	Patrick		8/9/22	Email	NGO	WET	Based upon the foregoing, USACE was aware of the adverse effects to the large area of seagrasses. Do you agree that this information was ignored? If not, what actions were performed by the USACE to stop the loss of seagrasses? My point and question are, will this type of response continue on the permit we are addressing in the DEIS? Should there be letters of reprimand for the USACE person or persons that have ignored and failed to enforce the Clean Water Act designed in part, to protect seagrasses? What about other agencies like the POCC that had foregoing knowledge of this? How will the seagrasses lost across IOB be mitigated and penalties assess?
231	64	Nye	Patrick		8/9/22	Email	NGO	DIRIMP	**Migratory Birds –** DEIS states that increase turbidity and disperse prey possibly reducing the foraging efficiency of some sight-feeding migratory seabirds…" What happens to the juvenile seabirds and extra burden placed on the breeding that turbidity will have? Do you have documentation of seabird survival rates when large areas are affected by dredging especially near Pelican Island? Shoreline erosion will increase, and ship wakes could cause higher mortality rates among the species that breed near the waterline. Does the DEIS have data to ensure that these protected species are safe? Whooping Crane is expanding its territories and there are frequent sighting around Port Aransas. If estuaries are being threatened by this project, wouldn't this endangered species deserve more study and protection?
231	65	Nye	Patrick		8/9/22	Email	NGO	NAV	**Navigation** – Port Aransas is the gateway to the Gulf of Mexico as well as inland lagoonal waters behind the barrier Padre Island. The convergence of CCSC, Lydia Ann Channel, Conn Brown Channel plus the Intracoastal Canal, La Quinta and numerous small and large vessel harbors throughout the Coastal Bend. The DEIS should include the increase in hazards from the increase in vessel traffic in all forms not just commercial vessel traffic. The hazards should include dredging operations, barge traffic in determining the treat to boaters as well as oil spills from collisions. On March 15, 2021 crude oil tanker Riverside lost power and crashed into Enbridge Ingleside pier (formerly MODA) causing approximately 80'of the pier's end to collapse into the water (see comment letter for sequence of events).
231	66	Nye	Patrick		8/9/22	Email	NGO	NAV	What are the probability of vessel collisions and oil spills with this project? How is the damage assessment modeled in terms of environmental and property to residents affect? What spill control measures are in place now and if the deepening occurs? What is the risk of collision now that the ship channel is deepened to 54' from 47'? What assurances can the USACE give to small boaters that navigate around Harbor Island if the permit is allowed? How will the Cheniere LNG tankers reported increase to 300 tankers per year, affect navigational risks?
231	67	Nye	Patrick		8/9/22	Email	NGO	FERRY	What about ferry traffic delays and loss of tourist revenues?
231	68	Nye	Patrick		8/9/22	Email	NGO	MITIG	Mitigation efforts are poorly designed and controlled by the Port. Images below (see comment letter for photos) show the lack of seagrass development due to high turbidity and high siltation rates that bury seagrasses reducing photosynthesis. Commenter provides examples of mitigation. Will this type of mitigation be utilized for the DEIS give the BU silt and vessel traffic will not sustain long-term seagrass growth? Based upon the documentation of the loss of habitat, specifically seagrasses, mitigation should be proposed and expanded as other areas are impacted. How will the DEIS grade the progress including BU spoil deposits?

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
231	69	Nye	Patrick	[redacted]	8/9/22	Email	NGO	NONGEN	Where are the costs associated with the project in the DEIS?
231	70	Nye	Patrick		8/9/22	Email	NGO	PUBMEET / OUT	Why are there documents delayed or incomplete in the DEIS that requires the public to review at a later date?
231	71	Nye	Patrick		8/9/22	Email	NGO	NOTAPP	Why are sections in the 2003 EIS Ship Channel Deepening removed from the DEIS?
231	72	Nye	Patrick		8/9/22	Email	NGO	ALTS	Prefer Alternative 2, offshore single point mooring.
232	1	Hilliard	Jennifer		8/9/22	Email	PC	DIRIMP	VII executive summary: "Beneficial use of dredged material would result in direct impacts to wetlands and SAV; 106.3 acres of SAV within SS1, 18.7 acres within HI-E, and 25.3 acres within PA4." This sentence is unclear. The first part of the sentence indicates direct impacts to wetlands and SAV but the totals reported here (106.3 + 18.7 + 25.3 = 105.3 acres) are only given for SAV. What are the total direct impacts to wetlands?
232	2	Hilliard	Jennifer		8/9/22	Email	PC	WET	VIII Executive Summary: "there would be no major impacts to existing wetlands or SAV." This confuses the reader, as it implies that the project would have no major impacts. Though not derived from dredging, impacts to existing wetlands and SAV during dredge material placement would result in impacts.
232	3	Hilliard	Jennifer		8/9/22	Email	PC	WET	"However, those impacts are expected to be temporary with the long-term objective of protecting and expanding these habitats." NMFS disagrees. Placement of dredged material in SAV or wetlands is a permanent impact.
232	4	Hilliard	Jennifer		8/9/22	Email	PC	ALTS	“As alternatives are identified that result in fewer direct impacts to aquatic resources, it is unclear how the applicant’s preferred alternative will be reconciled with the requirement to identify a least environmentally damaging practical alternative as part of the CWA 404 permitting process which is referenced in the ADEIS and in Appendix N - 404(b)(1) Guidelines Evaluation.”

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
232	5	Hilliard	Jennifer	[redacted]	8/9/22	Email	PC	ALTS	"Finally, the position that other project alternatives utilizing newly created dredged material placement areas would result in significantly more impacts is noted. However, it is also noted that other alternatives exist that would impact significantly fewer aquatic resources and limit the need for mitigation and/or beneficial use to offset those impacts."
232	6	Hilliard	Jennifer		8/9/22	Email	PC	CUMUL	Air Quality and Green House Gas emissions are not addressed. This proposed Project would result in a cumulatively considerable contribution to air quality and GHG emissions. The DEIS does not properly evaluate the projects contribution to cumulative impacts of air quality, and has not included a plan on feasible environmental control measures to reduce air quality impacts within the vicinity of the channel deepening and reduce GHG emissions that contribute to global climate change.
232	7	Hilliard	Jennifer		8/9/22	Email	PC	ALTS	**Appendix N 404 Evaluation:** Section 404 of the CWA governs the discharge of dredged or fill material into waters of the U.S. A Section 404(b)(1) evaluation is minimally prepared and included in the appendix. The 404(b)(1) evaluation does not demonstrates the preferred alternative and dredge plan complies with the 404(b)(1) guidelines. The preferred alternative #1 is not the least environmentally damaging practicable alternative (LEDPA).
232	8	Hilliard	Jennifer		8/9/22	Email	PC	MITIG	Coastal Zone Management Act: The approval of this project is not consistent with the State of Texas Coastal Management Program in that it disturbs/destroys wetland and seagrasses without a proven recovery plan, with no monitoring, and years of lack of productivity that will impact crucial breeding and fishing areas and offering NO mitigation.
232	9	Hilliard	Jennifer		8/9/22	Email	PC	WET	**Wetlands:** The statement that Channel Deepening would not impact Coastal Wetlands is totally misleading. Since Tidal wetland and freshwater wetlands are part of the Coastal Wetland classification. Please provide the wetland map that was used to determine this classification of disturbed wetlands. Please explain how damage to that type of wetland is not considered as part of the 404 USACE responsibility for ensuring "no net loss" of wetlands by requiring permit applicants to make every effort to avoid and minimize aquatic resource impacts and provide compensatory mitigation to offset any permitted impacts. In the Mott Macdonald's Waters and Wetland Study, 2021 that is cited in this DEIS; it states in section 3.1.2 that "As directed by PCCA, the waters and wetlands delineation survey was only conducted to the PSA boundaries and did not extend onto private property, even if the wetland extended beyond the PSA boundaries." As such the total impact to wetlands is not included in this DEIS. Impacts from dredge placement are noted to be seen up to 1 kilometer from the placement site. Still the study provided shows wetlands delineated totaling 745.911 acres that are subject to 404 regulations.
232	10	Hilliard	Jennifer		8/9/22	Email	PC	CUMUL	The salinity levels predicted for this 404 do not include the brine discharge from the Port of Corpus Christi Desalination plant that will discharge hundreds of millions of gallons into the channel right off Harbor Island. Salinity levels increase of 3ppt is significant and that is not in addition to the brine that will be resuspended by the additional VLCC and tug boats maneuvering to dock the VLCC adjacent to the desalination facility. This permit should not be granted without a comprehensive study that included the proposed and nearly permitted desalination facility that will be changing the qualities of the water dramatically.
232	11	Hilliard	Jennifer		8/9/22	Email	PC	EFH	"Turbidity increases from construction of Alternative 1 would be temporary and local." This statement is contradictory to what has been stated previously and what is stated below. Increase salinity will have long term effects on oysters as in makes the oyster more susceptible to disease and predation. In addition to turbidity having indirect impacts to 32 acres. How will these impacts or potential impacts be mitigated for or monitored to ensure the proposed impacts are only temporary and no additional mitigation is necessary for loss of oyster reefs?
232	12	Hilliard	Jennifer		8/9/22	Email	PC	WET	Please explain how coastal wetlands are separated from tidal wetland and freshwater wetlands and how damage to that type of wetland is not considered as part of the 404 USACE responsibility for ensuring "no net loss" of wetlands by requiring permit applicants to make every effort to avoid and minimize aquatic resource impacts and provide compensatory mitigation to offset any permitted impacts. In the Mott Macdonald's Waters and Wetland Study, 2021 that is cited in this DEIS; it states in section 3.1.2 that "As directed by PCCA, the waters and wetlands delineation survey was only conducted to the PSA boundaries and did not extend onto private property, even if the wetland extended beyond the PSA boundaries." As such the total impact to wetlands is not included in this DEIS. Impacts from dredge placement are noted to be seen up to 1 kilometer from the placement site. Still the study provided shows wetlands delineated totaling 745.911 acres that are subject to 404 regulations.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
232	13	Hilliard	Jennifer	[redacted]	8/9/22	Email	PC	NONGEN	**Permit Application (January 3, 2019) 401 Tier 2 Questionnaire, Page B-6, Water Quality Impacts:** It is not possible for the Port of Corpus Christi to make this statement as the facility that will be producing hundreds of millions of gallons of brine discharge has yet to be constructed. If the dredging occurs after the construction of the desalination plant, heavy salt sediments will be captured in the brine and deposited in the Placement Areas. This has not been considered. Even if the channel is dug before the facility is built, the maintenance dredging required for the channel will be dredging this discharged material and needs to be considered.
232	14	Hilliard	Jennifer		8/9/22	Email	PC	NONGEN	**Permit Application (January 3, 2019) 401 Tier 2 Questionnaire, Page B-6, Water Quality Impacts:** Response does not discuss settling of solids or adequately details how the dredge material will be placed to protect nearby wetlands and seagrasses. The Port of CC has a history of allowing unfiltered unsettled dredge material to spill into Redfish Bay. The response states that it will determine where use of settlement dikes and silt curtains will be used if appropriate and applicable, not if required and a best practice to mitigate damage to marine life and seagrasses.
232	15	Hilliard	Jennifer		8/9/22	Email	PC	NONGEN	**Permit Application (January 3, 2019) 401 Tier 2 Questionnaire, Page B-6, Water Quality Impacts:** The response does not state how they will protect these adjacent seagrasses from siltation during the dredge placement. They claim the impact from the placement will be temporary, but studies show that it takes up to 4 years for seagrasses beds to recover from dredging and it is recommended that dredge placement be located at least 1 kilometer from healthy seagrasses. Please note, this beneficial use being claimed in this response can be accomplished with other currently permitted maintenance dredge activities. The beneficial use being cited as the reason for why this permit is preferred to the off-shoring mooring option is false, and should not be used to justify impact to special aquatic environment when the benefit does not require the Proposed Alternative to be received.
233	1	Masten	Kathryn		8/9/22	Email	PC	STSURGE	Concerned about the storm surge if the channel is dredged that deep. Experiences a storm surge of up to 4 feet, inundating a quarter of IOB throughout the 2020 hurricane season. The Channel segment from the Gulf to Port Aransas has just been deepened from 47-feet to 54-feet in March 2020. Both modeling and historical research show that channel deepening will only make things worse, posing existential threats to coastal communities like Port Aransas and IOB.
233	2	Masten	Kathryn		8/9/22	Email	PC	STSURGE	Commenter provides information received via correspondence with Dr. Stefan Talked who said they world not be surprised if channel deepening actually helped water escape flooded areas (depends a lot on local geometry probably). A bigger ditch 'drains the swamp' more quickly. This is what we see in Jacksonville, Florida, with Hurricane Irma. The flip side of the coin is that a deepened channel (bigger ditch) allows more ingress as well, so that a big storm surge (such as the 1900 Galveston hurricane) could become more serious upstream." He said that historical tide records would "prove the case, one way or the other". In fact, he demonstrated for USACE Portland how to conduct such a study (Talked & Jay, 2017). Provides a summary of some key findings from recent channel deepening research (see Table 1 in comment letter).
233	3	Masten	Kathryn		8/9/22	Email	PC	ANALY	In Appendix I: Hydrodynamic & Salinity Modeling, 3D modeling by Baird & Associates compared two future states: Future with Project (to 75+ ft) with Future without Project (to 54' currently in construction). Thus, their study's conclusions do not reflect changes from the current baseline state (47'). Even then, modeling showed increased conveyance capacity in Aransas Pass, tidal exchange increase of 8% between the bay and the GOM, cumulative significant impact of tidal amplitude of 36% at the inner channel (14 cm max) and 26% (8 cm max) at Corpus Christi Bay, and increased range of salinity change +/-4 PSU.
233	4	Masten	Kathryn		8/9/22	Email	PC	ANALY	HRI modeling conducted Corpus Christi, and Nueces Bays and 0.04 inches increases in water level. Table 2 compares findings from these two studies (see comment letter). Due to relative sea level rise of 0.02 feet/year and increasing (Sweet et al., 2017), Subedee and Gibeaut ominously conclude "it is expected that water level and tide range increases caused by channel deepening will be overwhelmed by increases from other causes in a few years" (p. 48). But does that make channel deepening okay?
233	5	Masten	Kathryn		8/9/22	Email	PC	DIRIMP	Many Coastal Bend communities, including Port Aransas, Ingleside, Aransas Pass, and Ingleside on the Bay, are located in flood plains. Harbor Island, where the Port of Corpus Christi Authority (PCCA) is planning to entice more oil terminals to be built, is also in a flood plain. How does it make any sense to knowingly construct a ship channel as deep as the Suez Canal to reach NEW oil tanks and pipelines yet to be built in a flood plain, where a catastrophic hurricane like 2017's Hurricane Harvey can result in explosions and spills, causing untold environmental damage and loss of aquatic habitat and wildlife? Putting more industrial development on Harbor Island will remove the important protective role this critical floodplain plays during storm events and storm surge. Have emergency planners and city planners from Nueces and San Patricio Counties, Port Aransas, Ingleside on the Bay, Ingleside, and Aransas Pass even been engaged in discussions about this project? Jennifer Hilliard, IOBCWA's Treasurer and a licensed architect, is Chair of IOB's Planning and Zoning Commission. Sara Williams is San Patricio County's emergency manager. What do they, and the governing bodies of the Coastal Bend cities and counties, have to say about constructing MORE oil terminals in flood plains in harm's way?

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
233	6	Masten	Kathryn	[redacted]	8/9/22	Email	PC	ANALY	A thorough Hydrologic and Hydraulic System Analysis (H&H) needs to be performed in accordance with USACE Section 408 11(c)(2). This needs to take into account the entire channel configuration throughout the Coastal Bend Bays and Estuary system – the Corpus Christi Ship Channel, the La Quinta Channel, and all of the connected bays and estuaries. With hydrological channel modifications a threat to both human communities and to the environment, historical data on tides and storm surge from previous channel deepening likely readily available, and concern for storm surge impacts on communities a known issue brought up during scoping, it is disappointing that a thorough H&H was not performed as part of this Draft EIS.
233	7	Masten	Kathryn		8/9/22	Email	PC	P&N	Concerned that permit activities in the region are being rolled out one at a time instead of as connected actions: two CCSC projects, Harbor Island Desal Plant, La Quinta Desal Plant, La Quinta Channel Extension and Widening, and leased seagrass mitigation areas of Port-owned submerged property. Inner Harbor and Packery Channel are also part of this connected system.
233	8	Masten	Kathryn		8/9/22	Email	PC	CUMUL	Cumulative Impacts identifies 42 projects in the 4-county study area. However, that is an incomplete list and the discussion was shallow. The Port has recently entered into several MOUs for activities such as, but not limited to, carbon capture and sequestration (CCS), blue hydrogen, and decarbonization and energy transition. The Port likely has a good idea of how these projects will unfold, and most will involve use of the ship channels in some way. Sequestration locations under the bay floor are likely to be considered as part of CCS; blue hydrogen projects require freshwater, likely from desalination plants on the ship channels; energy transition means getting away from crude oil altogether, which would impact the very economic justification for this channel deepening project! *See comment letter for additional details.* Cites press release for the Port's response to the IPCC Report on Climate Change - "The Port of Corpus Christi has committed to developing much needed infrastructure to collect and pressurize CO2 for injection in permanent geological storage formations offshore in the Gulf of Mexico." What does this mean for Coastal Bend communities? It sounds like the Port, is offering up the Coastal Bend to be the dumping ground for all privately-generated carbon emissions, but with no compensation to the communities potentially placed further in harm's way. Who is paying for this infrastructure? This was not disclosed in this DEIS. Port should be much more forthcoming.
233	9	Masten	Kathryn		8/9/22	Email	PC	CUMUL	Numerous industrial activities are occurring along the La Quinta Ship Channel. This includes two desalination plants – one by the Port and one by the City of Corpus Christi, discharging 57 and 166 MGD of brine respectively (more than indicated in Cumulative Impacts). Yet the DEIS Cumulative Impacts section does not mention impacts on salinity and avoids discussing the environmentally sensitive La Quinta location altogether – stating only with regard to the City of Corpus Christi's two proposed desal plants that "the proposed location within the Inner Harbor avoids direct impacts to coastal resources due to the industrial setting". IOBCWA was recently granted affected party status in a TCEQ Contested Case Hearing against the Port's proposed La Quinta desal plant water rights permit.
233	10	Masten	Kathryn		8/9/22	Email	PC	CUMUL	*See comment letter for all details provided pertain to this comment.* The Cumulative Impacts section on Moda (former owner) states there is "no impact" to cultural resources. Enbridge is also planning to construct a $3 billion blue hydrogen facility on the former Navy Base property. The Cumulative Impacts section on Enbridge needs to be updated to reflect new ownership and activities. Flint Hills also has an open permit request to deepen their berths, which is not mentioned in the DEIS. South Texas Gateway Partners is already in full operations, having recently added new berths.
233	11	Masten	Kathryn		8/9/22	Email	PC	P&N	IOB featured prominently on the formal presentation for this project, but the City Council of IOB was not notified. My FOIA request to USACE related to the La Quinta Channel project was outright denied, as was a request by Healthy Gulf. Anything happening to the La Quinta Channel by the Port and by the industries accessing the channel should be considered "connected actions" with the CCSC actions. Without this basic infrastructure, these companies cannot fully operate. This is one connected channel system that traverses an estuary system deemed by the EPA as being of national significance and touches many communities.
233	12	Masten	Kathryn		8/9/22	Email	PC	P&N	As it stands now, the proposed new round of CCSC channel deepening is a "channel to nowhere". The only oil terminals already existing are located adjacent to IOB, which this segment of the channel doesn't reach. Are we to believe the Port has no plans to keep on going? Why won't USACE release the information on La Quinta Channel? The City of Ingleside on the Bay is not even listed in Appendix P – despite our numerous comments in 2020 on this project. IOB is NOT the same city as, or part of, the City of Ingleside.
233	13	Masten	Kathryn		8/9/22	Email	PC	CUMUL	The Port of Corpus Christi prevailed in a second round of TCEQ Contested Case Hearings to discharge 95.6 million gallons a day (MGD) of brine into the CCSC (according to the Port's 2018 Public Notice) as part of their planned Harbor Island desalination plant. This is way more than the 10 MGD mentioned in the Cumulative Impacts section. USACE rightfully identified that power needs for desal are in scope for this DEIS and that another EIS will be likely for the outfall, but there is NO MENTION in the DEIS about the cumulative impacts on salinity levels in the Bay, when coupled with increased salinity intrusion from the Gulf of Mexico from having a deepened channel. Baird's Hydrodynamic and Salinity Modeling Study doesn't even mention ANY of the 6 desalination plants proposed for Corpus Christi Bay (2 by the Port, 2 by the City of CC, one by City of Ingleside & Poseidon, and one by CC Polymers).

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
233	14	Masten	Kathryn	[redacted]	8/9/22	Email	PC	P&N	The two oil terminals proposed on Harbor Island, all the pipelines proposed to cross Redfish Bay to Harbor Island on their way to proposed offshore oil terminals (e.g., Bluewater), and the multi-purpose terminal at Taft need to be considered as connected actions.
233	15	Masten	Kathryn		8/9/22	Email	PC	PUBMEET / OUT	USACE and Port of Corpus Christi strategies of splitting up connected actions, refusing FOIA requests, holding public hearings in-person only at inconvenient locations, refusing to extend review and comment periods, failing to send notice to affected city governments, and not meeting with city planners and emergency personnel of coastal cities already threatened by climate change do not indicate honest efforts at community engagement.
233	16	Masten	Kathryn		8/9/22	Email	PC	CUMUL	The impact on health in IOB and Port Aransas residents and visitors is directly relevant to this permit because it represents a cumulative impact of a number of industrial projects already in existence (mostly since the lifting of the oil export ban in 2015) and yet-to-come – especially if the Proposed Project is approved. Much of the emissions can likely be attributed to increased shipping activity. When docked, these ships should be required to use shore power; as it is, the diesel from generators is floating into nearby communities. This will have a harmful effect not only on human health, but also on tourism and recreation in Port Aransas. We already experienced this ourselves in IOB, and I hate to see Port Aransas ruined because of the increased ship traffic emissions.
233	17	Masten	Kathryn		8/9/22	Email	PC	NAV	Concerned about the safety for boaters and swimmers in the channels in IOB due to the increased ship traffic.
233	18	Masten	Kathryn		8/9/22	Email	PC	WAKE	Concerned about the impacts from ship wakes from increased ship traffic.
233	19	Masten	Kathryn		8/9/22	Email	PC	SOCIO	These concerns about boater safety and beach erosion due to increased ship traffic also do not bode well for tourism and recreation at Port Aransas.
233	20	Masten	Kathryn		8/9/22	Email	PC	BUSITES	The placement of massive amounts of dredged materials just offshore from Mustang Island is also of concern. Not only will this attenuate desired wave action on the beach and affect sea turtle presence (both popular draws for tourists), but clay is likely to mix in with the beach sand, causing a mess for beach goers. Placement of offshore breakwaters, as was done in IOB in 2014, would be more protective of shorelines than creation of more loose spoil islands.
233	20	Masten	Kathryn		8/9/22	Email	PC	BUSITES	The placement of massive amounts of dredged materials just offshore from Mustang Island is also of concern. Not only will this attenuate desired wave action on the beach and affect sea turtle presence (both popular draws for tourists), but clay is likely to mix in with the beach sand, causing a mess for beach goers. Placement of offshore breakwaters, as was done in IOB in 2014, would be more protective of shorelines than creation of more loose spoil islands.
233	21	Masten	Kathryn		8/9/22	Email	PC	BUSITES	Surprised that plans to restore estuarine/aquatic habitat at Pelican and Dagger Islands and other sites were removed from this project. Dredge placement plans including filling in wetlands that were originally created from dredged spoil, claiming these former DMPAs as being of “lower value” so as not to require mitigation. IOB President Patrick Nye has reported the massive expansion of spoil islands that are in continuous industrial use, with loose sediment spilling over into surrounding waters, suffocating seagrasses. The DEIS should acknowledge that dangers that spoil island create.
233	22	Masten	Kathryn		8/9/22	Email	PC	WAKE	Ship wake impacts will only get worse with more, larger, and fully loaded ships traversing both the CCSC and the La Quinta Channels. But it’s impossible to say by how much. In Appendix H: Vessel Wake Analysis, it was acknowledged that modeling was limited because Boussinesq equations could not appropriately model impacts of wave propagation of tankers at over 50’ depth. Fully-laden VLCCs require 70’ depth. IOB residents Sheila and Jim Walton and Tom and Michelle Mack have video showing that both the CCSC and La Quinta Channel are sources of “concussion waves” that come ashore, damage bulkheads, and force seawater into yards. How much worse will this impact be on IOB with an even deeper CCSC? Unpredictable (but likely worsened) ship wake impacts from a deepened channel will cause significantly adverse effects to economic (property) values.
233	23	Masten	Kathryn		8/9/22	Email	PC	DIRIMP	Despite claiming that reduction of reverse lightering events to reduce air emissions is the goal, the DEIS outright admits that “More efficient transport of crude in greater volumes is the impetus for the Port to deepen the channel to accommodate fully loaded VLCCs.” This project will result in MORE ship traffic, not less. Among the 130 “lightering events” in 2019, how many of them resulted in accidents or spills? Why is this data not provided? Does it really make economic sense to deepen a ship channel to reduce (not even prevent) so few events, wreaking havoc on the estuarine bay system and coastal communities available for free public use, in order to increase efficiency for private petroleum companies?

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
233	24	Masten	Kathryn	[redacted]	8/9/22	Email	PC	ANALY	Feels that the results of the ship simulation leave cause for concern. *Commenter cites specific recommendations and conclusions from the report, but does not provide comments as to what the issues with those are.*
233	25	Masten	Kathryn		8/9/22	Email	PC	P&N	The basic purpose of this project is "To safely, efficiently, and economically export current and forecasted crude oil inventories via VLCC". Deepening a narrow and shallow public ship channel, that is highly used for recreational purposes, in order to accommodate fully-laden VLCCs plus 5 tugboats each, while threatening communities and the environment, will not be safe, efficient, or economical.
233	26	Masten	Kathryn		8/9/22	Email	PC	NOTSUP	Does not believe the public or private petroleum companies need this project. To invest in infrastructure that enables the continued build-out of a planet-threatening dwindling industry (crude oil) in order to boost short-lived private profits, while also harming communities and the natural ecosystem (carbon sinks) that can help combat climate change, is a bad investment and injurious to the nation's (and world's) public interests.
233	27	Masten	Kathryn		8/9/22	Email	PC	P&N	The Port's stated project purpose "to construct a channel with the capability to accommodate transit of fully laden VLCCs from multiple locations on Harbor Island into the Gulf" is contrary to the public interest and needs to be removed from consideration altogether.
233	28	Masten	Kathryn		8/9/22	Email	PC	ALTS	Concerned that no other ports were considered as alternatives for achieving the project basic purpose. Any alternative to the applicant's preferred alternative of deepening the channel to 75 feet would be significantly less harmful.
233	29	Masten	Kathryn		8/9/22	Email	PC	WET	**Public Interest Factor (a) wetlands:** No benefit. Benefits do not outweigh the damage to wetlands. See comment letter for information to support this statement. Concerned with the Port's argument for proposing no mitigation in Section 6, the Port justifies filling in 42.5 acres of wetlands on PA 4 as being of lower value since it was a former DMPA - thereby acknowledging that efforts at creating wetlands through dredged material placement have not been successful. The Port does not have a good track record of creating new wetlands and protecting seagrass. It is recommended that the District Engineer consult with others, including representatives from Mission Aransas NERR, RBSSA/ UTMSI, to discuss the cumulative effects, as described in 33 CFR 320.4(b)(3). It was concerning that USFWS cancelled their participation, according to the FAST-41 website. But more concerning is that I am unable to find that any local experts were consulted in the dredged material placement plan and destruction of wetlands in RBSSA; nor is anyone from UTMSI or Mission-Aransas NERR listed in Appendix P (Distribution list). These issues about wetlands destruction and lack of mitigation were brought up in original comments, and still seem to be unaddressed.
233	30	Masten	Kathryn		8/9/22	Email	PC	DIRIMP	**Public Interest Factor (b) fish and wildlife values:** No benefit. Claiming temporary and minor adverse impacts during dredging, but benthos recolonization is expected to occur after dredging operations cease. However, dredge and fill operations rarely cease and that is acknowledged in Section 9 stating they would continue to be disturbed during periodic maintenance dredging. It is unclear whether concerns brought up by TPWD and others during the earlier comment period have been adequately addressed.
233	31	Masten	Kathryn		8/9/22	Email	PC	DIRIMP	**Public Interest Factor (c) water quality:** No Benefit. There will be ongoing increased turbidity, and salinity levels will increase – especially with the addition of desalination plants – two of which are being pursued by the Port. Desalination processes in ship channels, as proposed, will also require more energy for reverse osmosis to clean the turbid water. Waste discharge from ships and the potential for even bigger oil spills also impact water quality.
233	32	Masten	Kathryn		8/9/22	Email	PC	CULRES	**Public Interest Factor (d) historic properties:** No Benefit. Shipwrecks like the 1845 Steamship Dayton off the coast of IOB may be in danger, but it is unclear from limited info in the DEIS. The Texas Historical Commission keeps exact locations confidential.
233	33	Masten	Kathryn		8/9/22	Email	PC	SOCIO	**Public Interest Factor (e) recreation:** No Benefit. Increased VLCC traffic with potentially bigger wakes will impact boater safety and shorelines. Vessel traffic and congestion not considered. The ship simulation did not consider situations with other vessels, even though the load and unloading terminals will be directly adjacent to the Port Aransas Ferry and this channel is the sole means for pleasure and fishing crafts to access the Gulf of Mexico. Deepening of the channel will have a direct impact on access to the Gulf of Mexico by commercial and recreational fishing vessels and will increase wait times much longer than the 30 minutes estimated by the Ports. With 4 VLCCs in port at the same time, along with tugboats, and recreational boaters trying to also go in and out – often early in the morning before the sun comes up, just imagine the potential for catastrophe! Placing a deep water channel and crude oil terminal at access point to the Gulf, at the juncture of a ferry landing and right on the boundary of a special marine environment and national estuary reserve seems to be a very bad decision and taking risks to protected aquatic resource. Ocean dumping and DMPAs offshore from Mustang and San Jose Islands may attenuate desirable wave action for beachgoers (and sea turtles), thereby reducing desirability of Port Aransas for tourists. Ferry delays for tourists. Recreational fishing negatively impacted.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
233	34	Masten	Kathryn	[redacted]	8/9/22	Email	PC	DIRIMP	**Public Interest Factor (f) shore erosion and accretion:** No Benefit. Increased large ship traffic of the CCSC and La Quinta Channels has already caused significant erosion at Ingleside on the Bay. It is expected to only get worse because of projected increased current speeds, storm surge, tropical storms, and relative sea level rise, with climate change exacerbated by continued use of fossil fuels, that approval of this project will promote.
233	35	Masten	Kathryn		8/9/22	Email	PC	DIRIMP	**Public Interest Factor (g) considerations of property ownership:** No Benefit. Erosion of and beachfront property and damage to bulkheads has already occurred as a result of increased ship traffic facilitated by channel deepening.
233	36	Masten	Kathryn		8/9/22	Email	PC	BUSITES	**Public Interest Factor (i) other Federal, state, or local requirements:** No Benefit. Ocean dumping and DMPAs B1-B9 and MI may not be in alignment with the 1995 City of Port Aransas Coastal Management Plan (https://cityofportaransas.org/wpcontent/uploads/2019/12/Coastal_Mgmt.pdf). It is unclear to what extent the City of Port A was consulted. Overriding issues of national importance do not appear to be applicable since current navigation is unhampered, and this oil EXPORT project does not serve energy needs for the U.S. No citations are given for how this project serves economic development or national needs at all.
233	37	Masten	Kathryn		8/9/22	Email	PC	NONGEN	**Public Interest Factor (j) floodplain values:** No Benefit. An essential part of this "channel to nowhere" is that it will connect to two oil terminals yet to be constructed on Harbor Island, which is located in a flood plain. Thus, not only does the project fail to avoid modification of floodplains, it directly supports floodplain development in contradiction to Executive Order 11988 – even though practicable alternatives exist. If the floodplain is developed, this removes another important protection for coastal communities and even puts them further in harm's way in the event of a storm that causes spills or explosions at the oil terminals or VLCCs harbored there.
233	38	Masten	Kathryn		8/9/22	Email	PC	P&N	**Public Interest Factor (k) energy conservation and development:** No Benefit. Crude oil exports will increase consumption globally, further contributing to global warming.
233	39	Masten	Kathryn		8/9/22	Email	PC	NAV	**Public Interest Factor (l) navigation:** No Benefit. It is expected that, since this will be the only port in North America capable of handling fully-laden VLCCs, and the goal is to increase exports, navigation in the channel will only increase but with bigger, less maneuverable, ships. VLCCs will need to be accompanied by tugboats, which will also increase navigation hazards. This will increase hazards of navigation for recreational and commercial boaters.
233	40	Masten	Kathryn		8/9/22	Email	PC	DIRIMP	**Public Interest Factor (m) general environmental concerns:** No Benefit. Bigger ships means bigger accidents. Worsened air and water quality from increased ship traffic and ongoing dredging will impact habitat, fish, wildlife, and human environment.
233	41	Masten	Kathryn		8/9/22	Email	PC	DIRIMP	**Public Interest Factor (n) economics:** No Benefit except for private companies and the Port. In the absence of ANY economic information, it is possible that taxpayers will be expected to pay for all or part of this project without receiving any economic return.
233	42	Masten	Kathryn		8/9/22	Email	PC	MITIG	**Public Interest Factor (o) mitigation:** No Benefit. Communities will lose valuable diverse established wetlands and seagrasses, with no mitigation being offered.
233	43	Masten	Kathryn		8/9/22	Email	PC	SOCIO	**Public Interest Factor (p) aesthetics:** No Benefit. Port Aransas residents and tourists will have to put up with the sights, sounds, smells, and constant rumbling of dredgers. This was most unpleasant when we lived in IOB.
233	44	Masten	Kathryn		8/9/22	Email	PC	STSURGE	**Public Interest Factor (q) flood hazards:** No Benefit. Coastal communities will suffer from increased storm surge and flooding – potentially deadly.
233	45	Masten	Kathryn		8/9/22	Email	PC	NONGEN	**Public Interest Factor (r) land use:** No Benefit. Flood insurance rates in coastal communities will likely increase even more than they already are based on sea level rise and subsidence.
233	46	Masten	Kathryn		8/9/22	Email	PC	P&N	**Public Interest Factor (s) energy needs:** Foreign countries will have more access to dirty crude oil. Petroleum companies locating along the deepened channel are likely to have high energy requirements that further heat up the already hot atmosphere in Texas, further taxing the fragile Texas grid.
233	47	Masten	Kathryn		8/9/22	Email	PC	NAV	**Public Interest Factor (t) safety:** An estimated 85 lightering events will be eliminated annually. Communities will be less safe because of direct and indirect effects of increased VLCC traffic to export crude oil - including risks of bigger spills and explosions; hazardous navigation; increased storm surge, tidal range, and flooding events; increased air emissions; loss of wetlands and flood plains; and impacts of global warming (rising see level, erosion, extreme weather events, power outages, etc.).

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
233	48	Masten	Kathryn	[redacted]	8/9/22	Email	PC	SOCIO	**Public Interest Factor (u) in general, needs and welfare of the people:** No Benefit. Quality of life in all Coastal Bend coastal communities is likely to suffer because of the ongoing dredging, the threats to coastal living from increased storm surge and tidal swings, the increased ship traffic, potential for larger spills and explosions, and the displacement of aquatic species and wildlife to places where their habitat is not so disturbed. In the event of a natural disaster or hazardous event, everyone's welfare will be jeopardized.
233	49	Masten	Kathryn		8/9/22	Email	PC	P&N	There is no economic (or other) justification for this project. There is no cost information. There is no information about who plans to pay for it. The 2003 EIS contained a lot of information on justification and costs. Since the PCCA is a public navigation district, 33 Code of Federal Regulations (CFR) 320.4(q) referenced on p. 1-10 does not seem to apply: "…when private enterprise makes application for a permit, it will generally be assumed that appropriate economic evaluations have been completed, the proposal is economically viable, and is needed in the market place…Therefore, for the purpose of the permitting process, the economic need, as stated by the overall project purpose, is considered to be met."
233	50	Masten	Kathryn		8/9/22	Email	PC	P&N	The Port's shift in the Application from imports (justified in 2003) to exports favors private interests over public interest. "As a result of PCCA's past investments in marine infrastructure and available capacity, PCCA has been capable of accommodating the recent historical shift in oil traffic from import to export; trend to continue "as long as the Port's infrastructure allows it" (Appendix A, p.29). Port infrastructure, paid for by taxpayers and labeled by the Port as "common and public", has not made available for open use. Instead, the Port either sells or leases the infrastructure to specific private companies, with no revenues coming back to local communities. Harbor Island terminals will be private lease agreements as well.
233	51	Masten	Kathryn		8/9/22	Email	PC	P&N	Channel Infrastructure not open, public, or common: Channel deepening from 54' to 75'+ may prop up private fossil fuel industry in the short-term, but it will certainly cause long-term (even permanent) and potentially devastating impacts on local coastal communities and the Corpus Christi Bay system (estuary of national significance) - under the absurd justifications that "beneficial use" of dredge is needed to save the bay system from climate change and that increasing oil exports is good for the U.S. and the world.
233	52	Masten	Kathryn		8/9/22	Email	PC	AIR	**Small impact:** There were only 130 lightering events in 2019, with this project expected at best to reduce this by half. How can the Port claim this will reduce air emissions, when they admit they're going to be increasing oil export ship traffic?
233	53	Masten	Kathryn		8/9/22	Email	PC	P&N	Illegitimate Purpose. The "overall project purpose" focuses on decreasing costs & increasing safety for private companies and their employees, while ignoring increased size of catastrophes involving VLCCs closer to local communities and the environment, when spills, accidents, explosions, collisions, storms, and terrorist activity occurs inside the once-protected bay system.
233	54	Masten	Kathryn		8/9/22	Email	PC	ALTS	LEDPA is anything BUT the proposed project (e.g., no action & offshore). Other alternatives, even for the proposed illegitimate purpose, were not considered, including other locations where residences and estuaries aren't as much at risk. If increasing oil exports by private companies thru fully-laden VLCCs coming into shore is truly a high national priority (which we doubt), then shouldn't that occur away from thriving estuaries of national significance and popular tourist destinations?
233	55	Masten	Kathryn		8/9/22	Email	PC	DIRIMP	Consequences for communities: Channelization worsens "sediment starvation" and erosion, increases storm surge and tidal range, increases salinity levels (without accounting for Harbor Island and other desal projects), increases hazards, will impact air quality, increase noise, smells, & visual esthetics thru dredgers.
233	56	Masten	Kathryn		8/9/22	Email	PC	GEN	Ingleside on the Bay (IOB) was omitted in DEIS: IOB suffered worse storm surge in a century in Hurricane Celia 1971. Yet it is not singled out for discussion in the Section 3.0 of the DEIS. Mayor Ehmann has already been on the News about safety issues in canal from increasing ship traffic in Corpus Christi & La Quinta Ship Channels.
233	57	Masten	Kathryn		8/9/22	Email	PC	DIRIMP	Worsens climate change impacts: Claims of "beneficial use" of dredged materials to combat climate change as main benefit doesn't make sense, when its continued use of fossil fuels (the reason for deepening the channel) that is causing climate change.
233	58	Masten	Kathryn		8/9/22	Email	PC	CUMUL	Focus on 14 "resources" (p. 5-2) is too limiting. PCCA says "cumulative impacts were discussed in further detail if the potential indirect and direct effects would have more than insubstantial temporary adverse or positive impacts to the resource. In addition, the health of the resource was taken into consideration." Per EPA guidance (1999): "While impacts can be differentiated by direct, indirect, and cumulative, the concept of cumulative impacts takes into account all disturbances since cumulative impacts result in the compounding of the effects of all actions over time. Thus, the cumulative impacts of an action can be viewed as the total effects on a resource, ecosystem, or human community of that action and all other activities affecting that resource no matter what entity (federal, non-federal, or private) is taking the actions." 42 projects didn't cover everything anticipated or going on currently. The Harbor Island desal plant is directly relevant and barely covered. No thoughtful consideration given to ecosystem or human community-level cumulative impacts over time.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
233	59	Masten	Kathryn	[redacted]	8/9/22	Email	PC	MITIG	Incorrect that no Mitigation is required due to PCCA portrayal that "beneficial use" of dredged placement outweighs impacts. PCCA provides 4 different excuses for not having to mitigate for destroying 200 acres of wetlands and 6 acres of seagrass: would erode anyway, restores to pre-Harvey conditions, was a DMPA originally, and was created by storm surge washout. The reason why there's a wetlands is immaterial. Mitigation is required when wetlands are destroyed - like for like type, in same area. To do otherwise is environmental destruction of Redfish Bay. It's hard to get a clear picture of acres impacted, when fuzzy math is used and verbiage changes throughout. There is no mention at all of breakwaters instead of flimsy spoil islands that are easily washed away to protect Redfish Bay or anyplace else alongside the ever deeper channel.
233	60	Masten	Kathryn		8/9/22	Email	PC	NONGEN	Sections 7-9: Less than 1 page, not properly answered.
233	61	Masten	Kathryn		8/9/22	Email	PC	NONGEN	LEDPA not identified.
233	62	Masten	Kathryn		8/9/22	Email	PC	P&N	Believes that in the purpose the Port trying to play match maker between an over-abundance of undesirable cargo (dirty crude oil) and an unwieldy overbuilt carrier (VLCCs built too big for most ports) at the expense of the Coastal Bend. Commenter provides a bulleted list of the reasons for this statement (see comment letter).
233	63	Masten	Kathryn		8/9/22	Email	PC	ALTS	“Partially loaded outbound VLCCs at Ingleside could top off at Harbor Island thereby reducing or eliminating reverse lightering.” The Ingleside export terminals are owned by different companies and thus the product pipeline would be carrying product owned by different supplier. This is a big reach that they would partially fill up at one Company with one owner’s product and top off at another company’s terminal with a product owned by someone else. The Port is reaching for rationalization.
233	64	Masten	Kathryn		8/9/22	Email	PC	BUSITES	Saint Joe Island is owned by the Bass family (petroleum dynasty) Should beneficial use of a federal project be used to benefit a private person or private company?
233	65	Masten	Kathryn		8/9/22	Email	PC	BUSITES	Most of the dredge will be dumped offshore in the Gulf, is not considered beneficial use, and is actually shown to have a detrimental impact on surrounding aquatic area. It should be investigated as to why the Port was given access to federal ocean dumping sites in the first place?
233	66	Masten	Kathryn		8/9/22	Email	PC	BUSITES	Any “real” beneficial use dredge material could be easily be provided by maintenance dredging of the newly dredged channel to 54' (CCSCIP) and the maintenance dredging of La Quinta Channel.
233	67	Masten	Kathryn		8/9/22	Email	PC	SOCIO	While Cove Park (located at the entrance to IOB) is discussed at length, IOB is not discussed AT ALL - and it's located adjacent to La Quinta Channel, within feet of CCSC. No mention of Brass Turtle Lodge & boat ramp, Ingleside Beach Club & fishing pier, or Bahia Marina and boat ramp, or entire city of IOB.
233	68	Masten	Kathryn		8/9/22	Email	PC	NAV	The Port brags that “Vessels using the channel system transport a wide variety of cargo. This includes crude oil and petrochemical products such as gasoline, liquefied natural gas, solvents, and ethylene.” This doesn't sound like a "wide variety of cargo" to me! Perhaps diversification to something other than petroleum-related products would be another good alternative.
233	69	Masten	Kathryn		8/9/22	Email	PC	NAV	Major expansions of the major midstream industries [located on Live Oak Peninsula adjacent to IOB] is expected to increase vessel calls of the current tanker fleet used in the existing channel. Is all this big ship traffic, going to be able to be handled safely with just a single point of entry/exit to the Gulf of Mexico? Based on the simulation results, it doesn’t bode well.
233	70	Masten	Kathryn		8/9/22	Email	PC	FERRY	What assurances are there that there won't be another near-collision with ferry traffic?
233	71	Masten	Kathryn		8/9/22	Email	PC	DIRIMP	Section 4.1.3.1, first paragraph. This is lunacy, the stated purpose of the project creates climate change, but they state the effects of climate change are world wide and span over 50 years, so even though this project will DIRECTLY contribute to climate change, the impact on the Texas coast will happen regardless of the project alternatives, which one is to not build the project at all.
233	72	Masten	Kathryn		8/9/22	Email	PC	DIRIMP	Section 4.1.1.1.2, page 4-3 and 4-4. “With proposed project, hurricane events could result in sedimentation volumes several times higher than the average annual sedimentation” (Baird, 2022a). This sounds bad - even worse sedimentation post-hurricane under proposed project.
233	73	Masten	Kathryn		8/9/22	Email	PC	DIRIMP	Only the proposed Project "could result in localized shoreline change" (erosion, sea level rise, and subsidence). This sounds bad.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
233	74	Masten	Kathryn	[redacted]	8/9/22	Email	PC	ANALY	"[B]each nourishment would widen the shoreline and advance the beach seaward, causing the nourished beach to extend further into the active transport zone." Even the beneficial use for beach nourishment sounds like it will be bad for the navigational purpose of the project, and therefore likely abandoned for safety reasons! So once again, how is the public going to benefit at all from this project?
233	75	Masten	Kathryn		8/9/22	Email	PC	ANALY	There will be an increase in current speed in the CCSC from Port Aransas to Ingleside where the water depth remains unchanged. How will this combine with increased storm surge and tidal range? What are the impacts on Ingleside on the Bay – and cities further up, like Gregory, North Beach, Flour Bluff?
233	76	Masten	Kathryn		8/9/22	Email	PC	CUMUL	Deepening of navigation channels can alter circulation patterns and increase saltwater intrusion by allowing deeper, more saline water to move further into the estuary (USACE, 1987). Localized changes in salinity of less than ±3 ppt in the proposed dredge area and connected navigation channels may occur (Baird, 2022c). Yet, there is no discussion about additional salinity increases from desalination plants.
233	77	Masten	Kathryn		8/9/22	Email	PC	CUMUL	IPCC (2021) Impacts related to climate change are limited to increased carbon dioxide emissions due to an increase in the number of vessels and reverse lightering operations with all alternatives. What about increased loading activities by the expanding and additional oil terminals? And who knows what other companies will also be coming in and their impacts on climate change (e.g. energy use)?
233	78	Masten	Kathryn		8/9/22	Email	PC	CUMUL	The list of 42 projects doesn't include any of the Port's MOUs for blue & green hydrogen, carbon capture and storage. It also doesn't include Enbridge's plans for $3 billion blue hydrogen facility next to IOB. Taft multi-use terminal "not considered connected action", but that's where 2 30" pipelines come from to supply Bluewater (offshore terminal). Ingleside Ethylene runs a 114.9 mile long, 8-inch diameter ethylene pipeline within a 75-foot-wide work corridor from their ethane cracker facility from Ingleside to Clemville (Matagorda Co), crossing 14 navigable waters & 85 wetlands. There are many other crisscrossing terrestrial pipelines from Taft to offshore. More terrestrial pipelines along coast are not mentioned as cumulative impacts with regard to safety. There's no cumulative look at risk, air and water quality degradation, loss of property value, and lack of job creation with pipelines.
233	79	Masten	Kathryn		8/9/22	Email	PC	CUMUL	With regard to dredging activities, there is no cumulative look at noise, aesthetics, air & water quality degradation, loss of property value, not job creators, impact on seagrass and misplacement of wildlife, killing sea turtles.
233	80	Masten	Kathryn		8/9/22	Email	PC	MITIG	Provides a table showing the Port's calculations of no mitigation for wetlands destruction. They will destroy 197.83 acres of wetlands, but after discounting value of some wetlands using fuzzy math, they determine no mitigation is necessary. Is that really how mitigation works? Claim "beneficial use" and all is forgiven? I don't think that aligns with wetlands policies. This plan goes totally against why Port/USACE got to do any previous dredging - the idea that DMPAs would be for BU. How can we believe that any of the new DMPAs proposed in this EIS will ever be useful for wildlife? Plus, we've seen it with our eyes. These will be used in perpetuity for dredge material, create eyesores, and sources of noise & construction - disrupting wildlife and communities like IOB.
233	81	Masten	Kathryn		8/9/22	Email	PC	EFH	Section 7.0 Unavoidable Environmental Impacts. "While there are unavoidable impacts to EFH, they may be compensated for through the protection and creation of marshes and SAV via placement actions targeting BU, increasing the amount of nursery areas, protective habitat, and food sources within Corpus Christi Bay." These are overly rosy projections of BU. EFH loss should always be compensated.
233	82	Masten	Kathryn		8/9/22	Email	PC	BUSITES	Section 7.0 Unavoidable Environmental Impacts. "Inshore PAs would convert deep open water areas to protect adjacent shallow bathymetry that support or can establish tidal wetlands and SAV or would restore eroding shorelines that would protect larger extents of SAV." Where is the evidence that inshore PAs (spearheaded by the Port) have worked elsewhere in the Coastal Bend?
233	83	Masten	Kathryn		8/9/22	Email	PC	BA	Section 7.0 Unavoidable Environmental Impacts. "Dredging may cause injury or mortality to sea turtle species, but any expected mortality should not be significant enough to affect long-term populations." Some of these sea turtles are endangered! How is this okay? What precautions are going to be taken in terms of warnings, times, seasons, etc.? Who will you be working on this? Has the Port reached out to UTMSI or Mission Aransas? I do not see them on distribution.
233	84	Masten	Kathryn		8/9/22	Email	PC	CULRES	Section 7.0 Unavoidable Environmental Impacts. "Permit would ensure all cultural resource issues are addressed to meet regulatory requirements prior to construction of the proposed project." When will the public get to review this?
233	85	Masten	Kathryn		8/9/22	Email	PC	DIRIMP	Section 7.0 Unavoidable Environmental Impacts. "Dredging would result in temporary and minor noise and light level increases but will be compatible with other industrial activities in the project area." I do not believe the beaches at Port Aransas already have a lot of "industrial activities". Speaking from my experience at IOB, the dredging can last for months, with sights, smells, sounds, and a constant rumbling. I used to step outside in the middle of the night to look for a ship passing by. It wasn't until I started researching this turns out it was dredgers coming up the CSCC for Segment 2 causing the rumbling. Are citizens and tourists really going to be okay with this? This is likely to impact people's livelihoods.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
233	86	Masten	Kathryn	[redacted]	8/9/22	Email	PC	NONGEN	Section 8.0 Irreversible Commitments of Resources. “Irreversible commitments of resources are those resulting from impacts to resources so they cannot be completely restored to their original condition. Includes labor, capital, and material resources expended in the planning and construction of this project.” I don’t think this was what was meant. Wrong definition & wrong example. This refers to environmental resources.
233	87	Masten	Kathryn		8/9/22	Email	PC	MITIG	Section 8.0 Irreversible Commitments of Resources. “However, some proposed placement actions are intended as BU and would improve some tidal resources in the project area.” Again, just label it as BU and unavoidable and irreversible impacts are forgiven?
233	88	Masten	Kathryn		8/9/22	Email	PC	DIRIMP	Section 8.0 Irreversible Commitments of Resources. “Deepwater bay bottom would be irretrievably lost from channel deepening and bend easing.” But won’t benthic organisms recolonize there?
233	89	Masten	Kathryn		8/9/22	Email	PC	NONGEN	Section 8.0 Irreversible Commitments of Resources. “Energy resources used by the dredge equipment would be committed during dredging operation.” I don’t believe that is what is meant by resources.
233	90	Masten	Kathryn		8/9/22	Email	PC	NONGEN	Section 9.0 Short-Term Human vs. Long-Term Productivity This section did not address the “relationship between local short-term uses of man's environment and maintenance & enhancement of long-term productivity”.
233	91	Masten	Kathryn		8/9/22	Email	PC	NONGEN	Section 10.0 Environmentally Preferred Alternative. LEDPA (least environmentally damaging project alternative) was not identified. The Port focused instead on how only channel deepening enables a fully loaded VLCC at Harbor Island, while also yielding 46.3 mcy of dredged material for inshore and offshore beneficial use.
233	92	Masten	Kathryn		8/9/22	Email	PC	P&N	Section 10.0 Environmentally Preferred Alternative. “As these exports increase, the number of lightering vessels and product carriers will also increase, adding to shipping delays and congestion inside and outside of the Port. These delays and congestion will increase the cost of transportation, which in turn will increase the cost of crude oil with the ultimate consequence of making U.S. crude less competitive in the global market.” This sounds like a business problem that can be handled through better scheduling and slowing things down. The fact is, there is still only going to be one point of entry/exit for ships of all size and purposes – making Harbor Island a rather busy and dangerous location. Since channel deepening to increase oil exports does NOT economically benefit the public, and does cause substantial harm to the environment, channel deepening is the least “environmentally preferred alternative”.
233	93	Masten	Kathryn		8/9/22	Email	PC	CULRES	Archaeological survey data (missing information). "It does not include findings and recommendations related to the presence/absence and present condition of archaeological cultural resources that could be affected by the Applicant’s Proposed Action Alternative. The discussion relied on available background information to interpret project-related effects to archaeological resources. This section will be updated once field data is available for review."
233	94	Masten	Kathryn		8/9/22	Email	PC	P&N	Cost-benefit analysis or economic evaluation (missing information). “In accordance with 33 Code of Federal Regulations (CFR) 320.4(q), “…when private enterprise makes application for a permit, it will generally be assumed that appropriate economic evaluations have been completed, the proposal is economically viable, and is needed in the market place…” Therefore, for the purpose of the permitting process, the economic need, as stated by the overall project purpose, is considered to be met.”
233	95	Masten	Kathryn		8/9/22	Email	PC	NONE	National Historic Preservation Act Section 106 Review (missing information). Extended to October 18, 2022.
233	96	Masten	Kathryn		8/9/22	Email	PC	NONE	Fish and Wildlife Conservation Act (FWCA) planning document (missing information). Due to staffing changes/limitations, FWS will not complete a separate FWCA planning document for the project. This action was cancelled.
233	97	Masten	Kathryn		8/9/22	Email	PC	P&N	The project violates: Section 9 and Section 10 of the Rivers and Harbors Act of 1899. The purpose of the Corpus Christi Ship Channel Improvement Project (CCSCIP) currently underway, as well as the proposed Corpus Christi Ship Channel Deepening Project (CDP), is to increase oil exports for private corporate profit. This deviates from plans from the CCSCIP’s authorized socioeconomic purpose to increase oil imports to maximize national economic development and energy independence.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
233	98	Masten	Kathryn	[redacted]	8/9/22	Email	PC	NONGEN	The project violates: Clean Water Act Section 404(b)(1) guidelines. Dredged material will have unacceptable adverse impacts both individually and in combination with known and/or probable impacts of other activities affecting the Coastal Bend Bays and Estuary system, which is one of 28 EPA designated estuaries of national significance (National Estuary Program). Increased salinity levels from dredging alone threaten aquatic species, but in combination with one or more desalination plants proposed (and nearing approval) by the applicant (Port of Corpus Christi) on Harbor Island and La Quinta Channel, the increased salinity levels will likely have a devastating impact. The filling in of nearly 200 acres of wetlands in the Redfish Bay State Scientific Area (including on a site previously created for beneficial use), represents an irreversible loss of valuable aquatic resources and offers evidence that new sites in the same rich estuarine location will not be of "beneficial use" as designed, according to the applicant. Berms are subject to washouts from frequent tropical storms and increased ship wake activity from the project, resulting in siltation over seagrasses and aquatic habitat.
233	99	Masten	Kathryn		8/9/22	Email	PC	NONGEN	The project violates: Marine Protection Research & Sanctuaries Act of 1972, Section 102. The placement of dredged material in the New Work ODMDS will unreasonably degrade amenities and economic potentialities. Placement of huge quantities of dredged material just off the beaches will attenuate wave action desired by in the beach tourism industry, which form the economic base of Port Aransas. Dredged material will mix with sand on the beaches on Mustang and San Jose Islands, making the beaches less attractive to tourists, which includes, among many other activities, a renowned sand sculpture event.
233	100	Masten	Kathryn		8/9/22	Email	PC	P&N	The project violates: 33 CFR Part 320.4 Public Interest Review. This project is contrary to the public interest.
233	101	Masten	Kathryn		8/9/22	Email	PC	MITIG	The project violates: 33 CFR Part 332 Mitigation. The Port of Corpus Christi offers no compensatory mitigation AT ALL in this project, despite the planned destruction of nearly 200 acres of wetlands in Redfish Bay State Scientific Area. With no known oversight, the Port itself serves as a mitigation bank, having industries that destroy wetlands and seagrasses in one place lease submerged land from the Port for the supposed reestablishment of aquatic resources. Appropriate mitigation should be required for this project, with federal oversight.
233	102	Masten	Kathryn		8/9/22	Email	PC	NOTSUP	Recommend that the permit be denied as contrary to the public interest.
233	103	Masten	Kathryn		8/9/22	Email	PC	PUBMEET / OUT	Request there be more time for the public to review and submit comments and that additional public meetings be held in the affected communities of Port Aransas and Aransas Pass, with the ability for individuals to participate remotely.
234	1	Hilliard	Jennifer		8/9/22	Email	PC	NONGEN	Flood Plain Management EO11988. The property on Harbor Island is currently mapped Zone AE and VE. While the VLCC terminals that should be part of this permit are not included, the VLCC traffic to the terminals is modelled and preliminary project plans show these terminals to be constructed in the flood plain. It is clear that this project is going to directly induce growth in the floodplain as these terminals, if located on harbor island will be in the flood plain. Yet the DEIS states that the "The CDP is not expected to significantly affect floodplains." How can this be true?
234	2	Hilliard	Jennifer		8/9/22	Email	PC	NONGEN	Even with only two storms modelled, there will be a direct impact to the flood prone regions in the coastal bend by the deepening of the CCSC. On top of the storm surge, tidal variations in Port Aransas are projected to be up to 15% greater and 9% greater in Corpus Christi Bay. I have attached the FEMA flood maps for the area closest to the dredge. Most, if not all, of the shoreline and immediate inland areas are mapped as Zone AE and VE. I do not see how it can be claimed that the CDP will not significantly affect floodplains when the minimal storm surge modelling that was conducted shows a possibility of 12 inches additional storm surge in areas mapped VE and AE in Port Aransas. This 12-inches would be in addition to the 15% tidal increase.
234	3	Hilliard	Jennifer		8/9/22	Email	PC	ANALY	The USACE should run storm surge analyses for storms that make landfall to the North, South as well as a direct hit to the proposed channel with many variations in speed, intensity, pressure, and wind field. Foremost, the EIS needs to be revised to address this additional threat of flooding and property damage to the communities of Port Aransas, Aransas Pass, Ingleside, Ingleside on the Bay, Portland, and Corpus Christi.
235	1	Strain	Cliff		8/9/22	Email	PC	DIRIMP	Concerned about a potential spill at the intersection and gateway to 3 major bay systems.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
235	2	Strain	Cliff	[redacted]	8/9/22	Email	PC	DREDMAT	Do not believe the depth is sustainable without continuous dredging.
235	3	Strain	Cliff		8/9/22	Email	PC	DIRIMP	Concerned about the disastrous effect on local seagrass beds that many species of fish and invertebrates use for nurseries. The regular dredging would cloud waters going into these grass beds and reduce light necessary for photosynthesis.
235	4	Strain	Cliff		8/9/22	Email	PC	SOCIO	Concerned about the impacts to tourism and the local commercial fishing industry.
235	5	Strain	Cliff		8/9/22	Email	PC	FERRY	The location of the associated turning basin for ships right next to the Ferry landing will disrupt the flow of tourists on and off the island. Could have a big impact on not only tourism in Port Aransas, but Aransas Pass, Ingleside, and Rockport as well.
235	6	Strain	Cliff		8/9/22	Email	PC	ANALY	Concerned that dredge material dumped offshore will impact and change the composition of the local beaches which again would impact a big reason why most of our tourist come (the beach and fishing).
235	7	Strain	Cliff		8/9/22	Email	PC	DREDMAT	The dredged material could resuspend buried toxins. Has core sampling down to 80ft been done in the proposed dredge site for composition, holding capacity, and toxicology?
235	7	Strain	Cliff		8/9/22	Email	PC	DREDMAT	The dredged material could resuspend buried toxins. Has core sampling down to 80ft been done in the proposed dredge site for composition, holding capacity, and toxicology?
235	8	Strain	Cliff		8/9/22	Email	PC	ALTS	A platform in the Gulf offshore where ships and load and offload seems to make so much more sense.
236	1	Strain	Cliff		8/9/22	Email	PC	NONE	Asking for a receipt acknowledging the USACE received the previous email.
237	1	Duncan	Brenda		8/9/22	Email	PC	WAKE	Concerned about neighbors on Bayshore Drive will continue to suffer the consequences of larger ships passing their properties.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
237	2	Duncan	Brenda	[redacted]	8/9/22	Email	PC	PUBMEET / OUT	Request more public meetings in Port Aransas and Aransas Pass.
238	1	Bartlett	Stacey		8/9/22	Email	PC	GEN	Requesting extensions on all applications concerning Harbor Island in the city limits of Port Aransas.
238	2	Bartlett	Stacey		8/9/22	Email	PC	PUBMEET / OUT	Request all meetings on this be held in person in either Port Aransas or Aransas Pass.
238	3	Bartlett	Stacey		8/9/22	Email	PC	GEN	Need extensions this, SWG-2019-00067; along with, Port of Corpus Christi application SWG-2019-00245 for ship berths on Harbor Island; and Axis Midstream's application SWG-0018-00789 for more ship berths and pipeline across Redfish Bay.
238	4	Bartlett	Stacey		8/9/22	Email	PC	ALTS	Support an offshore monobuoy known as SPM (single point mooring).
238	5	Bartlett	Stacey		8/9/22	Email	PC	DIRIMP	Concerned about the impacts to the fishery because Harbor Island is at the critical juncture of three channels "Ecological Hotspot".
238	6	Bartlett	Stacey		8/9/22	Email	PC	SOCIO	Concerned about the economy without a healthy fishery the town will die, area is based on tourism, lots of folks come for fishing tournaments.
238	7	Bartlett	Stacey		8/9/22	Email	PC	FERRY	Concerned about the impact the project will have on the ferry operation. If the ferry system is shut down while VLCCs are turning this will be impossible to evacuate, accommodate emergency vehicles if there is an emergency.
239	1	Holt	Scott		8/9/22	Email	PC	P&N	This EIS for a CDP is part of a three-prong project that must be evaluated as one action. Those three are this project (the deepening of the channel to -75'), the POCC dock/terminal facility at Harbor Island and the Axis Midstream dock/pipeline. The two dock/terminal projects are intended to have berths for VLCC size ships and a supply of oil from the mainland to fill them. They are listed in Table 5-1, Past, Present, and Reasonably Foreseeable Projects as numbers 41 and 38, respectively. At the top of page 2-5 the applicant states "The No-Action Alternative assumes that the Harbor Island and Axis Midstream marine terminal projects have been constructed." These projects absolutely have not BEEN CONSTRUCTED!! A few lines above, on page 2-4, the applicant states "Projects currently under way include building and operating a crude oil export terminal on land owned by the PCCA on Harbor Island and constructing facilities and pipelines for marine transport vessels by Axis Midstream (Port, 2019a; USACE, 2018, 2020)". There is no "building and operating" underway. *See comment letter. Commenter provides reasoning as to why the three project must be evaluated as one throughout the comment letter.*
239	2	Holt	Scott		8/9/22	Email	PC	CUMUL	In the Cumulative Impacts (5.3.2.9 pg 5-11) they state "PCCA is proposing to construct a terminal facility with vessel berths on Harbor Island that would accommodate up to two VLCCs deep-draft water borne vessels for the transportation of crude oil. Work in WOTUS would include: dredging two deep draft vessel berths at a slope of 3:1 to the CCSC authorized depth of –54 feet MLLW…". Here they accurately state that the POCC is actually proposing the project, not the totally unfactual statements about "built" or "under construction". At the end of the quote above, it can be seen that they even state, correctly for once, that the project is being proposed for only -54'. Even if it were permitted it would not be capable of filling a VLCC, as they misstate so consistently in this EIS.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
239	3	Holt	Scott	[redacted]	8/9/22	Email	PC	P&N	On page 4.1, at the beginning of section 4.0 they state "The No-Action Alternative condition considers those projects that have been completed (existing), are under construction, or have been authorized for construction. For the CDP, the No-Action Alternative includes the deepening and widening of the –54 foot CCSCIP from the Gulf to the Inner Harbor, building and operating a crude oil export terminal on land owned by the PCCA on Harbor Island, and constructing facilities and pipelines for marine transport vessels by Axis Midstream". This allows them to assume the construction and operation of these two absolutely essential components of the oil export project will have no impact relative to Alternative 1. That is patently deceptive and cannot be allowed. They must be required to at least assume those are future actions that have Cumulative impacts. In reality, the three actions are all one project and should be permitted together.
239	4	Holt	Scott		8/9/22	Email	PC	ALTS	As further obfuscation of the situation, the Applicant states on page 2-2 under the description of Alternate 1 "Under this alternative, only berths at Harbor Island would be capable of fully loading VLCCs. Partially loaded outbound VLCCs at Ingleside could top off at Harbor Island thereby reducing or eliminating reverse lightering." Not only is the dock/terminal project not built or under construction, but the existing permit application is only proposing a -54' berth. What the application for the CDP says about the utility of Alternative 1 is simply not feasible – it is simply false. How can the applicant give patently false information in the EIS and expect it to be approved?? These two projects are the subject of separate permits, permits that are at least 3-4 years old and may, or may not, even be under active evaluation. They certainly are not permitted and certainly not underway.
239	5	Holt	Scott		8/9/22	Email	PC	CUMUL	In section 5.4.7 of the Cumulative Impacts assessment, the applicant states "Past, present, and reasonably foreseeable actions with dredging or construction activities, and resultant turbidity, can potentially impact nearby wetlands and SAV. Pipeline installation can also have direct impacts to wetlands and SAV; however, HDD can avoid and minimize potential impacts." However, in their detailed description of each potential project that might produce cumulative effects, in section 5.3.3.2, describing the Axis Midstream project they say "The installation of the proposed Midway to Aransas pipeline bundle would result in 13.94 acres of temporary trench and fill impacts in WOTUS, including wetlands." What happened to the HDD solution the PCCA says can avoid potential impacts and why did section 5.4.7 not assess the cumulative trench and fill impacts?
239	6	Holt	Scott		8/9/22	Email	PC	DIRIMP	Throughout the text of the ESI there is extensive deceptive language which suggests that the proposed action would have a certain impact and the no-action alternative would have another impact. It is very important to recognize that the proposed project will extend into the bay system only to the Harbor Island area, terminating essentially in vicinity of the TEXDOT Ferry landings at Port Aransas, a distance of about 2 miles from the end of the jetties. The CCSC extends all the way into the Inner Harbor in the city of Corpus Christi, another 20 miles away. The applicant continuously refers to the CCSC as the project area or the impacted area. The applicant then implies that the CDP alternative would have certain effects that would negate of change the no-action alternative impacts. The reality is that the no-action scenario will continue for the 20 mile stretch from the ferry landing to the inner harbor regardless of whether the CDP is permitted or not.
239	7	Holt	Scott		8/9/22	Email	PC	CUMUL	Page 5-41 "Beneficial use placement actions could potentially benefit Federally listed species such as Piping Plovers and Red Knots by nourishing or restoring habitats. Designated Piping Plover Critical Habitat can be found throughout the project area on Mustang Island, San José Island, Port Aransas, and along Corpus Christi Bay. Placement actions could potentially increase shoreline habitat within designated Critical Habitat on San José and Mustang Island. Whooping Crane habitat may benefit from placement actions targeting BU as well." This is just word salad, no description of how this benefit would occur, or how such potential benefit was determined. They might as well just say "the action could benefit these species, it might not benefit them, it might harm them – who knows!!" The applicant should not be allowed to use such hedge words as "could potentially increase … habitat" or "habitat may benefit from placement". They should either be required to declare the effect as in "it will benefit Whooping Cranes" or they should be required to just acknowledge that they really do not know the potential effect of their action.
239	8	Holt	Scott		8/9/22	Email	PC	BUSITES	**Placement Site SS2.** Commenter points out this placement site is fraught with potential problems including it neglects to point out that it will impact some 57 acres of grasslands within the Port Aransas Nature Preserve. The design shows the fill area will be covered with dredged material up to 7 feet, destroying much of the grassland area. Grasslands are critical coastal habitat and an integral part of the nature preserve. The disposal area will be unusable for some period of time, possibly years, and will be very unattractive as a tourist draw in a town that almost solely relies on tourism, especially eco-tourism. Engineering plans do not show any berms or other mechanisms that will contain the material on the landward side of the area. The slurry will wash over sand flat areas, habitat that is used by Piping Plover, Whooping Crane, and other endangered birds. These sand flats are covered by a cyanobacteria mat that will be covered. A layer of slurry could eliminate this site for wildlife and tourists for years. The EIS should have provided a detailed assessment of the entire area affected, including the number of acres of mudflat affected, an estimate of the depth of slurry and estimate of the time for recovery, an estimate of production lost (both biological and economic, i.e. tourism) during that recovery period.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
239	9	Holt	Scott	[redacted]	8/9/22	Email	PC	DIRIMP	Commenter says there are numerous misrepresentations of the literature throughout the document. Provides one example: In the section on effects of turbidity from the dredging process (pages 4-50 to 4-52) the applicant makes repeated use of publications by Clarke and Wilber, 2000 and Wilber and Clarke, 2001). The applicant references these papers to support their conclusion that "Notwithstanding the potential harm to some individual organisms, no long-term impacts to finfish or shellfish populations are anticipated from project construction, dredging, and placement activities associated with the Alternative 1 compared with the No-Action Alternative" (top of page 4-52).
239	10	Holt	Scott		8/9/22	Email	PC	ALTS	The description of the impacts and effects of Alternative 2: Offshore Single Point Mooring are clearly better than the other alternatives, even, in most cases, the No-Action Alternative. It accomplishes the purpose and need with much less environmental impact than Alternative 1.
240	1	Nunez	Amy		8/9/22	Email	STATE	NONGEN	The GLO is responsible for managing state-owned submerged land dedicated to the Permanent School Fund. It has been identified that portions, both dredging and placement of material, of the Corpus Christi Ship Channel Deepening Project are proposed to be located on state-owned submerged land. These portions will require a lease authorized by the School Land Board under §61.116 of the Water Code. Attached is information about the lease application requirements and associated timelines for the authorization process. Although some preliminary coordination took place regarding this project in 2020, at this time, a completed application for the use of state land has not been received.
240	2	Nunez	Amy		8/9/22	Email	STATE	NONGEN	It has also been identified that placement of material on the beach or adjacent to the beach (nearshore water) is a component of this project. These actions are considered erosion response activities that require a Coastal Boundary Survey pursuant to Texas Natural Resources Code §33.136. Additionally, any placement of dredge material on Gulf facing beaches is considered a construction activity and requires a Beachfront Construction Certificate and Dune Protection Permit issued by the local government that will include GLO review for consistency with the Texas Administrative Code and state law. Furthermore, the GLO must ensure that the activities will not conflict with the Texas Dune Protection Act and the Texas Open Beaches Act, which includes GLO and local government approval of any temporary beach closures.
241	1	Phelan	Chris		8/9/22	Email	PC	PUBMEET / OUT	Does not feel that the USACE takes public participation seriously and does not follow protocol. Held the public meeting in Corpus Christi for dredging that will take place in another city.
241	2	Phelan	Chris		8/9/22	Email	PC	PUBMEET / OUT	Did not make the DIS available in a timely fashion.
241	3	Phelan	Chris		8/9/22	Email	PC	NONGEN	Do not appear to be following the Executive Orders concerning climate change or the secretary of defense or the Secretary of Army orders regarding the same.
241	4	Phelan	Chris		8/9/22	Email	PC	NONGEN	Did you not take the Strategic position of the nation in consideration because just dredging in particular will allow pastel Nations to use our valuable strategic materials to wage war against both economic and Military.
242	1	Fleer	Laurene		8/9/22	Email	NGO	DIRIMP	**Water and Sediment Quality.** Executive Summary states the new work material does not indicate potential for contaminants, however Appendix N states the opposite. The FEIS should resolve these incongruities.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
242	2	Fleer	Laurene	[redacted]	8/9/22	Email	NGO	ANALY	Metals and other chemicals were measured in site sediments in 2018 according to Appendix J, however whether further evaluation was conducted is not discussed and no results are presented. Silver concentrations measured in 2018 "exceeded the applicable screening criteria and as a result was evaluated in the STFATE model." The STFATE modeling results are also not discussed. These omissions are problematic—contaminant concentrations that exceed screening criteria warrant full discussion, as chemical concentrations in sediment may impact water quality during dredging and disposal. For a full discussion of the 2018 sampling event and other historical testing, Appendix J refers readers to the 2018 MPRSA Section 103 Report. However, this report is not widely available and was not provided to me upon request. The 2018 sampling report and all subsequent modeling and analyses should be appended to the EIS in full, instead of incorporated by reference. Chemical concentrations detected in sediments/ elutriates and data from toxicity and bioaccumulation tests must be provided to the public to support the agency's qualitative statements that no adverse environmental effects will result from dredging and disposal.
242	3	Fleer	Laurene		8/9/22	Email	NGO	DIRIMP	The Draft EIS states that additional sediment sampling is necessary to demonstrate the suitability of dredged material for ocean disposal, and is currently underway. However, the document also concludes that the dredged material is suitable for ocean disposal, before the sampling has been conducted. If existing data are not sufficient to demonstrate compliance with MPRSA §103 and CWA §404, then additional data must be collected and evaluated before a factual determination can be made. It is premature and arbitrary to conclude that the material is suitable for ocean disposal before sufficient data is available to make a factual determination.
242	4	Fleer	Laurene		8/9/22	Email	NGO	AIR	When comparing operating emissions from the No-Action Alternative and PCCA's Proposed Alternative, the DEIS counts reductions from reduced lightering demand, but fails to acknowledge the corresponding increase in onshore loading. The DEIS explains that loading vessels with crude oil at onshore terminals produces fewer emissions than lightering vessels and loading offshore, because vapors at port are routed to air pollution control devices (APCDs) that are not required offshore. While offshore emissions may be greater, emissions from loading crude onto vessels at onshore terminals are not zero and are not negligible. For example, the Enbridge/Moda Ingleside oil export terminal proposes to emit up to 305 tons of VOCs annually, with 96 tons from loading activities alone. Lightering will be replaced by increased loading and emissions at Harbor Island, which the DEIS fails to account for. The purpose of PCCA's Proposed Alternative is to facilitate onshore loading of VLCCs, therefore air emissions estimates should account for the additional onshore loading, in addition to the reduction in offshore loading.
242	5	Fleer	Laurene		8/9/22	Email	NGO	AIR	Air emissions estimates from onshore facilities should include the increase in throughput facilitated by the deepening project. The DEIS states that "Crude oil inventories exported at the Port have increased from 280,000 barrels per day in 2017 to 1,650,000 barrels per day in January 2020 with forecasts increasing to 4,500,000 barrels per day by 2030." The DEIS declines to estimate emissions from this increased throughput, based on a dubious assumption that that the same volume of oil will be exported with and without the proposed project.
242	6	Fleer	Laurene		8/9/22	Email	NGO	AIR	Assuming that PCCA will export 4.5 million bpd with or without the deepening project minimizes the relative impacts between the no-action and action alternatives. (If true, this assumption undermines the Applicant's assertion that the channel deepening is needed to meet future demand). The EIS should independently evaluate whether the Applicant's forecast of 4.5 million bpd in oil exports under the No Action Alternative is accurate, taking into account the capacity of the Port's existing infrastructure, production growth, and pipeline capacity. With project impacts should account for growth in throughput that is facilitated or incentivized by a deepened channel.
242	7	Fleer	Laurene		8/9/22	Email	NGO	AIR	The federal government has established that "Climate change is a fundamental environmental issue, and its effects fall squarely within NEPA's purview." The DEIS does not demonstrate that the Corps has satisfied its obligations under NEPA to assess and mitigate impacts from greenhouse gas emissions. Section 3.2.11.3 of the DEIS describes the greenhouse gas (GHG) emissions at the Port under current operations. However, the GHG emissions expected in the future, with and without the proposed action alternatives, are not addressed. GHG emissions are simply absent from the DEIS sections discussing environmental consequences and cumulative impacts of the project alternatives.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
242	8	Fleer	Laurene	[redacted]	8/9/22	Email	NGO	AIR	The applicant's stated need for the proposed channel deepening is to meet current and forecasted demand for U.S. produced crude oil, which they expect to increase from 1.65 million barrels per day in January 2020 to 4.5 million barrels per day by 2030. If this increased volume of oil is burned, it would generate hundreds of millions of tons of carbon dioxide emissions annually. This is unquestionably a significant impact that needs to be assessed in the EIS. The CEQ's 2016 GHG guidance encourages the use of widely available quantification tools to assess climate impacts and advises disclosure of reasonably foreseeable end uses of fossil fuels, including combustion.
242	9	Fleer	Laurene		8/9/22	Email	NGO	AIR	The creation of new crude export infrastructure impacts the production and consumption of oil. The EIS should evaluate the extent to which channel deepening to accommodate VLCCs will induce greater production of crude in Texas and consumption of crude globally, due to greater availability or lower price.
242	10	Fleer	Laurene		8/9/22	Email	NGO	PUBMEET / OUT	Would like to be notified of denials, approvals, hearings and/ or changes to the Applicant's request for a Department of Army (DA) Permit.
243	1	Ice	Lauren		8/9/22	Email	NGO	PUBMEET / OUT	The public comment deadline should be extended an additional 45 days to allow time to review the voluminous materials added and to allow for additional Public Meetings to be held in San Patricio, Nueces, and Aransas Counties.
243	2	Ice	Lauren		8/9/22	Email	NGO	NONGEN	Provides reasoning why this project falls under the 1998 CEQ Regulations. Agencies were instructed to develop or revise proposed agency NEPA procedures, that instruction was short lived when the current administration indicated its intent to revise them again. The USACE did not propose, let alone adopt, any revised NEPA procedures in response to the now-superseded 2020 CEQ Revisions.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
243	3	Ice	Lauren	[redacted]	8/9/22	Email	NGO	P&N	The DEIS improperly relies on 33 C.F.R. § 320.4(q) to form the basis for its conclusion that the purpose and need, as stated by the overall project purpose, is considered met. As the DEIS acknowledges, this provision in the USACEs regulations asserts that "when private enterprise makes application for a permit, it will generally be assumed that appropriate economic evaluations have been completed, the proposal is economically viable, and is needed in the market place." However, the Port is not a private enterprise; the Port is a navigation district, and all navigation districts are political subdivisions of the State of Texas. Therefore, these assumptions were misplaced.
243	4	Ice	Lauren		8/9/22	Email	NGO	P&N	The "project purpose" is explained by or justified by an assumption that there will be 4,500,000 barrels/day of crude oil exported each day at the Port. This projection may be realistic, but it also may not be. Though it is repeated dozens of times in the DEIS and its appendices, it is never supported by any analysis. The purported need to move that many barrels/day drives, among other costs, SPM costs, and, in turn, affects the considerations of at least Alternatives 2 and 3.
243	5	Ice	Lauren		8/9/22	Email	NGO	ALTS	DEIS's failure to justify basic assumptions, is true for the estimated cubic yards of dredge spoils. Alternative 1 is repeatedly estimated to produce 46.3 million cubic yards of dredge material. However, the sources of that material are nowhere identified, and there is no even rough calculation presented of the contribution of each source to the 46.3 million cubic yards. The volume of dredge spoils and, likely, the sources of dredge spoils attributable to Alternative 1 drive almost all the environmental impacts of that alternative.
243	6	Ice	Lauren		8/9/22	Email	NGO	P&N	The public — and, one would think, USACEs decisionmakers —cannot meaningfully analyze the alternatives or on the impacts of the alternatives without information about why there is thought to be the oft-repeated 4.5 million barrel/day "need" for the project and why 46.3 million cubic yards of spoil is thought to be a reasonable estimate. If a draft statement is so inadequate as to preclude meaningful analysis, the regulatory directive is that agency shall prepare and publish a supplemental draft of the appropriate portions of the DEIS. That is what should happen, here.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
243	7	Ice	Lauren	[redacted]	8/9/22	Email	NGO	P&N	Alternative 1 excludes Axis Midstream/Midway to Harbor Island Storage Terminal/Pipeline project and the Port of Corpus Christi/Harbor Island Terminal. These projects and the pipelines and upstream storage tanks that serve the terminals (at least, those pipelines and storage tanks within the geographic scope defined by this DEIS) are "connected actions." The terminals and their supporting infrastructure are actions that "will not proceed unless other actions [i.e., the channel and extension dredging] are taken previously or simultaneously or are interdependent parts of a larger action and depend on the larger action for their justification. 40 C.F.R. § 1501.9(e) provides that connected actions should be discussed in the same impact document, in this case, the same EIS. *See comment letter for additional information backing up this statement that these are "connected actions".*
243	8	Ice	Lauren		8/9/22	Email	NGO	CUMUL	The DEIS indicates (p. xiii) these terminal projects are among those for which impacts were only "described in general and qualitative terms" in the cumulative impacts analysis of the DEIS. That is generous, actually, insofar as the Port's Harbor Island terminal is concerned; this project is hardly described, at all. And, it is a large project, one for which air emissions on Harbor Island, alone and not including a co-located power generation plant, are permitted to allow 91.7 tons/year of CO2 equivalents. In any event, the Corps' position (DEIS, p. 2-5) is that "preliminary review of these applications indicated that an EIS is not required and, therefore, no NEPA documentation is available." Thus, very little information about the impacts of the two Harbor Island terminals is cumulated with those of the other the other 40 past, present, and reasonably foreseeable projects in the study area.
243	9	Ice	Lauren		8/9/22	Email	NGO	ANALY	The DEIS fails to include a thorough Clean Water Act 404(b) evaluation. Although Appendix N purports to include such an evaluation, this evaluation is woefully deficient. It fails, for instance, to demonstrate, or even discuss, that the proposed action is the least environmentally damaging practicable alternative ("LEDPA"). (see comment for additional reasons for this comment). The presumption that a less damaging alternative is available can be rebutted only with particularized facts. That is, there must be specific information about the extent of the impacts expected from the proposed alternatives.
243	10	Ice	Lauren		8/9/22	Email	NGO	ALTS	The Corps may also consider specific information relating to cost concerns when evaluating an alternative's "practicability." As with availability, the applicant must provide specific information, and the Corps must independently evaluate it.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
243	11	Ice	Lauren	[redacted]	8/9/22	Email	NGO	ALTS	The proposed project "does not require access or proximity to, or siting within, a special aquatic site in order to fulfill its basic purpose." Thus, there is a rebuttable presumption that alternatives that do not involve special aquatic sites are available and alternatives that do not involve special aquatic sites have less adverse impact on the aquatic environment. The DEIS acknowledges that special aquatic sites will be directly impacted by the disposal or placement of the dredged material. Yet, the DEIS fails to fully assess the potential impacts of the dredged material disposal on special aquatic sites. There is no specific information regarding the suitability of the dredged material for the intended purposes—such as whether the material is free from contaminants. Nor is there comprehensive information regarding the sites that are expected to be impacted—such as impacts on nearby seagrass beds. And there is no specific information provided so as to rebut the presumption that alternatives that do not involve special aquatic sites are available.
243	12	Ice	Lauren		8/9/22	Email	NGO	MITIG	Compensatory mitigation is required and necessary to maintain wetland function. *See comment later for specific rules/regulations regarding required mitigation [TCEQ, CFR, and USACE's own regulations)* The EIS takes the position that only inshore spoils placements are subject to this LEDPA analysis. Nowhere is this limitation on application of the LEDPA principle explained. The inshore placement areas are set out in Table 3 of DEIS Appendix N. They constitute roughly 4,663 acres. These acres will be covered with spoils for which the DEIS and its appendices provide absolutely no contaminant information. The Ports explanation for self mitigation does not qualify as mitigation under the USACE or TCEQ rules. Preservation is not allowed as compensatory mitigation unless the preserved site will be permanently protected through an appropriate real estate or other legal instrument (e.g., easement, title transfer to state resource agency or land trust). That is not what the Port is proposing to protect Redfish Bay.
243	13	Ice	Lauren		8/9/22	Email	NGO	ALTS	The alternatives analysis is deficient. The alternatives analysis in the DEIS is deficient in large part because the purpose and need analysis is inaccurate. Further, the DEIS fails to provide specific detail regarding the projected environmental impacts and other factors that led to the identification of the preferred alternative. And finally, the alternatives analysis fails to include the requisite wide range of alternatives, considering the degree of adverse environmental impacts that are expected as a result of the preferred alternative. The DEIS fails to properly define the Port's Preferred Alternative. The description excludes the Axis Midstream/Midway to Harbor Island Storage Terminal/Pipeline project and the Port of Corpus Christi/Harbor Island Terminal, even though these are connected actions. Having failed to accurately define the preferred alternative, the Corps cannot have, in good faith, objectively taken a hard look at the environmental consequences of the proposed action, including the environmental consequences of the connected actions. And without a rigorous analysis of the environmental consequences of the entire project, no meaningful alternatives analysis can be performed.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may paraphrased or summarized)
		Last Name	First Name						
243	14	Ice	Lauren	[redacted]	8/9/22	Email	NGO	AIR	Consideration of climate change impacts is deficient. The DEIS erroneously limits its consideration of impacts related to climate change to "increased carbon dioxide emissions due to an increase in the number of vessels and reverse lightering operations with all alternatives." Not only does this fail to consider the potential for increase in vessels and total larger vessels should transportation become more "efficient" under the Preferred Alternative, it also wholly fails to consider the increase in total crude being transported and burned. The impact of GHG emissions on climate change is certainly a part of a NEPA cumulative impact analysis, but that analysis must include a quantification of the incremental impacts that the proposed project's emissions will have on climate change or on the environment more generally in light of other past, present, and reasonably foreseeable actions. Thus, it is not only the increased emissions due to the increased number of vessels (which the DEIS does not quantify in any way) that must be considered, but also, the downstream and upstream impacts of the fossil fuel being transported. It is reasonably foreseeable that an increase in the number of vessels and the size of the crude oil shipments will increase the total oil transported that will be burned and contribute to climate change. The DEIS does not consider the Project's contribution to transport and burning of crude oil and fossil fuels.
243	15	Ice	Lauren		8/9/22	Email	NGO	T&E	Consideration of impacts on endangered and threatened species is deficient. This deficiency appears to be a result of a failure to initiate consultation with the USFWS and NMFS early in the process—well in advance of preparing the DEIS.
243	16	Ice	Lauren		8/9/22	Email	NGO	BA	The biological assessment acknowledges the potential for adverse impacts to various sea turtles—both in-water impacts and nesting impacts. Yet, the assessment gives short shrift to any discussion of meaningful measures to avoid such impacts. For instance, the assessment notes that use of "hopper dredges" can increase the potential of mortality or injury for sea turtles. Yet, there is no commitment to avoid use of such hopper dredges. To the contrary, the DEIS states that the construction contractor may opt to employ hopper dredges, and if hopper dredges are used, additional (but unspecified) best management practices would be required. This promise to use unspecified best management practices does nothing to ensure the continued existence of sea turtles.
243	17	Ice	Lauren		8/9/22	Email	NGO	BA	Includes the unsupported conclusory statement that the channel deepening project is expected to "lower the risk of a collision between sea turtles and ships," because the project would decrease the volume of lightering vessel traffic. There is no discussion or estimate provided of collisions between sea turtles and lightering vessels in the Corpus Christi Ship Channel. Thus, this statement should be disregarded as it offers nothing meaningful to the biological assessment.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
243	18	Ice	Lauren	[redacted]	8/9/22	Email	NGO	BA	The DEIS acknowledges that increased work boat traffic associated with construction activity could increase vessel collision, contaminant spills and debris and trash, which could adversely impact sea turtles. The DEIS suggests that the likelihood of these adverse impacts can be greatly reduced when avoidance, minimization, and conservation measures are performed, such as those described in the biological assessment. A review of those proposed measures, however, reveals that they are nothing more than a plan to look for turtles, their nests, and their eggs each day, and to get them out of the way, if observed. This is not a “conservation” plan. This plan does nothing to ensure that the channel deepening project will not jeopardize the continued existence of the sea turtles or destroy or adversely modify their critical habitat. The general plan proposed in the DEIS simply proposes to move turtles and their nests out of the way of the project and to use dim lighting.
243	19	Ice	Lauren		8/9/22	Email	NGO	BA	Regarding the various species that are considered likely to be affected, but not likely to be adversely affected, there is little basis for this determination. The DEIS simply presumes that once the project is complete, there will be less vessel traffic, and increased habitat and improved marshes. The DEIS concludes that the project would therefore not jeopardize the continued existence or the potential of recovery for the various affected species. But the DEIS provides no specifics—no data—to support these conclusory statements.
243	20	Ice	Lauren		8/9/22	Email	NGO	PUBMEET / OUT	USFWS and NMFS have yet to weigh in with their biological opinions. This is likely a result of a failure to formally consult with these agencies early in the process. Consequently, the public has not had the benefit of these agencies’ opinions. The comment period should be extended or reopened, once the agencies have completed their review and offered their opinions.
245	1	Sadlier	Robert		8/9/22	WC	STATE	NONGEN	Discharges of return water from confined upland disposal areas should not exceed 300 mg/l total suspended solids (TSS).
245	2	Sadlier	Robert		8/9/22	WC	STATE	DIRIMP	The DEIS should provide a list of Best Management Practices (BMPs) that will be used to protect and maintain water quality and seagrass habitat in and around the project area, including the adjacent Redfish Bay State Scientific Area, during and after the construction phase of the project.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
246	1	Wolf	Clayton	[redacted]	8/9/22	WC	STATE	MITIG	Project documents do not quantify how habitat impacts (own water/bottom, beach nourishment, wetlands, SAV, oysters, and unconsolidated shorelines) would be offset by the Proposed Action.
246	2	Wolf	Clayton		8/9/22	WC	STATE	DIRIMP	There is an overall concern that the DEIS does not consider or address the significance of the 32,000-acre Redfish Bay Scientific Area located between Harbor Island and the mainland.
246	3	Wolf	Clayton		8/9/22	WC	STATE	T&E	There is an overall concern that the DEIS does not consider or address the potential effects on state-listed threatened or endangered species that are likely to occur in the project area.
246	4	Wolf	Clayton		8/9/22	WC	STATE	ALTS	The creation of the RBSSA is firmly rooted in the muti-agency effort to develop a statewide conservation plan for seagrass. However due to a lack of quantitative analysis provided, the DEIS does not demonstrate that the Proposed Action is the least environmentally damaging preferred alternative.
246	5	Wolf	Clayton		8/9/22	WC	STATE	NONGEN	As furnished in Appendix B, TPWD had previously provided comments and recommendations for the proposed project. However, the extent to which our recommendations will be incorporated during project implementation is not explicitly included in the DEIS. TPWD reiterates these previous comments and encourages the applicant to implement TPWD recommendations to avoidant minimize impacts to fish and wildlife resources.
246	6	Wolf	Clayton		8/9/22	WC	STATE	ALTS	**2.2.3 Construction Page 2-10** states that light plants would be used in the late afternoon and evening time frames to provide additional lighting for the crew and to serve as safety beacons to surrounding waterborne traffic. Sky glow resulting from light pollution can have negative impacts on wildlife and ecosystems by disrupting natural day and night cycles inherent in managing behaviors such as migration, reproduction, nourishment, rest, and protection from predators. **Recommendation:** As protection measures for wildlife, TPWD recommends utilizing the minimum amount of night-time lighting fixtures needed for safety and security. TPWD recommends minimizing the project's contribution toward skyglow by focusing light downward, with full cutoff luminaries to avoid light emitting above the horizontal. TPWD also recommends using dark-sky friendly lighting that is only illuminated when necessary, minimizes brightness and blue light emissions, and is fully shielded. Appropriate lighting technologies, best management practices (BMP), and other dark sky resources can be found at the International Dark-Sky Association and McDonald Observatory websites.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
246	7	Wolf	Clayton	[redacted]	8/9/22	WC	STATE	GEN	**3.3 Ecological and Biological Resources.** Considering the significant amount of aquatic habitat provided by the tidal flats within the vicinity of the project site, the DEIS includes an insufficient amount of information about their extent, function, and value. *See White et al. (2006) and comment letter for specific information on tidal flats in the area.* Although Section 3 .3 .3 .4 of the DEIS acknowledges extensive losses of tidal flats in the region over time, the degree to which those losses have occurred is not detailed. TPWD is not aware of any tidal flat or mud flat restoration projects with documented success in Texas and considers these habitats to be difficult to replace. **Recommendation:** Due to the ecological importance of tidal flat habitats, the FEIS should describe the location and extent of tidal flats within the project area and describe the functions and values they provide so that the environmental effects of the project alternatives can be fully assessed.
246	8	Wolf	Clayton		8/9/22	WC	STATE	GEN	**3.3.3.2.6 Artificial Reefs** On Page 65, the DEIS misspells the Large Tomate (Haemulon aurolineatum) which is correctly spelled "Tomtate". **Recommendation**: Let the FEIS reflect the correct spelling of this important reef fish.
246	9	Wolf	Clayton		8/9/22	WC	STATE	GEN	**3.3.5.1 Protected Lands** Have previously provided information about the RBSSA and expressed concern for potential impacts to the fish and wildlife resources and outdoor recreational amenities that occur within the RBSSA. The DEIS does not provide a description of the RBSSA on Page 3-72 and does not identify the RBSSA on the associated map (Figure 3-17) on Page 3-73. Section 2.14 of the CZM Consistency Determination in Appendix O provides additional information about the RBSSA, but the policies for development in state parks, wildlife management areas, or preserves were not reviewed for compliance. State scientific areas are explicitly included in the definition of "coastal preserve" under Title 31, section 501.3(b)(3) of the Texas Administrative Code. *See comment letter for additional information provided on the RBSSA.* **Recommendation:** The FEIS should describe the RBSSA as protected land and evaluate the effects of the proposed project on the RBSSA in a manner consistent with all applicable definitions of special aquatic sites, including state designated areas and vegetated shallows, as described in 40 CFR 230.40(a) and 40 CFR 230.43(a). The FEIS should also review the policies for development in State Parks, Wildlife Management Areas, or Preserves as described at Title 31, section 501.29 of the Texas Administrative Code for consistency with the Texas Coastal Management Program. The FEIS should describe the RBSSA as protected land and evaluate the effects of the proposed project on the RBSSA in a manner consistent with all applicable definitions of special aquatic sites, including state designated areas and vegetated shallows, as described in 40 CFR 230.40(a) and 40 CFR 230.43(a). The FEIS should also review the policies for development in State Parks, Wildlife Management Areas, or Preserves as described at Title 31, section 501.29 of the Texas Administrative Code for consistency with the Texas Coastal Management Program.
246	10	Wolf	Clayton		8/9/22	WC	STATE	T&E	3.3.5.2. Threatened and Endangered Species. A species list was included in the permit application submitted to the USACE as detailed in Appendix A of the DEIS. However, Section 3.3.5 of the DEIS does not identify state-listed threatened or endangered species that are not also on the federal threatened and endangered species list. In addition, Section 4.2 does not consider the effects that the Proposed Action and alternatives would have on state"listed species or detail BMP's that would be implemented to avoid and minimize those impacts. **Recommendation:** The FEIS should identify species listed on the TPWD Rare, Threatened, and Endangered Species of Texas by County online application (RTEST) that are not included in Table 3-19. The FEIS should evaluate potential effects to those species) and describe BMP that would be implemented to avoid and minimize those impacts.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
246	11	Wolf	Clayton	[redacted]	8/9/22	WC	STATE	SOCIO	**3.5.2.2. Recreational Resources.** This section of the DEIS describes numerous recreational resources throughout the project area. Lighthouse Lakes Park and Lighthouse Lakes Paddling Trail, which have close proximity to the proposed project site, are not described. In addition, this section does not describe the Great Texas Coastal Birding Trails comprised of the Aransas, Corpus Christi Bay, and Mustang Island Loops which detail publicly accessible birdwatching sites. **Recommendation:** Considering the proximity of the proposed project to Redfish Bay, this section of the FEIS should include Lighthouse Lakes Park, Lighthouse Lakes Paddling Trail, and the Aransas, Corpus Christi Bay, and Mustang Island Loops of the Great Texas Coastal Birding Trails.
246	12	Wolf	Clayton		8/9/22	WC	STATE	DIRIMP	**4.2 Ecological and Biological Resources.** In the summary table (Table 4-16, page 4-43) it is noted that the Flats category includes intertidal estuarine habitats comprised of aquatic beds, emergent vegetation, and unconsolidated shores as well as uplands which includes tidal flats located above high tide. Not only does the summary table not differentiate between aquatic and upland flats/beach, but the potential impacts to flats and oysters are not furtlter detailed in section 4.2 of the DEIS.
246	13	Wolf	Clayton		8/9/22	WC	STATE	DIRIMP	**4.2 Ecological and Biological Resources.** Sections 4.2.2.2.2. (Estuarine Habitats and Fauna), 4,2.5.3.2 (Essential Fish Habitat), and 5.4.8 (Cumulative Effects on Aquatic Resources) of the DEIS state that direct impacts from inshore PA construction resulting from the Proposed Action include 84.85 acres of unconsolidated shorelines (tidal sand flats/algal flats/beach). The locations and extents of these or other impacts are not identified in the DEIS.
246	14	Wolf	Clayton		8/9/22	WC	STATE	DIRIMP	Section 2.7 of Appendix O describes 3.17 acres of oysters mapped within a 500-foot construction buffer of an inshore PA. The DEIS does not indicate the location of this oyster reef relative to the project footprint, does not clearly describe how these oyster impacts would be avoided or minimized, and does not indicate if post-construction monitoring will be conducted to assess permanent impacts.
246	15	Wolf	Clayton		8/9/22	WC	STATE	WET	Habitat survey reports prepared by Mott MacDonald and Triton Environmental Solutions for the Proposed Action are referenced but not provided in the DEIS for review by commenting agencies, such as TPWD, or the public. Efforts to survey non-wetland special aquatic sites, such as oysters and tidal flats, are not described. While limited bathymetric data is provided in the Dredged Material Management Plan (DMMP), other project documents do not show the locations, types, or extents of the various special aquatic sites and sensitive habitats surveyed in the project area relative to the project footprint.
246	16	Wolf	Clayton		8/9/22	WC	STATE	WET	Recommendation (comment #'s 12-15): The applicant should provide the location and areal extent of each affected habitat type in tabular and spatial formats relative to the project footprint (including work corridors, staging areas, and access routes), tide lines, and water depths in either cross-section or plan views to inform environmental evaluations.
246	17	Wolf	Clayton		8/9/22	WC	STATE	DIRIMP	The potential beneficial environmental effects of the project are not quantitatively assessed by a Habitat Evaluation Procedure (HEP), or similar analysis, and results are not detailed in tabular or spatial formats for comparison with project impacts to demonstrate that the proposed project will not result in a net loss of aquatic resource functions. Furthermore, no post-construction monitoring is proposed to ensure that BU and PA site construction does not result in a net loss of aquatic resource function. **Recommendation:** The effects on aquatic resources "with" the project should be weighed against the effects on aquatic resources "without" the project using a quantitative assessment to demonstrate whether the Proposed Action would result in an overall net benefit to fish and wildlife resources.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
246	18	Wolf	Clayton	[redacted]	8/9/22	WC	STATE	DIRIMP	The habitat and bathymetric survey prepared for the Axis Midstream project (SWG-2018-00789) identified 71.47 acres of unvegetated flats, the majority of which are located within the placement area described in the DEIS as SSL By letter dated September 13, 2019 (available on Page 125 of Appendix B), TPWD expressed concern for a conceptual mitigation project that would construct a 76-acre, 30-foot-tall shoreline stabilization project within the same area as SSL TPWD has similar concern for impacts to tidal flats and other special aquatic sites that would result from the construction of PA SS 1. It is not clear how the modeled increases in current speeds and tidal amplitudes within this section of the CCSC will react to the construction of this hardened vertical feature along the channel. The DEIS does not quantify any net effects of other project alternatives, even though similar projects within the vicinity of the Proposed Action (including inshore terminals and offshore deepwater ports) are currently undergoing environmental review and project information has been made publicly available. **Recommendation:** To the extent appropriate and practical, project documents associated with similarly situated crude oil export facilities should be used to inform the FEIS with respect to impacts associated with the "No Action", "Inshore/Offshore", and "Offshore" alternatives.
246	19	Wolf	Clayton		8/9/22	WC	STATE	ANALY	Baseline Report Part 19 (Mott MacDonald Wetland Delineation Report, Oct 2021) indicates that the Project Study Area (PSA) for proposed placement areas (PAs) SSl, SS2, PA4, HI-E, and MI included a 500-foot buffer around each PA. Except for PA SJI, wetland delineations did not extend onto private properties located within the 500-foot buffer.
246	20	Wolf	Clayton		8/9/22	WC	STATE	ANALY	Table 5.1-1 on page 48 of 88 of Baseline Report Part 20 provides a summary of waters and wetlands delineated within five project study areas (PSAs). Table 5.1-1 on page 579 of 585 of Baseline Report Part 1 summarizes waters and wetlands delineated within the PSA identified as SJI (located along the Gulf shoreline of San Jose Island). It is unclear what percentage of the habitat acreages presented in Tables 5 .1 of Baseline Report Part 1 and Part 20 were within the project area as opposed to the 500-foot buffer. Therefore, TPWD is unable to verify how much direct and indirect impact is anticipated at each site based on the supplemental Baseline Reports. According to the DEIS, inshore placement would directly impact 16.61 acres of tidal wetlands, 122.46 acres of freshwater wetlands, 84.85 acres of unconsolidated shorelines (including tidal sand flats, algal flats, and beaches), 6.88 acres of seagrass, and 0.10 acre of oyster reef. Based on the information provided in the Baseline Report, it is still not clear how the applicant has avoided direct and indirect impacts to 141.415 acres of seagrass, 3.312 acres of oysters, 29.716 acres of non-tidal wetlands, and 79.701 acres of tidal wetlands including tidal flats.
246	21	Wolf	Clayton		8/9/22	WC	STATE	DIRIMP	The 33 files provided on the project website include detailed wetland delineation and aquatic resource survey results and biological survey reports. The survey reports identify and describe each potentially affected aquatic resource in greater detail than the DEIS. In addition, the biological surveys demonstrate the importance of these special aquatic sites for migratory birds and threatened and endangered species. According to the Baseline Project Report, threatened and endangered species, including piping plover, red knot, and reddish egrets, were observed using these habitats during the project surveys. **Comment:** TPWD reiterates our previous comments concerning the need to quantify direct impacts and to provide a detailed explanation of how the project will result in a net benefit to aquatic resources. TPWD reiterates our previous comments concerning the need to provide a detailed description of BMPs used to avoid and minimize impact to state-listed rare, threatened, and endangered species.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
246	22	Wolf	Clayton	[redacted]	8/9/22	WC	STATE	ANALY	Page 10 of 103 of Baseline Report - Part 10 (Mott MacDonald Wetland Delineation Report, April 2021) includes an email correspondence dated April 6, 2021, which states that grab samples of seagrass are not required for seagrass surveys. The rationale for this recommendation cites recent changes in state law regarding uprooting seagrasses and that "difficult permits will need to be secured". However, section 66.024 of Parks and Wildlife Code only prohibits uprooting seagrass "by means of a propeller". Thus, collecting grab samples of rooted seagrass for the purpose of surveying seagrass beds does not require a permit issued by TPWD. Oysters, however, are a regulated fishery species and may require one or more authorizations from TPWD to legally possess or transport oyster specimens collected for the purpose of conducting habitat surveys. TPWD does not object to visual and tactile seagrass surveys when timing and water conditions support the accuracy of those methods. However, TPWD strongly encourages grab samples to support presence/absence data collected outside the growing season when aboveground biomass (i.e., leaves) may have senesced or when water conditions are not conducive to visual or tactile survey methods (e.g., rough waters, low visibility, low water temperatures).
246	23	Wolf	Clayton		8/9/22	WC	STATE	GEN	As the state's authority on fish and wildlife resources, TPWD appreciates coordination with U.S. Army Corps Engineers to review appropriate aquatic resource survey methodologies to inform permit decisions, and the associated TPWD authorization requirements for habitat sampling methods. To ensure regional consistency, TPWD recommends that future coordination on such matters be routed through the Ecosystem Resources Program Director, Emma Clarkson.
246	24	Wolf	Clayton		8/9/22	WC	STATE	ANALY	Page 22 of 88 of Baseline Report - Part 20 (Mott MacDonald Wetland Delineation, October 2021) indicates that the oyster delineation results were for "live" oyster beds. TPWD would like to clarify that oyster habitat does not have to contain "live" oysters to meet the definition of a special aquatic site or to provide biological, chemical, or physical ecosystem functions. The presence of oyster shells (living or dead, including predominance of shell fragments greater than 25 mm) provides direct evidence that the area supports the recruitment and growth of live oysters when conditions are favorable. When conditions are unfavorable for the recruitment and growth of live oysters, these biogenic structures continue to provide food, substrate, and shelter to the oyster community of fish and invertebrates; continue to dampen wave action for shoreline stabilization; and continue to buffer the pH of the waterbody. **Recommendation:** Habitat surveys should not rely solely on the presence of "live" oysters to delineate oyster habitats, but also the predominance of dead shell material. Impacts to oyster habitat (dead or living) should be avoided and minimized to the extent practicable and compensatory mitigation should be provided for unavoidable impacts.
246	25	Wolf	Clayton		8/9/22	WC	STATE	NONGEN	TPWD provides correspondence with the USACE on the following: • Permit Application Number SWG-2019-00174 Bluewater Texas Terminal LLC, December 20, 2021 • Bluewater Texas Terminal, LLC DOT Docket No. MARAD-2019-0094, December 13, 2021 • Permit Application Number SWG-2019-00067 Port of Corpus Christi Authority Special Public Notice, July 2, 2020 • Permit Application Number SWG-2018-00789 Axis Midstream Holdings, LLC, September 13, 2019 • Axis Midstream Redfish to Hamor Island Pipelines, December 6, 2018 • Permit Application Number SW0-20L9-00245 Port of Corpus Christi Authority (PCCA), September 20, 2019 • Permit Application Number SWG-2019-00067 Port of Corpus Christi Authority (PCCA), August 28, 2019 • Permit Application Number SWG-1995-02221 Moda Ingleside Oil Terminal, LLC, March 9, 2020 • Permit Application Number SWG-2006-02562 South Texas Gateway Terminal, LLC, July 8, 2019 • Deepwater Port License Application: Bluewater Texas Terminal, LLC Notice of intent; notice of public meeting; request for comments. Docket No. MARAD-2019-0094, August 2, 2019
247	1	Sirmon	Monte		8/10/22	Email	PC	FERRY	*Note: Comment received after comment period ended.* Concerned about a super tanker filling station and turn-around next to the ferry
247	2	Sirmon	Monte		8/10/22	Email	PC	DIRIMP	*Note: Comment received after comment period ended.* Concerned about the possibility of accidents and shutting down the entire petroleum refining capacity.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
248	1	Wolfe	Mark	[redacted]	8/17/22	Email	STATE	NONGEN	*Note: Comment received after comment period ended.* The DEIS is incomplete regarding cultural resources, as stated within the document. The reports for the archeological investigations, terrestrial and underwater, have not been submitted to the Texas Historical Commission (THC) for review, as required by Section 106 of the National Historic Preservation Act and the Antiquities Code of Texas. The THC cannot review the DEIS until it is complete and it addresses the results of the archeological investigations and the potential impacts posed by the project. Please submit the DEIS to the THC for review once it is complete and includes this information.
249	1	Martin	Natasha		8/11/22	WC	NGO	P&N	*Note: Comment received after comment period ended.* USACE has rightly pointed out that channel deepening is necessary for the construction of the Harbor Island Te1minal Facility (Terminal Facility), and that Axis Midstream Holdings LLC's proposed pipelines, planned to cross sensitive habitat, would serve the Terminal Facility (Pipelines). See Significance Determination for Pe1mit SWG-2019-00067 (Significance Determination), March 7, 2019, at p. 6. The Project and these two other projects taken together will share the same wate1ways, cause an increase in traffic, and the construction of each could contribute to spills negatively impacting the environn1ent. NEPA and federal case law require that the totality of impacts from these three proposed projects be reviewed as one whole project in the final EIS.
249	2	Martin	Natasha		8/11/22	WC	NGO	GEN	*Note: Comment received after comment period ended.* In Section 3.3.3.2.3, the USACE makes the statement that "[m]ost oyster reefs in Corpus Christi Bay are dead." While this may be true, it is important to recognize the reasons why this has occurred. The average salinity of Corpus Christi Bay has increased dramatically over the past 50 years due to channel deepening and decreased freshwater inflows. Even the slightest increase in average salinities from current conditions will be the ultimate demise of remaining oyster reefs. Ultimately, compounding effects from this Project and other projects will result in Corpus Christi Bay becoming hyper-saline. Further, the USACE states that "[s]ome commercial harvesting of oysters occurs in Aransas Bay, but none in Corpus Christi Bay or the Upper Laguna Madre (pers. comm., D. Topping [TPWD], 2016)." This statement is false as there were reported commercial landings from Corpus Christi Bay in the late 1980s and the early 1990s. This Section fails to mention recreational oyster harvest in the impacted area or the role that oyster reefs play in carbon sequestration.
249	3	Martin	Natasha		8/11/22	WC	NGO	GEN	*Note: Comment received after comment period ended.* There is no explicit mention of the night-time fishing effort that occurs immediately within the Project area in Section 3.3.3.3.2. Southern Flounder are mostly a night-time fishing activity (gigging) and while TPWD lacks fishing effort data for this specific fishery, USACE must recognize the value of this fishery and the impact the Project will have on this activity.
249	4	Martin	Natasha		8/11/22	WC	NGO	DIRIMP	*Note: Comment received after comment period ended.* The information presented in Section 4.1.2.2.2 is conflicting. On page 4-11, USACE states that "[s]hort-term modeling indicates that the construction of the Proposed Action could slightly decrease bay salinities, less than 1 part per thousand (ppt) on average in the Corpus Christi Bay system," and on page 4-12 USACE states that "[t]he results indicate that channel deepening would increase average salinity by less than 1 ppt in the Corpus Christi Bay system. This magnitude of change would appear negligible given the wide salinity tolerances of estuarine species. Therefore, it was concluded that channel deepening would not result in major changes to salinity in the Corpus Christi Bay system." USACE needs to clarify if the salinity in Corpus Christi Bay will increase or decrease. The blanket statement that the projected magnitude of change appears negligible given the wide salinity tolerances of estuarine species is a gross generalization of potential impacts, specifically for growth and production of vulnerable oyster reefs which are already at the upper end of their salinity tolerance. Any increase in salinity in the Corpus Christi Bay system will have significant detrimental impacts for live oyster reefs.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
249	5	Martin	Natasha	[redacted]	8/11/22	WC	NGO	DIRIMP	*Note: Comment received after comment period ended.* On page 4-51, USACE claims that "finfish and shellfish are motile enough to avoid highly turbid areas." While this may be true for juvenile and adult stages of aquatic species, it is not the case for their larval stage. Larval fish and shellfish lack significant mobility and are generally at the mercy of tides, currents, and wave energy. As they pass through turbid waters, they can quickly become asphyxiated. This is a significant concern for red drum larvae that must recruit into the bay system through the proposed Project area.
249	6	Martin	Natasha		8/11/22	WC	NGO	DIRIMP	*Note: Comment received after comment period ended.* CCA Texas partially disagrees with the following statement on page 4-53: "[a]s described in Section 3.3.3.2.3, oysters can tolerate relatively high salinities, temperatures, and increased water depths. However, some oyster predators (stone crabs [Menippe mercenaria] and oyster drills) and diseases (Dermo) may occur more frequently or in higher concentrations with higher temperatures and salinities (Cake, 1983; Murdock and Brenner, 2016; Soniat and Kortright, 1998). The slight increase in salinity that is expected resulting from Alternative 1 is not anticipated to cause any long-term impacts to oyster reefs in the project area." As mentioned in previous comments, any increase in salinity will further stress live oyster reefs in Corpus Christi Bay and will possibly be their ultimate demise.
249	7	Martin	Natasha		8/11/22	WC	NGO	CUMUL	*Note: Comment received after comment period ended.* The cumulative effects that are discussed in Section 5 are general and broad. As noted above, USACE must provide "some quantified or detailed information; ... [g]enteral statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided" when considering cumulative impacts. Ocean Advocates, 402 F.3d at 868. Further, the impacts to aquatic species as well as commercial and recreational fisheries were not addressed in Section Five.
249	8	Martin	Natasha		8/11/22	WC	NGO	CUMUL	*Note: Comment received after comment period ended.* The potential cumulative impacts discussed in Section 5.4.1 focus on sediment transport and shorelines. According to Table 5-2, the CEA Project Groups (defined below) "may contribute to adverse or beneficial cumulative effects in conjunction with the proposed action." CEA Project Groups include offshore oil and gas te1minals; onshore storage and fabrication te1minals; utility, gas, petroleum pipelines; maintenance and navigation dredging; bulkheads, breakwaters, boat ramps, and marinas; commercial and residential development; and ecosystem restoration. This cumulative effect analysis is vague and limited, and fails to meet the standard set forth in Fritiofton. The analysis should be expanded to consider other valuable resources which could be affected, while also considering a broader array of potential effects. For example, SAV will be negatively impacted by several of the proposed projects and loss of SAV results in diminished water quality and increased shoreline erosion. Increased sediment transport could also lead to the siltation of low-relief oyster reefs, which also negatively affects water quality. By expanding the assessment to consider SAV and oyster reef functions and their importance with a broader context, cumulative impacts could be more fully assessed. Important functions to focus on could include the economic value of seagrass and oysters and how they play a large role in preventing and slowing erosion.
249	9	Martin	Natasha		8/11/22	WC	NGO	CUMUL	*Note: Comment received after comment period ended.* States that dredging or hardening of shorelines from other projects could contribute to cumulative impacts through altered bathymetry, increased currents, associated impacts to the hydrosalinity gradients. Salinity modeling indicates that a change in the tidal prism associated with channel deepening increases the exchange of saltwater between Corpus Christi and Nueces bays. The results indicate that channel deepening would increase average salinity by less than 1 ppt in the Corpus Christi Bay system. Section 5.4.2 states that "this magnitude of change would appear negligible given the wide salinity tolerances of estuarine species" (Baird, 2022c). However, this Section does not address the cumulative impacts to salinity that will result when all of the desalination projects are taken into consideration. Further, it does not address how the increase in salinity will impact oyster habitat and fisheries in the impact zone. It is worth noting that CC Bay is a fringe bay system for oyster reefs. Of all the abiotic factors that can affect the biology on an estuarine organism such as Crassostrea virginica, the synergistic effects of temperature and salinity have the most profound effects and long-term exposure to high salinities can be detrimental. The projected increase in CC Bay salinities in model runs have the potential to further hinder the production of oyster reefs by providing a favorable environment for predators (oyster drills), putting the oysters in an environment outside their optimal salinity range (10-30ppt), or both.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
249	10	Martin	Natasha	[redacted]	8/11/22	WC	NGO	CUMUL	*Note: Comment received after comment period ended.* Temporary and localized impacts to water quality (in the form of increased turbidity) may result during dredging and placement. There would be limited spatial (several hundred feet, approximately 1,000 feet) and temporal (several hours) ranges of turbidity effects and related sediment movement. Actions that require dredging or marine construction could increase turbidity temporarily and locally. Section 5.4.3 does not address the overall impact that can be expected if individual impacts are allowed to accumulate. For example, without any specificity, this Section states that "past, present, and reasonably foreseeable actions in the area could contribute similar temporary and localized impacts to water quality." However, Section 5.4.3 does not address the cumulative effect of increased turbidity and how this will affect different species of fish and wildlife in the area as well as how this will affect commercial and recreational fisheries. The Draft EIS also fails to address the adverse impacts to water quality that are certain to occur from any spills or leaks from any utility, gas, and petroleum pipelines in the area of the Project.
249	11	Martin	Natasha		8/11/22	WC	NGO	CUMUL	*Note: Comment received after comment period ended.* The Project would impact both tidal and non-tidal wetlands through placement activities. It is noted that dredging the channel is not expected to impact wetlands. However, Section 5.4.7 contains general statements about possible effects and some risk. It does not include any quantified or detailed info1mation. These approaches are too limited and should be expanded to consider other valuable resources which could be affected, while also considering a broader array of potential effects. By expanding the assessment to consider the full array of wetland functions and their importance with a broader context, cumulative impacts could be more fully assessed. For example, important functions to focus on could include the wetlands' role as a nursery for recreationally and/or commercially valuable aquatic species; its ability to minimize downstream flooding; and its ability to improve water quality.
249	12	Martin	Natasha		8/11/22	WC	NGO	CUMUL	*Note: Comment received after comment period ended.* States that "the CDP would directly affect the estuarine habitats and fauna in the study area ... impact 1,182 acres of open water/bottom habitat through excavation (NOAA, 2010)." Table 5-10 notes that impacts of other Maintenance and Navigation Dredging (CEA Project Group #4) projects "could contribute to aquatic resource impacts ... also contribute to turbidity and erosion which can impact aquatic resources." This potential cumulative impact analysis is vague and deficient. To better assess potential impacts, the final EIS must consider the dredging effects on migrating adult southern flounder and recruitment of southern flounder larvae. The timing of dredging is extremely important since flounder move along the bottom of the channel, spawn offshore and larvae go back into the channel in the springtime. Hydraulic entrainment, through the direct uptake of aquatic organisms by the suction field generated at the draghead or cutterhead during dredging operations, results in the localized by-catch of fish eggs, larvae, and mobile juveniles and adults. When entrainment occurs near large spawning aggregations, however, replenishment of fish populations could theoretically be suppressed via the removal of reproductive adults. Where sufficient ecological information exists, the risk of entraining larval fish and eggs can be minimized by restricting dredging during key reproductive and recruitment time periods and avoiding nurseries and spawning aggregations.
249	13	Martin	Natasha		8/11/22	WC	NGO	PUBMEET / OUT	*Note: Comment received after comment period ended.* If it is found that the DEIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or new reasonably available alternatives that are within the spectrum of alternatives analyzed in the DEIS, which could reduce the environmental impacts of the proposal have been identified then the identified additional information, data, analyses, or discussion should be included in the FEIS. Further, if the DEIS does not adequately assess the potentially significant environmental impacts of the Project, the NEPA review will be found inadequate and thus should be formally revised and made available for public comment in a supplemental or revised DEIS.
250	1	Fulton	Cathy		8/22/22	WC	PC	WAKE	*Note: Comment received after comment period ended.* Sent 2 DVD's to the USACE. One DVD shows a large ship wake at Charlie's pasture. The 2nd DVD is about contrary tidal currents. I observed this contrary current event for over 2 hours on December 21, 2021.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
250	2	Fulton	Cathy	[redacted]	8/22/22	WC	PC	WAKE	*Note: Comment received after comment period ended.* Computer models are limited and are based on chosen inputs. What occurs in natural environments is not always predictable or uniform as shown in the short videos. We see the video occurrences often, but none of these events are reflected in the models conducted by Freese & Nicoles or Baird Engineering.
251	1	Stawar	Brett		8/22/22	WC	CITY	STSURGE	*Note: Comment received after comment period ended.* Any deepening of the channel should not increase any storm surge impacts. If anything, this project should have the opposite mitigation to further protect our community. In addition, the project and outcomes should not expand any slope impacts to shoreline structures.
251	2	Stawar	Brett		8/22/22	WC	CITY	NONGEN	*Note: Comment received after comment period ended.* Tourism is a multi-billion-dollar economy within the City of Port Aransas. Dredging, if allowed, would need to be stopped during our key seasons, including spring break and Texas Sandfest, summer (mid-May through mid-September), and holiday weeks in November and December.
251	3	Stawar	Brett		8/22/22	WC	CITY	FERRY	*Note: Comment received after comment period ended.* Any dredging impact should not impact any summer ferry operations, or other key visitation times to and from Port Aransas.
251	4	Stawar	Brett		8/22/22	WC	CITY	NAV	*Note: Comment received after comment period ended.* Our fishing industry is a pillar of our tourism economy; therefore, any allowed dredging should not impact recreation boating, especially during our summer economy and key weeks of seasonal fishing and boating.
251	5	Stawar	Brett		8/22/22	WC	CITY	BUSITES	*Note: Comment received after comment period ended.* The beaches of Port Aransas are the primary destination driver for our tourism economy. Any dredged sand mineralogy must match the current beach sand if placed on our beaches.
251	5	Stawar	Brett		8/22/22	WC	CITY	BUSITES	*Note: Comment received after comment period ended.* The beaches of Port Aransas are the primary destination driver for our tourism economy. Any dredged sand mineralogy must match the current beach sand if placed on our beaches.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
251	6	Stawar	Brett	[redacted]	8/22/22	WC	CITY	FERRY	*Note: Comment received after comment period ended.* The proposed turning basin is located within a primary intersection of our already busy waterways. Wherever the turning basin is located, it should have zero impacts to ferry operations and zero impacts to recreational boating. We cannot afford any additional negative impacts. Although unrelated to this project, even the current flow of VLCCs and Port of Corpus Christi water traffic should be restricted during peak times of daily ferry operations and busy use times of the ferry, especially on holidays and Sunday check-out times.
N/A	1	Canales	Barbara		6/22/22	PMC	PC	NONE	Good afternoon to everybody. Primarily today my comments will focus on what I am about to embark on which is to read the Draft EIS. I appreciate the presentation that was given so that I can have thorough analysis of what the Port's presentation is and also what the process will be for the EIS. My purpose in coming today is to assure my constituents not only do I intend to have data drive decisions but to promote the science should bring about the balancing act that is pretty pressing right now within the GO political circles. We all understand the global demand for energy. I am very familiar with the Port processes but I can tell you that since I left the Port, the Environmental team has been greatly enhanced. So I am prepared for both. I am prepared to read and to hear from my constituents, particularly my job is to protect those particularly that are highly effected which would be those for my constituency in Port Aransas.
N/A	2	Canales	Barbara		6/22/22	PMC	PC	NONE	In addition, I also want to make reference to the fact that I think that there should be a real clear message that I am here on my own as the Nueces County Judge. I have not been sent by Nueces County Commissioners court nor have we taken any formal position nor do I expect there to be a formal position taken on it. However, I think the constituents can count me to be a repository for their concerns and their comments. If a permit were to be issued, my main focus would then be go right back to that Sediment Incident Management Plan that Nueces County already has with the Corps of Engineers to work on beneficial use, to make certain that shoreline protection particularly as it applies to some of the things you talked about, whether it is restoration seagrasses, living shorelines, erosion, beach nourishment. I will be deeply focused on that. So I am kind of prepared for both to make certain that my constituents understand that I am here to listen and to hopefully aid and guide in that very difficult balancing act between protecting this economy, making sure that these barrels do get to our western allies. But all the while, if the data and the science does not support the project that we are absolutely vocal about that too. So again, I thank you for the opportunity to learn here today. I will stay for a little bit in order to hear more. But as the Emergency Manager for this county, I think it is important that I consider any impact to the environment as a current emergency as is climate change as is so many other things. But I don't discount the GO political nature that a west Texas barrel of crude is still the best crude around. So I am here to make certain that you know that I am resource and that you can count on me as a partner as this process continues. Thank you.
N/A	1	Daley	Tom		6/22/22	PMC	PC	STSURGE	There are several things about the storm surge in the EIS but the consequences not fully explored. There is no mention of their interactions as part of the cumulative impacts in Chapter The 2022 EIS notes that channel deepening would allow more surge to propagate the channel, intensifying velocity and increasing water level. This includes a direct cumulative increase in tidal range, particularly in the inner channel near Port Aransas where it could be as high as 36 percent. The inundation area will increase up to 492 acres but it does not say where. Modeling data shows that the speed of the current Port Aransas to Ingleside will increase as a result of channel deepening since the water depth in that stretch will remain unchanged but it does not say by how much. Researchers have found that channel deepening is the main contributor to storm surge effects even though Ingleside on the Bay residents made numerous comments on the original EIS scoping, Ingleside on the Bay is not treated as a separate city in the EIS. IOB will be affected by normal and seasonal tidees, let alone tropical storms and hurricanes which already cause 4-foot storm surge
N/A	2	Daley	Tom		6/22/22	PMC	PC	STSURGE	Research which was brought up in scoping shows that hydrodynamic changes or channel deepening increase both intensity and extent of flooding and storm surge pushing the water further inland. Ingleside on the Bay experienced 4-foot storm surge during 2020 with every tropical storm in the Gulf, yet nowhere in the EIS are concerns about flood and storm surge impacts for communities like IOB or Gregory which could be catastrophic in the event of another major hurricane.
N/A	3	Daley	Tom		6/22/22	PMC	PC	NONE	Conclusion: Update research talk about others about channel deepening and storm surge needs to be included in the EIS. Ingleside on the Bay should be specifically included in the EIS with more focus on impacts of channel deepening, on flooding tides, storm surge and coastal communities. The Corps should deny. Thank you guys
N/A	1	Nye	Patrick		6/22/22	PMC	PC	NONE	This is a colossal wrong to be done. Corps of Engineers has so many experience in doing many things. This is wrong. This is unprecedented. 80-foot deep channel? There is nothing like it in the Gulf Coast or even on the eastern seaboard. You all have no idea what your models are showing. Your models are showing nothing to do with relative sea level rise as it is today. I think they are older models. There is a Texas A&M study that shows 4- to 6 feet of erosion along the Gulf Coast. That's not included. We are not looking forward enough to what is happening. When you get a storm surge, the numbers that you are putting in there don't even measure with relative sea level rise over time. What does that mean to the property owners where Brian Gulley lives, when they fill in the Packery Channel and all those people that bought those beautiful lots with all those channels, what is going to happen? Who is paying for this? Oh, I guess the Port is in real estate, perhaps they can ensure it for us. But that's not really my point.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
N/A	2	Nye	Patrick	[redacted]	6/22/22	PMC	PC	NONE	But that's not really my point. The other thing is Purpose 1, the forecast demand is wrong. In 2003, the forecast is for imports. Now they are not even on the books. They are exports. Okay. That's fine. If you want to make the national debt or international debt even, why don't we just export 10 percent and that way we can balance our debt. We don't need to have all these exports taking our oil away and given to somewhere else. This oil needs to stay in the United States. That's what we are paying international people to bring over here. That's not smart. It's inflationary. In fact, electric vehicle, just read today in Reuters, 33 percent of all global vehicles will be electric. So you are putting in a fossil fuel export terminal at the termination of the fossil life. This is it. We are running out. We also have climate change. I know the Corps believes in climate change. I know you believe in relative sea level rise. This will only promote more of that worldwide.
N/A	3	Nye	Patrick		6/22/22	PMC	PC	NONE	I also want to say that -- I guess I already talked about the volumes. So storm surge as Mr. Daley was talking about is critical for our Bay. I think your numbers are wrong. Ingleside of the Bay is at the confluence of La Quinta, the ship channel -- Corpus Christi Ship Channel, intercoastal canal. We are seeing already the Corps made a determination within bridges permit. They took out all this seagrass. There is probably 30 percent of the seegrass loss in that immediate area. There is no response from the Corps on that. There is other issues the Corps has had. Let's look at Brazos. We diverted the channel and look what happened Sergeants Beach. We really need to think this thing through. I think this is not even a no action but a reverse action. Thanks.
N/A	1	Wadhal	Thomas		6/22/22	PMC	PC	NONE	First of all, what's the purpose of doing all of this. I've seen a lot of documentation that has a lot of very good comments about why the purposes is being propose to do the deepening. But if you look back in 2003, there was the last Environmental Impact Statement done on Corpus Christi Channel at least that I could find and the purpose at that time was to ensure that we could handle increase of oil and gas and also agricultural exports. But since then as we all know, in 2015 when we got rid of the oil export banned, things really took off. And we have seen a lot of changes with companies coming into the area with petrochemical plants, tank farms, oil export terminals. They came here for several reasons. One, financially, it's a great place to come to do business. We have some good working people and we've got some space. But what does that really mean to us? What happens is they get large tax incentives to do that. They get degradation of the seagrass.We can look at Google Earth for the last ten, 15 years. It's really going down.
N/A	2	Wadhal	Thomas		6/22/22	PMC	PC	NONE	Then we've got water quality and the overall degradation of our environment. One of the things that I am concerned about is that with the environment, we are not Louisiana. We are not Port Arthur orange. We are not Houston, Texas City, come down to Freeport, even Point Comfort. We got good air here relatively speaking and what we are doing is getting companies to come down here and buy the ability to permit pollution in the air that is not exceeding the EPA limits because you can't do that in Houston. You build a product there, you got to take somebody else's emissions or get rid of yours. That's a whole different story. Anyway, the bottom line, we really have this deepening channel, I think it will adversely affect the air quality. It will affect the coastal bend air which is marginally monitored by TCEQ. If you look at all their monitoring stations and where the wind blows, the wind blows -- monitoring is here and the wind blowing over here. So, I think that's a problem. Anyway, to summarize, we have to look at the real need to affect the world experts. Okay. Thank you for your efforts.
N/A	1	King	James		6/22/22	PMC	PC	NONE	I kind of want to help the Corps because y'all need some help. You are getting a bunch of B.S. from the Port here that this channel to nowhere. I've coined it "The Bridge to Nowhere." Why are we even evaluating an 80-foot dredge when it goes nowhere. There is no terminal. There is no pipeline to get the oil there and it's just a gigantic boondoggle. You have been down this road before. I think you guys have maybe done maybe 3 EISs on deep dredging, deep port, home port, safe port, whatever you call it. This is just another iteration of the same thing.
N/A	2	King	James		6/22/22	PMC	PC	EFH	I appreciate the alternatives you are looking at. Maybe another alternative is to put all the money in retrofitting our refineries so we can use our own oil and not have to export our oil to other countries. There are lots of things I want to say here. The Essential Fish Habitat, I would highly encourage you guys to look at our local universities. They have a wonderful scientists here. This is Aransas Pass that we are dealing with here. This is not just some channel. It is a significant migration route of larvae, shrimp, crab and a life cycle between the Gulf and the Bays. It is like doing surgery on the aorta of a heart. It is significant.
N/A	3	King	James		6/22/22	PMC	PC	PUBMEET / OUT	And the map that I look at this, when I see all this dredge material going around, using these words "beneficial use", "nourishment", that's all PR terms. This is sludge. This is dredge material. Let's just call it what it is. Let's don't try to make these soft names like it's going to help us. Mother nature developed these barrier islands and this system. What do you think the Corps of Engineers and the Port of Corpus Christi can do better. So I think that this is going to take a lot of science. It's going to take a lot of evaluation. I think -- I have a house in Port Aransas. I am right on the ship channel. It's offensive to us that this meeting is here in Corpus Christi. If you look at this map, we are 30 miles away from where you are trying to do this. You should have this meeting in Port Aransas. That's the place that is going to affect it most. Forget industry, let's look at nature, tourism, outdoor, our families. That's what this is all about. Thank you.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
N/A	1	Amos	Michael	[redacted]	6/22/22	PMC	PC	NONE	My pop, he's gone. He started this outfit, the Arc Animal Rehabilitation. He started counting plastic trash on the beach 40 years ago. He did it out of mortification. Look man, I am not making anybody the bad guy here. I am sure there is such a thing. I spoke to people before I stepped into this room who were super sincere, looks me straight in the eye, were fascinated upon the issues at hand. I don't need to doubt that. What I do need to doubt, however is the definition of National Energy Security and who's defining it. Okay. You have already heard people speak to this indirectly. Larger ships and fewer trips focuses on the how without examining the Why. The EIS contents, I don't get passed Chapter 1 and 2. You know. The Need and Purpose. That's National Energy Security. In the absence of looking at this one gentleman said, alternative energy and where we are going with that. We have to look at where we are right now and I appreciate that and I am sure you do too. We worked so hard and we made all this studies and gotten clear about all the facts about the how. But I don't think it is so clear why. We are on the verge of doing something irrevocable. I want to know that I was up here and I opposed it. That's my official position.
N/A	2	Amos	Michael		6/22/22	PMC	PC	NONE	I have to disagree with my representative Barbara Canales. The west Texas barrel of crude in the ground is the best barrel around. If we got that straight, all of this would be an intellectual endeavor. I am not putting anyone down. I am grateful for everybody's effort and best intentions. But if we don't get step one right, we have no prayer and that will be our legacy. Thank you.
N/A	1	Bennett	Craig		6/22/22	PMC	PC	PUBMEET / OUT	My name is Craig Bennett, B-E-N-N-E-T-T. I am with the law firm of Jackson Walker. We have been following this and very interested in this process. First, I just want to make a request that there should be another public meeting in Port Aransas. The draft EIS statement was issued only 14 days ago. Most of the members of the public have not had an adequate opportunity to review that, to be able to prepare comments. I understand this is not a public hearing under 33CFR but even under that, those generally require minimum of 30-days notice. I think it's only reasonable to give the public a little more opportunity. I think it would build a lot of goodwill and it would actually be within the spirit of the purpose of giving notice to the public and having a public meeting. There is sufficient time to hold another public meeting in Port Aransas in the local area which is where most of the local citizens who have expressed an interest and who will be affected by this project are located. I think it would build a lot of goodwill and certainly would not delay the process or the project by holding another public meeting in Port Aransas.
N/A	2	Bennett	Craig		6/22/22	PMC	PC	P&N	Now I want to turn to the Draft EIS. I would bring to your attention a number of things. One, it does not appear that the Draft EIS was prepared consistent with the new regulations, the new NEPA regulations that were adopted in May of 2022 that just went into effect. Those relate -- have new requirements related to the evaluation of the project's purpose and need. Specifically set out in 40CFR Sections 15.02, 15.07 and 15.08, there are requirements for the court to do certain things related to purpose and need that does not appear to have been done for the Draft EIS. The Corps needs to look at those regulations and correct certainly before the final EIS is issued. I also, as has been noted, Mr. King mentioned the phrase dredge to nowhere. He makes a very valid point that barring the Harbor Island terminal project and midstream pipeline project, both which are being considered by the Corps, the dredging makes no sense. Therefore, I would reurge the Corps to look at whether those three projects which the Corps is considering all of them, are part of a single and complete project. A Corps official earlier made that determination and then reversed course. I don't think there is any justification to change that earlier determination because clearly all of the projects are related to one another and dependent upon one another.
N/A	3	Bennett	Craig		6/22/22	PMC	PC	DIRIMP	Also, I would note that the Corps determined that the proposed project is not water dependent which creates a rebuttable presumption and an alternative is available with less impact on the equatic environment. But the alternatives analysis does not address this rebuttable presumption at all. I would also note that the socioeconomic analysis does not address potential impacts for Aransas tourism, fishing or ferry operations post-dredging. These are significant impacts that must be considered as part of any sufficient socioeconomic analysis. Thank you.
N/A	1	Vasey	Iain		6/22/22	PMC	PC	NONE	Thank you for your time this evening. I-a-i-n, V-a-s-e-y. I am the president and CEO of Corpus Christi Regional Economic Development Corporation. We are the keepers and calculators of economic health and benefits for the region. In the last 11 years, we have seen the emergence of the Port of Corpus Christi as really the energy port of the Americas. We have seen 54 billion dollars worth of investments in this area, primarily in the energy sector. Actually, it will be more than that. Cheniere announced today another 7 billion dollar investment in the LNG facility. We have really become the hub of the energy sector that supplies energy to the western world, the democracies of the west. The Port will be handling upon within the next couple years, we anticipate between 3- and 4 percent of the global crude oil movement especially as the Russian oil is taken off the market. So it's increasingly important that all oil makes it to the western Europe and our allies around the world. From an economic's perspective, 70,000 jobs in this MSA are directly or indirectly supported by the Port operations. That's one in five jobs in this region. One in five families supported by this energy operations.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
N/A	2	Vasey	Iain	[redacted]	6/22/22	PMC	PC	AIR	We are especially interested to hear and monitoring closely that this will remove the need for lightering and reverse lightering. So that's going to improve our air quality in the 20015 NAAQS standards which currently stand at 70 parts per billion. We test currently at about 71 parts per billion and pointed in the right direction in removing some of those emissions from the air. This will help us further improve the air quality for the entire region. The other things we are seeing is we are seeing the emergency of green and blue energy projects, more environmentally friendly energy, hydrogen type projects. We are starting to see those. This will help us make more -- more competitive as we pursue some of the those projects. Our calculations are without this project we could fail to see some of those projects and potentially see over a ten to 20,000 job loss over a ten year period. With that, I want to thank you for your time for allowing me to participate. Thank you.
N/A	1	Serna	Encarnacion		6/22/22	PMC	PC	AIR	I am going to start talking from here to take advantage of my time. This thing about the quality air and all of that, you get infernal flares in your backyard. This is one in my backyard. To burn the gases that are expelled from those times which are going to have seals around it that never get fixed. Brother Patrick, they got the flares, I got mine. I am going to put this in here so you all can see it because I am going to cover about salinity. The flares come later and it's going to be ACES(sp.ph) and Lone Star behind this project. My name is Encarnacion Serna. It is too long and I don't want to use my three minutes spelling it out. I will write it for you.
N/A	2	Serna	Encarnacion		6/22/22	PMC	PC	NONE	I saw the Environmental Impact Statement, three volumes over 2000 pages. I read the introduction and I read pages 284 to 290 of Volume 1 and some pages of Volume 3. We are suppose to read all of that in less than a month. I can say this much, based on what I read so far, the Environmental Impact Statement is characterized with oversights on crucial issues, it has half truths, spins and it is saturated with factoids, bullshit and dances around the important issues but never digs, never digs like it needs to dig.
N/A	3	Serna	Encarnacion		6/22/22	PMC	PC	CUMUL	Because of the three-minute limitation, let me just talk about salinity. There are seven proposed gigantic, monster-size salinity projects. No cumulative effects on salinity were done because you left out four. You left out four. You can see that figure Table 5.1. The four desalination projects that you left out of the so-called cumulative effects was the Port of Corpus Christi La Quinta Channel was going to produce 30 million gallons a day in the permitting process. Then the City of Corpus Christi La Quinta Channel which will produce 40 in the permitting process. And then the Corpus Christi Polymers which went under the radar, it's build but has not been commissioned. It was left out. Then the City of Ingleside Poseidon is in the planning stages and not permitted yet. So you left those four out. I am going to leave this here so you guys can go back and do your study. I am also very very worried about the following very important issues; physical oceanography, salinity, climate setting, the assessment of water quality, air quality, cumulative effects and several more saturated with factoids and bullshit. Thank you.
N/A	1	Torres	Chloe		6/22/22	PMC	PC	NONE	My name is Chloe Torres. However, I am making this comment on behalf of Dorothy Pena. The Army Corps of Engineers mission as stated on their website is to deliver vital engineering solutions in collaboration with our partners to secure our nation, energize our economy and reduce disaster risk. You represent a system that engages in defensive tactics in order to achieve your mission. As an aside to not seem so defensive to the civilians you claim to serve and protect, you state that you also produce disaster risk. Disaster is what happens when complex systems are created without the proper investigations or foresight. Our community knows disasters. We are the ones who keep each other fed when the lights go off. We are the ones who keep each other safe, not the Port of Corpus Christi. What we are asking you to do today is just to avoid the disaster entirely by not moving forward with this dredging project. Do the proper investigation of the possible cumulative impact of this project and the climate crisis which are already affecting our coastal region.
N/A	2	Torres	Chloe		6/22/22	PMC	PC	NONE	You were ordered on January 27 by executive order 14008 to take the climate crisis into consideration before making crucial decisions that could further exacerbate this particular eco region. Your agency is also responsible for upholding the regulations of the Clean Water Act which we have seen you violate in the past. It seems highly unlikely for your agency to properly serve the federal government, your partners and the taxpayers you claim to protect. Something has to give and usually it is the health and well-being of our communities. We pay. Not the corporations or industries. Our communities. Our environment pays. No more exploitation of our bay or our communities which are predominately of color. We understand your values change every time a new administration comes into power. New laws or regulations are written so you can quote, better collaborate with your partners. But our values don't change. It is not okay to destroy our bay to ensure national security, whatever that means. It is not okay to sacrifice the health and well-being of communities; Black, indigenous and other communities of color. Your government has done this, hallmark communities since it's inception and it needs to stop. No more violence on our bay or our community. I save the rest of my time.
N/A	1	Palitza	Jessica		6/22/22	PMC	PC	DREDMAT	I strongly oppose this dredging project. I am especially concerned about the sediment quality from accumulation of pesticides and heavy metals. The public needs to see the details and data of what was tested and where. I believe they are available somewhere but it is too complicated and time consuming to find this crucial information for most people directly impacted. Also the sampling is not complete as of today which means there will be data in the final EIS which the public has no say in. Additionally, ACE is given two months during paid working hours to reviews the final EIS while the public has less than two months to prepare for public comment by reading hundreds of dense pages on their own time. I thank the good people involved on this project and ask all of you to not just hear our concerns but feel for us and see our perspectives as humans on a finite planet. Thank you.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
N/A	1	Palitza	Jessica	[redacted]	6/22/22	PMC	PC	DREDMAT	I strongly oppose this dredging project. I am especially concerned about the sediment quality from accumulation of pesticides and heavy metals. The public needs to see the details and data of what was tested and where. I believe they are available somewhere but it is too complicated and time consuming to find this crucial information for most people directly impacted. Also the sampling is not complete as of today which means there will be data in the final EIS which the public has no say in. Additionally, ACE is given two months during paid working hours to reviews the final EIS while the public has less than two months to prepare for public comment by reading hundreds of dense pages on their own time. I thank the good people involved on this project and ask all of you to not just hear our concerns but feel for us and see our perspectives as humans on a finite planet. Thank you.
N/A	1	Hilliard	Jennifer		6/22/22	PMC	PC	ALTS	The science is clear that new fossil fuel infrastructure projects are contrary to public interest. This project should not be authorized according to Section 404(b) guidelines as it is not in the public interest. It involves impacts to special aquatic sites, namely Redfish Bay. The public interest is not served by approving a project that will directly hasten climate change, negatively impact estuaries and marine resources further congest transportation between Aransas Pass and Port Aransas, elevate the risk of oil spills in the bay and increase storm surge threatening coastal communities.
N/A	2	Hilliard	Jennifer		6/22/22	PMC	PC	AIR	The purpose of this project to allow the safe and efficient loading of very large crude carriers will induce the development at additional crude export facilities on Harbor Island and pipelines that would cross Redfish Bay. This increase in crude oil production transport and processing will directly increase greenhouse gas emissions and hasten our heeded marsh to climate disaster. The overwhelming scientific consensus has conclusively determined that without significant rapid emission reductions the planet will result in catastrophic damage around the world. This project will directly and indirectly create additional warming that in turn threatens people's lives, health, safety and their livelihoods as well as threatening economy and national security for this generation and future generations.
N/A	3	Hilliard	Jennifer		6/22/22	PMC	PC	ALTS	If for some reason the Corps does not feel that addressing the cause of climate change is within their authority as it relates to this permit, the Corps is required by 404(b) guidelines to analyze less environmentally damaging alternatives to the proposed project to achieve it's purpose. The do nothing alternative should be preferred as it would leave 300 acres of seagrass in tact and not cover 5,000 acres of benthic habitat all while not producing the development of pollution causing and carbon industries. The offshore site alternative is definitely better than the Port's preferred project as while it does accomplish the ecological stated of the project, it does so with the least environmental impact similar to the do nothing option while also lowering the risks of accidents within the estuary bay system and lowering emissions caused by reverse lightering.
N/A	4	Hilliard	Jennifer		6/22/22	PMC	PC	DIRIMP	The beneficial use argument that is stated in the EIS is flimsy at best. It does not come close to offsetting the destruction of habitat caused by construction. Beneficial use of dredge material proposed in this document could also be provided by the currently authorized dredging of the ship channel, maintenance dredging at La Quinta channel and the maintenance dredging that will be required to maintain the channel at it's current authorized depth of 54-feet. I request that the Army Corps of Engineers exercise its regulatory authority in a manner consistent with existing law, science and the President's Executive Order 14008 to respond to climate change at a time when we should all be coming together to deal with this problem, the Port of Corpus Christi is pursuing an infrastructure project that will provide a direct conduit to increase carbon production and further worsening the climate crisis. These climate implications are not addressed in this Environmental Impact Statement and we ask the court to provide a supplemental Environmental Impact Statement with the best available science regarding concerns raised at this meeting and submitted written comments. Thank you.
N/A	1	Marks	Brandon		6/22/22	PMC	PC	CUMUL	My name is Brandon Marks. I am the Coastal Bend Regional Coordinator with the Texas Campaign for the Environment. I am a resident of Corpus Christi as is my family, including my dad, my grandmother and my cousins. I am here today because what is at stake is not a single dredging project. What is at stake is the heart and future of the Coastal Bend community. This project is just one piece in a larger plan to push an oil, gas and petrochemical industrial build-out on the Coastal Bend. This dredging project alone will lead to two new oil exports terminals on Harbor Island, increased traffic from very large crude carriers and new pipelines through the protected Redfish Bay state scientific area. This is not to mention what the rest of the industrial build-out will will bring like the plans for four desalination plants in Corpus Christi Bay that are designed to get water, to bring new petrochemical facilities to our community as well as an expansion of crude oil exports from Embridge and LNG from Cheniere.
N/A	2	Marks	Brandon		6/22/22	PMC	PC	NOTSUP	Again, in addition to that, we have the Blue Water Offshore Oil Project. Our community is inundated with a fossil fuel industrial build-out. If allowed, this project and soon fossil fuel build-out will harm our collective health, our environment and our livelihoods. This may make our community profitable for a few corporations. But it will make it unlivable for the residents here. It's time to say no to the fossil fuel expansion. It is time to say no to any more toxic pollution that makes us sick at home and causes climate change around the world. We deserve better. We deserve elected and appointed officials that put the public interest above private profit. We deserve a future with breathable air, a livable climate and green jobs. But instead, we get false promises and greenwashing from the Port for projects like carbon capture and hydrogen that will just further the fossil fuel industry. To the elected and appointed officials in the room, if you are not willing to champion the people, our environment and our community, I urge you to step down and step aside. Let others with the courage and vision to take your place.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
N/A	3	Marks	Brandon	[redacted]	6/22/22	PMC	PC	NOTSUP	To the US Army Corps of Engineers, when our local, elected and appointed officials fail us, I urge you to step in to protect us. Hold a second public meeting in Port Aransas. Provide better outreach in Spanish to this community. Revise the DEIS, provide the supplementals that everyone is calling for with new information and reject the end of the day this harmful dredging proposal. Thank you.
N/A	1	Fulton	Cathy		6/22/22	PMC	PC	P&N	Hello and thank you for doing this meeting and though I am going to say like everybody else, we need one in Port Aransas because you've got us at a terrible time. It's freaking summer here. So we need it over there because a lot of people don't even try to leave the island at all during the summer and I am actually one of them. So I want to quote real quick on the dredge to nowhere based from one of your letters to the Port. "Based on this conclusion, it is clear that the deepening of the Corpus Christi ship channel and the construction of the Harbor Island terminal facility are interdependent --intaerdependent -- and should be considered a large, single and complete project." It goes onto state that "access midstream holdings to construct a series of pipeline and facilities that would supply that terminal, that that application also needs to be considered with this application." You guys said it. You guys first. Then every agency, the US Fish and Wildlife, The Texas Parks and Wildlife, the CCA, and I am forgetting one right now all said the same thing about we can't even look at this because we can't evaluate it without the other projects. So this is the biggest -- I don't want to say mistake -- wrongdoing that there is.
N/A	2	Fulton	Cathy		6/22/22	PMC	PC	NONE	i want to go onto state that the Port -- and I am going to be submitting a bunch of written comment. But the Port of Corpus Christi sent out an email on Friday. In that email, they indicated -- they sent it out to their friends, I guess -- they said they recently received funding approval for their long awaited ship channel improvement project under the Army Corps of Engineers Coastal Navigation construction category. It goes onto ask them to: Please come attend this meeting and say positive things about the Port and one of the things, Number 1, we all know that there has been no funding approved because the project hasn't been approved. Just for you guys to know, everybody is being misled one more time. It's another lie. Then they go onto make the statement that it's going to help with agricultural export. Really? At Harbor Island? How is that possible? But all right. And it's going to help the military. Really? The Naval base is going to benefit going to Harbor Island?
N/A	3	Fulton	Cathy		6/22/22	PMC	PC	NONE	Let's be realistic about what we are talking about. Let's talk about reverse lightering real quick. I want everybody to understand this. Reverse lightering will not be reduced. It will not be reduced. Why? Because all the people upstream that are already doing this, they are not going to change their business model and stop again and, what, berth at Harbor Island and go through all of that just to top off and buy from another entity. That's not what they are going to do.
N/A	4	Fulton	Cathy		6/22/22	PMC	PC	CUMUL	I also want to talk about salinity. Y'all are not looking at salinity. For Judge Canales, if she is still here, if you want to have your oyster rehabilitation be successful, do not support this project because the salinity rise is going to kill all the oyster beds not just what's already dead in Nueces Bay. Thank you.
N/A	1	Coeckelenbergh	Patt		6/22/22	PMC	PC	NONE	Cathy is a very hard act to follow especially since I have not written anything down. I want to say thank you for the opportunity to be here. I do live in Port Aransas and I am here representing my neighborhood and my neighbors that were unable to attend today because it is a very busy season. We are all against the destruction of the Coastal Bend area. Period. The slide show was beautiful, lots of pretty words. But that seagrass is not going to make it with an 80-foot dredge.
N/A	2	Coeckelenbergh	Patt		6/22/22	PMC	PC	NONE	Ms. Canales made a reference to our allies needing oil. Well, war is the number 1 cause of climate change. It displaces people. It causes death and, well -- I don't need to go into that. It's just the Number 1 cause of climate change. We need to be thinking about going forward into the future. The Port of Corpus Christi has the resources. They have the money. They need to invest in research instead of in drilling.
N/A	3	Coeckelenbergh	Patt		6/22/22	PMC	PC	NONE	The Army Corps of Engineers need to protect the people, all the people, everywhere. When you live near a project, you suffer from it. Not just the pollution but the noise, everything that can happen. I strongly recommend that all the projects, any projects in the Coastal Bend be looked at as a whole because they are all intertwined and for the Port of Corpus Christi, I suggest that you do your homework and look at what we can do for the future because actually there is only decades of crude oil left in the earth. And that's not going to last very long and you will leave a dystopia for the rest of this world. Thank you.
N/A	1	Morris	John		6/22/22	PMC	PC	P&N	John Morris. Resident of Port Aransas. Port of Corpus Christi and other entities who continue to entertain a broad range of ever changing plan for our ride that can include berth, a desal plan, oil storage tanks and other infrastructures support both on and off terminals on an island that has been repeatedly characterized as the absolute worse location for these projects by respected members of the scientific community. Apparently, the Port does not believe in that community nor did they really believe in the community. The Corps of Engineers note that in 2019 that original deep dredge permit request was incomplete as it failed to recognize and consider the other permits associated with what should be characterized as a series of interdependent projects within the Harbor Island and complex. Each of these projects have notable impacts on their own. But the cumulative effects appear to be completely ignored and exponentially more damaging.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
N/A	2	Morris	John	[redacted]	6/22/22	PMC	PC	NONE	Additionally, this increase dredging exists solely to serve one entity, the Port of Corpus Christi. If and only if, it can find another willing or gullible investor to take such a gamble. As many can recall, this whole project began with the Carlisle Group commitment that was lost several years ago when they apparently made the determination it was a bad investment. What in the hell has changed since then.
N/A	3	Morris	John		6/22/22	PMC	PC	NONE	Meanwhile, upstream industry has invested and continues to invest in terminal capacity that is meeting demand. This proposed project has very little positive effect on reducing reverse lightering. That's just not going to stop. One little terminal right in front of a community is not going to stop reverse lightering. That's just another smoke and mirrors by the Port.
N/A	4	Morris	John		6/22/22	PMC	PC	NONE	The subsequent number of ship movements, exhausts, fluid discharge from vessel, vapor release, ship wakes, all this crap is going to continue. Nothing is going to change but you are going to destroy a community. You are going to destroy a bay system. The very life blood of the entire area. And through all of that, they kind of forget that Blue Water terminal, among others, is trying to do offshore terminals. Nobody is building 80-foot deep holes in the dirt to try to do loading and unloading in VLCCs. They are all offshore. Why does the Port think they are so much smarter. I have not figured that one out. Obviously, three minutes is not enough time to adequately express what a bad idea this is. I implore you to listen to the science and heed the warnings of failure to find investors. This is a bad idea. An ego driven pipe dream of a Port Authority run amuck. Let's think about another meeting in Port A where the people are actually affected. It's two hours worth of drive time to get here. Thank you.
N/A	1	Campos	Sylvia		6/22/22	PMC	PC	NONE	Today is a really special day for me personally because I lost my sister two years ago today. So instead of remembering her honor -- remembering her. I am here. And I am channeling her spirit because I thought about where she worked. She worked at Citgo 25 years. So we know what that industry can do. But the other thing is, we also know that we can't let one type of industry take over our entire region. That is -- another word -- stupid. It's just crazy. So I implore you to listen to the people here. I know that there is the show that the Port Authority has done. But when it comes to the people's part, all we have is our voices. All we have is our heart. But we breathe the air. We drink the water. We are from this area.
N/A	2	Campos	Sylvia		6/22/22	PMC	PC	NONE	I know -- just recently I did an ancestry and I am 56 percent indigenous and we never left this area. We were robbed. We were robbed of our language. We were robbed of our land. Yet still, it's never enough. It's never enough. So I just ask that you please rethink this. Think not just of the money because they are going to tell you what you want to hear which is jobs, jobs, jobs. That's what it's always been. That's what we have been sold on. But we are already know the history. We know that we are lied to and we will continue to be lied to until we stand up. So I ask you to please listen to the people that are here, the people that have traveled and the people that will continue to live here. I am here to represent my children's children because we are going to continue to live here and I want to be able to say that I stood up. I stood up for my grandchildren and my grandchildren's children. Thank you.
N/A	1	Williams	John		6/22/22	PMC	PC	NONE	Good evening. My name is John Williams. I am a state Commission Harbor pilot here at the Port of Corpus Christi. I hold a US Coast Guard license, a master on oceans and gross tons. I have been piloting Port of Corpus Christi for over 17 years. Prior to entering the piloting profession, I spent 12 years at sea as a dec officer which two years were spent as a master oil tankers and other vessels. I am the current presiding officer of Aransas-Corpus Christi Pilots Associations. I represent 18 state commission pilots. Each with similar backgrounds as mine. We provide all the piling services at the Port of Corpus Christi. Tankers at Harbor Island is not new for the pilots. For decades up until the early 90s there were two tanker terminals located at Harbor Island. The vessels are not as large. However, over the last 30 years, technological improvements in both ship and harbor tech design vastly improved. Members of the pilots, we took part in all full mission -- excuse me, all full mission bridge simulations completed for this study and were consulted on other navigation questions. We brought the simulations, our combined years of experience of handling ships on the existing channel, that experience includes hundreds of actual VLCC transits.
N/A	2	Williams	John		6/22/22	PMC	PC	SUPPORT	Politics, experience, participation of these simulation contributed to the conclusion that fully loaded VLCCs can be successfully accommodated within the boundaries of this deepening project. The rotor tugs and vision for use are highly maneuverable and powerful with capabilities suited for these expected environmentals. Any impact on other traffic would be minimal. The terminal's proximity to the open Gulf of Mexico allows for minimal transit times within the channel. Therefore, one-way restrictions imposed by these VLCCs to and from Harbor Island terminals would be negligible. Sea state effects 100 clearance would be minimal. Offshore waters tend to be rough. However, wake periods or short duration cause no effect on vessels of such length. Aransas-Corpus Christi Pilots delivery of a new ;arger size pilot vessel will help us accommodate working further offshore. In other words, we are already equipped to provide pilot service if and when it's needed. Thank you for your time.
N/A	1	Pecore	Dan		6/22/22	PMC	PC	DIRIMP	Because of the time constraints here, I am going to focus my comments on one specific phenomenon that I believe would be negatively impacted if the Port is allowed to dredge to 80 feet. This phenomenon is quite simply the migration of marine life through the Aransas Pass. In other words, from the Gulf of Mexico into the estuary. A few years ago, I was for fortunate enough to attend the presentation of Dr. Ed Busky gave who is a professor at UTMSI. I will start by quoting Dr. Busky from a white paper he authored in 2018. This was a quote:"Several species of shell fish and fin fish of commercial and recreational importance in the Nueces and Mission Aransas estuaries possess live history patterns that are dependent upon estuaries whereby members of these species liveand mature in these estuary nurseries then migrate into the Gulf of Mexico as reproductive adults, releasing their eggs in platonic larvae in the open ocean."

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
N/A	2	Pecore	Dan	[redacted]	6/22/22	PMC	PC	DIRIMP	Now looking specifically at how brown and white shrimp make their way through the pass into the estuaries to mature, Dr. Busky wrote, Quote:"When larval shrimp approach the passes between the Gulf and the estuary nursery grounds, they detect a decrease in salinity that indicates the presence of an estuary. This detection of estuary water triggers a process called selective title stream transport. This is where the small weak larvae swim up into the water column on flood tides. They carry them through the channel toward the estuary. When an ebb tide occurs that would carry them back into the Gulf, the larvae swim down toward the bottom of the channel where the current speeds are lower." During the presentation I asked Dr. Busky, what percentage total larvae make it from the depths of the channel into the much shallower waters of the estuaries to mature. He replied the number was below 20 percent. This was based on the channel depth of 47 feet. But here we are now and we stand 54 feet.
N/A	3	Pecore	Dan		6/22/22	PMC	PC	DIRIMP	This Draft EIS is based on proposed channel depth of 75 feet. At this proposed depth, it stands to reason that the larvae will still have to swim toward the channel bottom where current speeds are slower. However, now the bottom is going to be 75-feet. Let's look at the entrance of the Lydia Ann Channel right off the ship channel and assume the depth of 14-feet in the intercoastal waterway. There is part of the Lydia Ann Channel. The swimming larvae must move from 75 feet to 14 feet in order to mature. That's a difference of 61 feet. If the channel -- if the survival percentage of larvae is less than 20 percent at 47, what does the Corps think it will be if the channel is dredged to 75 feet. It stands to reason that the chances of larval survival will be that much less. This is environmentally and frankly morally unacceptable. You need to come to Aransas for another meeting.
N/A	1	Garcia	Matt		6/22/22	PMC	PC	SUPPORT	My name is Matt Garcia. I am the Regional Director for the Texas Oil and Gas Association a/k/a TXOGA. I reside with my family here in Corpus Christi. On behalf of TXOGA, I stand before you today to show our support for the channel deepening project which will allow for the safe transit of fully laden very large crude carriers at the Port of Corpus Christi, largest crude oil and second largest LNG gateway in the nation. Founded in 1919, the Texas Oil Gas Association or TXOGA is a statewide transit association with approximately 5000 member representing every facet of the Texas Oil and Ga industry including small independent and major producers. Collectively, TXOGA members account for almost 90 percent of all oil and natural gas produced in Texas, operate a vast majority of the state's refining milage and gas processing capacity and are responsible for the (inaudible) state's refining capacity.
N/A	2	Garcia	Matt		6/22/22	PMC	PC	SUPPORT	TXOGA recognizes that projects like the channel deepening project are creating world class transportation infrastructure to help our communities and business reach markets across the globe and are essential for the continued success and growth of the Texas Energy Industry and therefore the Texas economy and vital to not only our nation's energy and national security but that of our allies abroad.
N/A	3	Garcia	Matt		6/22/22	PMC	PC	SUPPORT	VLCC capable infrastructure currently exists at the port of Long Beach importing heavy (interruption) varieties required by many US refiners. Sound science and technology will ensure an environmentally responsible efficient maritime operations and according to provided models, the channel deepening project will positively effect the air quality in the Coastal Bend air shed through admissions reductions as a result of less reverse lightering. Nationwide, increased production and consumption of natural gas for electricity has allowed the US to lead the world in CO2 reductions.
N/A	4	Garcia	Matt		6/22/22	PMC	PC	SUPPORT	Investments that increased Texas wealth at the water energy export are critical for creating jobs and enhance economic development and ripple effects that resonate across locality across the region. They provide much needed property tax revenue that supports our first responders, our schools, hospitals and services across Texas. To secure the economic future of Texas, TXOGA supports new investments and infrastructure including imports, production, pipelines and processing such as refining capacity and petrochemical manufacturing along the Texas Gulf Coast.
N/A	5	Garcia	Matt		6/22/22	PMC	PC	SUPPORT	We are generally supportive of ensuring these projects are of the up most consideration. The Channel Deepening Project and other projects that are in various phases of completion will ensure Texas produced energy from the Permian Eagle Ford will be able to meet the growing global energy needs and provide much needed market opportunities for Texas producers while creating local economic development, greater prosperity and new investment in the Coastal Bend. TXOGA appreciates your consideration.
N/A	1	Perales	Marisa		6/22/22	PMC	PC	PUBMEET / OUT	My name is Marisa Perales. So three minutes to address the Draft EIS. I think I will focus my comments this evening on the public participation process. Because ultimately that is one of the goals of NEPA and the NEPA process. So to begin with, as we heard others encourage you to do, I too would encourage you to hold at least one more public meeting and this public meeting should be in Port Aransas. But I also want to encourage you to consider holding additional public meetings and to do so in a different way than you are doing here tonight.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
N/A	2	Perales	Marisa	[redacted]	6/22/22	PMC	PC	PUBMEET / OUT	I would encourage you to hold public meetings in more vulnerable communities because we know that those vulnerable communities are already overburdened by polluting industries. Polluting industries that have been permitted or authorized to impact those communities by governmental entities. These very communities are going to be the ones that are most impacted by climate change. That climate change is going to be exacerbated by the decisions that are governmental entities make. These communities can help you understand the true costs of the decisions that you make when you undertake your cost analysis. I also encourage you to extend your comment period. If your purpose, as you mentioned earlier tonight, is truly to make an informed decision, then by providing an extended comment period by providing more robust public participation opportunities, this can only help you in achieving that objective. Because what has been made apparent tonight is that the local residence, the impacted community are the true experts here. You have acknowledged that the Draft EIS is lengthy, dense and technical. So allow the community to have the time, sufficient time that is necessary to truly digest this information and to provide you with informed comments.
N/A	3	Perales	Marisa		6/22/22	PMC	PC	PUBMEET / OUT	Again, I encourage you to consider alternative ways of engaging the community of public participation processes including consider remote public participation in today's time of COVID, a lot of folks, especially those who are immunocompromised would benefit from having a remote option. I encourage you to put out more materials and have interpreters here to encourage Spanish speaking residence to provide comments. I encourage you to provide a more inviting atmosphere so that parents of small children will have a place to entertain their children while they listen to the various information that is being provided. Consider, I appreciate the drinks you have here, but consider having some food for children as well, some snacks. Once again ultimately, I encourage you to engage in more public participation, more alternative ways in engaging the public and extending the public comment period. This would not only benefit the impacted community but benefit you as well. Thank you.
N/A	1	Taylor	Lamont C.		6/22/22	PMC	PC	NOTSUP	Good afternoon. My name is Lamont C. Taylor. A picture tells a thousand words. In this picture that you have here about the project features told me a lot. I did not even attempt to crack in 2, 3 and 4 of the EIS. However, I will provide additional input. What I would like to point out what is glaring to me is that someone said this is a project to nowhere. It's a project to somewhere. But you are not telling the people what else is tacked onto this particular project. Because I do not believe as an urban planner as an EUO officer, as a compliance officer that this is all that it is to this particular project because you are dredging 80 feet and then you just stopping at a terminal point. Something is happening upstream that you are not implying in this particular project.
N/A	2	Taylor	Lamont C.		6/22/22	PMC	PC	PUBMEET / OUT	So, what I guess am impressed that you are having the comment period. However, I would like to see another public hearing in Port Aransas. I would like to see something to the Spanish speaking population of this particular city. I would like to see also that you be concerned about what is really happening here and tell the people what is really going on in this project because this just -- then the other aspect of this picture. You are putting in these green spaces over here.
N/A	3	Taylor	Lamont C.		6/22/22	PMC	PC	DREDMAT	You are going to put dredge material on a beach where people, tourists are coming in makes no sense. You are putting green area here. You are going to put the dredge material along the Gulf facing projects. So that's going to be Mustang Island. You are going to put the dredge material there and you have not told the people what is the sampling of the dredge material. But you are going to put it out there any way. There is a lot of questions that I have just by looking at the picture. So when I do start reading this particular project, I would definitely put in more public comment in the written section. I thank you very much for your time and God bless you.
N/A	3	Taylor	Lamont C.		6/22/22	PMC	PC	DREDMAT	You are going to put dredge material on a beach where people, tourists are coming in makes no sense. You are putting green area here. You are going to put the dredge material along the Gulf facing projects. So that's going to be Mustang Island. You are going to put the dredge material there and you have not told the people what is the sampling of the dredge material. But you are going to put it out there any way. There is a lot of questions that I have just by looking at the picture. So when I do start reading this particular project, I would definitely put in more public comment in the written section. I thank you very much for your time and God bless you.
N/A	1	Kershaw	Michael		6/22/22	PMC	PC	SUPPORT	Good evening. My name is Captain Michael Kershaw. I will direct my comments towards the navigational aspects of this project. All maritime projects are challenges which is why there are experts whose task is to help solve problems. In our case and locally, it is the Aransas County Corpus Christi Pilots who during the past year have done immense number of simulations that required new technologies, new trainings to ensure the safe navigation of the vessel using the proposed terminal. In my experience, which began here in 1963, I have watched the developmental of skills and equipment and tools and the planning that go into the development of terminals that are complex and futuristic as these are. It is my satisfaction of having viewed the simulation for this project that this project can be done safely navigationally speaking in all respects. Thank you.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
N/A	1	Boone	Charles	[redacted]	6/22/22	PMC	PC	DIRIMP	My name is Charles Boone. I live in Ingleside on the Bay. Ingleside on the Bay is one of the coastal communities that are directly impacted by the project. You have already heard several people talking to you about the direct impact that it will have. The benefit of the project, obviously, is going to the oil and gas industry and to the Port Authority of Corpus Christi. The money is going there. The actual impact as I can see every day, I can sit at my house on Ingleside on the Bay and I look out into the La Quinta channel and if I move a little bit down the road, I can look into the Corpus Christi channel as well. The seagrass that we have had there is covered with just a current amount of traffic through there is covered with silt and it's brown and it used to be green. As other people have said too, this is not really a project that goes nowhere. It goes directly to the oil and gas industry. The cumulative project you can't build this and bring oil here and expect nothing else to happen. I would like to point out that doing this puts new crude oil facilities putting these in Harbor Island will induce development in the floodplains. There is going to be additional industrial facilities. Those are located in the flood plan. As far as I understand, the EIS does not address the requirements in executive order in 119(a)(a) related to analysis to be done on impact on the flood plain.
N/A	2	Boone	Charles		6/22/22	PMC	PC	NOTAPP	Also, the mayor of Ingleside on the Bay has already issued some sort of warning to the citizens there about the problem with displacement. Currently, the displacement of water in our area is large. People trying to fish there, kayak there use the water there are -- can be put in some kind of danger if they don't understand what is going on.
N/A	3	Boone	Charles		6/22/22	PMC	PC	NOTSUP	The amount of boat traffic or ship traffic that I have seen has gone up four or five times in the last -- I lived there seven years in the last couple of years. I am opposed to the project. The people who are here speaking in general are opposed to the project. They can't really match the money that you are going to get out of big oil or that big oil is putting in here. But that does not mean that they are not the ones that are directly going to have to live with the amount of traffic, the damage to the fisheries, the impact on the coastal oaks that are taken out and the communities themselves. Thank you.
N/A	1	Canales	Eduardo		6/22/22	PMC	PC	NOTSUP	Eduardo Canales. Member for the greater good and for the greater good. I oppose this dredging, this proposal. This proposal is a major project along with the other project's desal plants that only cater to the corporate interest that will span oil and gas and chemical heavy industry build out. It will continue to degrade our Coastal Bend. The absurdity of it all, justification of studies which are smoke and mirrors, dog and pony shows, voodoo signs and any environmental impacts study never, never takes a total picture, is never cumulative to the entire picture of this community. It's never a total assessment and never a total analysis of what impact it really will have in our environment.
N/A	2	Canales	Eduardo		6/22/22	PMC	PC	DIRIMP	The other point I want to make, there is no accountability to the community. Time and time again, people, the community shows up to oppose these projects, overwhelmingly oppose these projects that will continue to destroy our bays, destroy our water, our air, our lands and harm our health. Examples: Permits, hearings that you go through proforma, perfunctory sessions like this and never, never take into account the majority of the community that is opposing this. Public officials like the City Council and the Port of Corpus Christi commissioners are unelected. It's an unbalanced entity. It does not represent all the interest in this community and this Coastal Bend. It just -- these are proposed because it is their rubber stamp by public entities that serve the corporate interest only. Example Texas Environmental Quality -- Texas Commission on the Environmental Quality. Port of Corpus Christi, we are asking you to seize, to reverse, to pause the expansion of continued fossil fuel industry in our community. Join us. Seek an agreed economy and act now for the greater good. Thank you.
N/A	1	Cabellero	Rachel		6/22/22	PMC	PC	NOTSUP	Just to clarify too, I am not one of the nice guys. But I would like for everybody here who is opposed to raise your hands to make a visual concept for these guys. We are not for this. Okay. And as far as Barbara Canales is concerned, she does not represent the majority of her constituency. She represents the budget in her home. I would like to applaud Sean Strawbridge for remaining in this meeting to hear what the public has to say. I am emotional. I'm sorry. And also for warning me that I could get kicked out because of how vocal I am. So we don't agree with young oil gas guy. We don't agree with John and we don't agree with Barbara, just for the record.
N/A	2	Cabellero	Rachel		6/22/22	PMC	PC	DIRIMP	I also would like to clarify and let the people know that the Corps of Engineers is being paid by the Port of Corpus Christi Authority. Conflict of interest much? Little bit. If they are paying you, you are not going to represent us. You are going to listen to the people that are paying your salary so you can pay your light bill, right. To have it here, in the Port of Corpus Christi Center is a conflict of interest because people do not feel comfortable coming into the enemy land to fight for their rights. Why did you guys not provide any of the supporting studies that are not conclusive? Why are we not seeing those? As residents of this town, we don't want to see or hear that you have no concluded studies. We want them done before the trigger is pulled on this. We don't want like maybes, what ifs and ors. Okay. I also would like a study to be done on the human impact of this. You guys are spending all this money on engineering. Let's have a human impact portion of this. If you are the Corps of Engineers, you guys know everything, let's add the human aspect into this, yeah.
N/A	3	Cabellero	Rachel		6/22/22	PMC	PC	NOTSUP	The next thing is I don't understand how it is not clear to Corps of Engineers that more volume causes more surges which causes more environmental impact. You don't have to be an engineer or part of the Port to understand this. This is common sense. The people behind all of this, all these studies, we live here. This is our city. This is our water. This is our land. And this is our community. Enough with these schematics, the logistics and all of that good stuff. We don't care about the global perspective. We don't care about the national perspective. We care about our water. We care about our land and we care about our community and our neighbors. So let's absorb that gentlemen. Yes.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
N/A	1	Krueger	Jo	[redacted]	6/22/22	PMC	PC	PUBMEET / OUT	Jo Krueger. I am from Port Aransas. I would like to request another meeting in Port Aransas. Because according to the map, that's who is being affected is Port Aransas.
N/A	2	Krueger	Jo		6/22/22	PMC	PC	DIRIMP	So Texas Parks and Wildlife, they did studies and there are five zones to leave alone. This is one of them. There is a lot of reasons why. The fisheries, beaches, the larvae. But another thing is also, I sit every day, I managed a marina right across from Harbor Island for 20 years. I watched these VLCCs go in and out. I watch when they come in. I watch a foot of water go out and I watch it swirl back in. That happens all day long and you can't tell me that the sediment is not coming in and out of the Harbor. The VLCCs, they come around the corner and there is Harbor Island. So what are they going to do? Just stop right there? You got the Lydia Ann Channel. You got the Aransas channel. It all comes together there. It's three channels coming together. There is hundreds of boats in and out all day long.
N/A	3	Krueger	Jo		6/22/22	PMC	PC	FERRY	You have the Ferry landing right there. They are going to be right on top of the Ferry landing. What are they going to do with the Ferry landing. We have 5- to 6 million people come to Port Aransas every year. Our beaches are packed. Why do we have to destroy every inch of the Texas coast? We have plenty of oil gas. I am not against oil and gas. I was born and raised in South Texas. I am not against oil and gas. But there is a right places to put it and this is not the right place to put it. This is the one zone to leave alone. We have the VLCCs. They are going in and out. Nobody is stopping them and they moved the Port of Corpus Christi where it's at because of hurricanes. Harbor Island is a barrier island. So is Port Aransas. You can't -- they took everything off of Harbor Island because of hurricanes. I will tell you, Harvey came right across there. It's just not the right place to put it. So I wish we don't have to destroy every inch of the coast and leave this zone alone. Thank you.
N/A	1	Gulley	Brian		6/22/22	PMC	PC	NONE	Brian Gulley. G-u-l-l-e-y. I lived here all my life. I spent about 20 years living in Port Aransas. Now I live on Packery Channel. Born and raised here, trained as a marine biologist. Changed my mind and became a surgeon and now I am serving my second term as a voluntary Port commission. We are not elected. We are appointed by combination of 22 different elected politicians. We are not picked probably because we are not politicians. We are volunteers. I have been involved in this project and one thing I can say is the Corps of Engineers are a pretty tough group of guys to get any kind of projects through without vetting those things very seriously. We spent several million dollars, started before I was even on the Board, on this project, with the modeling and studies and the stuff. I encourage everyone to read the complete study before they make any comments on what is missioning in the study because there is a lot of that information in there.
N/A	2	Gulley	Brian		6/22/22	PMC	PC	NONE	Sticking strictly to the science, I studied there at the UTMSI. I did graduate work in estuarian ecology and oceanography, population biology. I have a little bit of understanding on this and I approach this with my eyes wide open. I am proud of the Port because we spent about 22 million -- 22 percent of all of the operating budget on environmental-type studies like this, environmental projects. So I think we -- being on the inside, I see a different side of the Port than I think most of the people here see. There is a great deal of mistrust and that's unfortunate. I hope some day we can fix that. In the meantime, we have to understand that we are going to be stuck with fossil fuels for a few more decades. We are very proud of our projects that we have coming down the line with hydrogen and carbon-free projects. We worked very, very hard on those things. I am very proud of those things but they are going to take a long, long time. We are going to have to work together with combination of fossil fuels, some solar, some wind, some hydrogen and some ammonia. I've heard all kinds of scatter shots about this. But I think we need to get back to really what it is. This is a great big 'ol giant ditch that allows us to bring ships that are already coming here and allow us to clean up the air and do it a little bit cleaner and dock them no further than Harbor Island, same way we have been doing for decades and decades and decades there and avoid that reverse lightering and avoid the fact that we cannot capture that gas at sea. It can be be captured at Harbor Island and not get in the atmosphere. So it's a very good environmental project. No saline. No salt water. There is no health concerns. We need to get away from all of that and look at what the project is. It's not that difficult.
N/A	1	Farley	Barney		6/22/22	PMC	PC	CUMUL	Long time resident of Port Aransas. I have a statement. I wish I had some notes. I also have a question. What am I doing here today? Is this another thing where we are going to talk about all the environmental issues because really that's the biggest part of this thing is the environmental thing. And so am I going to be a winey, tree-hugging complainer, no. I am here today, they are fixing -- we are putting -- Port Aransas has been there a long time. It has survived three attempts to make a VLCC port out of it. Is has survived all the oil that went through there, all the ships, all that volume. We survived that. We did not get clobbered by oil spills and we have not had the ships at our tanks for a long time. It's still a nice place. We have challenges from -- we have challenges from industry. If you go to Aransas Pass, Ingleside, Rockport, Portland, I don't even like to drive thru Portland because it is such a mess. There is, it's happening right now. These are just the things that we know about; about the desal plants, about the plastics plants, about the natural gas. You get your natural gas shipped overseas and you also get your plastic made out of it in China, our good friend. Okay. So where does it stop? Can anybody say what the end is? Well, like I said, this is just the stuff we know about? So what is coming down the line. Now they want to put a -- stomp a mud hole in Harbor Island which definitely is -- that's ground zero. For one, all them fishies and larvaes, shrimp things, they all have to go through there. That does not seem to matter because we have to get that oil shipped overseas so they can ship some oil to us and it does not make sense. Yeah, it's a bad place to be. Well, okay, so we were talking about cumulative effects. What about that desal plant that might go through on Harbor Island? What about that? We just heard about that. So then we are going to have all that brine coming out. We got desal plants everywhere to feed those factories. That's the one reason they are building built. Now you want your terminal over there. I am mad about It.

Port of Corpus Christi Authority Channel Deepening Project Draft EIS Comment/Response Matrix
December 2022

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
N/A	1	Zamora	Melissa	[redacted]	6/22/22	PMC	PC	NOTSUP	Hello. My name is Melissa Zamora. So this project is not in the public's best interest. Prevention before mitigation. Think about that. Prevention before mitigation. We can prevent all of these horrible things that are being said if we just say when is enough enough? Marine life is important. People's lives are important. People and workers' lives is concerning as we should not forget the propone pipeline explosion that occurred by the ship channel back in 2020. That was caused by negligent dredging activities and cost four people their lives and many others injuries as a result.
N/A	2	Zamora	Melissa		6/22/22	PMC	PC	NOTSUP	The best alternative is no action. There is tons of cumulative impacts that you have already heard. Coming from a younger person who is studying environmental science, is studying to be a science teacher because I am trying to teach the younger generations that they do have a say, that there is still hope, that we can change things. I have been born and raised here my whole life. I am a South Texan and I don't agree with the way things are going. I am not okay with oil and gas being so expansive to harm the communities that they are in, to harm the global community. Only in certain few, the people who are over here bullshitting about how great this is are the ones making the money from it. People like me, we are coming out here, we are spending time away from our families. We are being up here as voices for people who can't come here in person because of COVID or because other issues that they could not make it because of work. I am spending time away from my son who is why I am standing here today. I hope that he has a future and that his children do in a world that is not burning up, facing significant droughts like we are already in, exacerbated by greenhouse gas emissions where oil and gas plays a significant role but is not the only contributor. When we talk about carbon capture and all of those things, we need to think about prevention before mitigation and leaving the wetlands where they are to help as natural carbon as they are, to help with the old growth seagrass conservation and not just blow out all of the old growth that has been thriving and adapting to what we have already done and try to throw some new seedlings in and maybe they will make it, maybe they won't. We just need to really think about the impacts in the greater sense. Remember that we are a native land on stolen land and where is the indigenous people's perspective. Where is consent. We do not agree as part of a member for indigenous people of the Coastal Bend and for the greater good. We do not approve of this project.
N/A	1	King	Tammy		6/22/22	PMC	PC	NOTSUP	My name is Tammy King. We have a home on the ship channel in Port Aransas and have been part of a fight against the Corps of Engineers and-or the Port of Corpus Christi for the past seven years, probably helped raise and spent money on lawyers of over $7 million of private money to fight the over industrialization of our region. I have talked to many people, both political parties, and the most -- the biggest impact was made when I spoke to a CEO and a CFO of a major oil facility in Ingleside. There is Valero. There is Moda. There is South Texas Gateway, Flint Hills Resources. There is -- I can't think of the rest of the them in the inner harbor. They have been waiting with private money for their investments to come true for a 54-foot dredge. It may be coming in. Their tariff money is not being used to be pay for the dredging. We are asking the tax dollars, the federal government for $650,000,000 to do the 54-foot dredge. Now we want to go ahead and do an 80-foot dredge because, yes, it will be 80, not 75 foot at Harbor Island which will benefit just the Port of Corpus Christi which will be a direct competition with the stakeholders who are using private equity to fund their own deals, to give the Port of Corpus Christi 80 foot dredge is taking away from all the industries stakeholders. That same CEO and CFO told us that they have to go through rigorous permitting and if a private company tried to do this on Harbor Island, it would not happen. But because the Port of Corpus Christi has a way with the Corps of Engineers somehow, some way, this might get passed because they are doing it. They have more money to do it than the private of us who can fight it privately.
N/A	2	King	Tammy		6/22/22	PMC	PC	NONE	The book Texas Bays is a Jim Blackburn book that talks about how the bays and estuaries have been saved. He wrote this many years ago. The fight about deep port in the 70s was won because the Port realized that it was not going to do it. Basically, i just gives us, the next generation, a call to action. It was denied then. It was deactivated then. It should not be at Harbor Island. We fought it. We won it all these years. It should not happen now just because the Port has more money to do this, to out finance their stakeholders. Thank you.
N/A	1	Alex	Armon		6/22/22	PMC	PC	DIRIMP	Hi, my name is Armon Alex. I will be pretty clear here and speak from the heart. I am a scientist by mind and passion, not by profit. And shame for any of the scientists that were here in attendance or saying that there was nothing wrong with the science. Shame on you. Your degree needs to be taken away if that is what you are claiming here today. Obviously, when you were in that room, there are very specific scientific points that were pointed out on how the ecology of that specific area will be impacted and for you to stand up here and say that this is not true, get a grip. I think that the rest of the parties and in play here need to get a grip.
N/A	2	Alex	Armon		6/22/22	PMC	PC	NONE	I have been here my entire life, born and raised. I have fond memories of my father and I going along the Corpus Christi beach area picking up seashells. When I was little, we would spend some time counting the ships that would come in within about five to ten minutes. Since then, 22 years later, the amount of ships that comes in within five minutes is ridiculous and that's because of heavy industry in our area, specifically.

Letter ID	Comment ID	Commenter		Commenter Contact Information	Date Received	Mode of Comment	Entity	Type of General Comment/ Response	Comment (may be paraphrased or summarized)
		Last Name	First Name						
N/A	3	Alex	Armon	[redacted]	6/22/22	PMC	PC	CUMUL	But let's get back to this specific project in terms of the dredging. As a scientist, I can tell you that what's going on in the area and the impacts, we have these individual little things going on in terms of salinity, whether we look at the ecology of benthic animals or whether we look at the water quality. They are all separate and you are saying they are temporary situations. But when you put all those together, the long term, the long term output of that is bad. This area depends on ecotourism, especially in the specific area of the Harbor Island Port A. I lived here for 22 years. We see the tourism in this area. Nobody wants to go to a beach where we've got sludge washing up, where you've got dirty water. What do you think that is going to do to the area? How much longer is the industry in this area going to take over where it's not even viable to live here any more. News flash! It's not viable to live here anymore when people are dying of asthma, people are being irritated in terms of eye and skin irritation. That stuff is real and tangible. I am asking you as a resident of this area is to look at the bigger picture here. When you approve this permit, if you do that, you are allowing space for this continuation of the industrial build out to be bigger than what it already is. We are already experiencing the problems. If you allow this to happen, it's only going to get worse. Worse is even more detrimental than what is going on right now. So get a grip. News flash. We are suffering right now and by letting this happen even further we are going to suffer more. Thank you.

Appendix F

Public Meeting Transcript

Transcript of the Testimony of

Public Meeting

Date:

June 22, 2022

Case:

Port of Corpus Christi Authority Channel Expansion EIS

PUBLIC MEETING

PORT OF CORPUS CHRISTI AUTHORITY

CHANNEL EXPANSION EIS

June 22, 2022

5:30 p.m.

Ortiz Center

402 Harbor Drive
Corpus Christi, TX 78401

APPEARANCES:

US ARMY CORPS OF ENGINEERS
Mr. Bob Heiley, Acting Chief of Regulatory Division USACE
Jayson Hudson, Project Manager USACE

PORT OF CORPUS CHRISTI AUTHORITY
Mr. Sean Strawbridge, CEO
Mr. Sean Horejs
Mr. Brian Gulley, Port Commissioner

Freese & Nichols, Engineering Team

MR. HEINLY: Good evening everybody. My name is Bob Heinly. I am the Acting Chief of the Regulatory Division for the US Army Corps of Engineers Galveston District Regulatory Division.

Today we are conducting a public meeting associated with the Draft Environmental Impact Statement or DEIS published by the Corps on June 10 of this year, 2022 for the Department of Army permit SWG-201600067 for the Port of Corpus Christi Authority's Channel Deepening Project.

On behalf of the project team, thank you for your time and interests in the Port of Corpus Christi Channel Deepening Project Environmental Impact Statement or EIS.

The National Environmental Policy Act, or NEPA, requires all federal agencies undertaken an action that might significantly impact the quality of the human environment to evaluate potential impacts of the proposed project and document with the best available information these potential impacts in an EIS. While the Environmental Impact Statement is a separate process from the permit public interest review process, they are both integral in making my decision whether or not to issue or deny a permit. A Public Notice for the Permit Application was published in August of 2019. A Notice

of Intent to prepare an EIS was published in Federal register in May of 2020 and a Public Scoping meeting was held in June of the same year 2020.

We appreciate the public's role in the permitting process and value your attendance here today to try to consider this application for the Port's Channel Deepening Project. It's important to know that the Corp is neither a proponent or an opponent of this project. Ultimately, we are the decision maker who has to decide the proposed project is or is not contrary to the publish's best interest. As such, we are trying to gather as much information as possible in a timely manner to allow us to make an informed decision.

The purpose of this meeting is to provide you with an opportunity to present information, you views, and recommendations concerning the findings of the Draft EIS. I would like to emphasize that this meeting is not a voting contest, simply determine the number of people for or against the project.

The decision to issue or deny permit will be based on evaluation of the probable impacts, including cumulative impacts, of the proposed activity on the human environment. Consideration will be given to the protection as well as the utilization of important resources in the system. The benefits which

Reasonably may be expected to accrue if the project is authorized will be balanced against the foreseeable detriments which may result from the work. Before we proceed with our agenda, I would like the acknowledge project team members that are in attendance today. From the US Army Corps of Engineers we are joined by Jayson Hudson project manager. From the Port of Corpus Christi Authority we are joined by Port Commissioner Dr. Brian Gulley; Sean Strawbridge, Chief Executive Officer; Jeff Pollack, Chief Strategy and Sustainability Officer, Omar Garcia, Chief External Affairs Officer; Ken Britton -- Kent Britton, Chief Financial Officer; Sarah Garza, Director of Environmental Planning and Compliance; Beatriz Rivera, Manager of Sustainability and Resilience; Rob Schulz, Manager of Environmental Compliance; Harrison McNeil, Supervisor of Environmental Permitting; Yvonne Dives-Gomez, Environmental Permitting Specialist; McKenzie Ward, Environmental Compliance Specialist; Robert Lindsay, Environmental Compliance Specialist. Belize Ellison, Sustainability Specialist and Miranda De La Garza, Contract Sustainability Specialist.

We are also joined by several members of the Corps' EIS contractor team from Freese and Nichols, Incorporated. If you did not sign up to speak when you

arrived at the registration table today, you may do so at any time during this meeting by visiting the speaker registration table over here. So Greg, just waive his hand around so everybody knows where you need to sign up to speak if you haven't already and would like to speak.

You may also provide verbal comments at any time by visiting the court reported located in the Jim Wells room down the hall. So if you need to speak to someone not in this public environment, we can go down the hall and we have a court reporter there to take your comment.

If you wish to provide comments in writing, you may submit written comments this evening by completing the comment form provided to you at registration. Comment collection baskets are located in each room of the meeting as well as registration table. You can also submit written comments through mail and email.

The mailing address information can be found on the fact sheet provided to you at registration as well as well as the Corps project website.

Speakers will be called on to provide comments in the order in which they signed up. We will announce upcoming speakers in groups of five so you are aware when you will be called to speak. Once your name

is called, you may move up to the reserve seating in the front row until you are called to speak.

We now begin with a presentation portion of the meeting with the Port of Corpus Christi Channel Deepening Project presentation made by Sean Horejs.

Sean, would you come on up.

MR. HOREJS: Thank you, Bob. I appreciate that. Good afternoon everyone. On behalf of the Board of Corpus Christi, we would like to thank you all for your time and attention and for your participation and engaging in tonight's meeting. Also a big thank you to the Army Corps of Engineers for hosting the meeting tonight.

This presentation will provide a brief overview of the Port of Corpus Christi Authority's Channel Deepening Project including Project Purpose and engineering and design considerations.

As the energy port of the Americas, the Port of Corpus Christi is also an independent political subdivision governed by seven commissioners. The Port develops property and leases it to support energy trade in the global market and utilizes public private partnerships to do this.

The Port of Corpus Christi Authority is requesting permit authorization from the US Army Corps

of Engineers to conduct dredge and fill activities to deepen a portion of the existing Corpus Christi Ship Channel as well as a 5.5-mile extension of the ship channel to the natural minus 80 bathymetric contour in the Gulf of Mexico.

The Project would deepen the channel from the western portion of Harbor Island into the Gulf of Mexico, an overall distance of approximately 13.8 miles.

The proposed project channel limits are shown here in yellow right there.

The Port of Corpus Christi's economic impact for the State of Texas is $40 billion. 6 billion of that is right here in the Corpus Christi area providing over 94,000 jobs in our region and generating $428 million of local and state taxes. This Project alone will generate 25 to 30-billion dollars of economic impact raising that total 65 to 70 billion for Texas.

The Port of Corpus Christi has implemented an environmental policy which was recently updated and adopted by the Port Commission on March 15, 2022. This policy serves to ensure growth in a responsible and sustainable manner and establishes specific environmental performance benchmarks. Every project or operation is evaluated against this policy to ensure these all six precepts that you see here. This

project is no exception.

The Port of Corpus Christi's proximity to Texas shale combined with currently forecasted Port infrastructure make the Port an attractive location for efficiently exporting crude oil by very large crude carriers always known as VLCC. Exports have quintupled since 2017 and projected to increase 50 percent by 2030.

The Project is needed to accommodate the transit of fully laden VLCCs that draft approximately 70 feet. The depending activities will be completed within the footprint of the authorized Corpus Christi Ship Channel with the proposed project does not include widening of the channel. However, some minor incidental widening of the channel slopes is expected to meet slide slope requirements and to maintain stability of the channel. This will also minimize environmental impacts.

Dredge material removed from the channel will be used to restore shorelines, create aquatic habitats and provide protection to eroding shorelines and seagrass habitats.

The Project will also reduce the number of lightering vessels traveling in and out of the Port, effectively lowering emissions and reducing operational risks of crude transfers that are currently occurring outside of the Port.

This is a depiction of the process currently utilized by large tankers to load crude oil and calling it the Port of Corpus Christi. It is the existing channel that requires crude carriers to depart partially loaded from the Port or that VLCCs remain offshore while smaller tankers transfer their cargo to the larger VLCCs from inshore, a process known as reverse lightering. The inefficiency of this process is compounded by some of these smaller vessels, Suez max vessels, for instance, that are being used and also not fully loaded while traversing the channel. As exports increase, and they are, the number of lightering vessels and carriers will also increase adding to shipping delays and congestion which will effect all industries. These delays and congestion will increase the costs of transportation which in turn will increase the cost of crude oil with the ultimate consequence of making US crude oil less competitive in the global market.

By deepening the channel, it will allow the VLLCs to travel in and out of the port fully loaded, ultimately allowing for more efficient movement of US produced crude oil and meeting current and forecasted demand in the support of National Energy Security and National Trade Objectives. This will also reduce the number of vessels trips costs, man hours, operational

risks and air emissions.

For perspective on this, 172 vessels were involved in lightering operations in 2020. Those vessels accounted for 295.9-tons of NOx emissions. 816.3 tons of VOCs and 16.3 tons of SOx. This Project will eliminate those emission totals in future years which is a huge win.

The dimensions of the design vessel play an important role in determining the depth of the proposed channel. The three largest classes of liquid bulk crude tankers were analyzed for the current world wide fleet as well as vessels on order to be constructed. So thinking into the future. The selected vessel design known as the VLCC represent 32 percent of the current number of crude vessels and 54 percent of dead weight tonnage. VLCCs also represent 45 percent of the current order but for crude carriers sort of mirroring the global trade situation whether it's container or tanker. It's larger ships, fewer trips.

The typical VLCC size has been extremely stable the past 25 years. Therefore, significant changes in size in the foreseeable future are not expected. You can see here the average dimensions of the 99 percentile vessel with draft base on west Texas intermediate crude oil density values. These values

were selected to determine the minimum channel dimensions for the proposed channel deepening. Presented here is a concise summary of the current authorized channel depths and widths compared to the proposed channel deepening project channel depths and widths.

As previously discussed, the deepen channel design was based on the 99 percentile the VLCC vessel characteristics. Those characteristics in conjunction with design factors such as currents, wind and wave effects, shift speed, navigational traffic patterns and ship maneuverability were used to determine the optimal channel depths and widths. The study on the optimal depth and width applied to design characteristics of PIANC, the World Association for Waterborne Transport infrastructure and US Army Corps of Engineers design guidelines for channels to calculate the channel depths and widths as shown in the table here.

PIANC is a global organization and has been providing guidance and technical advice for sustainable waterborne transportation infrastructure to ports, marinas and waterways since 1885. Both one-way and two-way vessel traffic designs were considered. One-way traffic was ultimately decided upon in order to

limit the required new work materials necessary to be removed in the channel deepening design for the project and for future channel maintenance.

Portions of the channel have been divided into segments, depending on the preferred design channel depths, widths and slopes as you can see here. Segments 1 and 2 will be excavated to minus 77 feet mean low low water. While segments three through six will be deepened the currently authorized depth of minus 54 feet MLLW to my minus 75 feet. Segment 1 referred to as the outer channel is the new entrance channel extension to the existing minus 80-foot bathymeter contour in the Gulf of Mexico. Segment 2 continues inbound, deepening the existing authorized minus 56-foot channel to the same proposed dimensions as the outer channel. Segments three through six are the inbound portions encompassing the Harbor Island transition flare, Harbor Island Junction and Inner Corpus Christi Channel.

A breakdown of anticipated new work dredging volumes by segment is displayed here. The design depths do not include the additional two feet of advanced maintenance dredging and two feet over dredge allowance. However, the total dredge volume by segment does include the advance maintenance and lower dredge allowance volumes. As shown in the last row, the total

estimated dredge volume from the channeling deepening project is just under 42 million cubic yards. The Dredge Material Management Plan or DMMP for the Project proposes a series of existing upland placement areas and new and existing beneficial use sites to beneficially use the new work dredge materials as much as possible.

Agency and public input was used to develop the DMMP which included the using the existing placement areas, beneficial use sites and Ocean Dredge Material Disposal Sites or ODMDS. Whether feasible environmental impacts to existing oyster habitats, seagrass, wetlands and other ecosystems were avoided. The material will be used to expand upland placement areas and beneficial use sites as well as address shoreline repair needs within Redfish Bay, Corpus Christi Bay and the Gulf of Mexico in the vicinity of the channel. $13.million cubic yards of dredge material are planned to be placed in the new work ODMDS located approximately 3.4 miles offshore. The materials mostly comprised of non-structural clays which are not beneficial to construction or berms or dikes.

Modeling using US Army Corps of Engineers MP fake modeling confirms that there is enough capacity within the ODMDS for disposal of the entire 13.8 million cubic yards without exceeding the limiting

mounting height of 11 feet within the ODMDS.

The planning effort focused on existing placement areas and beneficial use sites as new upland placement area opportunities are limited and as mentioned, the initial beneficial use concepts were generated by considering existing agency restoration plans such as TGLO Texas Coastal Resiliency Master Plan, storm damage cause by Hurricane Harvey and beneficial use features implemented elsewhere on the Gulf Coast.

Input was also gathered from federal, state and local resource agencies and used to help shape the direction of the DMMP. Nine initiatives were ultimately decided upon. Eight of which were beneficial use features aimed to achieve a variety of shoreline restoration, land loss restorations, marsh cell expansion and Gulf site shoreline initiatives.

The figures shown here summarizes the placement areas included in the DMMP. Green areas create and restore estuarian aquatic marsh habitats and provide beach and dune renourishment on the gulf side. Yellow areas expand and repair existing placement areas. Restore eroded shorelines or provide protection to seaseagrass areas. The feeder berms shown in the blue offshore San Jose Island and Mustang Island will nourish beach shorelines throughout the natural sediment

transport process.

That's a lot of information to chew on but all of this information is available in the breakout room with posters as well after if you have any questions. Thank you very much.

MR. HEINLY: Thank you, Sean. As a reminder, if you have not registered to speak during the meeting today and would like to do so, sign up at this table over here.

Now we will provide information about the US Army Corps of Engineers EIS process and overview of the Draft EIS from Jayson Hudson.

MR. HUDSON: Thank you, Bob. I would like to start with the environmental statutes initiated regulatory program.

The Natural Environmental Policy Act is basically what is compelling the Environmental Impact Statement is an umbrella act in such that other statutes that are evaluated are done under the Environmental Impact Statement. For the example, the Corps of Engineers Channel Deepening Project permit evaluation, the project is subject to numerous Corps statutes. First is Section 10 of the Rivers and Harbors Act. This regulates the dredging and other work that is being done in the water in the US. It's also subject to Section 14

of Rivers and Harbors Act. Many of you may be more familiar with that under the name of the 408 Program. That is a regulatory program. If you are going to modify a federal project, channel deepening project is located within the Federal Navigation Channel therefore, subject to 408. Also subject to Section 44 of the Clean Water Act. Specifically is the dredge material that is being placed in the beneficial use.

Finally it is subject to Section 103 of the Marine Protection Research and Sanctuaries Act. This is for the placement of the dredge material offshore and ocean dredge material disposal site. So four statutes of the Corps of Engineers. On the other side of the umbrella we have other statutes that the Corps of Engineers must address. This includes Section 401 of the Clean Water Act that is administered through the Texas Commission Environmental Quality and as a water quality issue. We also have Endangered Species Act, National Marines Fisheries, Magnuson-Stevens Act. We also have a National Historic Preservation Act for cultural resources.

Finally, this project is subject to FAST 41. FAST is a fact -- Federal -- Fixing America's Surface Transportation. It is a program overseen by another federal agency called the Federal Permit

Improvement Steering Committee. Basically it is an Act that makes sure that the Corps of Engineers follows the timeframe in which it set out to do it's evaluation.

There are a lot of statutory authorities affecting this project. Because of that, I would like to talk about the EIS team. If you joined us in the public breakout room, you probably met most of these folks. There are multiple team members. Of course, the Corps of Engineers is the lead federal agency. We are joined by multiple cooperating agencies including the US Fish and Wildlife Service, National Marine and Fishery Service, Environmental Protection Agency and US Coast Guard. We have participating agencies for the other statutes such as Texas Parks and Wildlife, Texas Historical Commission, Texas General Land Office, and as I've already mentioned, Texas Commission on Environmental Quality.

The applicant is considered a member of the team as they are providing the initial information that our announcer starts with. Because it is an EIS contract, the Corps of Engineers issues a third-party contractor. You may have met them, Freese and Nichols.

I would like to talk a little bit about how we got to where we are today. It is highlighted in bold. It is the public meeting for the Draft

Environmental Impact Statement. There is a 45-day comment period. Prior to that, we held scoping meetings as Bob mentioned at the beginning about two years ago.

After this, we will take your comments and evaluate them. The next two major milestones are the final Environmental Impact Statement which is currently scheduled for February of 2023 and then the record of decision which is scheduled for May of 2023.

The final Environmental Impact Statement like the Draft Environmental Impact Statement will not have any permit decisions in it. That is in the record of decision which comes after the final EIS.

I would like to take take a look at this graph because the bullet list makes it look like we are at the end of the process. This graph flow chart, the highlighted circle in red is where we are today. It shows a little better where we are in the overall process. The flow chart goes across the stop, loops down. We are in the middle of this process. This is one of the most important stages of the EIS process in that you have the ability to review the studies that the Corps of Engineers has done with its cooperating agencies and participating agencies and comment and provide influence on the outcome in the final Environmental Impact Statement.

Let's talk about that scoping process. We did scoping back in 2020. Seems like a life time ago but we had a pretty good response. We had over 200 comments on the environmental concerns raised by this project. We had 90 comments on the public involvement. Keep in mind, this was May of 2020 and we were just entering into the COVID experience. So public involvement was a different experience. We had 87 comments regarding (inaudible) analysis.

For those of you who came by and spoke with me in the breakout room, I talked a lot about the alternatives we were evaluating. We had 82 comments addressing land and recreational use. We had 45 comments addressing the purpose and need of the project. I spoke with a few of you today about the purpose of the project again -- it's time. That's why it's doing that. There is a scoping report that is located on our website. If you have not seen it already, I do encourage you to go read through it. That was the beginning of the process for developing the Environmental Impact Statement.

Let's talk a little bit about the EIS content. As I spoken to a quite a few of you, it is a very large document with a very short time to read and comment and it is fairly technical. It is a complicated

project. So what I would like to do is talk about the different chapters and the appendices in the EIS.

The first chapter is the introduction to the project, a basic overview of what the Port of Corpus Christi is proposing. It includes their stated purpose and need and includes the Corps overall purpose statement. The overall purpose statement is used for our alternatives and analysis.

Chapter 2 is the proposed action in more detail and introduces the alternatives that were evaluated by the Corps.

Chapter 3 entitled the Effected Environment is a baseline chapter establishes quite a few environmental baselines not just ecological environmental. Remember NEPA is the human environment so it is a much larger environmental and does include economics, recreation, land ownership. It's much larger than the ecological aspect.

Chapter 4 is the environmental consequences. This chapter begins the analysis of the project and the alternatives and their impact on that environment that is described in Chapter 3.

Chapter 5 is cumulative effects. It takes a look at the proposed project in addition to the all the past, present and reasonably foreseeable project

and compares their impacts. I generally advise folks to focus their attention especially if they are already familiar with the project on Chapters three through five. That is your impact analysis and provides you some of the best information and generally when you ask any question, I will point to.

Chapter 6 is mitigation. It is a board mitigation plan for the impacts that are described in Chapter 4. Remaining chapters are NEPA requirements. It covers issues like environmental impacts that cannot be avoided, resources that have been committed. These are requirements in NEPA that they not be -- research not be committed beyond returner. So we documented our review of those. But if you are looking for an impact analysis of the proposed project and the alternatives, Chapters three, four and five are the meat of the EIS.

Now it uses conclusions of studies and baseline information that we included in the appendices. The general rule of thumb for EIS is that if it is not readily available to you, I have to provide it to you in the appendices. We have done that to the best of our abilities.

(Speaker talking too fast) Appendix A the original Permit application the Port of Corpus Christi submitted so you can see exactly what the Corps started

their evaluation process with.

Appendix B is the public and agency coordination process that is happened to date. Obviously, today's meeting was not included in the Draft EIS that was published two weeks ago. It leads up to this point.

Appendix C is Dredge Materials Management Plan the beneficial use plan in the use of ODMDS if you have been looking at the exhibits for the -- including the one that was just in the Port's presentation that is what we management plan. It includes Appendix D our Biological Assessment for Endangered Species Act. We are in currently in consultation with both the US Fish and Wildlife Service and the National Fishery service. That's why they are cooperating agencies on this.

Appendix E is our Essential Fish Habitat Assessment. We are currently in consultation with another Department of National Marine Fisheries for managed fisheries. This is our habitat assessment.

Appendix F is a cultural resources baseline summary. At this stage we have not completed all of the cultural resource surveys. So here we provide state of the knowledge that we have and we move into the Draft Environmental Impact Statement. At this time, we have not found any impacts. Like I said, we

have not concluded our study.

Appendix G is a sediment transport model. Some of you were taking a look at the model videos and talking with some of our EIS contractors on the sediment transport. There is the model report is included in the appendices. So is the vessel wake analysis. Some of you are enjoying the videos. Hydrodynamic and salinity model reports in there. We have analyzed a 125-square mile study area for salinity and other factors that can change.

Appendix J is the sampling and analysis claim for the use of the offshore dredge material. We have not completed our analysis of the dredge material. That will be completed by the final Environmental Impact Statement. So we have provided you with our Sampling and Analysis Plan. In it, you will find a study of the history of testing in this area. That will give you a pretty good indication of what the results are likely going to be. Like I said, we have not completed that study yet.

Appendix K is our Ship Simulation Report. We also have some videos of ship simulation runs, graphically demonstrate what was evaluated in these reports.

Appendix L. We have propeller scour

studies. Some of you were very concerned about erosion from the vessels coming through specifically on your property. The scour report analyzes that. One of the other issues that we looked at is an under keel study that has been described to you several times, the very large crude carriers draft a very large amount and one of the things the Corps of Engineers wanted to make sure was that the channel was deep enough that the vessels could transit out without bouncing on the bottom of the sides. Our study found that they did not.

We also have Appendix M, Clean Water Section 404B1. I tell you at this it's an initial analysis, not complete analysis. A complete analysis is a decision as I mentioned before, we don't make decisions until a record decision. At this point we are informing you of the impacts. So listening to your comments.

Appendix O is the Coastal (inaudible) Determination. One of the statutes that I kind of glossed over earlier requires to be consistent with that act. This is our analysis of that.

And then finally, final appendices is our distribution list. It demonstrates who we have sent information to and when. So I hope that helps a little bit with narrowing down on where you need to focus based

on your issues. Like I said, the main body of the Draft EIS, I find the most information is Chapters 3, 4, and 5. If there is a conclusion on an analysis and it's not a readily available study, it's in the appendices. You can go look at how we conducted those studies and how we came to the decisions we made when we made. One of the most important parts of NEPA analysis core evaluation is the analysis of alternatives. I spoke with quite of few of you about that. There are four alternatives that we have evaluated. There is the no action alternative that is a permit denial. That means the Port of Corpus Christi does not get the permit to do the channel deepening. So we evaluate the impact of that. There is also the alternative one that is the Port of Corpus Christi proposed Channel Deepening Project. Based on scoping with the state and federal agencies, the Corps will two additional alternatives that were carried through our analysis.

Alternative 2 is called the offshore alternative. This is an array of single moorings that would eliminate the need for vessels to come inshore to load. Then we have Alternative 3 which is combined inshore offshore alternative where there is a single point offshore that will top off a VLCC basically requiring VLCC to go inshore fill and then go offshore

to load eliminating the lightering. All that does is eliminate the lightering. This allows you to compare the impacts of these proposed projects, these four alternatives to each other. It is one of the more important parts of this process.

All right. So next steps. The comment period for the Draft EIS will close July 25th, 2022. You can make comments today. You can leave written comments. You can make verbal comments here in the open room or you can make them in the more private room. But we are taking written comments through either email or the address in every piece of material we passed out today. If you do not have it, please see me.

After the comment period closes, we will analyze the comments. We will conduct further studies as necessary and then we will approve the final EIS.

The final Environmental Impact Statement is scheduled for February of 2023. This is not the final decision. The Corps will not make a decision to issue condition or deny in the EIS. We will do that in our Record of Decision. The Record of Decision is scheduled for May of 2023, so about two months after the final Environmental Impact is issued.

Under NEPA we generally do not have a second public comment period or another public meeting

in the final Environmental Impact Statement but there is a requirement that federal agency pause which is whey there are 60 days or 90 days between these two called a cooling off period and you can submit comments to the final EIS at that stage. So if you want to scribble that down real quick, that is the mailing address that you can send me your written comments and that is the project email address that you can send your written comments. If you have questions or want help finding information in the Environmental Impact Statement, it's a big document, please feel free to email me. I check that project email every day and will respond if you have questions. If you have questions I can help you. So, thank you. Appreciate it.

MR. HEINLY: Thank you, Jayson. Appreciate it. All right. That concludes the presentation portion of today's public meeting. We will now begin with the commenting period.

Again, if you have not registered to speak, come over here, give us your name and we will get you on the list to speak. If you wish to provide comments in writing, you may submit written comments this evening by completing the comment form provided to you at registration or by submitting written comments through mail or email. Mailing address information

project email address can be found on the fact sheet that you just saw on the screen as well as on the Corps Project website.

Formal public commenting portion of today's hearing will be conducting in the following way. First, federal, state and local elected officials who wish to speak will be called on to do so. Then anyone else who has registered to speak will be given the same opportunity. I will call each member of the public who has signed up to speak by the name used during the meeting registration. Each speaker will be given three minutes to make their comments. Connor will notify you with time cards when you have 30 seconds remaining and when your time has ended. As your time ends, please be courteous to the other members of the public and quickly wrap up your comments to ensure that everyone who would like to speak has the opportunity to do so.

If you do not need the entire time allotted, help us to include everyone by using only the time that you need. If you complete your comments in less than three minutes, we will restart the clock for the next speaker. Remaining time cannot be reserved or transferred to another speaker. We ask that you support us in conducting a respectful, orderly and courteous meeting. We want to ensure that we get all of your

comments recorded and need your cooperation to do so. Here are a few of the ground rules for today. When it is your opportunity to speak, please state and spell your first and last name before proceeding with your comments so that our court reporter here can document that information accurately. We will not respond today to the comments submitted. However, all comments made today will be documented and reflected in the development of the EIS. Just a reminder, you may not defer your time to others. The public meeting will adjourn at 7:30 or 30 minutes after the last registered speaker has provided comments. If you have additional comments that you would like to submit beyond what you are able to address during your comment period, please submit them in writing.

Speakers we call on to provide comments in the order in which they have signed up, we will announce upcoming speakers in groups of five so you are aware of when you are called to speak. Once your name is called, you may move up front. We have open seats that you can make yourself available to speak.

Please again, we have a court reporter. She is documenting all the information. So when you speak, be clear with the information so she can get all of that into the record accurately. All comments

received during the formal commenting period through July 25th as Jayson noted, 2022 will carry the same weight as the comments submitted today and you do not have to submit a comment today and you will be heard just as quickly as those who spoke today.

So first up, I would like to invite the public officials that we have in attendance. First is Barbara Canales, the Nueces County Judge.

MS. CANALES: Barbara Canales, Nueces County Judge. Good afternoon to everybody. Primarily today my comments will focus on what I am about to embark on which is to read the Draft EIS. I appreciate the presentation that was given so that I can have a thorough analysis of what the Port's presentation is and also what the process will be for the EIS. My purpose in coming today is to assure my constituents not only do I intend to have data drive decisions but to promote the science should bring about the balancing act that is pretty pressing right now within the GO political circles. We all understand the global demand for energy. I am very familiar with the Port processes but I can tell you that since I left the Port, the Environmental team has been greatly enhanced. So I am prepared for both. I am prepared to read and to hear from my constituents, particularly my job is to protect

those particularly that are highly effected which would be those for my constituency in Port Aransas.

In addition, I also want to make reference to the fact that I think that there should be a real clear message that I am here on my own as the Nueces County Judge. I have not been sent by Nueces County Commissioners court nor have we taken any formal position nor do I expect there to be a formal position taken on it. However, I think the constituents can count me to be a repository for their concerns and their comments. If a permit were to be issued, my main focus would then be go right back to that Sediment Incident Management Plan that Nueces County already has with the Corps of Engineers to work on beneficial use, to make certain that shoreline protection particularly as it applies to some of the things you talked about, whether it is restoration seagrasses, living shorelines, erosion, beach nourishment. I will be deeply focused on that. So I am kind of prepared for both to make certain that my constituents understand that I am here to listen and to hopefully aid and guide in that very difficult balancing act between protecting this economy, making sure that these barrels do get to our western allies. But all the while, if the data and the science does not support the project that we are absolutely vocal about

that too.

So again, I thank you for the opportunity to learn here today. I will stay for a little bit in order to hear more. But as the Emergency Manager for this county, I think it is important that I consider any impact to the environment as a current emergency as is climate change as is so many other things. But I don't discount the GO political nature that a west Texas barrel of crude is still the best crude around.

So I am here to make certain that you know that I am resource and that you can count on me as a partner as this process continues. Thank you.

MR. HEINLY: Thank you very much. Next I would like to invite Tom Daley, Ingleside councilman. Mr. Daley.

MR. DALEY: Thank you. Thank you, guys for putting on the presentation. Tom D-A-L-E-Y. I just want to read a quick statement here, if I may, on storm surge.

There are several things about the storm surge in the EIS but the consequences not fully explored. There is no mention of their interactions as part of the cumulative impacts in Chapter 5. The 2022 EIS notes that channel deepening would allow more surge to propagate the channel, intensifying velocity and

increasing water level. This includes a direct cumulative increase in tidal range, particularly in the inner channel near Port Aransas where it could be as high as 36 percent. The inundation area will increase up to 492 acres but it does not say where. Modeling data shows that the speed of the current Port Aransas to Ingleside will increase as a result of channel deepening since the water depth in that stretch will remain unchanged but it does not say by how much. Researchers have found that channel deepening is the main contributor to storm surge effects even though Ingleside on the Bay residents made numerous comments on the original EIS scoping, Ingleside on the Bay is not treated as a separate city in the EIS. IOB will be affected by normal and seasonal tidees, let alone tropical storms and hurricanes which already cause 4-foot storm surge. Research which was brought up in scoping shows that hydrodynamic changes or channel deepening increase both intensity and extent of flooding and storm surge pushing the water further inland. Ingleside on the Bay experienced 4-foot storm surge during 2020 with every tropical storm in the Gulf, yet no where in the EIS are concerns about flood and storm surge impacts for communities like IOB or Gregory which could be catastrophic in the event of another major

hurricane.

Conclusion: Update research talk about others about channel deepening and storm surge needs to be included in the EIS. Ingleside on the Bay should be specifically included in the EIS with more focus on impacts of channel deepening, on flooding tides, storm surge and coastal communities. The Corps should deny. Thank you guys.

MR. HEINLY: Thank you. Then we will slide into the general public comments. The first five speakers that are invited to speak are Patrick Nye, Thomas, James King, Tammy King and Michael Amos. So first up, I would like to call Mr. Patrick Nye.

MR. NYE: Patrick Nye, N-Y-E. This is a colossal wrong to be done. Corps of Engineers has so many experience in doing many things. This is wrong. This is unprecedented. 80-foot deep channel? There is nothing like it in the Gulf Coast or even on the eastern seaboard. You all have no idea what your models are showing. Your models are showing nothing to do with relative sea level rise as it is today. I think they are older models. There is a Texas A&M study that shows 4- to 6 feet of erosion along the Gulf Coast. That's not included. We are not looking forward enough to what is happening. When you get a storm surge, the numbers

that you are putting in there don't even measure with relative sea level rise over time. What does that mean to the property owners where Brian Gulley lives, when they fill in the Packery Channel and all those people that bought those beautiful lots with all those channels, what is going to happen? Who is paying for this? Oh, I guess the Port is in real estate, perhaps they can ensure it for us. But that's not really my point. The other thing is Purpose 1, the forecast demand is wrong. In 2003, the forecast is for imports. Now they are not even on the books. They are exports. Okay. That's fine. If you want to make the national debt or international debt even, why don't we just export 10 percent and that way we can balance our debt. We don't need to have all these exports taking our oil away and given to somewhere else. This oil needs to stay in the United States. That's what we are paying international people to bring over here. That's not smart. It's inflationary. In fact, electric vehicle, just read today in Reuters, 33 percent of all global vehicles will be electric. So you are putting in a fossil fuel export terminal at the termination of the fossil life. This is it. We are running out. We also have climate change. I know the Corps believes in climate change. I know you believe in relative sea

level rise. This will only promote more of that worldwide. I also want to say that -- I guess I already talked about the volumes. So storm surge as Mr. Daley was talking about is critical for our Bay. I think your numbers are wrong. Ingleside of the Bay is at the confluence of La Quinta, the ship channel -- Corpus Christi Ship Channel, intercoastal canal. We are seeing already the Corps made a determination within bridges permit. They took out all this seagrass. There is probably 30 percent of the seegrass loss in that immediate area. There is no response from the Corps on that. There is other issues the Corps has had. Let's look at Brazos. We diverted the channel and look what happened Sergeants Beach. We really need to think this thing through. I think this is not even a no action but a reverse action. Thanks.

MR. HEINLY: Thank you, sir. Next up. Mr. Thomas Wadhal.

MR. WADHAL: My name is Thomas Wadhal W-A-D-H-A-L. Well, I got a couple of topics to talk about.

First of all, what's the purpose of doing all of this. I've seen a lot of documentation that has a lot of very good comments about why the purposes is being propose to do the deepening. But if you look back

in 2003, there was the last Environmental Impact Statement done on Corpus Christi Channel at least that I could find and the purpose at that time was to ensure that we could handle increase of oil and gas and also agricultural exports. But since then as we all know, in 2015 when we got rid of the oil export banned, things really took off. And we have seen a lot of changes with companies coming into the area with petrochemical plants, tank farms, oil export terminals. They came here for several reasons. One, financially, it's a great place to come to do business. We have some good working people and we've got some space. But what does that really mean to us? What happens is they get large tax incentives to do that. They get degradation of the seagrass. We can look at Google Earth for the last ten, 15 years. It's really going down. Then we've got water quality and the overall degradation of our environment. One of the things that I am concerned about is that with the environment, we are not Louisiana. We are not Port Arthur orange. We are not Houston, Texas City, come down to Freeport, even Point Comfort. We got good air here relatively speaking and what we are doing is getting companies to come down here and buy the ability to permit pollution in the air that is not exceeding the EPA limits because you can't do that in Houston. You

build a product there, you got to take somebody else's emissions or get rid of yours. That's a whole different story. Anyway, the bottom line, we really have this deepening channel, I think it will adversely affect the air quality. It will affect the coastal bend air which is marginally monitored by TCEQ. If you look at all their monitoring stations and where the wind blows, the wind blows -- monitoring is here and the wind blowing over here. So, I think that's a problem.

Anyway, to summarize, we have to look at the real need to affect the world experts. Okay. Thank you for your efforts.

MR. HEINLY: Thank you, sir. James King.

MR. KING: James King. James K-i-n-g. How are you doing this evening? I kind of want to help the Corps because y'all need some help. You are getting a bunch of B.S. from the Port here that this channel to nowhere. I've coined it "The Bridge to Nowhere." Why are we even evaluating an 80-foot dredge when it goes nowhere. There is no terminal. There is no pipeline to get the oil there and it's just a gigantic boondoggle. You have been down this road before. I think you guys have maybe done maybe 3 EISs on deep dredging, deep port, home port, safe port, whatever you call it. This is just another iteration of the same thing.

I appreciate the alternatives you are looking at. Maybe another alternative is to put all the money in retrofitting our refineries so we can use our own oil and not have to export our oil to other countries. There are lots of things I want to say here. The Essential Fish Habitat, I would highly encourage you guys to look at our local universities. They have a wonderful scientists here. This is Aransas Pass that we are dealing with here. This is not just some channel. It is a significant migration route of larvae, shrimp, crab and a life cycle between the Gulf and the Bays. It is like doing surgery on the aorta of a heart. It is significant. And the map that I look at this, when I see all this dredge material going around, using these words "beneficial use", "nourishment", that's all PR terms. This is sludge. This is dredge material. Let's just call it what it is. Let's don't try to make these soft names like it's going to help us. Mother nature developed these barrier islands and this system. What do you think the Corps of Engineers and the Port of Corpus Christi can do better. So I think that this is going to take a lot of science. It's going to take a lot of evaluation. I think -- I have a house in Port Aransas. I am right on the ship channel. It's offensive to us that this meeting is here in Corpus

Christi. If you look at this map, we are 30 miles away from where you are trying to do this. You should have this meeting in Port Aransas. That's the place that is going to affect it most. Forget industry, let's look at nature, tourism, outdoor, our families. That's what this is all about. Thank you.

(Applause)

MR. HEINLY: Next up, Tammy King.

AUDIENCE MEMBER: She is not here.

MR. HEINLY: Michael Amos.

MR. AMOS: Michael Amos, A-M-O-S. My pop, he's gone. He started this outfit, the Arc Animal Rehabilitation. He started counting plastic trash on the beach 40 years ago. He did it out of mortification. Look man, I am not making anybody the bad guy here. I am sure there is such a thing. I spoke to people before I stepped into this room who were super sincere, looks me straight in the eye, were fascinated upon the issues at hand. I don't need to doubt that. What I do need to doubt, however is the definition of National Energy Security and who's defining it. Okay. You have already heard people speak to this indirectly. Larger ships and fewer trips focuses on the how without examining the Why. The EIS contents, I don't get passed Chapter 1 and 2. You know. The Need and Purpose. That's National

Energy Security. In the absence of looking at this one gentleman said, alternative energy and where we are going with that. We have to look at where we are right now and I appreciate that and I am sure you do too. We worked so hard and we made all this studies and gotten clear about all the facts about the how. But I don't think it is so clear why. We are on the verge of doing something irrevocable. I want to know that I was up here and I opposed it. That's my official position.

I have to disagree with my representative Barbara Canales. The west Texas barrel of crude in the ground is the best barrel around. If we got that straight, all of this would be an intellectual endeavor. I am not putting anyone down. I am grateful for everybody's effort and best intentions. But if we don't get step one right, we have no prayer and that will be our legacy. Thank you.

(Applause)

MR. HEINLY: Thank you. The next speaker are Craig Bennett. Ian Vessey, Lawrence Valls and Encarnacion Serna and Chloe Torres.

MR. BENNETT: Thank you very much. My name is Craig Bennett, B-E-N-N-E-T-T. I am with the law firm of Jackson Walker. We have been following this and very interested in this process.

First, I just want to make a request that there should be another public meeting in Port Aransas. The draft EIS statement was issued only 14 days ago. Most of the members of the public have not had an adequate opportunity to review that, to be able to prepare comments. I understand this is not a public hearing under 33CFR but even under that, those generally require minimum of 30-days notice. I think it's only reasonable to give the public a little more opportunity. I think it would build a lot of goodwill and it would actually be within the spirit of the purpose of giving notice to the public and having a public meeting. There is sufficient time to hold another public meeting in Port Aransas in the local area which is where most of the local citizens who have expressed an interest and who will be affected by this project are located. I think it would build a lot of goodwill and certainly would not delay the process or the project by holding another public meeting in Port Aransas.

Now I want to turn to the Draft EIS. I would bring to your attention a number of things. One, it does not appear that the Draft EIS was prepared consistent with the new regulations, the new NEPA regulations that were adopted in May of 2022 that just went into effect. Those relate -- have new requirements

related to the evaluation of the project's purpose and need. Specifically set out in 40CFR Sections 15.02, 15.07 and 15.08, there are requirements for the court to do certain things related to purpose and need that does not appear to have been done for the Draft EIS. The Corps needs to look at those regulations and correct certainly before the final EIS is issued. I also, as has been noted, Mr. King mentioned the phrase dredge to nowhere. He makes a very valid point that barring the Harbor Island terminal project and midstream pipeline project, both which are being considered by the Corps, the dredging makes no sense. Therefore, I would reurge the Corps to look at whether those three projects which the Corps is considering all of them, are part of a single and complete project. A Corps official earlier made that determination and then reversed course. I don't think there is any justification to change that earlier determination because clearly all of the projects are related to one another and dependent upon one another.

Also, I would note that the Corps determined that the proposed project is not water dependent which creates a rebuttable presumption and an alternative is available with less impact on the equatic environment. But the alternatives analysis does not

address this rebuttable presumption at all. I would also note that the socioeconomic analysis does not address potential impacts for Aransas tourism, fishing or ferry operations post-dredging. These are significant impacts that must be considered as part of any sufficient socioeconomic analysis. Thank you.

MR. HEINLY: Thank you. Ian Vasey.

MR. VASEY: Thank you for your time this evening. I-a-i-n, V-a-s-e-y. I am the president and CEO of Corpus Christi Regional Economic Development Corporation. We are the keepers and calculators of economic health and benefits for the region.

In the last 11 years, we have seen the emergence of the Port of Corpus Christi as really the energy port of the Americas. We have seen 54 billion dollars worth of investments in this area, primarily in the energy sector. Actually, it will be more than that. Cheniere announced today another 7 billion dollar investment in the LNG facility. We have really become the hub of the energy sector that supplies energy to the western world, the democracies of the west. The Port will be handling upon within the next couple years, we anticipate between 3- and 4 percent of the global crude oil movement especially as the Russian oil is taken off the market. So it's increasingly important that all oil

makes it to the western Europe and our allies around the world.

From an economic's perspective, 70,000 jobs in this MSA are directly or indirectly supported by the Port operations. That's one in five jobs in this region. One in five families supported by this energy operation.

We are especially interested to hear and monitoring closely that this will remove the need for lightering and reverse lightering. So that's going to improve our air quality in the 20015 NAAQS standards which currently stand at 70 parts per billion. We test currently at about 71 parts per billion and pointed in the right direction in removing some of those emissions from the air. This will help us further improve the air quality for the entire region. The other things we are seeing is we are seeing the emergency of green and blue energy projects, more environmentally friendly energy, hydrogen type projects. We are starting to see those. This will help us make more -- more competitive as we pursue some of the those projects. Our calculations are without this project we could fail to see some of those projects and potentially see over a ten to 20,000 job loss over a ten year period. With that, I want to thank you for your time for allowing me to participate. Thank

you.

MR. HEINLY: Thank you.

THE COURT: Lawrence Valls. Lawrence Valls? Encarnacion Serna.

MR. SERNA: I am going to start talking from here to take advantage of my time. This thing about the quality air and all of that, you get infernal flares in your backyard. This is one in my backyard. To burn the gases that are expelled from those times which are going to have seals around it that never get fixed. Brother Patrick, they got the flares, I got mine. I am going to put this in here so you all can see it because I am going to cover about salinity. The flares come later and it's going to be ACES(sp.ph) and Lone Star behind this project. My name is Encarnacion Serna. It is too long and I don't want to use my three minutes spelling it out. I will write it for you.

I saw the Environmental Impact Statement, three volumes over 2000 pages. I read the introduction and I read pages 284 to 290 of Volume 1 and some pages of Volume 3. We are suppose to read all of that in less than a month. I can say this much, based on what I read so far, the Environmental Impact Statement is characterized with oversights on crucial issues, it has half truths, spins and it is saturated with factoids,

bullshit and dances around the important issues but never digs, never digs like it needs to dig.

Because of the three-minute limitation, let me just talk about salinity. There are seven proposed gigantic, monster-size salinity projects. No cumulative effects on salinity were done because you left out four. You left out four. You can see that figure Table 5.1. The four desalination projects that you left out of the so-called cumulative effects was the Port of Corpus Christi La Quinta Channel was going to produce 30 million gallons a day in the permitting process. Then the City of Corpus Christi La Quinta Channel which will produce 40 in the permitting process. And then the Corpus Christi Polymers which went under the radar, it's build but has not been commissioned. It was left out. Then the City of Ingleside Poseidon is in the planning stages and not permitted yet. So you left those four out. I am going to leave this here so you guys can go back and do your study. I am also very very worried about the following very important issues; physical oceanography, salinity, climate setting, the assessment of water quality, air quality, cumulative effects and several more saturated with factoids and bullshit. Thank you.

(Applause)

MR. HEINLY: Chloe Torres.

MS. TORRES: My name is Chloe Torres. However, I am making this comment on behalf of Dorothy Pena. The Army Corps of Engineers mission as stated on their website is to deliver vital engineering solutions in collaboration with our partners to secure our nation, energize our economy and reduce disaster risk. You represent a system that engages in defensive tactics in order to achieve your mission. As an aside to not seem so defensive to the civilians you claim to serve and protect, you state that you also produce disaster risk. Disaster is what happens when complex systems are created without the proper investigations or foresight. Our community knows disasters. We are the ones who keep each other fed when the lights go off. We are the ones who keep each other safe, not the Port of Corpus Christi. What we are asking you to do today is just to avoid the disaster entirely by not moving forward with this dredging project. Do the proper investigation of the possible cumulative impact of this project and the climate crisis which are already affecting our coastal region. You were ordered on January 27 by executive order 14008 to take the climate crisis into consideration before making crucial decisions that could further exacerbate this particular eco region. Your

agency is also responsible for upholding the regulations of the Clean Water Act which we have seen you violate in the past. It seems highly unlikely for your agency to properly serve the federal government, your partners and the taxpayers you claim to protect. Something has to give and usually it is the health and well-being of our communities. We pay. Not the corporations or industries. Our communities. Our environment pays. No more exploitation of our bay or our communities which are predominately of color. We understand your values change every time a new administration comes into power. New laws or regulations are written so you can quote, better collaborate with your partners. But our values don't change. It is not okay to destroy our bay to ensure national security, whatever that means. It is not okay to sacrifice the health and well-being of communities; Black, indigenous and other communities of color. Your government has done this, hallmark communities since it's inception and it needs to stop. No more violence on our bay or our community. I save the rest of my time. (Applause)

MR. HEINLY: The next five speakers that will be invited to speak are Jessica Palitza, Jennifer Hilliard, Brandon Marks, Kathy Fulton and Pat Kaplan. First up would be Jessica Palitza.

MS. PALITZA: Jessica P-a-l-i-t-z-a. I strongly oppose this dredging project. I am especially concerned about the sediment quality from accumulation of pesticides and heavy metals. The public needs to see the details and data of what was tested and where. I believe they are available somewhere but it is too complicated and time consuming to find this crucial information for most people directly impacted. Also the sampling is not complete as of today which means there will be data in the final EIS which the public has no say in. Additionally, ACE is given two months during paid working hours to reviews the final EIS while the public has less than two months to prepare for public comment by reading hundreds of dense pages on their own time. I thank the good people involved on this project and ask all of you to not just hear our concerns but feel for us and see our perspectives as humans on a finite planet. Thank you.

MR. HEINLY: Jennifer Hilliard.

MS. HILLIARD: Jennifer H-i-l-l-i-a-r-d.

The science is clear that new fossil fuel infrastructure projects are contrary to public interest. This project should not be authorized according to Section 404(b) guidelines as it is not in the public interest. It involves impacts to special aquatic sites,

namely Redfish Bay. The public interest is not served by approving a project that will directly hasten climate change, negatively impact estuaries and marine resources further congest transportation between Aransas Pass and Port Aransas, elevate the risk of oil spills in the bay and increase storm surge threatening coastal communities.

The purpose of this project to allow the safe and efficient loading of very large crude carriers will induce the development at additional crude export facilities on Harbor Island and pipelines that would cross Redfish Bay. This increase in crude oil production transport and processing will directly increase greenhouse gas emissions and hasten our heeded marsh to climate disaster. The overwhelming scientific consensus has conclusively determined that without significant rapid emission reductions the planet will result in catastrophic damage around the world. This project will directly and indirectly create additional warming that in turn threatens people's lives, health, safety and their livelihoods as well as threatening economy and national security for this generation and future generations.

If for some reason the Corps does not feel that addressing the cause of climate change is

within their authority as it relates to this permit, the Corps is required by 404(b) guidelines to analyze less environmentally damaging alternatives to the proposed project to achieve it's purpose.

The do nothing alternative should be preferred as it would leave 300 acres of seagrass in tact and not cover 5,000 acres of benthic habitat all while not producing the development of pollution causing and carbon industries. The offshore site alternative is definitely better than the Port's preferred project as while it does accomplish the ecological stated of the project, it does so with the least environmental impact similar to the do nothing option while also lowering the risks of accidents within the estuary bay system and lowering emissions caused by reverse lightering.

The beneficial use argument that is stated in the EIS is flimsy at best. It does not come close to offsetting the destruction of habitat caused by construction. Beneficial use of dredge material proposed in this document could also be provided by the currently authorized dredging of the ship channel, maintenance dredging at La Quinta channel and the maintenance dredging that will be required to maintain the channel at it's current authorized depth of 54-feet.

I request that the Army Corps of

Engineers exercise its regulatory authority in a manner consistent with existing law, science and the President's Executive Order 14.008 to respond to climate change at a time when we should all be coming together to deal with this problem, the Port of Corpus Christi is pursuing an infrastructure project that will provide a direct conduit to increase carbon production and further worsening the climate crisis.

These climate implications are not addressed in this Environmental Impact Statement and we ask the court to provide a supplemental Environmental Impact Statement with the best available science regarding concerns raised at this meeting and submitted written comments. Thank you. (Applause)

MR. HEINLY: Thank you. Next up, Brandon Marks.

MR. MARKS: Hi. My name is Brandon Marks. I am the Coastal Bend Regional Coordinator with the Texas Campaign for the Environment. I am a resident of Corpus Christi as is my family, including my dad, my grandmother and my cousins. I am here today because what is at stake is not a single dredging project. What is at stake is the heart and future of the Coastal Bend community. This project is just one piece in a larger plan to push an oil, gas and petrochemical industrial

build-out on the Coastal Bend. This dredging project alone will lead to two new oil exports terminals on Harbor Island, increased traffic from very large crude carriers and new pipelines through the protected Redfish Bay state scientific area. This is not to mention what the rest of the industrial build-out will will bring like the plans for four desalination plants in Corpus Christi Bay that are designed to get water, to bring new petrochemical facilities to our community as well as an expansion of crude oil exports from Embridge and LNG from Cheniere.

Again, in addition to that, we have the Blue Water Offshore Oil Project. Our community is inundated with a fossil fuel industrial build-out. If allowed, this project and soon fossil fuel build-out will harm our collective health, our environment and our livelihoods. This may make our community profitable for a few corporations. But it will make it unlivable for the residents here. It's time to say no to the fossil fuel expansion. It is time to say no to any more toxic pollution that makes us sick at home and causes climate change around the world. We deserve better. We deserve elected and appointed officials that put the public interest above private profit. We deserve a future with breathable air, a livable climate and green jobs. But

instead, we get false promises and greenwashing from the Port for projects like carbon capture and hydrogen that will just further the fossil fuel industry. To the elected and appointed officials in the room, if you are not willing to champion the people, our environment and our community, I urge you to step down and step aside. Let others with the courage and vision to take your place.

To the US Army Corps of Engineers, when our local, elected and appointed officials fail us, I urge you to step in to protect us. Hold a second public meeting in Port Aransas. Provide better outreach in Spanish to this community. Revise the DEIS, provide the supplementals that everyone is calling for with new information and reject the end of the day this harmful dredging proposal. Thank you. (Applause)

MR. HEINLY: Next up is Cathy Fulton. Cathy.

MS. FULTON: C-a-t-h-y F-u-l-t-o-n.

Hello and thank you for doing this meeting and though I am going to say like everybody else, we need one in Port Aransas because you've got us at a terrible time. It's freaking summer here. So we need it over there because a lot of people don't even try to leave the island at all during the summer and I

am actually one of them. So I want to quote real quick on the dredge to nowhere based from one of your letters to the Port.

> "Based on this conclusion, it is clear that the deepening of the Corpus Christi ship channel and the construction of the Harbor Island terminal facility are interdependent -- intaerdependent -- and should be considered a large, single and complete project." It goes onto state that "access midstream holdings to construct a series of pipeline and facilities that would supply that terminal, that that application also needs to be considered with this application."

You guys said it. You guys first. Then every agency, the US Fish and Wildlife, The Texas Parks and Wildlife, the CCA, and I am forgetting one right now all said the same thing about we can't even look at this because we can't evaluate it without the other projects. So this is the biggest -- I don't want to say mistake -- wrongdoing that there is. I want to go onto state that the Port -- and I am going to be submitting a bunch of written comment. But the Port of Corpus Christi sent out an email on Friday. In that email, they indicated -- they sent it out to their friends, I

guess -- they said they recently received funding approval for their long awaited ship channel improvement project under the Army Corps of Engineers Coastal Navigation construction category. It goes onto ask them to: Please come attend this meeting and say positive things about the Port and one of the things, Number 1, we all know that there has been no funding approved because the project hasn't been approved. Just for you guys to know, everybody is being misled one more time. It's another lie. Then they go onto make the statement that it's going to help with agricultural export. Really? At Harbor Island? How is that possible? But all right. And it's going to help the military. Really? The Naval base is going to benefit going to Harbor Island?

Let's be realistic about what we are talking about. Let's talk about reverse lightering real quick. I want everybody to understand this. Reverse lightering will not be reduced. It will not be reduced. Why? Because all the people upstream that are already doing this, they are not going to change their business model and stop again and, what, berth at Harbor Island and go through all of that just to top off and buy from another entity. That's not what they are going to do.

I also want to talk about salinity.

Y'all are not looking at salinity. For Judge Canales, if she is still here, if you want to have your oyster rehabilitation be successful, do not support this project because the salinity rise is going to kill all the oyster beds not just what's already dead in Nueces Bay. Thank you.

MR. HEINLY: Next is Patt Coeckelenbergh.

MS. COECKELENBERGH: P-A-T-T, C-O-E-C-K-E-L-E-N-B-E-R-G-H. Cathy is a very hard act to follow especially since I have not written anything down. I want to say thank you for the opportunity to be here. I do live in Port Aransas and I am here representing my neighborhood and my neighbors that were unable to attend today because it is a very busy season.

We are all against the destruction of the Coastal Bend area. Period. The slide show was beautiful, lots of pretty words. But that seagrass is not going to make it with an 80-foot dredge.

Ms. Canales made a reference to our allies needing oil. Well, war is the number 1 cause of climate change. It displaces people. It causes death and, well -- I don't need to go into that. It's just the Number 1 cause of climate change. We need to be thinking about going forward into the future. The Port of Corpus Christi has the resources. They have the

money. They need to invest in research instead of in drilling.

The Army Corps of Engineers need to protect the people, all the people, everywhere. When you live near a project, you suffer from it. Not just the pollution but the noise, everything that can happen. I strongly recommend that all the projects, any projects in the Coastal Bend be looked at as a whole because they are all intertwined and for the Port of Corpus Christi, I suggest that you do your homework and look at what we can do for the future because actually there is only decades of crude oil left in the earth. And that's not going to last very long and you will leave a dystopia for the rest of this world. Thank you.

MR. HEINLY: Thank you. The next five speakers are John Morris, Silvia Campos, John Williams, Dan Picor and Matthew A. Garcia. So first up, I invite John Morris.

MR. MORRIS: John Morris. Resident of Port Aransas. Port of Corpus Christi and other entities who continue to entertain a broad range of ever changing plan for our ride that can include berth, a desal plan, oil storage tanks and other infrastructures support both on and off terminals on an island that has been repeatedly characterized as the absolute worse location

for these projects by respected members of the scientific community. Apparently, the Port does not believe in that community nor did they really believe in the community. The Corps of Engineers note that in 2019 that original deep dredge permit request was incomplete as it failed to recognize and consider the other permits associated with what should be characterized as a series of interdependent projects within the Harbor Island and complex. Each of these projects have notable impacts on their own. But the cumulative effects appear to be completely ignored and exponentially more damaging.

Additionally, this increase dredging exists solely to serve one entity, the Port of Corpus Christi. If and only if, it can find another willing or gullible investor to take such a gamble. As many can recall, this whole project began with the Carlisle Group commitment that was lost several years ago when they apparently made the determination it was a bad investment. What in the hell has changed since then.

Meanwhile, upstream industry has invested and continues to invest in terminal capacity that is meeting demand. This proposed project has very little positive effect on reducing reverse lightering. That's just not going to stop. One little terminal right in front of a community is not going to stop reverse

lightering. That's just another smoke and mirrors by the Port.

The subsequent number of ship movements, exhausts, fluid discharge from vessel, vapor release, ship wakes, all this crap is going to continue. Nothing is going to change but you are going to destroy a community. You are going to destroy a bay system. The very life blood of the entire area. And through all of that, they kind of forget that Blue Water terminal, among others, is trying to do offshore terminals. Nobody is building 80-foot deep holes in the dirt to try to do loading and unloading in VLCCs. They are all offshore. Why does the Port think they are so much smarter. I have not figured that one out. Obviously, three minutes is not enough time to adequately express what a bad idea this is. I implore you to listen to the science and heed the warnings of failure to find investors. This is a bad idea. An ego driven pipe dream of a Port Authority run amuck. Let's think about another meeting in Port A where the people are actually affected. It's two hours worth of drive time to get here. Thank you.

MR. HEINLY: Thank you. Silvia Campos.

MS. CAMPOS: Sylvia Campos. Today is a really special day for me personally because I lost my

sister two years ago today. So instead of remembering her honor -- remembering her. I am here. And I am channeling her spirit because I thought about where she worked. She worked at Citgo 25 years. So we know what that industry can do. But the other thing is, we also know that we can't let one type of industry take over our entire region. That is -- another word -- stupid. It's just crazy. So I implore you to listen to the people here. I know that there is the show that the Port Authority has done. But when it comes to the people's part, all we have is our voices. All we have is our heart. But we breathe the air. We drink the water. We are from this area.

I know -- just recently I did an ancestry and I am 56 percent indigenous and we never left this area. We were robbed. We were robbed of our language. We were robbed of our land. Yet still, it's never enough. It's never enough. So I just ask that you please rethink this. Think not just of the money because they are going to tell you what you want to hear which is jobs, jobs, jobs. That's what it's always been. That's what we have been sold on. But we are already know the history. We know that we are lied to and we will continue to be lied to until we stand up. So I ask you to please listen to the people that are

here, the people that have traveled and the people that will continue to live here. I am here to represent my children's children because we are going to continue to live here and I want to be able to say that I stood up. I stood up for my grandchildren and my grandchildren's children. Thank you. (Applause)

MR. HEINLY: Thank you. John Williams.

MR. WILLIAMS: John Williams. Good evening. My name is John Williams. I am a state Commission Harbor pilot here at the Port of Corpus Christi. I hold a US Coast Guard license, a master on oceans and gross tons. I have been piloting Port of Corpus Christi for over 17 years. Prior to entering the piloting profession, I spent 12 years at sea as a deck officer which two years were spent as a master oil tankers and other vessels. I am the current presiding officer of Aransas-Corpus Christi Pilots Associations. I represent 18 state commission pilots. Each with similar backgrounds as mine. We provide all the piling services at the Port of Corpus Christi. Tankers at Harbor Island is not new for the pilots. For decades up until the early 90s there were two tanker terminals located at Harbor Island. The vessels are not as large. However, over the last 30 years, technological improvements in both ship and harbor tech design vastly

improved. Members of the pilots, we took part in all full mission -- excuse me, all full mission bridge simulations completed for this study and were consulted on other navigation questions. We brought the simulations, our combined years of experience of handling ships on the existing channel, that experience includes hundreds of actual VLCC transits. Politics, experience, participation of these simulation contributed to the conclusion that fully loaded VLCCs can be successfully accommodated within the boundaries of this deepening project. The rotor tugs and vision for use are highly maneuverable and powerful with capabilities suited for these expected environmentals. Any impact on other traffic would be minimal. The terminal's proximity to the open Gulf of Mexico allows for minimal transit times within the channel. Therefore, one-way restrictions imposed by these VLCCs to and from Harbor Island terminals would be negligible. Sea state effects 100 clearance would be minimal. Offshore waters tend to be rough. However, wake periods or short duration cause no effect on vessels of such length. Aransas-Corpus Christi Pilots delivery of a new larger size pilot vessel will help us accommodate working further offshore. In other words, we are already equipped to provide pilot service if and when

it's needed. Thank you for your time.

MR. HEINLY: Dan Pecor.

MR. PECORE: Dan P-e-c-o-r-e. Because of the time constraints here, I am going to focus my comments on one specific phenomenon that I believe would be negatively impacted if the Port is allowed to dredge to 80 feet. This phenomenon is quite simply the migration of marine life through the Aransas Pass. In other words, from the Gulf of Mexico into the estuary. A few years ago, I was for fortunate enough to attend the presentation of Dr. Ed Busky gave who is a professor at UTMSI. I will start by quoting Dr. Busky from a white paper he authored in 2018. This was a quote:

> "Several species of shell fish and fin fish of commercial and recreational importance in the Nueces and Mission Aransas estuaries possess live history patterns that are dependent upon estuaries whereby members of these species live and mature in these estuary nurseries then migrate into the Gulf of Mexico as reproductive adults, releasing their eggs in platonic larvae in the open ocean."

Now looking specifically at how brown and white shrimp make their way through the pass into the estuaries to mature, Dr. Busky wrote, Quote:

"When larval shrimp approach the passes between the Gulf and the estuary nursery grounds, they detect a decrease in salinity that indicates the presence of an estuary. This detection of estuary water triggers a process called selective title stream transport. This is where the small weak larvae swim up into the water column on flood tides. They carry them through the channel toward the estuary. When an ebb tide occurs that would carry them back into the Gulf, the larvae swim down toward the bottom of the channel where the current speeds are lower."

During the presentation I asked Dr. Busky, what percentage total larvae make it from the depths of the channel into the much shallower waters of the estuaries to mature. He replied the number was below 20 percent. This was based on the channel depth of 47 feet. But here we are now and we stand 54 feet.

This Draft EIS is based on proposed channel depth of 75 feet. At this proposed depth, it stands to reason that the larvae will still have to swim toward the channel bottom where current speeds are slower. However, now the bottom is going to be 75-feet. Let's look at the entrance of the Lydia Ann Channel right off the ship channel and assume the depth of

14-feet in the intercoastal waterway. There is part of the Lydia Ann Channel. The swimming larvae must move from 75 feet to 14 feet in order to mature. That's a difference of 61 feet. If the channel -- if the survival percentage of larvae is less than 20 percent at 47, what does the Corps think it will be if the channel is dredged to 75 feet. It stands to reason that the chances of larval survival will be that much less. This is environmentally and frankly morally unacceptable.

You need to come to Aransas for another meeting.

MR. HEINLY: Thank you. Matthew Garcia.

MR. GARCIA: Good evening. My name is Matt Garcia. I am the Regional Director for the Texas Oil and Gas Association a/k/a TXOGA. I reside with my family here in Corpus Christi. On behalf of TXOGA, I stand before you today to show our support for the channel deepening project which will allow for the safe transit of fully laden very large crude carriers at the Port of Corpus Christi, largest crude oil and second largest LNG gateway in the nation. Founded in 1919, the Texas Oil Gas Association or TXOGA is a statewide transit association with approximately 5000 members representing every facet of the Texas Oil and Gas industry including small independent and major

producers. Collectively, TXOGA members account for almost 90 percent of all oil and natural gas produced in Texas, operate a vast majority of the state's refining milage and gas processing capacity and are responsible for the (inaudible) state's refining capacity.

TXOGA recognizes that projects like the channel deepening project are creating world class transportation infrastructure to help our communities and business reach markets across the globe and are essential for the continued success and growth of the Texas Energy Industry and therefore the Texas economy and vital to not only our nation's energy and national security but that of our allies abroad.

VLCC capable infrastructure currently exists at the port of Long Beach importing heavy (interruption) varieties required by many US refiners.

Sound science and technology will ensure an environmentally responsible efficient maritime operations and according to provided models, the channel deepening project will positively effect the air quality in the Coastal Bend air shed through admissions reductions as a result of less reverse lightering. Nationwide, increased production and consumption of natural gas for electricity has allowed the US to lead the world in CO2 reductions.

Investments that increased Texas wealth at the water energy export are critical for creating jobs and enhance economic development and ripple effects that resonate across locality across the region. They provide much needed property tax revenue that supports our first responders, our schools, hospitals and services across Texas. To secure the economic future of Texas, TXOGA supports new investments and infrastructure including imports, production, pipelines and processing such as refining capacity and petrochemical manufacturing along the Texas Gulf Coast.

We are generally supportive of ensuring these projects are of the up most consideration. The Channel Deepening Project and other projects that are in various phases of completion will ensure Texas produced energy from the Permian Eagle Ford will be able to meet the growing global energy needs and provide much needed market opportunities for Texas producers while creating local economic development, greater prosperity and new investment in the Coastal Bend. TXOGA appreciates your consideration.

MR. HEINLY: Thank you. The next five speakers will be Marissa Perales, Lamont C. Taylor, Becky Gallagher, Captain Michael Kershaw and Charles Boon.

Let's start with Marissa Perales.

MS. PERALES: Good evening. My name is Marisa Perales. So three minutes to address the Draft EIS. I think I will focus my comments this evening on the public participation process. Because ultimately that is one of the goals of NEPA and the NEPA process.

So to begin with, as we heard others encourage you to do, I too would encourage you to hold at least one more public meeting and this public meeting should be in Port Aransas. But I also want to encourage you to consider holding additional public meetings and to do so in a different way than you are doing here tonight. I would encourage you to hold public meetings in more vulnerable communities because we know that those vulnerable communities are already overburdened by polluting industries. Polluting industries that have been permitted or authorized to impact those communities by governmental entities. These very communities are going to be the ones that are most impacted by climate change. That climate change is going to be exacerbated by the decisions that are governmental entities make.

These communities can help you understand the true costs of the decisions that you make when you undertake your cost analysis. I also encourage you to extend your comment period. If your purpose, as you

mentioned earlier tonight, is truly to make an informed decision, then by providing an extended comment period by providing more robust public participation opportunities, this can only help you in achieving that objective. Because what has been made apparent tonight is that the local residence, the impacted community are the true experts here. You have acknowledged that the Draft EIS is lengthy, dense and technical. So allow the community to have the time, sufficient time that is necessary to truly digest this information and to provide you with informed comments.

Again, I encourage you to consider alternative ways of engaging the community of public participation processes including consider remote public participation in today's time of COVID, a lot of folks, especially those who are immunocompromised would benefit from having a remote option. I encourage you to put out more materials and have interpreters here to encourage Spanish speaking residence to provide comments. I encourage you to provide a more inviting atmosphere so that parents of small children will have a place to entertain their children while they listen to the various information that is being provided. Consider, I appreciate the drinks you have here, but consider having some food for children as well, some snacks. Once again

ultimately, I encourage you to engage in more public participation, more alternative ways in engaging the public and extending the public comment period. This would not only benefit the impacted community but benefit you as well. Thank you.

MR. HEINLY: Lamont C. Taylor.

MR. TAYLOR: Good afternoon. My name is Lamont C. Taylor. A picture tells a thousand words. In this picture that you have here about the project features told me a lot. I did not even attempt to crack in 2, 3 and 4 of the EIS. However, I will provide additional input. What I would like to point out what is glaring to me is that someone said this is a project to nowhere. It's a project to somewhere. But you are not telling the people what else is tacked onto this particular project. Because I do not believe as an urban planner as an EUO officer, as a compliance officer that this is all that it is to this particular project because you are dredging 80 feet and then you just stopping at a terminal point. Something is happening upstream that you are not implying in this particular project. So, what I guess am impressed that you are having the comment period. However, I would like to see another public hearing in Port Aransas. I would like to see something to the Spanish speaking population of this

particular city. I would like to see also that you be concerned about what is really happening here and tell the people what is really going on in this project because this just -- then the other aspect of this picture. You are putting in these green spaces over here. You are going to put dredge material on a beach where people, tourists are coming in makes no sense. You are putting green area here. You are going to put the dredge material along the Gulf facing projects. So that's going to be Mustang Island. You are going to put the dredge material there and you have not told the people what is the sampling of the dredge material. But you are going to put it out there any way. There is a lot of questions that I have just by looking at the picture. So when I do start reading this particular project, I would definitely put in more public comment in the written section. I thank you very much for your time and God bless you. (Applause).

MR. HEINLY: That you, sir. Becky Gallagher. Becky Gallagher. Captain Michael Kershaw.

MR. KERSHAW: Good evening. My name is Captain Michael Kershaw. I will direct my comments towards the navigational aspects of this project. All maritime projects are challenges which is why there are experts whose task is to help solve problems. In our

case and locally, it is the Aransas County Corpus Christi Pilots who during the past year have done immense number of simulations that required new technologies, new trainings to ensure the safe navigation of the vessel using the proposed terminal. In my experience, which began here in 1963, I have watched the developmental of skills and equipment and tools and the planning that go into the development of terminals that are complex and futuristic as these are. It is my satisfaction of having viewed the simulation for this project that this project can be done safely navigationally speaking in all respects. Thank you.

MR. HEINLY: Thank you. Charles Boone.

MR. BOONE: My name is Charles Boone. I live in Ingleside on the Bay. Ingleside on the Bay is one of the coastal communities that are directly impacted by the project. You have already heard several people talking to you about the direct impact that it will have. The benefit of the project, obviously, is going to the oil and gas industry and to the Port Authority of Corpus Christi. The money is going there. The actual impact as I can see every day, I can sit at my house on Ingleside on the Bay and I look out into the La Quinta channel and if I move a little bit down the road, I can look into the Corpus Christi channel as

well. The seagrass that we have had there is covered with just a current amount of traffic through there is covered with silt and it's brown and it used to be green. As other people have said too, this is not really a project that goes nowhere. It goes directly to the oil and gas industry. The cumulative project you can't build this and bring oil here and expect nothing else to happen. I would like to point out that doing this puts new crude oil facilities putting these in Harbor Island will induce development in the floodplains. There is going to be additional industrial facilities. Those are located in the flood plan. As far as I understand, the EIS does not address the requirements in executive order in 119(a)(a) related to analysis to be done on impact on the flood plain.

Also, the mayor of Ingleside on the Bay has already issued some sort of warning to the citizens there about the problem with displacement. Currently, the displacement of water in our area is large. People trying to fish there, kayak there use the water there are -- can be put in some kind of danger if they don't understand what is going on.

The amount of boat traffic or ship traffic that I have seen has gone up four or five times in the last -- I lived there seven years in the last

couple of years. I am opposed to the project. The people who are here speaking in general are opposed to the project. They can't really match the money that you are going to get out of big oil or that big oil is putting in here. But that does not mean that they are not the ones that are directly going to have to live with the amount of traffic, the damage to the fisheries, the impact on the coastal oaks that are taken out and the communities themselves. Thank you.

MR. HEINLY: Thank you. The next speakers invited to talk are Eduardo Canales, Rachel Caballero, Joe Krueger and Brian Gulley. First up, Eduardo Canales.

MR. CANALES: Eduardo Canales. Member for the greater good and for the greater good. I oppose this dredging, this proposal. This proposal is a major project along with the other project's desal plants that only cater to the corporate interest that will span oil and gas and chemical heavy industry build out. It will continue to degrade our Coastal Bend. The absurdity of it all, justification of studies which are smoke and mirrors, dog and pony shows, voodoo signs and any environmental impacts study never, never takes a total picture, is never cumulative to the entire picture of this community. It's never a total assessment and never

a total analysis of what impact it really will have in our environment. The other point I want to make, there is no accountability to the community. Time and time again, people, the community shows up to oppose these projects, overwhelmingly oppose these projects that will continue to destroy our bays, destroy our water, our air, our lands and harm our health. Examples: Permits, hearings that you go through proforma, perfunctory sessions like this and never, never take into account the majority of the community that is opposing this. Public officials like the City Council and the Port of Corpus Christi commissioners are unelected. It's an unbalanced entity. It does not represent all the interest in this community and this Coastal Bend. It just -- these are proposed because it is their rubber stamp by public entities that serve the corporate interest only. Example Texas Environmental Quality -- Texas Commission on the Environmental Quality. Port of Corpus Christi, we are asking you to seize, to reverse, to pause the expansion of continued fossil fuel industry in our community. Join us. Seek an agreed economy and act now for the greater good. Thank you.

MR. HEINLY: Thank you. Rachel Cabellero.

MS. CABALLERO: Very quickly before my

time starts. I just want to clarify. Mr. Serna back there is also a certified PE Chemical Engineer. He is a resident concerned and also one of you guys.

MR. SERNA: I read their bullshit.

MS. CABALLERO: Just to clarify too, I am not one of the nice guys. But I would like for everybody here who is opposed to raise your hands to make a visual concept for these guys. We are not for this. Okay. And as far as Barbara Canales is concerned, she does not represent the majority of her constituency. She represents the budget in her home. I would like to applaud Sean Strawbridge for remaining in this meeting to hear what the public has to say. I am emotional. I'm sorry. And also for warning me that I could get kicked out because of how vocal I am. So we don't agree with young oil gas guy. We don't agree with John and we don't agree with Barbara, just for the record. I also would like to clarify and let the people know that the Corps of Engineers is being paid by the Port of Corpus Christi Authority. Conflict of interest much? Little bit. If they are paying you, you are not going to represent us. You are going to listen to the people that are paying your salary so you can pay your light bill, right. To have it here, in the Port of Corpus Christi Center is a conflict of interest because

people do not feel comfortable coming into the enemy land to fight for their rights. Why did you guys not provide any of the supporting studies that are not conclusive? Why are we not seeing those? As residents of this town, we don't want to see or hear that you have no concluded studies. We want them done before the trigger is pulled on this. We don't want like maybes, what ifs and ors. Okay. I also would like a study to be done on the human impact of this. You guys are spending all this money on engineering. Let's have a human impact portion of this. If you are the Corps of Engineers, you guys know everything, let's add the human aspect into this, yeah.

The next thing is I don't understand how it is not clear to Corps of Engineers that more volume causes more surges which causes more environmental impact. You don't have to be an engineer or part of the Port to understand this. This is common sense. The people behind all of this, all these studies, we live here. This is our city. This is our water. This is our land. And this is our community. Enough with these schematics, the logistics and all of that good stuff. We don't care about the global perspective. We don't care about the national perspective. We care about our water. We care about our land and we care about our

community and our neighbors. So let's absorb that gentlemen. Yes.

MR. HEINLY: Thank you. Jo Krueger.

MS. KRUEGER: Jo Krueger. I am from Port Aransas. I would like to request another meeting in Port Aransas. Because according to the map, that's who is being affected is Port Aransas. So Texas Parks and Wildlife, they did studies and there are five zones to leave alone. This is one of them. There is a lot of reasons why. The fisheries, beaches, the larvae. But another thing is also, I sit every day, I managed a marina right across from Harbor Island for 20 years. I watched these VLCCs go in and out. I watch when they come in. I watch a foot of water go out and I watch it swirl back in. That happens all day long and you can't tell me that the sediment is not coming in and out of the Harbor. The VLCCs, they come around the corner and there is Harbor Island. So what are they going to do? Just stop right there? You got the Lydia Ann Channel. You got the Aransas channel. It all comes together there. It's three channels coming together. There is hundreds of boats in and out all day long. You have the Ferry landing right there. They are going to be right on top of the Ferry landing. What are they going to do with the Ferry landing. We have 5- to 6 million people

come to Port Aransas every year. Our beaches are packed. Why do we have to destroy every inch of the Texas coast? We have plenty of oil gas. I am not against oil and gas. I was born and raised in South Texas. I am not against oil and gas. But there is a right places to put it and this is not the right place to put it. This is the one zone to leave alone. We have the VLCCs. They are going in and out. Nobody is stopping them and they moved the Port of Corpus Christi where it's at because of hurricanes. Harbor Island is a barrier island. So is Port Aransas. You can't -- they took everything off of Harbor Island because of hurricanes. I will tell you, Harvey came right across there. It's just not the right place to put it. So I wish we don't have to destroy every inch of the coast and leave this zone alone. Thank you.

MR. SERNA: We don't have the money that the Honorable Canales has and Sean Strawbridge to go to Baja California, to go to Cozumel. We, my grandkids we love that island. We need that island. We need to stop messing up that island.

THE COURT: Next up. Brian Gulley.

MR. GULLEY: Brian Gulley. G-u-l-l-e-y. I lived here all my life. I spent about 20 years living in Port Aransas. Now I live on Packery Channel. Born

and raised here, trained as a marine biologist. Changed my mind and became a surgeon and now I am serving my second term as a voluntary Port commission. We are not elected. We are appointed by combination of 22 different elected politicians. We are not picked probably because we are not politicians. We are volunteers. I have been involved in this project and one thing I can say is the Corps of Engineers are a pretty tough group of guys to get any kind of projects through without vetting those things very seriously. We spent several million dollars, started before I was even on the Board, on this project, with the modeling and studies and the stuff. I encourage everyone to read the complete study before they make any comments on what is missioning in the study because there is a lot of that information in there. Sticking strictly to the science, I studied there at the University of Texas Marine Science. I did graduate work in estuarian ecology and oceanography, population biology. I have a little bit of understanding on this and I approach this with my eyes wide open. I am proud of the Port because we spent about 22 million -- 22 percent of all of the operating budget on environmental-type studies like this, environmental projects. So I think we -- being on the inside, I see a different side of the Port than I think

most of the people here see. There is a great deal of mistrust and that's unfortunate. I hope some day we can fix that. In the meantime, we have to understand that we are going to be stuck with fossil fuels for a few more decades. We are very proud of our projects that we have coming down the line with hydrogen and carbon-free projects. We worked very, very hard on those things. I am very proud of those things but they are going to take a long, long time. We are going to have to work together with combination of fossil fuels, some solar, some wind, some hydrogen and some ammonia.

I've heard all kinds of scatter shots about this. But I think we need to get back to really what it is. This is a great big 'ol giant ditch that allows us to bring ships that are already coming here and allow us to clean up the air and do it a little bit cleaner and dock them no further than Harbor Island, same way we have been doing for decades and decades and decades there and avoid that reverse lightering and avoid the fact that we cannot capture that gas at sea. It can be be captured at Harbor Island and not get in the atmosphere. So it's a very good environmental project. No saline. No salt water. There is no health concerns. We need to get away from all of that and look at what the project is. It's not that difficult. Thank

you.

MS. CABALLERO: It's not a ditch. You are a sell out.

MR. HEINLY: Guys, let's be respectful, please. Next up, Barney Farley.

AUDIENCE MEMBER: They are calling our home a ditch is very disrespectful.

MR. SERNA: Heavy flares in our background is very disrespectful.

MR. HEINLY: Sir, can we please move on. Thank you.

MR. SERNA: That's more offensive than what I am saying.

MR. FARLEY: Barney F-a-r-l-e-y. Long time resident of Port Aransas. I have a statement. I wish I had some notes. I also have a question. What am I doing here today? Is this another thing where we are going to talk about all the environmental issues because really that's the biggest part of this thing is the environmental thing. And so am I going to be a winey, tree-hugging complainer, no. I am here today, they are fixing -- we are putting -- Port Aransas has been there a long time. It has survived three attempts to make a VLCC port out of it. Is has survived all the oil that went through there, all the ships, all that volume. We

survived that. We did not get clobbered by oil spills and we have not had the ships at our tanks for a long time. It's still a nice place. We have challenges from -- we have challenges from industry. If you go to Aransas Pass, Ingleside, Rockport, Portland, I don't even like to drive thru Portland because it is such a mess. There is, it's happening right now. These are just the things that we know about; about the desal plants, about the plastics plants, about the natural gas. You get your natural gas shipped overseas and you also get your plastic made out of it in China, our good friend. Okay. So where does it stop? Can anybody say what the end is? Well, like I said, this is just the stuff we know about? So what is coming down the line. Now they want to put a -- stomp a mud hole in Harbor Island which definitely is -- that's ground zero. For one, all them fishies and larvaes, shrimp things, they all have to go through there. That does not seem to matter because we have to get that oil shipped overseas so they can ship some oil to us and it does not make sense. Yeah, it's a bad place to be. Well, okay, so we were talking about cumulative effects. What about that desal plant that might go through on Harbor Island? What about that? We just heard about that. So then we are going to have all that brine coming out. We got

desal plants everywhere to feed those factories. That's the one reason they are building built. Now you want your terminal over there. I am mad about It.

(Applause)

MR. HEINLY: Do we have any other folks that signed up?

AUDIENCE MEMBER: I signed up. I did not get called.

MR. HEINLY: I'm sorry. What is your name?

AUDIENCE MEMBER: Melissa Zamora.

MR. HEINLY: Please come forward. Just please spell your name so we can capture it.

MS. ZAMORA: Hello. My name is Melissa Zamora. So this project is not in the public's best interest. Prevention before mitigation. Think about that. Prevention before mitigation. We can prevent all of these horrible things that are being said if we just say when is enough enough? Marine life is important. People's lives are important. People and workers' lives is concerning as we should not forget the propone pipeline explosion that occurred by the ship channel back in 2020. That was caused by negligent dredging activities and cost four people their lives and many others injuries as a result.

The best alternative is no action. There is tons of cumulative impacts that you have already heard. Coming from a younger person who is studying environmental science, is studying to be a science teacher because I am trying to teach the younger generations that they do have a say, that there is still hope, that we can change things. I have been born and raised here my whole life. I am a South Texan and I don't agree with the way things are going. I am not okay with oil and gas being so expansive to harm the communities that they are in, to harm the global community. Only in certain few, the people who are over here bullshitting about how great this is are the ones making the money from it. People like me, we are coming out here, we are spending time away from our families. We are being up here as voices for people who can't come here in person because of COVID or because other issues that they could not make it because of work. I am spending time away from my son who is why I am standing here today. I hope that he has a future and that his children do in a world that is not burning up, facing significant droughts like we are already in, exacerbated by greenhouse gas emissions where oil and gas plays a significant role but is not the only contributor. When we talk about carbon capture and all of those things, we

need to think about prevention before mitigation and leaving the wetlands where they are to help as natural carbon as they are, to help with the old growth seagrass conservation and not just blow out all of the old growth that has been thriving and adapting to what we have already done and try to throw some new seedlings in and maybe they will make it, maybe they won't. We just need to really think about the impacts in the greater sense. Remember that we are a native land on stolen land and where is the indigenous people's perspective. Where is consent. We do not agree as part of a member for indigenous people of the Coastal Bend and for the greater good. We do not approve of this project. Thank you. (Applause)

MR. HEINLY: We had some people that signed up to talk that were not here at the time. I understand some have returned. Is Tammy King here?

MS. KING: Yes. My name is Tammy King. We have a home on the ship channel in Port Aransas and I have been part of a fight against the Corps of Engineers and-or the Port of Corpus Christi for the past seven years, probably helped raise and spent money on lawyers of over $7 million of private money to fight the over industrialization of our region. I have talked to many people, both political parties, and the most -- the

biggest impact was made when I spoke to a CEO and a CFO of a major oil facility in Ingleside. There is Valero. There is Moda. There is South Texas Gateway, Flint Hills Resources. There is -- I can't think of the rest of the them in the inner harbor. They have been waiting with private money for their investments to come true for a 54-foot dredge. It may be coming in. Their tariff money is not being used to be pay for the dredging. We are asking the tax dollars, the federal government for $650,000,000 to do the 54-foot dredge.

Now we want to go ahead and do an 80-foot dredge because, yes, it will be 80, not 75 foot at Harbor Island which will benefit just the Port of Corpus Christi which will be a direct competition with the stakeholders who are using private equity to fund their own deals, to give the Port of Corpus Christi 80 foot dredge is taking away from all the industries stakeholders. That same CEO and CFO told us that they have to go through rigorous permitting and if a private company tried to do this on Harbor Island, it would not happen. But because the Port of Corpus Christi has a way with the Corps of Engineers somehow, some way, this might get passed because they are doing it. They have more money to do it than the private of us who can fight it privately.

The book Texas Bays is a Jim Blackburn book that talks about how the bays and estuaries have been saved. He wrote this many years ago. The fight about deep port in the 70s was won because the Port realized that it was not going to do it. Basically, it just gives us, the next generation, a call to action. It was denied then. It was deactivated then. It should not be at Harbor Island. We fought it. We won it all these years. It should not happen now just because the Port has more money to do this, to out finance their stakeholders. Thank you. (Applause)

MR. HEINLY: Is Lawrence Valls in the room? Lawrence Valls? How about Becky Gallagher? Becky Gallagher? Anybody else signed up? No.

All right. Well, we have gone through all the commenters who have signed up so far. We will remain available for public comments until 7:30 so just another less than ten minutes to accommodate anyone else who would like to speak. Yes, sir.

AUDIENCE MEMBER: May I speak?

MR. HEINLY: If you would just please announce your name.

ARMON ALEX: Hi, my name is Armon Alex. I will be pretty clear here and speak from the heart.

I am a scientist by mind and passion, not

by profit. And shame for any of the scientists that were here in attendance or saying that there was nothing wrong with the science. Shame on you. Your degree needs to be taken away if that is what you are claiming here today.

Obviously, when you were in that room, there are very specific scientific points that were pointed out on how the ecology of that specific area will be impacted and for you to stand up here and say that this is not true, get a grip. I think that the rest of the parties and in play here need to get a grip.

I have been here my entire life, born and raised. I have fond memories of my father and I going along the Corpus Christi beach area picking up seashells. When I was little, we would spend some time counting the ships that would come in within about five to ten minutes.

Since then, 22 years later, the amount of ships that comes in within five minutes is ridiculous and that's because of heavy industry in our area, specifically.

But let's get back to this specific project in terms of the dredging. As a scientist, I can tell you that what's going on in the area and the impacts, we have these individual little things going on

in terms of salinity, whether we look at the ecology of benthic animals or whether we look at the water quality. They are all separate and you are saying they are temporary situations. But when you put all those together, the long term, the long term output of that is bad. This area depends on ecotourism, especially in the specific area of the Harbor Island Port A. I lived here for 22 years. We see the tourism in this area. Nobody wants to go to a beach where we've got sludge washing up, where you've got dirty water. What do you think that is going to do to the area? How much longer is the industry in this area going to take over where it's not even viable to live here any more. News flash! It's not viable to live here anymore when people are dying of asthma, people are being irritated in terms of eye and skin irritation. That stuff is real and tangible. I am asking you as a resident of this area is to look at the bigger picture here. When you approve this permit, if you do that, you are allowing space for this continuation of the industrial build out to be bigger than what it already is. We are already experiencing the problems. If you allow this to happen, it's only going to get worse. Worse is even more detrimental than what is going on right now.

So get a grip. News flash. We are

suffering right now and by letting this happen even further we are going to suffer more. Thank you.

(Applause)

MR. HEINLY: Is there anybody else interested in talking?

AUDIENCE MEMBER: Can you let us use a podium next time like you use a podium?

MR. HEINLY: Sure.

AUDIENCE MEMBER: We are all equal in this room.

MR. HEINLY: We will remain available until 7:30 if anybody else is interested in talking, for another -- about four minutes.

Thank you very much for your time.

(Pause)

MR. HEINLY: The time is now 7:30. The formal commenting period has ended for this meeting. All statements placed in the record will be given consideration. It should be noted that comments on the proposed action can be submitted any time during the NEPA process, but only those submitted during formal comment period will be included in the summary report and will be guaranteed to be addressed in the final Environmental Impact Statement.

Thank you for your participation today

and the interest that you have shown in the proposed action.

(Meeting concluded at 7:30 p.m.)

STATE OF TEXAS

COUNTY OF NUECES

I, MYRA G. HANEY, Certified Court Reporter in and for Nueces County, State of Texas, do hereby certify that the above and foregoing contains a true and correct transcription of hearing conducted and proceedings requested.

I further certify that the total cost for the preparation of this Reporter's Record is $ and was paid/will be paid by .

WITNESS MY OFFICIAL HAND this the 6th day of July, A.D. 2022.

MYRA G. HANEY, CSR# 2874
Expiration Date:07/31/2022
Magna Legal Services
Firm Registration No. 633
1635 Market Street, 8th Floor
Philadelphia, PA 19103

B

D

S

U

Appendix B7

DEIS Comments and Responses

PCCA CDP Draft EIS Comment/Response Matrix
December 2023

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
1	1	Thanking USACE for Special Public Notice email.	Thank you for your comment.
2	1	Concerned that the project has killed the spawning grounds for bait fish and that the mucky water over the flats kills fish and seagrass in protected areas.	Impacts associated with the Applicant's Proposed Action Alternative to estuarine fisheries and wetlands/SAV are described in detail Sections 4.2.1.2, 4.2.2.2.2, and Appendix E in the DEIS.
2	2	Concerns about socioeconomic regulations on Speckled Trout from TPWD and CCA due to freeze damage (falsely) and that these fish are being choked by silt.	Thank you for your comment. The "socioeconomic regulations" of Speckled Trout are implemented by the TPWD. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
2	3	Tugs churning water up water, damage from ships traveling at dangerous speeds with the prop wash on top of the dredge.	The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) indicate that the CDP would have minimal impacts to the shorelines along the CCSC.
3	1	Forwarding on the Special Public Notice email.	N/A
4	1	Expressing concerns that the Public Meeting was not being held in Port Aransas and asking why is the meeting not being held in the community that will be impacted. Requested a change of venue to the Civic Center in Port Aransas.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
5	1	Agrees with email from Cathy Fulton (May 26, 2022) on change of venue to the Civic Center in Port Aransas for the Public Meeting.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
6	1	Agrees with email from Cathy Fulton (May 26, 2022) regarding a TCEQ meeting on air quality and about the location of the public meeting not supporting public participation.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
7	1	Feels that people living in Port Aransas will be affected most by this project.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
7	2	Points out that the Applicant will proceed with building Harbor Island which will require constructing pipelines that go through Port Aransas and nearby communities, therefore expresses that two Public Meetings should be held, the one on June 22 and another one in Port Aransas; if only one Public Meeting is to be held then it should be conducted in Port Aransas.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
8	1	Expressing concerns that the Public Meeting was not being held in Port Aransas. Requested a change of venue to Port Aransas.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
9	1	Requests that the Public Meeting be moved to the Port Aransas Civic Center.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
9	2	The Ports plan to construct loading facilities at Harbor Island have fallen through as multiple investors have abandoned the project, therefore there is no need or customer support for this project.	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The Applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, Federal review of a navigation district's stated need for the project in the marketplace.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
9	3	Port has not sufficiently studied where to dispose of the dredged material. Concerned about dredged material being used for beach nourishment that could spoil the beaches or the material being dumped in Ingleside like the 54-foot project and causing an eyesore.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
9	3	Port has not sufficiently studied where to dispose of the dredged material. Concerned about dredged material being used for beach nourishment that could spoil the beaches or the material being dumped in Ingleside like the 54-foot project and causing an eyesore.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
9	4	Port has not done a sufficient study or proposed realistic mitigation for impacts to marine life.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
10	1	Requested Spanish speakers at the public meeting.	A Spanish interpreter was available during the Public Meeting that was held June 22, 2022.
11	1	Expressing concerns that the Public Meeting was not being held in Port Aransas. Requested a change of venue to Port Aransas.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
12	1	Expressing concerns that the Public Meeting was not being held in Port Aransas. Requested a change of venue to Port Aransas.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
13	1	Believes the larger ships will add to the already deterioration of the shoreline and sash our their property, therefore does not approve of the project.	The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) indicate that the CDP would have minimal impacts to the shorelines along the CCSC.
14	1	Expressing concerns that the Public Meeting was not being held in Port Aransas. Requested that any future Public Hearings be in Port Aransas.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
14	2	Does not support the project being constructed.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
14	3	Concerned that the construction of the Harbor Island Marine Terminal and the channel deepening would completely change the ecosystem of the area. Specifically concerned about impacts to the Redfish Bay State Scientific Area and the Port Aransas Nature Preserve. Larger ships destroying seagrass by churning up sediments, impacts to larval fish, threatened and endangered species, birds, wetlands.	Harbor Island Marine Terminal is included as part of the Cumulative Impacts of the project and are addressed in Section 5.0. Redfish Bay was designated a state scientific area by the Texas Parks and Wildlife Department in June 2000 to protect and study native seagrasses. The RBSSA contains the northernmost extensive stands of seagrass on the Texas coast. In May 2006, the "no-uprooting"/"no-Prop" regulation took effect in RBSSA. By September 2013, the "no-uprooting"/"no-Prop" regulation had been expanded statewide. While Redfish Bay remains a designated Scientific Area, all seagrass beds along the Texas coast have comparable protections laws. Seagrass beds are a special aquatic sites and will be evaluated in accordance with the 404(b)(1) Guidelines. The Redfish Bay State Scientific Area will be added to sections 3.3.5.1 and 4.2.5.1 for the Final EIS. Impacts specific to Port Aransas Nature Preserve are addressed in Section 4.2.5.1.2. Impacts of the project on wetlands/seagrass can be found in Section 4.2.1.2, fish in Section 4.2.2.2.2 and Appendix E (EFH Assessment), and threatened and endangered species in Section 4.2.5.2.2 and Appendix D (Biological Assessment).
14	4	Concerned that the increase in channel depth will dramatically change the water flow within the entire bay system and impact larval transport/migration.	Current speeds are expected to decrease an average of 0.23 feet per second with the deeper entrance channel under Alternative 1 (Baird, 2022c; Appendix I). This slight decrease in velocity at the entrance channel is not anticipated to impact fauna. In addition, Valseth et al. (2021) found that the change in channel depth did not significantly impact larval transport reaching nursery grounds, and may experience a slight increase in larval transport with the decreased velocities.
14	5	Concerned the deepening would increase storm surge risks, as a greater volume of water would be moving into and out of the bays.	Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with "planned future conditions" representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI's modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI's application of model parameters or inputs for the ADCIRC/SWAN models used in its study.
14	6	Concerned about dredged material placement area impacts.	Impacts associated with the proposed placement sites under the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
14	7	Would like to see the project taken offshore.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
15	1	Does not support the project being constructed.	Thank you for your comment.
15	2	Concerned that the project will be detrimental to the wetlands, water quality, conservation efforts (i.e. migration of birds), shoreline stabilization, fish, and wildlife.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
15	3	Concerned the environmental impacts will negatively affect the economics (livelihood of people who live there) of the area.	The DEIS discusses the potential adverse impacts to livelihoods in the study from the implementation of the Applicant's Proposed Action Alternative. These impacts are addressed in Section 4.4.2.
16	1	Does not support the project being constructed.	Thank you for your comment.
16	2	Expressing concerns that the Public Meeting was not being held in Port Aransas. Requested a change of venue to Port Aransas.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
16	3	The Ports plan to construct loading facilities at Harbor Island have fallen through as multiple investors have abandoned the project, therefore there is no need or customer support for this project.	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The Applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, Federal review of a navigation district's stated need for the project in the marketplace.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
16	4	Port has not sufficiently studied where to dispose of the dredged material. Concerned about dredged material being used for beach nourishment that could spoil the beaches or the material being dumped in Ingleside like the 54-foot project and causing an eyesore.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
16	4	Port has not sufficiently studied where to dispose of the dredged material. Concerned about dredged material being used for beach nourishment that could spoil the beaches or the material being dumped in Ingleside like the 54-foot project and causing an eyesore.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
16	5	Port has not done a sufficient study or proposed realistic mitigation for impacts to marine life.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
17	1	Stating that 33 CFR 327.11(a) requires 30 days notice of a public hearing and the meeting on June 22 does not comply with the regulation. Requests another Public Meeting be scheduled and located in Port Aransas.	The scheduling for the development of the EIS, including the Draft EIS comment period, was developed to comport with requirements of both NEPA and FAST-41. To ensure appropriate public engagement, the public has been encouraged to provide comments to USACE on the project during the August 2019 Public Notice, the EIS Scoping meeting in June 2020 that included 4 public meetings, and the Draft EIS in July 2022. During all three of these comment periods, the USACE has received a significant response from the public. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
18	1	Concerned about the impacts to the environment .	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
19	1	Concerned about the impacts to the environment and the people.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
20	1	Does not support the project being constructed.	Thank you for your comment.
20	2	Concerned that the project could have irreversible consequences.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
20	3	Should take the operation offshore.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.

PCCA CDP Draft EIS Comment/Response Matrix
December 2023

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
21	1	Concerned about the ecological impacts the project will cause.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
22	1	Concerned about the ecological damage the dredging will cause along the coast.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
22	2	Concerned about the high probability of oil contamination to the region.	Impacts associated with HTRW under the Applicant's Proposed Action Alternative are addressed in Section 4.1.8.2.
22	3	Does not support the project being constructed.	Thank you for your comment.
23	1	Asking the USACE if a recording of the Public Meeting will be available as they are unable to attend.	USACE responded that a transcript of the meeting will be included in the documentation and posted to the USACE Special Projects website.
24	1	Concerned about the ecological damage the dredging will cause along the coast.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
24	2	Concerned about the high probability of oil contamination to the region.	Impacts associated with HTRW under the Applicant's Proposed Action Alternative are addressed in Section 4.1.8.2.
24	3	Concerned that actions like this force forward climate collapse.	Impacts associated with climate change under the Applicant's Proposed Action Alternative are addressed in Section 4.1.3.1.
25	1	Registering support of the Port's efforts to expand their LNG capabilities and thanking the USACE for continuing to support the responsible growth of our energy infrastructure in the region.	Thank you for your comment.
26	1	Supports the Port's effort to ensure continued growth and success.	Thank you for your comment.
27	1	Does not support the project being constructed.	Thank you for your comment.
27	2	Concerned about the ecological damage the dredging will cause along the coast.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
27	3	Concerned about the toxic pollution and oil spills that will be dumped into the ocean.	Impacts associated with HTRW under the Applicant's Proposed Action Alternative are addressed in Section 4.1.8.2. Impacts associated with oil spills under the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
28	1	Recognizes that dunes are eroding and would like to see the project done quickly to improve the dune and beach erosion would be a plus for the environment.	Thank you for your comment.
29	1	Concerned about the impact the project will have on animals and marine life in the bay and beaches.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
29	2	Concerned the project will negatively impact the fishing and tourist industry.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. This section describes the potential adverse short-term impacts to boating and fishing associated with construction activities. Long-term adverse impacts to recreation and tourism are expected to be minor. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
29	3	Concerned that the large dredged material mounts with toxic dredge spoil will impact animals and marine life and find its way into the food and water supply.	Measurable impacts from chemical contaminants such as heavy metals, synthetic organic compounds, and nutrients are not expected to occur with dredging activities based on pre-dredging bulk analyses and toxicity and bioaccumulation assessments conducted from 1980 to 2002. Results from those assessments show that no extensive or severe contamination occurs in the sediments within the CCSC, and that dredged material was suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003). Most of the material to be dredged will be new work material, which is unlikely to have been exposed to contaminants or pollution. Montgomery and Bourne (2018) conducted sampling for sediment, water and elutriate for the CCACIP in accordance with MPRSA Section 103 to evaluate the potential for adverse environmental effects associated with dredging and open water ocean placement of new work sediments. No potential for adverse bioaccumulation effects were found for project sediments. A Sampling Analysis Plan for MPRSA Section 103 evaluation of sediment was developed to determine if the new work material sediments proposed to be dredged are acceptable for disposal in the New Work ODMDS. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. MPRSA requires that testing follow protocols outlined in Chapter 8 of the Green Book (EPA and USACE, 1998) and the Ocean Dumping Regulations, guidance testing including the Regional Implementation Agreement (RIA) (EPA and USACE, 2003). The EPA must concur with the findings in accordance with 40 CFR 227 prior to USACE approval.
29	4	Water system infrastructure needs to be updated to improve water quality in our country.	Thank you for your comment.
30	1	Does not feel the Port has studied the long term impact of a deeper channel.	An extensive independent study was conducted by USACE in compliance with Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) regulations. These studies utilized the best available scientific information and reached objective, scientifically-based conclusions. Results of the study are included in the DEIS. Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), Appendix E (EFH Assessment), Appendix G (Sediment Transport Modeling), Appendix H (Vessel Wake Analysis), Appendix I (Hydrodynamic and Salinity Modeling), Appendix L (Ship Simulation Report), Appendix M (Propeller Scour Study), and Appendix N (Underkeel Clearance Study).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
30	2	Does not feel the Port has studied the long term impact of what larger vessels will do to deteriorate the shoreline along the ship channel. Questions if the USACE has studies this impact.	An extensive independent study was conducted by USACE in compliance with Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) regulations. These studies utilized the best available scientific information and reached objective, scientifically-based conclusions. The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) indicate that the CDP would have minimal impacts to the shorelines along the CCSC.
30	3	Concerned about the possibility of littering the shoreline with dredge spoil.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
30	3	Concerned about the possibility of littering the shoreline with dredge spoil.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
30	4	Concerned about the long term impact on the tourism industry.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term impacts to recreational activities (e.g. boating, fishing, beach visitation) from the construction of the project. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism.

PCCA CDP Draft EIS Comment/Response Matrix
December 2023

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
31	1	Request a 3 month extension to review the DEIS due to the length and complexity of the DEIS and the delayed fulfillment of the public information request submitted to the Applicant. Commenter submitted a Public Information Request to the Applicant on June 9 for specific studies that they did not receive. Copy of the request attached to comment letter.	The scheduling for the development of the EIS, including the Draft EIS comment period, was developed to comport with requirements of both NEPA and FAST-41. To ensure appropriate public engagement, the public has been encouraged to provide comments to USACE on the project during the August 2019 Public Notice, the EIS Scoping meeting in June 2020 that included 4 public meetings, and the Draft EIS in July 2022. During all three of these comment periods, the USACE has received a significant response from the public. USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
32	1	Does not support the project being constructed.	Thank you for your comment.
32	2	Believes that the best option is the No-Action Alternative.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
33	1	The DEIS does not address all of the environmental impacts from facilities needed to carry out this project's stated purpose and without a proper listing and examination of all adverse impacts, a valid comparison of this project to other alternatives cannot be done.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
33	2	To accomplish the stated purpose, the CDP is designed to serve the Harbor Island terminal which currently does not exist and is problematic and highly controversial having substantial adverse environmental impacts. The Port's CDP alone cannot accomplish its stated purpose. The CDP and the Harbor Island Terminal are completely interdependent parts of a singular project. And a third project also needs to be completed, Axis Midstream. A complete DEIS, that includes all three projects, must be prepared as required by NEPA.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
33	3	The DEIS does not include many of the environmental impacts the complete VLCC project (all 3 project considered together) will cause.	The potential cumulative effects of the Applicant's Proposed Action Alternative and reasonably foreseeable projects are discussed in Section 5.0.
33	4	The DEIS lacks substantive discussion of cumulative impacts from a complete VLCC project (all 3 project considered together).	The potential cumulative effects of the Applicant's Proposed Action Alternative and reasonably foreseeable projects are discussed in Section 5.0.
33	5	Some of the impacts from the interdependent parts of the VLCC project are not just additive but magnified when considered together (i.e. increased risk to navigation and public use of the waters in the vicinity of Harbor Island).	This information is addressed in Section 5.4.14.
33	6	The DEIS should be supplemented to include and properly address all of the impacts from the complete VLCC project.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
34	1	The two VLCC terminals on either side of the ferry are absent from any of the DEIS analysis.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
34	2	Concerns about the dredged material being placed on one of the most popular beaches in Texas. Does not support any placement on beaches, dunes, or offshore.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
34	2	Concerns about the dredged material being placed on one of the most popular beaches in Texas. Does not support any placement on beaches, dunes, or offshore.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
35	1	Believes the USACE is determining alternatives without any actual knowledge of crude oil management and availability to the Corpus Christi area currently or in the future. Uses Alternative 2 an example and states that the crude oil terminals in the Inner Harbor and at various existing facilities will not allow for 4.5 million barrels per day to be available to the Port. This number, provided by the Port, is not realistic and too high. The alternatives analysis lacks any real connection to reality and there is no terminal designed and no inclusion of that facility in the DEIS that makes it not follow Federal laws.	The alternative analysis was developed in coordination with the cooperating agencies and is designed to address requirements in the 404(b)(1) guildines, MPRSA- Need for Ocean Dumping, and NEPA. The alternatives anlaysis is not designed to analyze or reevalute the economic assement made by the Applicant.
35	2	Alternative 3 has no connection with crude oil management. Need to include industry and other sources outside what the Port says as you are designing false alternatives that are not based in reality.	The alternative analysis was developed in coordination with the cooperating agencies and is designed to address requirements in the 404(b)(1) guildines, MPRSA Need for Ocean Dumping and NEPA. The alternatives anlaysis is not designed to analyze reevalute the economic assement made by the Applicant.
35	3	Add some science that came out of the desal contested case on Harbor Island.	The potential cumulative effects of the Applicant's Proposed Action Alternative and reasonably foreseeable projects are discussed in Section 5.0.
36	1	Does not support the project being constructed.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
37	1	Concerned with the proposed dredged material placement on the beach. Believes this will not work with the Coastal Management Plan used by the city. Will the material be sandy or clay?	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
37	1	Concerned with the proposed dredged material placement on the beach. Believes this will not work with the Coastal Management Plan used by the city. Will the material be sandy or clay?	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
37	2	Would like to know what the green areas on the figure (figure showing the proposed placement areas) are. Concerned that the proposed dredging plan is going to impact the beaches.	Green polygons represent locations proposed for dredged material placement. Any dredged material beneficially used for shoreline improvements will be tested for contaminants and will only consist of suitable materials. Sediment quality information is disclosed in Section 4.1.4.3 Sediment Quality. Appendix C DMMP provides information on where materials will be placed.
38	1	Wants the VLCC loaded offshore and not dredging the ship channel.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
39	1	Does not support the project being constructed.	Thank you for your comment.
40	1	Does not support the project being constructed.	Thank you for your comment.
41	1	Does not want dredged material being placed on the beaches.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
41	1	Does not want dredged material being placed on the beaches.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
42	1	Wants the Port to accomplish the loading of VLCC's offshore and not by deepening the channel. Deny the permit.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
43	1	Does not support the project being constructed.	Thank you for your comment.
43	2	Concerned about the environmental impacts.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
44	1	Concerned about toxic dredged material being placed in Mustang and San Jose islands.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
44	1	Concerned about toxic dredged material being placed in Mustang and San Jose islands.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
44	2	Concerned that the project would have significant implications for the environment considering the proximity to Redfish Bay, increasing the risks of oil spills, air pollution, flooding, storm surge, silting of seagrass and endangering wildlife surrounding it.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). Redfish Bay was designated a state scientific area by the TPWD in June 2000 to protect and study native seagrasses. The RBSSA contains the northernmost extensive stands of seagrass on the Texas coast. In May 2006, the "no-uprooting"/"no-Prop" regulation took effect in RBSSA. By September 2013, the "no-uprooting"/"no-Prop" regulation had been expanded statewide. While Redfish Bay remains a designated Scientific Area, all seagrass beds along the Texas coast have comparable protections laws. Seagrass beds are a special aquatic sites and will be evaluated in accordance with the 404(b)(1) Guidelines.
44	3	Does not support the project being constructed and instead support clean energy, renewable energy, and energy efficiency measures.	Thank you for your comment.
45	1	Does not support the project being constructed.	Thank you for your comment.
45	2	Concerned about placing dredged materials on the beach and how that may harm the coastline.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
45	2	Concerned about placing dredged materials on the beach and how that may harm the coastline.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
46	1	There is no way you will dig the ship channel to 80 feet and make it stay dredged.	Maintenance dredging would occur on a routine basis and is addressed in Section 2.0 (Proposed Action and Alternatives), Section 3.0 (Affected Environment), Section 4.0 (Environmental Consequences), and Section 5.0 (Cumulative Impacts).
46	2	People do not want dredged spoil on San Jose and Mustang islands. Do not want the material offshore either as it will end up back on the beach.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
46	2	People do not want dredged spoil on San Jose and Mustang islands. Do not want the material offshore either as it will end up back on the beach.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
46	3	Concerns as to what dredged material offshore would do to marine life.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
46	4	Does not support the project being constructed.	Thank you for your comment.
46	5	An offshore monobouy would solve the Port's wish to expand by exporting more oil.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
47	1	Does not support the project being constructed.	Thank you for your comment.
48	1	Requesting a 45 day extension for the comment period on the DEIS.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
48	2	The USACE is not reviewing the information the Port submitted. The DEIS needs to be peer reviewed.	The USACE conducted an extensive independent study in coordination with the Cooperating Agencies and soliciting comments from Federal, State, and the public. The EPA, NOAA, USFWS, and USCG are Cooperating Agencies in the development of the EIS. A cooperating agency is a Federal agency that has jurisdiction by law or special expertise with respect to the proposed project. Cooperating agencies must assume responsibility for the development of information and the preparation of environmental analyses early in the process.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
48	3	The socioeconomics section is based on data no associated with Port Aransas or Nueces County, but for Aransas Pass and surrounding areas.	Tables in Section 3.5 of the DEIS mistakenly reported Port Aransas in Aransas County. This error will be corrected in the FEIS. In addition, the discuss in this section has been reviewed for accurancy regarding the description of cities within each county. Other corrections have been made to this section to address the other specific issues listed in this comment.
48	4	Requests the Public Meeting be held in Port Aransas.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
49	1	Request that the Channel Deepening project, file number SWG-2019-00067, the Axis Midstream Terminal project, file number SWG-2018-00789, the PCCA Desalination Plant project, TCEQ Permit No. WQ0005253000, Lone Star Ports Air Quality Permit project. SOAH Docket no, 582-20-3438, and the Harbor Island Terminal Facility project, file number SWG-2019- 00245 all be considered as one big environmental problem.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
49	2	Concerned about the environmental impacts (threatened and endangered species, water quality, wetlands) the project would cause and that the reports from Triton state that there are unavoidable impacts.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
49	3	Consider Alternative 2 to avoid the negative impacts the proposed project will have.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
49	4	The proposed laying of pipeline (big 48") across the ICW and Red Fish bay will impact the seagrass vegetation, the thousands of living organisms, including the endangered species, for decades to come. It will also ruin recreational fishing for decades to come.	The proposed CDP does not include installation of a pipeline. Section 5 Cumulative Impacts includes impacts from past, present and resonably forseable projects, including pipelines.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
49	5	The dredging and the contaminants will disrupt/destroy the life cycles of numerous marine life that use the waterway to maintain their species survival.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
49	5	The dredging and the contaminants will disrupt/destroy the life cycles of numerous marine life that use the waterway to maintain their species survival.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
49	6	The dredge materials from the bay, Harbor Island and the Channel will spread contaminated materials to other wetlands and beaches.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
49	6	The dredge materials from the bay, Harbor Island and the Channel will spread contaminated materials to other wetlands and beaches.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
49	7	The proposed VLCC vessels will be huge in the small area around Harbor Island and Port Aransas. The noise, lights, and congestion will affect all residents and visitors to Port Aransas.	Impacts associated noise and socioeconomics associated with the with the Applicant's Proposed Action Alternative are addressed in Section 4.1.10.2 Noise and Section 4.4.2 Socioeconomics.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
49	8	These VLCC vessels will displace a gigantic amount of water in the small area around Port Aransas. The effect on the ferry system will be devastating, yet no one has talked about it.	The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) indicate that the CDP would have minimal impacts to the shorelines along the CCSC. Hydrodynamic and salinity modeling was conducted (see Appendix I). Overall, the impact of CDP on water level is insignificant. It is unlikely to increase the flood risk associated with changes in high tide or navigation risk associated with the changes in low tide and mean sea level in the Corpus Christi Bay. The impact on water level should be limited to the segment of the navigation channel from Point Mustang to Humble Basin. The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. *Response continues on next row.*
	8	These VLCC vessels will displace a gigantic amount of water in the small area around Port Aransas. The effect on the ferry system will be devastating, yet no one has talked about it.	Under the proposed project, it anticipated Axis Terminal's inbound/ outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
49	9	These giant LVCC vessels, according to Appendix K: Ship Simulation, will take up so much room that recreational boating will be dangerous and the Ferry system will be halted causing tremendous backups.	Under the Applicant's Proposed Action Alternative, there would be no increase in VLCC vessel traffic and no change to the VLCC one-way traffic restrictions. However, due to reductions in reverse lightering there will be a decrease in tanker vessel traffic, by reducing the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations, thereby reducing commercial and recreational marine vessel transit conflicts. The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. *Response continues on next row.*
	9	These giant LVCC vessels, according to Appendix K: Ship Simulation, will take up so much room that recreational boating will be dangerous and the Ferry system will be halted causing tremendous backups.	Under the proposed project, it anticipated Axis Terminal's inbound/ outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
49	10	The dredging itself, will pose a threat to the wetlands, bays and the whole marine ecosystem.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
49	11	Axis Midstream Terminal project, Lone Star Ports project, and the Harbor Island Terminal Facility project, if allowed, will destroy Port Aransas tourism with noxious odors, and harmful polluting gases.	Past, present, and reasonably foreseeable future actions in the study area are discussed in Section 5.0.
50	1	Does not support the project being constructed.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
50	2	The effects on the Port Aransas and Mustang Island marine environment will be significantly negative due to the likely resulting increase in turbidity of bay side waters, and the deposition of spoils (containing organic matter-containing sediments) off of our beaches.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
50	3	This project will have a disproportionately negative and long-term impact on the Port Aransas & Mustang Island businesses and communities with little to no compensating factors. Tourism, fishing and environmental preservation are sustainable and a huge asset to individuals and families in Texas and beyond.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism.
51	1	Does not support the project being constructed.	Thank you for your comment.
51	2	Supports the offshore alternatives.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
52	1	Does not support the project being constructed.	Thank you for your comment.
52	2	Supports the offshore alternatives.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
53	1	Does not support the project being constructed.	Thank you for your comment.
53	2	Supports the offshore alternatives.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
54	1	Does not feel that 45 days to review the DEIS is enough.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
54	2	Port is continuing to deceive the public by hiding studies that must be included to make the application complete.	An extensive independent study was conducted by USACE in compliance with Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) regulations. These studies utilized the best available scientific information and reached objective, scientifically-based conclusions. Studies conducted for the CDP included: Sediment Transport Modeling Study (Appendix G), Vessel Wake Analysis (Appendix H), Hydrodynamic and Salinity Modeling Study (Appendix I), Ship Simulation Study (Appendix L), Propeller Scour Study (Appendix M), and Underkeel Clearance Study (Appendix N). Additional studies conducted by the Applicant include: Wetland Delineation, Aquatic Surveys, Threatened and Endangered Species Surveys, Marine and Cultural Resources Study, Water and Sediment Quality Study. The results of these studies were incorporated into the impacts (Section 4.0), Biological Assessment (Appendix D), and EFH Assessment (Appendix E) of the DEIS. In addition, additonal resources that were not included in the appendices were added to the USACE's Special Project Website. The comment period was extended to August 9, 2022 to provide the public more time to review these additional materials.
54	3	The DEIS should be withdrawn, finished and released again for a real public review and not worry about FAST41 timelines and hiding important information.	Thank you for your comment.
55	1	Concerned about the ecosystem around Port Aransas and Gulf of Mexico and that we have to pay attention to the scientific data, i.e. that plankton produce 50% of oxygen on Earth and global warming destroying the ocean.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
56	1	Does not support the project being constructed as does not want the damage to the beaches or economy.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
57	1	Opposed to having dredged material placed offshore and along beaches in Port Aransas.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
57	1	Opposed to having dredged material placed offshore and along beaches in Port Aransas.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
57	2	Supports the offshore mooring alternative.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
58	1	Dredging will ruin Port Aransas, creating a greater risk for spills and toxic pollution that will kill marine life and endanger people.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
59	1	Requesting a 90 day extension for the comment period on the DEIS to allow the public to adequately review the DEIS.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
59	2	Requesting in-person Public Meeting be held in the communities that would be most impacted by the project as the only one so far was at a location difficult for most residents to participate.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
60	1	Several of the appendices do not include a complete analysis: Appendix F (Cultural Resources), Appendix J (analysis of Dredged Material, and Appendix N (404(b)(1) analysis). Without completed analysis it is premature to ask the public to submit complete comments on the DEIS. The community should be adored an opportunity to review the complete appendices before having to form their comments.	Consultation is ongoing with the SHPO, USFWS, NMFS, EPA. The DEIS included Appendix D (Biological Assessment), Appendix E (EFH Assessment), Appendix J (Sampling Analysis Plan) that all provided preliminary conculsions. USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
60	2	Documents that were relied on and referenced in the DEIS have not been made available to the public, despite an open records request to the Port. The public must have access to these documents, to determine whether the Draft EIS is based on reliable and credible data.	The appenices in the DEIS included materials prepared in connection to the EIS that were used to substantiate the analysis. The Appendix is not intended to be an encyclopedic compendium of all resources. Many of the resoucres cited in the reference section are already publically avaliable. The additonal resources that were not included in the appendices were added to the USACE's Special Project Website. The comment period was extended to August 9, 2022 to provide the public more time to review these additional materials.
60	3	The location of the June 22 Public Meeting was not convenient for those most likely impacted by the project. Robust community engagement requires convening more than one public meeting, at more than one location. An extension of the comment deadline would allow the Port and the USACE to engage in the type of robust community discussion that is necessary and desired by the community.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period. USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
60	4	Request that the deadline to submit comments on the DEIS be extended 60 days from the date which the draft appendices are completed, and all referenced documents are made available to the public.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
60	5	Requests that the USACE hold additional public meetings during the extended comment deadline to reach the impacted communities in San Patricio, Nueces, and Aransas counties.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period. USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
61	1	Concerned that the VLCCs will disrupt the flow of ferry traffic can cause extended ferry waits and harm the safety of residents and tourists getting off the island in the event of an emergency.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
62	1	Impossible to read the DEIS in such a short period of time.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
63	1	The endangered turtle population in the subject section of the ship channel will be decimated. The turtles are just starting to recover from the jetty repairs completed after hurricane Harvey. How many other sensitive or endangered species will be impacted by the initial and future maintenance dredging?	Impacts associated threatened and endangered species with the Applicant's Proposed Action Alternative are addressed in Section 4.2.5.2 and Appendix D. USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
63	2	Following the last channel deepening project, clay was washing up on beach in Port Aransas as the spoil was dumped off shore. We are facing a lot more volume with this project, and more likely to encounter clay given the increased depth of dredging. We do not want that on our beaches.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
63	2	Following the last channel deepening project, clay was washing up on beach in Port Aransas as the spoil was dumped off shore. We are facing a lot more volume with this project, and more likely to encounter clay given the increased depth of dredging. We do not want that on our beaches.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
63	3	Concerned that turning around VLCCs on either side of the Ferry would cause additional marine traffic congestion.	Under the Applicant's Proposed Action Alternative, there would be no increase in VLCC vessel traffic and no change to the VLCC one-way traffic restrictions. However, due to reductions in reverse lightering there will be a decrease in tanker vessel traffic, by reducing the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations, thereby reducing commercial and recreational marine vessel transit conflicts. The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. *Response continues on next row.*
63	3	Concerned that turning around VLCCs on either side of the Ferry would cause additional marine traffic congestion.	Under the proposed project, it anticipated Axis Terminal's inbound/ outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
63	4	Storm Surge is going to increase at Port Aransas as a result of deepening the channel, and also in the Bay. We should not compound that problem.	Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with "planned future conditions" representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI's modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI's application of model parameters or inputs for the ADCIRC/SWAN models used in its study.
63	5	There are more appropriate alternatives, i.e. offshore.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
64	1	Would like the USACE to consider holding another meeting in Port Aransas where the citizens most directly impacted live.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
65	1	Would like the public comment period extended for an additional 90 days.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
66	1	Requesting an extension of the public comment period.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
66	2	Requesting a public meeting be held in Port Aransas.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
66	3	DEIS Chapter 3, page 98 and 100, places Port Aransas in Aransas County, when it is located in Nueces County.	Thank you for your comment. The tables is Section 3.5 of the EIS have been corrected to show Port Aransas in Nueces County.
67	1	Supporting the comments provided by Cathy Fulton in an email dated July 14, 2022, 4:48 PM.	N/A
68	1	Does not support the project being constructed.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
68	2	The transporting and loading can be handled offshore without the various hazards and problems that will arise in the Port Aransas area.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
68	3	The project will further congest the area and impede normal ship and road traffic in the area of the ferry.	Under the Applicant's Proposed Action Alternative, there would be no increase in VLCC vessel traffic and no change to the VLCC one-way traffic restrictions. However, due to reductions in reverse lightering there will be a decrease in tanker vessel traffic, by reducing the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations, thereby reducing commercial and recreational marine vessel transit conflicts. The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. *Response continues on next row.*
68	3	The project will further congest the area and impede normal ship and road traffic in the area of the ferry.	Under the proposed project, it anticipated Axis Terminal's inbound/ outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
68	4	Feels the citizens and visitors will be impacted, i.e. tourism, water recreation. These could be adversely impacted causing financial impact to many local communities.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term impacts to recreational activities (e.g. boating, fishing, beach visitation) from the construction of the project. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism.
68	5	The environmental impacts would be significant with the increased large ships berthing in the immediate area of the main ship channel entrance and the time to load the ships and get them in and out of the proposed docks.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
68	6	With the tidal impacts of the movement of water and the additional movement caused by the increased ship traffic in and around the channel entrance would be a negative to the region.	The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) indicate that the CDP would have minimal impacts to the shorelines along the CCSC.
68	7	Where is all the dredge to be place. It is a problem in most areas now, the constant dredging to keep the channel to the depth is now in most areas. There is only so much dredge placement area available.	Figure 2-1 in the EIS, Section 2.0 (Proposed Action and Alternatives), and Appendix C (DMMP) all provide information on proposed placement areas for dredged materials.
69	1	Inquiring where all the previously submitted comments on the project are and asking why the USACE is not disclosing those comments. The DEIS is again incomplete.	The scheduling for the development of the EIS, including the Draft EIS comment period, was developed to comport with requirements of both NEPA and FAST-41. To ensure appropriate public engagement, the public has been encouraged to provide comments to USACE on the project during the August 2019 Public Notice, the EIS Scoping meeting in June 2020 that included 4 public meetings, and the Draft EIS in July 2022. During all three of these comment periods, the USACE has received a significant response from the public. Comments submitted during scoping were included in Appendix B4 (Scoping Meeting Report, June 2020) of the DEIS. All comments are taken into consideration during the development of the EIS. If it was determined that there were significant impacts associated with a concern that was raised during scoping, it was analyzed in detail in the EIS.
69	2	Would like to know why none of the previous comments are addressed in the DEIS.	The scheduling for the development of the EIS, including the Draft EIS comment period, was developed to comport with requirements of both NEPA and FAST-41. To ensure appropriate public engagement, the public has been encouraged to provide comments to USACE on the project during the August 2019 Public Notice, the EIS Scoping meeting in June 2020 that included 4 public meetings, and the Draft EIS in July 2022. During all three of these comment periods, the USACE has received a significant response from the public. Comments submitted during scoping were included in Appendix B4 (Scoping Meeting Report, June 2020) of the DEIS. All comments are taken into consideration during the development of the EIS. If it was determined that there were significant impacts associated with a concern that was raised during scoping, it was analyzed in detail in the EIS.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
69	3	Concerned that the USACE is glossing over all the concerns about dredged material placement claiming the "beneficial dredged" placement will make all of the long-term impacts go away.	Beneficial use must be determined to the the Lease Environmentally Damaging Practicable Alternative (LEDPA) pursuant to a 404(b)(1) evalution.
69	4	Does not want dredged material being placed on the beaches or offshore.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
69	4	Does not want dredged material being placed on the beaches or offshore.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
70	1	With no new pipeline projects capable of bringing crude oil to Corpus Christi having been announced, proposed, or in any stage of permitting how does the 4.5MM bpd export estimate become achievable when current pipeline capacity is 2.4MM bpd? The Port is proposing that POCCA exports could grow to 4.5MM bpd in 2030 from 1.63MM bpd in 2021. Current pipeline capacity to POCCA is 2.4MM bbls so they are saying 2 new (1MM bpd) pipelines would get 4.5MM bbls to Corpus by then? Also what about the other Industries share in Inner Port, Ingleside, and Blue Water. It is a false premise to consider 4.5 bpd. Undermines the entire Permit and EIS.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
70	2	Alternative 3 (2.4.1) states that some inshore berthing would be required at Harbor Island and Ingleside to partially fill VLCC which would then go to the offshore SPM to fully load. The question is if the VLCC could fully load at the SPM why would it make the trip in shore to partially load at Harbor Island or Ingleside?	Alternative 3 does not consist of deepening the CCSC and does not require reverse lightering. Some inshore berthing would be required at Harbor Island and Ingleside to partially fill half-laden VLCCs. The half-laden VLCCs would be fully loaded at the SPM.
70	3	Why is the Harbor Island Terminal not included in the study nor the pipelines that would be required to supply the oil?	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
70	4	Why is there not an alternative that reflects the current capabilities of the Port and an incremental SPM project for the potential production growth?	The No Action alternative considers what would happen if the project is not permitted and approximates the current capabilities of the port. Alternatives 2 and 3 are similar to the No-Action in that the channel is not deepened, but includes a range from a single on SPM to multiple arrays of SPMs to analyze an incremental impact.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
71	1	Residents and visitors to Port Aransas have not been provided information about the project.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period. Additionally, information is provided on the USACE's Special Projects website.
71	2	Concerned the project will destroy the ecosystem and placement of dredged material clouding the water.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
71	3	Concerned about the ferry operation and delays that would occur and how that will impact many workers that depend on the ferry to get to and from work. Also visitors coming to Port Aransas having to wait even longer to get to the island.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
72	1	Concerned about the ferry delay for berthing and unberthing and how that will impacts tourists and locals.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
72	2	The following comments are regarding Appendix H (Vessel Wake Analysis) of the DEIS: Executive Summary: What is low speed and who will enforce the low speed?	Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
72	3	Executive Summary: Rapid drawdown can create strong currents in harbor inlets.	Drawdown is noted as being the predominent driver for bed and shoreline change and is due to constrained nature of the channel.
72	4	Executive Summary: The traffic numbers would change (increase) due to "the planned Axis and Harbor Island terminals" are not yet built. Where are these ships currently going? So it will increase ship traffic not decrease or no change.	The Executive Summary states: "There would be no increase in VLCC vessel traffic and no change to the VLCC one-way traffic restrictions. Reductions in reverse lightering would decrease vessel traffic, by reducing the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations."
72	5	Executive Summary: What are the localized changes? What is considered "not significant"?	While the language in the Executive Summary is subjective and related to the relative change between the Future Without Project and Future With Project channel scenarios (i.e. not the total predicted future change), refer to quantiative results in Section 5 of the Vessel Wake Analysis (Appendix H).
72	6	Executive Summary: The sediment that is displaced must go somewhere. Is segments 4,5 and 6 on Figure 1.1 page 1 not part of the federal navigation channel?	Segments 4, 5, and 6 are part of the Federal navigation channen and they are part of the proposed channel deepening.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
72	7	Page 3, Figure 1.3 Primary Waves Illustrations: Their small scale illustrations is showing wave breaking at the shoreline. Most of the primary waves break prior to shoreline which produces a lot of energy when hitting the shoreline.	Wave breaking prior to the shoreline will be dependent on vessel size, speed and water level (i.e. tide), and Figure 1.3 in Appendix H (Vessel Wake Analysis) is included from available imagery as an example of the key processes. Refer to model results in Section 4, Appendix H that indicate wave breaking prior to the shoreline does occur for larger inbound vessels.
72	8	Page 5, Funwave Numerical Model: Per USACE: FUNWAVE is the fully nonlinear Boussinesq-type phase resolving numerical wave model capable of solving complex nearshore wave induced coastal processes within intermediate and shallow water regimes. What is nearshore? What depth is intermediate and shallow?	Intermediate and shallow water depths are dependent on wave period and hence will differ for the primary and secondary wakes. For shorter period secondary wakes, these depths will be shallower than the channel bed level.
72	9	Page 5, Capping Water Depth for Modeling: Funwave cannot model anything >50ft deep. Using a 15ft depth cap for secondary wave action when the water in that area is >45ft. How can the modeling give a realistic representation.	The modeling of secondary wakes is considered realistic as in reality propagation of these short period waves are unaffected by the relatively deep channel depth (>50 feet). Capping the depth as was done for the study does not alter this outcome, but allows for the underlying Boussinesq equations to be solved. It is noted that this was only done for the secondary wake simulations and not the primary drawdown wave simulations which are the principal driver for bed and shoreline change along the CCSC.
72	10	Page 6, XBeach Modeling Illustration: The illustration only shows 8 profiles not 9. What will the ship hydrodynamic effects be on ships docked and loading pipe connectors at Enbridge? Motion caused by primary and secondary waves over time can weaken the connectors/pipes. We have seen secondary waves turn from one ship turn another sideways. If Enbridge can feel effects of the hydrodynamics, it would stand to reason that IOB shoreline will also feel these effects.	The correct number of Xbeach profiles is 8, as per the figure. The effects on ships and loading pipe connectors at Enbridge was not in scope of the Vessel Wake Analysis (Appendix H). It is noted that the outcomes of the study do not predict no future shoreline change, but indicates that the CDP would have minimal additional impacts to the shorelines along the CCSC in comparison to a Future Without Project channel scenario.
72	11	Page 8, Vessel Dimensions for Modeling: Supposedly the VLCC that will be using this deeper channel will have a draft of 68ft. The modeling that they are using is for VLCC with a draft of 52ft thereby minimizing the vessel hydrodynamics effects. The report is saying that "at times" the smaller VLCC draft is used to due to channel being shallow when in fact the channel will be deeper	The primary areas for which change of the natural shoreline is being assessed are west of the channel deepening project (that will establish a 75 foot channel up to the Harbor Island Terminals). Beyond the project extent the baseline Future Without Project and Future With Project scenarios depict a channel configuration following the maintenance dredging campaign currently being executed by the USACE with a navigable depth of 54 feet along the full length of the channel. To navigate these channel lengths, VLCC's will be required to restrict their draft to 52 feet.
72	12	Page 11, Pilot Workshop: Pilots saying outbound transit speed of 10.5 knots unrealistic. Baird capped the mean at 8.1 and used that for wake analysis. VLCC come out of POCC at times >11 knots.	The vessel speed was limited based on Pilot advice for an outbound partially laden 52 foot draft vessel navigating a 54 foot channel.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
72	13	Page 12, Primary Wave Estimate: 8 knots (capped speed) will have waves a little over a foot. 12 knots (data from AIS) was actually used in the table verifying that the ships do go faster than 8 knots and can produce primary waves anywhere from 4-5 feet which can cause damage to property/boats, people by either drawing it in or the wave energy that is produced.	The vessel speed was limited for an outbound partially laden 52ft draft vessel navigating a 54 foot channel only, based on Pilot advice. The annualized results are a weighted average of the three vessel speed scenarios, with a higher weighting given to the mean speed scenario (minimum 20%, mean 60%, maximum 20%). This was considered appropriate for the Vessel Wake Analysis that was assessing the additional impact of the CDP by comparing Future Without Project and Future With Project channel scenarios.
72	14	Page 13, Secondary Wave Estimate: 1-2 ft waves will have an impact on smaller recreational vessels and will also generate a force when hitting the shoreline.	Secondary waves have the potential for impacts at the shoreline, however are more dispersive and of less import in comparison to the primary drawdown waves. The impacts from secondary waves are captured in the vessel wake analysis (Appendix H).
72	15	Page 19, Annualized Bed Change: Pelican Island will have erosion even with armoring and is localized. The primary and secondary waves will create erosion to all shorelines not just Pelican Island since the VLCC will be traveling the full channel.	This is indicated by the model results, however the discussion on page 19 of the Vessel Wake Analysis (Appendix H) refers to the comparison between the Future Without Project and Future With Project channel scenarios.
72	16	Page 19, Annualized Bed Change: Stronger primary and secondary waves will put more force on the seagrass. Uprooting or killing the grass due to turbidity	The comparative analysis of vessel wakes under Future Without Project and Future With Project channel scenarios captures both the change in magnitude of primary and secondary waves but also the change in frequency due to changes in vessel traffic as a result of the CDP. The analysis indicates that the CDP would have minimal impact when considering the additional impacts to the shorelines along the CCSC.
72	17	Page 25, Annual Shoreline Change Estimates: Unrealistic how 6 extra VLCC transits will not have effect on shoreline.	The comparative analysis of vessel wakes under Future Without Project and Future With Project channel scenarios captures both the change in magnitude of primary and secondary waves but also the change in frequency due to changes in vessel traffic as a result of the CDP. The analysis indicates that the CDP would have minimal impact when considering the additional impacts to the shorelines along the CCSC.
72	18	Page 26, Annual Shoreline Change Illustration 6.3: FWOP not showing on any graphs.	The FWOP is included in the graphs however is not discernable underneath the FWP profile, highlighting the neglible impact of the CDP.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
72	19	Page 27, Conclusions: The conclusion states "As a result, the primary wave is the predominant driver for bed and shoreline change." But section 6.3 phrased it as "Differences in he shoreline change estimates for the FWOP and FWP scenarios are negligible with no observable difference in the annual result". Contradicting bed/shoreline change to negligible change. EIS p244 vol 1 Alternative 1 However, larger vessels like VLCCs going through the CCSC would produce larger wakes, which could degrade shoreline Critical Habitat for Piping Plover. However, vessel wake analysis conducted 4.0 ENVIRONMENTAL CONSEQUENCES (*NEPA REQUIRED) 4-63 by Baird (2022b; Appendix H) indicate that the CDP would have minimal impacts to the shorelines along the CCSC. contradicting	The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) assessed the additional impact of the CDP by comparing Future Without Project and Future With Project channel scenarios. The analysis does not conclude that no future bed and shoreline change is expected. Annualized bed change results (in Section 5) and shoreline change (in Section 6) quantify the expected change in the Future Without Project scenario. The analysis indicates that the CDP would have minimal additional impacts to the shorelines along the CCSC compared to the Future Without Project scneario.
72	20	Page 27, Conclusions: Phrased as "A general recession trend is observed in analysis of historical shoreline positions and the annual shoreline change modeling, and no discernable increase in the recessional trend as a result of the project could be identified" The "trend" is also relevant to erosion not caused naturally. EIS p241-242 vol1 Alternative 1 Larger vessels such as VLCCs going through the CCSC with their tugboats may affect shoreline erosion and degrade or reduce the amount of shoreline for use by birds and terrestrial wildlife. However, vessel wake analysis conducted by Baird (2022b; Appendix H) indicate that the CDP would have minimal impacts to the shorelines along the CCSC...conflicting	The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) assessed the additional impact of the CDP by comparing Future Without Project and Future With Project channel scenarios. The analysis does not conclude that no future bed and shoreline change is expected. Annualized bed change results (in Section 5) and shoreline change (in Section 6) quantify the expected change in the Future Without Project scenario. The analysis indicates that the CDP would have minimal additional impacts to the shorelines along the CCSC compared to the Future Without Project scneario.
73	1	Urges the Port to protect Port Aransas by supporting clean and renewable energy, and energy efficiency measures, instead of harming our environment by aiding the deepening of the Corpus Christi Ship Channel.	Thank you for your comment.
74	1	Requesting copies of three reports: Montgomery and Bourne (2018); EPA/USACE (2008 and 2018).	These reports are publicly available.
75	1	We are handing out a 1-page flyer. I gave some to Dan and am copying more. I have sent in 5 letters thus far. Today is a big letter, the joke of the reverse-lightering claims.	N/A

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
76	1	Commenter provides a figure from Volume III of the DEIS page 927 (Ship Simulation Report), adding a number of landmarks that will be impacted by the project. Adding that this figure is incorrect and missing information.	Generic figure only meant to show the navigation channel in relation to the dock facilities.
76	2	Expressing concerns about the ferry and how the project will impact ferry operations. Concerned that the workforce taking the ferry to and from work will be impacted. Concerned tourists coming for summer will have extremely long wait times.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. *Response continues on next row.*
76	2	Expressing concerns about the ferry and how the project will impact ferry operations. Concerned that the workforce taking the ferry to and from work will be impacted. Concerned tourists coming for summer will have extremely long wait times.	Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
76	3	The DEIS is not complete and should be withdrawn, corrected, and peer reviewed before a decision can be made.	Thank you for your comment.
77	1	Concerned about the environmental impacts this project could have with the placement of dredged material and how this will adversely affect the balance of wildlife in the area.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
77	2	Load the VLCC's offshore, this is safer.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
78	1	Concerned about the environmental impacts the project will have on wildlife and people who live on the coast.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
79	1	Commenting on an email from Cathy Fulton (re: DEIS and the ferry system) that her letter was good and that people can comment as much as they want.	N/A
80	1	Commenting on an email from Cathy Fulton (re: DEIS and the ferry system) that her letter was good.	N/A
81	1	Asking elected officials to withdraw support for the project and support renewable energy and energy efficiency measures instead.	Thank you for your comment.
81	2	Concerned about the potential to dredge toxic waste and place it on Mustand Island and St Joe's beaches causing harm for the environment and people who live there. This would increase the risk and realistically the amount of oil spills, air pollution, flooding, and storm surge, putting the safety of our communities, animals, and ecosystems at risk.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
81	3	Historically, there has been a violation of the rights of Indigenous people, particularly, the Karankawa people who have sacred artifacts and land in "Corpus Christi". Land developments, such as the Enbridge infrastructure expansion, violate the rights of the Karankawa people and harm both the land & ocean due to the toxicity of manufacturing & creating energy through fossil fuels. I am asking that you also ask for informed consent from the Indigenous People of the Coastal Bend such as the Karankawa people.	The proposed project was coordinated with the Federally Recognized Native American Tribes who have expressed an interest in the project area (the Apache Tribe of OK, the Comanche Nation of OK, the Kiowa Indian Tribe of OK, the Mescalero Apache Tribe, the Northern Arapaho Tribe, the Tonkawa Tribe of OK, and the Wichita and Affiliated Tribes). None of the Native American Tribes contacted expressed an interest in engaging in consultation on the project. The Karankawa Kadla are not recognized as a Tribe by the Federal Government and accordingly, any discussions with the Karankawa should be conducted under the Public Interest Review.
82	1	Does not support the project being constructed.	Thank you for your comment.
82	2	Concerned the dredging will create hazards to the local beaches, bays and marine life.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
83	1	Sending a blurb that sent via email and social media about the project and lack of concern and bias against the public.	Thank you for your comment.
83	2	Expressing concern that the USACE only extended the public comment period 18 days not because the public requested it but because of the studies that were withheld from the DEIS. The public cannot possibly get through all the information in the 33 baseline studies released in this timeframe.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
83	3	Requesting a public meeting be held in Port Aransas or Aransas Pass.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
83	4	The DEIS is grossly incomplete and fails to acknowledge the over 15,000 comments received by the public. None of the comments sent are noted in the DEIS.	The scheduling for the development of the EIS, including the Draft EIS comment period, was developed to comport with requirements of both NEPA and FAST-41. To ensure appropriate public engagement, the public has been encouraged to provide comments to USACE on the project during the August 2019 Public Notice, the EIS Scoping meeting in June 2020 that included 4 public meetings, and the Draft EIS in July 2022. During all three of these comment periods, the USACE has received a significant response from the public. Comments submitted during scoping were included in Appendix B4 (Scoping Meeting Report, June 2020) of the DEIS. All comments are taken into consideration during the development of the EIS. If it was determined that there were significant impacts associated with a concern that was raised during scoping, it was analyzed in detail in the EIS.
86	1	Does not support the project being constructed.	Thank you for your comment.
86	2	Concerned about the environmental impact to sea life.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
86	3	Concerned about the impact to fishing and tourism which Port Aransas depends upon.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism.
86	4	Concerned it would badly constrain vessel traffic in the narrow channel and present an oil spill hazard.	Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
86	5	Build offshore.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
87	1	Commenter concerned that the comments received previous to the Draft EIS were not referenced in the document.	The scheduling for the development of the EIS, including the Draft EIS comment period, was developed to comport with requirements of both NEPA and FAST-41. To ensure appropriate public engagement, the public has been encouraged to provide comments to USACE on the project during the August 2019 Public Notice, the EIS Scoping meeting in June 2020 that included 4 public meetings, and the Draft EIS in July 2022. During all three of these comment periods, the USACE has received a significant response from the public. Comments submitted during scoping were included in Appendix B4 (Scoping Meeting Report, June 2020) of the DEIS. All comments are taken into consideration during the development of the EIS. If it was determined that there were significant impacts associated with a concern that was raised during scoping, it was analyzed in detail in the EIS.
88	1	It is unclear how the Port's preferred alternative will be reconciled with the requirement to identify a least environmentally damaging practical alternative, as part of the CWA Section 404 permitting process, which is referenced in the Draft EIS and in Appendix N - 404(b)(1) Guidelines Evaluation. The Draft EIS has identified alternatives, other than the PCCA's proposed action alternative, that could result in fewer direct impacts to aquatic resources. As identified, both the offshore single point mooring alternative and the inshore/offshore combination alternative result in fewer impacts and are comparable to the no action alternative. As stated in the Draft EIS, the USACE will consider all comments received during the comment period to assist in determining whether to issue, modify, condition or deny any permit for the proposed Action. Please address this alternative selection concern under Section 404 in the Final EIS.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
88	2	There are concerns with the Port's no mitigation approach without further evaluation to quantify the benefits of the proposed beneficial use activities to ensure appropriate in-kind replacement of impacted resources. Recommend the Port attempt to quantify future without project versus future with project estimates of aquatic resource functions using available habitat evaluation procedures or other applicable analysis to quantify placement site benefits. Until such time project benefits can be quantitatively identified, it is unclear whether adequate benefits to resources will be provided to offset aquatic impacts as described in the dredged material management plan. The quantification of benefits derived from the proposed beneficial use placement sites should be demonstrated along with requirements to ensure the likelihood of success and long-term sustainability with adaptive management as necessary.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
88	3	If the beneficial use approach continues to be pursued, we recommend the proposed beneficial use areas be monitored for ecological success to ensure anticipated benefits are achieved. As proposed, temporal losses of aquatic resource function would occur given the placement of dredged material in seagrasses or wetlands is a permanent impact. These temporal losses should be addressed as part of the forementioned habitat evaluation procedures. We again note that it appears other alternatives are identified and exist that would impact significantly fewer aquatic resources and limit the need for mitigation and/or beneficial use to offset those impacts. Please clarify and fully address this concern in the Final EIS.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
88	4	Community concerns have been expressed regarding the evaluation impacts to salinity and tidal amplitude. The magnitude of salinity and tidal amplitude changes are modeled; however, limited conclusions are drawn as to the impacts of these changes upon aquatic resources. It is unclear as to the basis for the determination that the minor change in salinity identified by modeling would not be expected to result in impacts.	Modeling by Baird (2022) (Appendix I) indicate minor increases in salinity (less than 1 ppt) are anticipated under Alternative 1. As described in the DEIS, most estuarine organisms occupying these environments are ubiquitous along the Texas coast and can tolerate a wide range of salinities (Pattillo et al., 1997). Additional information regarding salinity tolerances and salinity maximums for common fish, shellfish, wetlands, and submerged aquatic vegetation within the study area has been added to Section 3.2.3.4 (Salinity).
88	5	Similarly for tidal amplitude, concerns associated with the modeled increase in tidal amplitude that may result near Harbor Island appear to have been discounted even though the change may be ecologically significant for that specific area.	Tidal amplitude increases, particularly near Harbor Island, were identified as a cumulative impact in Section 5.5.
88	6	Sediment transport modeling associated with the nearshore berm components do not clearly support the merits of beneficial use as it is stated the nearshore berm has little influence on beach stability. The berms being subject to erosion and sediment loss do not necessarily equate to ecological benefit. EPA recommends modeling estimate sediment utilization by the ecosystem to further support these proposed beneficial use components. To address these concerns EPA asks that the Final EIS address whether it is appropriate to base the effectiveness of the proposed nearshore berms based only upon the monitoring of the ecological success of the adjacent beaches. Please clarify and fully address this concern in the Final EIS.	Numerical model results indicated that the offshore berm provides some level of protection of the beach against long period waves such as those during Hurricane Delta (Figure 7.12, Appendix G [Sediment Transport Modeling]). The cumulative effect of this protection could support the ecological health of the nearby beaches that can be documented through monitoring.
88	7	Pursuant to NEPA, the USACE is required to comply with Executive Order 13175, Consultation and Coordination with Indian Tribal Governments. A discussion related to coordination and consultation with Indian Tribal Governments was not provided in the Draft EIS. EPA recommends that the Final EIS describe the process and outcome of government-to-government consultation between the USACE and each of the tribal governments within the project area, issues that were raised (if any), and how those issues were addressed in the selection of the proposed alternative. Please fully address this concern in the Final EIS.	The proposed project was coordinated with the Federally Recognized Native American Tribes who have expressed an interest in the project area (the Apache Tribe of OK, the Comanche Nation of OK, the Kiowa Indian Tribe of OK, the Mescalero Apache Tribe, the Northern Arapaho Tribe, the Tonkawa Tribe of OK, and the Wichita and Affiliated Tribes). None of the Native American Tribes contacted expressed an interest in engaging in consultation on the project. The Karankawa Kadla are not recognized as a Tribe by the Federal Government and accordingly, any discussions with the Karankawa should be conducted under the Public Interest Review

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
88	8	EPA recommends that the USACE evaluate the totality of the project adverse environmental impact, especially air emission and noise to minority and low-income populations, and any indirect cumulative impacts contributed and associated with other major federal actions in the project vicinity such as the Harbor Bridge Project, a major Federal Highway Administration and TxDOT Highway Project within the affected project area. Please fully address this concern in the Final EIS.	Impacts on low income and minority populations from increases in noise and air emissions under each alternative are discussed in Section 4.4.2. Additional information regarding the Karankawa Tribe was added to Section 3.5. The Harbor Bridge Project is included in the Cumulative Impacts (Section 5.0). Potential noise and air cumulative impacts are discussed in Section 5.4. For those projects that result in an increase in surface or marine traffic, there could be a potential contribution to air quality or noise cumulative impacts.
88	9	The Final EIS should recognize that all Non-Road Engines be certified as in compliance with the EPA Tier 4 regulations found at 40 CFR Parts 89 and 1039, which includes new and in-use nonroad compression-ignition engines. Additionally, should any land-clearing activities occur which result in the use of open burning to dispose of woody debris, coordination should be conducted with the TCEQ to determine air quality conditions such as atmospheric inversions prior to performing open burning activities, and consider any expected air quality/ visibility impacts to Class I Federal Areas identified in 40 CFR Part 81, Subpart D. This also includes assurance that all project personnel are educated and made familiar with the requirements of the Dust Control Plan. Please fully address this concern in the Final EIS.	The statement was added to Section 4.1.9.2.2, subsection Dredging Emissions Factors, 5th sentence modified to read: "All equipment is anticipated to use diesel engines that would be compliant with Chapter 40 of the Code of Federal Regulations (CFR) Parts 89, 1039 and 1042 that govern the type of construction and marine equipment engines that would be used in construction." The following was also added to the end of Section 11.2: . "As discussed in Section 4.1.9.2.2, non-road and marine engines used in construction would be compliant with 40 CFR 89, 1039 and 1042. The USACE will rely on EPA and TCEQ to assure compliance through their respective CAA regulatory and enforcement programs."
90	1	Does not support the project being constructed.	Thank you for your comment.
90	2	Increased oil production and exports will exacerbate the impacts of climate change as that oil is combusted.	The global extraction, transportation, and consumption of crude oil is outside of the USACE's Scope of Analysis, as defined in 33 CFR 325 Appendix B, for the proposed CDP.
90	3	The Coastal Bend region is situated on a low-lying coast subject to coastal erosion and hurricanes so we have reason to be concerned about sea level rise and the growing risk of stronger hurricanes. It is ironic that the very facilities that may benefit from the ability to export more oil if the channel is deepened will stand a greater chance, due to their efforts, of being heavily damaged by a hurricane made more powerful by climate change.	Impacts associated with climate setting (Climate Change, RSLR, Severe Storms and Hurricanes, and Storm Surge Effects) under the Applicant's Proposed Action Alternative are addressed in Section 4.1.3
90	4	If the Harbor Island facility is built, there will also be greater potential for oil spills in close proximity to sensitive natural habitats like Redfish Bay where Gulf species rely upon clean water and abundant seagrasses to thrive.	This information is addressed in Cumulative Impact sections 5.4.3 and 5.4.7.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
90	5	Concerned that the proposed dredge spoils marked as B1 in Figure 2-1 in Volume 1 of draft EIS will smother the sand bars on the north side of the Aransas Channel jetties that cause the Gulf swells to form into rideable waves and urge the Port and USACE to find an alternate site for the spoils. The addition of spoils in that location could ruin surfing on San Jose Island for years.	The numerical model results in Appendix G indiciate that the berms will function as stable nearshore berms with only minor sediment transporation.
90	6	Concerned that sedimentary materials that differ from the existing fine grained beach sand may be deposited in nearshore waters both north and south of the channel. This occurred as a result of a 2011 beach renourishment project in which the Brownsville Ship Channel was dredged, and balls of clay were introduced onto the beach on South Padre Island.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
90	6	Concerned that sedimentary materials that differ from the existing fine grained beach sand may be deposited in nearshore waters both north and south of the channel. This occurred as a result of a 2011 beach renourishment project in which the Brownsville Ship Channel was dredged, and balls of clay were introduced onto the beach on South Padre Island.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
90	7	Port Aransas' economy relies heavily upon tourism and business owners should not have to deal with a loss of business due to a miscalculation resulting in undesirable beach conditions.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term impacts to recreational activities (e.g. boating, fishing, beach visitation) from the construction of the project. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism.
91	1	With no new pipeline projects capable of bringing crude oil to Corpus Christi having been announced, proposed, or in any stage of permitting how does the 4.5MM bpd export estimate become achievable when current pipeline capacity is 2.4MM bpd? The Port is proposing that POCCA exports could grow to 4.5MM bpd in 2030 from 1.63MM bpd in 2021. Current pipeline capacity to POCCA is 2.4MM bbls so they are saying 2 new (1MM bpd) pipelines would get 4.5MM bbls to Corpus by then? Also what about the other Industries share in Inner Port, Ingleside, and Blue Water. It is a false premise to consider 4.5 bpd. Undermines the entire Permit and EIS.	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The Applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, Federal review of a navigation district's stated need for the project in the marketplace.
91	2	Alternative 3 (2.4.1) states that some inshore berthing would be required at Harbor Island and Ingleside to partially fill VLCC which would then go to the offshore SPM to fully load. The question is if the VLCC could fully load at the SPM why would it make the trip in shore to partially load at Harbor Island or Ingleside?	There are a wide range of possibile combinations off onshore and offshore the can be used. USACE describes the most likely operations, but understands the the economics may change temproarily or permanently the operations at any time and does not speculate or document the entire range of possibilities.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
91	3	Why is the Harbor Island Terminal not included in the study nor the pipelines that would be required to supply the oil?	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
91	4	Why is there not an alternative that reflects the current capabilities of the Port and an incremental SPM project for the potential production growth?	The No-Action Alternative reflects the current capabilities of the Port and is described in Section 2.1. Alternative 3 (Inshore/Offshore Combination) is the incremental SPM for the project with the goal to compare to the preferred alternative.
92	1	Commenter is not happy that the Public Meeting was held in Corpus Christi. Feels that this is a lack of concern/ discrimination for those who are disabled and cannot travel long distances to have their opinions heard. Requests that more meetings be held in the areas most affected.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
92	2	The public does not have time to review the additional documents that were uploaded regarding the DEIS.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
92	3	Unhappy that the public meeting took place during the summer when people are traveling and unable to attend.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
92	4	Requests an extension to the comment period beyond August 9 to give the public more time to comment.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
93	1	The DEIS should adequately demonstrate that the Applicant's preferred alternative is the least environmentally damaging alternative to meet the stated purpose and need. The Project is expected to result in increases in large vessel traffic, tidal amplitude, storm surge, salinity, turbidity, shoreline propeller scour, maintenance dredging, and inshore oil spill risk. These increases could negatively impact threatened and endangered species, migratory birds, wetlands, and seagrass. The FWS agrees that the use of suitable dredged material to renourish beaches and restore eroded habitats can be beneficial; however, these benefits may not outweigh irreversible damage that the Project could potentially cause.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
93	2	The DEIS states that the presence of offshore ports in Alternatives 2 and 3 would reduce or eliminate the need for Very Large Crude Carriers (VLCC) to enter the CCSC and reverse lightering offshore. However, in 2020, the PCCA became the leading crude oil exporter in the U.S. and crude oil exports are forecasted to increase 1600% by 2030 (https://www.portcorpuschristiprojects.com/deepening-project/market-demand/). Construction of the new Harbor Bridge in Corpus Christi is scheduled to be completed in 2024, allowing VLCCs to enter the Inner Harbor. Given the increased market demand and possible accessibility to the Inner Harbor, large vessels could potentially still opt to enter the CCSC for partial loading.	There are a wide range of possibile combinations off onshore and offshore that can be used. USACE describes the most likely operations, but understands the the economics may change temproarily or permanently the operations at any time and does not speculate or document the entire range of possibilities.
93	3	A VLCC can take 48 to 60 hours to fully load from a deepwater port. A single point mooring buoy offshore may lead to long wait times, resulting in some vessel operators opting for partial loading from the CCSC and reverse-lightering offshore. Suggest providing an analysis of the potential impacts from increased vessel traffic throughout the CCSC under each alternative.	There are a wide range of possibile combinations off onshore and offshore that can be used to reach their objective. USACE describes the most likely operations, but understands the the economics may change temproarily or permanently the operations at any time and does not speculate or document the entire range of possibilities.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
93	4	The USFWS is concerned that cumulative effects of increased salinity from the Project, periods of drought, climate change, and effluent from multiple proposed desalination plants, could result in a significant change in the distribution and species composition of seagrass and lower trophic level organisms in Redfish, Corpus Christi, Aransas, and Nueces bays. This change would affect threatened and endangered species and migratory birds that feed, breed, nest, and roost in these estuaries. Recommends expanding upon the cumulative impacts analysis to further examine potential increases in salinity.	See Section 5.4.7-11; salinity changes due to the proposed actions were modeled accordingly and the results of that are presented in Section 4.1.2.2. Although examining the cumulative effects of future desal projects in conjunction with this project is not possible, we did acknowledge that desal effects in conjunction with this projects impacts to the hydrosalinity gradient could have detrimental impacts to seagrass, wetlands, aquatic and terrestrial wildlife, listed species, and migratory birds, particularly during drought conditions.
93	5	The USGS is concerned that the effects of channel deepening on salinity in Baffin Bay and connecting waters behind Padre Island and Laguna Madre have not been adequately addressed. This area is a rare, hypersaline environment, and its ecology possibly could be impacted if an increase in lesser saline water from Corpus Christi Bay is forced southward. Recommends adding language on the potential increase of salinity in the southern lagoons or expand the model boundaries for analysis to include southern hypersaline areas.	The model domain was selected to be centered on the project site (i.e., Aransas Pass) and includes the water bodies, which may be potentially impacted by the proposed project. It includes Corpus Christi Bay and its connected subtropical bays: Nueces Bay, Oso Bay, Redfish Bay, Aransas Bay, Copano Bay, and part of Baffin Bay. The model results show that there is very little impact near Packery Channel - sound end of Corpus Christi Bay. The impact to Baffin Bay will be less than that at Packery Channel. Therefore, the impact to Baffin Bay due to this project is expected to be insignificant.
93	6	**Section 3.5 Socioeconomic Conditions:** This section states that the Region of Influence (ROI) for socioeconomic analysis includes the three counties of Nueces, Aransas, and San Patricio. However, Section 3.5.4, Environmental Justice, considers only block census tracts within a project area much smaller than the ROI or the DEIS' study area. The Department understands that the project area represents an area of resources more directly impacted; however, we recommend analyzing indirect and cumulative impacts throughout the DEIS' study area. For example, if seagrass and low trophic level organisms are affected by turbidity, salinity changes, tidal amplitude, or other Project effects, then fishing and viewshed resources would likely be affected beyond just the project area.	Agree with the comment that the socioeeconomic study area was defined as the three county study area and some direct impacts were evaluated in the smaller project area where they were likely to occur. For the FEIS the project team will further evaluate any impacts that are likely to occur in the broader region, including cumulative impacts from any of the alternatives.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
93	7	**Appendix I (Hydrodynamic and Salinity Modeling Study):** This section provides a description of model data inputs. This includes evaporation data from NOAA climate stations. On page 44 of Appendix I an explanation is provided for the use of "daily evaporation measured at the USGS gage at Mathis". The USGS does not collect evaporation data at stations near Mathis. The Department suggests revising to reflect NOAA Station: MATHIS 4 SSW, TX US with Network:ID GHCND:USC00415661.	Correct, the station owner was misattributed to USGS. It will be revised. Our record shows that the evaporation data was downloaded from MATHIS 4 SSW, TX US (Station ID: USC00415661) which is maintained by NAA.
93	8	**Appendix J (Sampling Analysis Plan):** Results of sediment characterizations and toxicity tests were not provided in the DEIS. The FWS requests the opportunity to review and provide comments and recommendations in coordination with the EPA and TCEQ when the report becomes available.	A Sampling Analysis Plan for MPRSA Section 103 evaluation of sediment was developed to determine if the new work material sediments proposed to be dredged are acceptable for disposal in the New Work ODMDS. Included in that plan is the biological testing of sediment, including sediment toxicity and bioaccumulation. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. MPRSA requires that testing follow protocols outlined in Chapter 8 of the Green Book (EPA and USACE, 1998) and the Ocean Dumping Regulations, guidance testing including the Regional Implementation Agreement (RIA) (EPA and USACE, 2003). The EPA must concur with the findings in accordance with 40 CFR 227 prior to USACE approval.
93	9	**Appendix J (Sampling Analysis Plan):** This section includes as its own Appendix A the USACE Final EIS for previous channel improvement work titled Corpus Christi Ship Channel, Texas Channel Improvement Project, dated April 2003. Section 4.6.1, page 158 appears to erroneously use USGS for the abbreviation of the US Coast Guard versus the more appropriate USCG in discussion of shipping channel regulations. The Department suggests that a statement or errata be included in Appendix J to address the erroneous reference to the USGS.	The typographical error of the April 2003 EIS does not affect the analysis provided by the inclusion of this document.
94	1	Concerned that the project would cause immense environmental damage ruining the fishing and tourism industries on which Port Aransas depends.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
94	2	Concerned that the project would cause immense environmental damage to the critical breeding grounds and habitat for species and fish populations will be drastically reduced.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
94	3	Are there no alternatives offshore in a less environmentally sensitive area?	Thank you for your comment.
94	4	Concerned that real estate will be devalued, development stagnate, and jobs lost for fishermen.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term impacts to recreational activities (e.g. boating, fishing, beach visitation) from the construction of the project. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism. The section also discusses the impacts to land use. The FEIS will expand the discussion to consider impacts to real estate values. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
94	5	Concerned the project would badly constrain vessel traffic and present an oil spill hazard.	Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster’s office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
94	6	Concerned the project would cause delays in the ferry for commuters to the island and hurt local businesses.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
95	1	Requests the public comment period be extended.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
95	2	Concerned about the effect of deepening and dredged material disposal on the estuarine environment.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
95	3	Concerned about what effect a deeper channel will have on the hydrology of Aransas Pass.	Hydrodynamic and salinity modeling was conducted (see Appendix I). Overall, the impact of CDP on water level is insignificant. It is unlikely to increase the flood risk associated with changes in high tide or navigation risk associated with the changes in low tide and mean sea level in the Corpus Christi Bay. The impact on water level should be limited to the segment of the navigation channel from Point Mustang to Humble Basin. There would be no major impact on currents in Corpus Christi Bay, Redfish Bay, and Nueces Bay. The model predicted that Alternative 1 would reduce current speeds through the deepened navigation channel. The mean current speed at Aransas Pass is reduced by about 0.213 feet per second and the maximum current speed is reduced up to 0.614 feet per second. The current speed increases in the CCSC from Port Aransas to Ingleside where the water depth remains unchanged. The current speed at the Inner Channel near Port Aransas increases by about 0.09 to 0.03 feet per second, up to 0.36 feet per second. Secondary long-term modeling also demonstrates no major impact on currents in Corpus Christi Bay, Redfish Bay, and Nueces Bay. Channel deepening would reduce current speeds through the proposed dredge area and increase the current speed in the Corpus Christi Channel from Port Aransas to Port Ingleside where the water depth remains unchanged.
96	1	Urge the USACE not to allow a turning basin on Harbor Island.	Thank you for your comment.
96	2	The technology has been available for decades to load/ offload offshore to buoys at much lower cost and no harm to the visitors and residents of Port Aransas.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
97	1	Concerned that the project will cause damage to the communities, estuarine habitats, and beaches.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
98	1	Does not want the project to be built next to the ferry landing. This would increase the long lines during tourist season and interfere with local businesses ability to get goods onto the island.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
99	1	Concerned about the environmental impacts the project will have on the passes (Aransas Pass) and along the Texas coast as they are environmentally critical to several species that are economically and recreationally important.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.2 Ecological and Biological Resources, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
99	2	Concerned that the large amounts of dredged material will reduce water clarity during operations as well as impact the area.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
99	3	Concerned about the environmental impacts large-scale oil spills from increased ship traffic and increased capacity of ships entering would have.	Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements. Impacts of oil spills associated with the Applicant's Proposed Action Alternative are addressed in Section 4.0.
99	4	Concerned that industrialization of the ship channel imperils the current economic engine fueled by tourism and out recreation in the area.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term impacts to cutural activities (e.g. boating, fishing) from the construction of the project. Long-term adverse impacts to these activities are expected to be minor given that the Port is already an industrialized area and activites associated with the Port will continue in the future and will co-exist with cultural activities. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
99	5	Concerned about the cultural use of the ship channel, nearshore habitats, and estuary are invaluable to the residents of the this area.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
99	6	Suggest offshore terminals for filling ships be used as an alternative solution.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
100	1	The result of the project would be devastating to Port Aransas and the environment.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
100	2	Concerned about the ferry wait for people commuting to work.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
101	1	Place the terminal offshore.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
102	1	Reply to Surfrider letter asking if the letter was ready to share.	N/A
103	1	Concerned about the environmental effects dredging would have on marine life, animal life on land, and humans.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
103	2	Requests that the comment period be extended by 90 days to allow everyone to have input.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
103	3	Request a Public Meeting in Port Aransas so the people affected by this project can ask questions and provide feedback.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
103	4	Please hold the Port responsible for providing current environmental studies and research showing the best alternatives to maintain the current needs to protect fragile ecosystems and maintain clean beaches which are important to the people who live in this area and the million of Texans and other visitors who come to this area every year.	Thank you for your comment.
104	1	Does not support the project being constructed.	Thank you for your comment.
105	1	Opposed to the proposed placement of dredged material on the Port Aransas beach and offshore along the shoreline due to the negative impacts.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
105	1	Opposed to the proposed placement of dredged material on the Port Aransas beach and offshore along the shoreline due to the negative impacts.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
105	2	Offshore terminal/pipeline is the only possibility.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
105	3	Concerned it would impact tourism.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term impacts to recreational activities (e.g. boating, fishing, beach visitation) from the construction of the project. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism.
106	1	Ask to consider the offshore oil port option.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
106	2	Concerned about the environment being destroyed and unrecoverable. There is a very small margin for what could truly be an acceptable loss when considering altering/destroying local habitat and other ecosystem. The Port may be withing that margin but the ecosystems are not.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
107	1	Opposed to the location of the VLCC turning basin being adjacent to the ferry landings. This plan would permanently disrupts the lives of Port Aransas residents, fishing, ferry traffic, tourism, etc.	Thank you for your comment.
107	2	Requesting the comment period be extended at least 90 days.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
107	3	Requesting at least two more Public Meeting be held, on in Port Aransas and one in Aransas Pass.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
108	1	Does not support the project being constructed.	Thank you for your comment.
109	1	Does not support the project being constructed.	Thank you for your comment.
109	2	Believes the inconvenient and traffic congestion at the ferry will cause negative impacts to Port Aransas.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
110	1	Concerned about the impact the project will have on the ferry system, making the daily drive take hours, cutting of a large number of residents and tourists, leaving 361 as the only unsafe and almost unusable option.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
110	2	Concerned about the damage that will be done to the environment with changes made to fish and wildlife habitat.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
110	3	Does not understand the avoidance of looking at alternatives.	Multiple alternatives were evalauted.
111	1	Concerned about the damage to grass beds if the project moves forward. These are critical to the quality of the environment. Concerned that dredging will cause silt to cover the grass beds killing them. These are vital for healthy fisheries habitat for bay fish and offshore species.	Impacts to wetlands/seagrass associated with the Applicant's Proposed Action Alternative are addressed in Section 4.2.1.2.
111	2	Believe the speed of the ships coming through the jetties making their way into the Port has increased over the years, causing erosion along the banks. There is no need for the excessive speed and hope fines can be assessed to the vessels that are coming through there too fast and causing damage.	The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) indicate that the CDP would have minimal impacts to the shorelines along the CCSC. USACE does not regulate vessel operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
111	3	There has to be another location you can look at that can be expanded.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
111	4	Concerned what it may do to the endangered whooping crane as they uses this habitat and water quality in the bays is critical for the blue crabs in their diet.	Impacts associated threatened and endangered species with the Applicant's Proposed Action Alternative are addressed in Section 4.2.5.2 and Appendix D. USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3).
111	5	Opposed to any group or individual, intentionally destroying vital habitat in the coastal bend from Rockport to Aransas Pass, to Port Aransas, or anywhere for that matter.	Thank you for your comment.
111	6	Requests an extension of the comment period and to hold a Public Meeting in Port Aransas.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant’s team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
112	1	Requesting an additional 90 days to review the additional reports that were added.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
113	1	If over the course of the coming years and decades there is a high likelihood we will export less oil as a nation and consume less oil as a planet, why would we embark on a project designed to INCREASE the ability to do something we’re trying to limit?	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
113	2	The more prudent approach would be to leave the channel at the current depth under the realization the need for fully loaded VLCCs is more likely to decline than increase, and the funding of dollars and manpower for this project is better utilized elsewhere.	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The Applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, Federal review of a navigation district's stated need for the project in the marketplace.
114	1	Requesting a 90 day extension of the comment period and a public meeting in Port Aransas.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
114	2	Feels the project would complicate transportation with fully loading VLCCs on both sides of the ferry landing.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
114	3	Concerned about the sensitive marine areas if the project is permitted.	Impacts to Protected Lands associated with the Applicant's Proposed Action Alternative are addressed in Section 4.2.5.1. USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
115	1	Requesting a 90 day extension of the comment period and a public meeting in Port Aransas.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant’s team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
115	2	Feels the project would complicate transportation with fully loading VLCCs on both sides of the ferry landing.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
115	3	Concerned about the sensitive marine areas if the project is permitted.	Impacts to Protected Lands associated with the Applicant's Proposed Action Alternative are addressed in Section 4.2.5.1.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
116	1	Concerned about the impact the project would have on the ferry and taking tourists and workers to and from Port Aransas. Feels this would destroy the town.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
117	1	Concerned the project will disrupt the ferry making it difficult for workers and tourists.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
118	1	Request a public meeting in Port Aransas and an extension of 90 days for the public comment period.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
119	1	Request a public meeting in Port Aransas and an extension of 90 days for the public comment period.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
120	1	Request a 90 day extension for the public comment period.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
121	1	Request a 90 day extension for the public comment period.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
122	1	Requests a meeting be held so residents can respond.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
123	2	Concerned about potentially toxic dredge spoil.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
123	2	Concerned about potentially toxic dredge spoil.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
123	3	Concerned about degradation of natural areas and resources in the placement areas.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
123	4	Concerned about increased erosion and property damage from increased ship sizes and traffic.	The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) assessed the additional impact of the CDP by comparing Future Without Project and Future With Project channel scenarios. The analysis indicates that the CDP would have minimal additional impacts to the shorelines along the CCSC.
123	5	Concerned about interruption of ferry services due to proximity of oil terminal and turning basin.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
123	6	Concerned about increased risk of spills and pollution.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
123	7	Concerned about chronic health issues associated with oil and gas facilities.	Not applicable to the CDP.
123	8	Concerned about risks associated with locating oil storage facility in a storm surge prone area.	Not applicable to the CDP.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
124	1	Concerned about the wait times for the ferry as a result of the project. Longer wait times will be unacceptable shutting down transportation in and out of the city.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
124	2	Loading of the ships offshore is a much better solution than creating the terminal to be located on Harbor Island.	Thank you for your comment.
125	1	Does not support the project being constructed.	Thank you for your comment.
126	1	If this project is built would it not be limiting the access to Port Aransas to one way only? How would this work in emergency situations like Hurricanes?	There would be no increase in VLCC vessel traffic and no change to the VLCC one-way traffic restrictions. For safety purposes, the decisions to leave the Port are made well ahead of a hurricane's arrival, therefore minimizing the potential for one-way transits upon the immediate approach of a hurricane.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
126	2	Concerned about the ferry.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
127	1	An offshore terminal that would serve VLCCs and load them via underwater pipelines is a clear and reasonable alternative that better protects the environment. Specifically the Bluewater Texas Terminals. This offshore project can accomplish the same goals sought by the Port with much less risk to the beaches, bays, and estuaries that bring hundreds of thousands of visitors to Port Aransas each year. Because this offshore terminal will accommodate VLCCs, significantly expand the export capacity of the area, and accomplish the same goals as the Port's proposed Harbor Island development, it is a reasonable alternative that negates the need for the Port's proposed dredging permit. Therefore, we request the USACE deny the permits that would allow the industrial development of Harbor Island to continue.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
128	1	This project is one of several related projects PCCA is proposing that make up a single and complete project, including a planned loading terminal and desalination plant in the Harbor Island area. We are concerned that analyzing and reviewing these projects separately may not take into account the broad suite of environmental and economic impacts associated with them. PCCA's planned channel deepening project, loading terminal and desalination plant, if built, could significantly impair the ecology and economy of a large part of the Texas Gulf Coast.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
128	2	Concerned that the proposed CDP and related loading terminal and subsequent vessel traffic will have unanticipated impacts on the hydrodynamics of the area and on species recruitment and use of the area, including impacts to recreationally and commercially important species, changes in current and erosion patterns, and increased shoreline loss associated with storms and hurricane such as flooding and storm surge (Valseth and Dawson, 2022).	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, and Section 4.5 Navigation. Modeling conducted: Sediment Transport Modeling Study (Appendix G), Vessel Wake Analysis (Appendix H), Hydrodynamic and Salinity Modeling Study (Appendix I), Ship Simulation Study (Appendix L), Propeller Scour Study (Appendix M), and Underkeel Clearance Study (Appendix N).
128	3	The PCCA has not only requested a permit to deepen Aransas Pass, but also to construct a $1 billion loading terminal facility on 200 acres of Harbor Island allowing oil tankers (very large crude carriers or VLCCs) to enter Aransas Pass and transport millions of gallons of crude oil per day through the pass for export to overseas markets.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis. Past, present, and reasonably foreseeable future actions in the study area are discussed in Section 5.0.
128	4	The dredging, construction of facilities, and subsequent shipping traffic associated with the project will unquestionably transform this pivotal environmental area. Some of the many potential negative effects include degradation to water quality and subsurface habitats; disruptions of animal migrations and activities due to shipping, noise, and lighting; and potential oil spills or other contamination incidents from ships or pipelines (Buskey 2018).	The potential cumulative effects of the Applicant's Proposed Action Alternative and past, present, and reasonably foreseeable projects (including dredging actions and new facilities) are discussed in Section 5. Specifically, potential cumulative effects to water quality is disclosed in Section 5.4.3, terrestrial and aquatic habitats in sections 5.4.7 - 5.4.11. The increased risk of spills as a cumulative effect is disclosed several times throughout Section 5.0.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
128	5	Also of concern is PCCA's proposal to construct a saltwater desalination plant at Harbor Island to provide water for planned industrial facilities. As currently conceived, the plant would discharge nearly 100 million gallons per day of highly saline effluent into the ship channel, which connects Aransas Pass and Corpus Christi Bay and serves as a migration route for marine life. This could significantly alter the salinity in the channel and threaten faunal resources over a large part of the central and lower Texas coast.	The potential for cumulative impacts due to desalination projects is discussed in Section 5.4.2.
128	6	Any adverse impacts to the ecological health of the bay system will impact recreation and commercial fishing in the area as well as the public perception of the health of the bay, all of which could reduce the benefit to the community from the tourism and fishing industries.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
128	7	Suggest that the USACE request that PCCA explore other alternatives, such as an offshore terminal, that could be constructed with less potential for destructive effects on the long-term economic and ecological health of the central coast.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
129	1	Concerned that this project and the other projects being done (export terminals) will cause both significant temporary and permanent damage on Harbor Island and surrounding islands including Port Aransas.	Past, present, and reasonably foreseeable future actions in the study area are discussed in Section 5.0.
129	2	Concerned that people living in this area will be affected and people who make a living from the islands, including tourism, will see severe damage to their way of life.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2.The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism.
129	3	Does not feel that the Port and preparers of the EIS have told the truth with the information and have presented it is a negligent and fraudulent way.	Thank you for your comment.
129	4	Concerned the project will have a devastating impact on Corpus Christi Bay and the estuarine system.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
129	5	Concerned the island and residents will be impacted as a result of the project.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
129	6	Concerned about air quality during construction and during operation when the VLCC get loaded with pumps, tanks, and pipelines that will never be operated or repaired properly.	Air quality impacts to Alternative 1 during construction are addressed in Section 4.1.9.2.2 Emissions From Construction Equipment and operation in Section 4.1.9.2.3 Operational Emissions. A statement will be included that non-road engines should be compliant with 40 CFR 89 and 1039 and that USACE will rely on EPA and TCEQ to assure compliance through their respective CAA regulatory and enforcement programs.
129	7	Commenter does not support exporting crude oil from the US to other countries.	Thank you for your comment.
129	8	Does not believe the review period for the DEIS was appropriate.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
129	9	Feels the study is weak and does not reflect an in -depth research study needed for the general public to accept is validity and approve with the negative environmental impacts it will have.	An extensive independent study was conducted by USACE in compliance with Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) regulations. These studies utilized the best available scientific information and reached objective, scientifically-based conclusions. Studies conducted for the CDP included: Sediment Transport Modeling Study (Appendix G), Vessel Wake Analysis (Appendix H), Hydrodynamic and Salinity Modeling Study (Appendix I), Ship Simulation Study (Appendix K), Propeller Scour Study (Appendix M), and Underkeel Clearance Study (Appendix N). Additional studies conducted by the Applicant include: Wetland Delineation, Aquatic Surveys, Threatened and Endangered Species Surveys, Marine and Cultural Resources Study, Water and Sediment Quality Study. The results of these studies were incorporated into the impacts (Section 4.0), Biological Assessment (Appendix D), and EFH Assessment (Appendix E) of the DEIS.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
129	10	The project under FAST-41 is supposed to improve the timeliness, predictability, and transparency of the process. Does not feel that this is the case and that rather benefits the Port by pushing the project forward without doing the proper analysis.	On June 18, 2019, the Federal Permitting Improvement Steering Council (FPISC) added the proposed Project to the inventory of "covered projects" that are pending environmental review or authorization of the head of any Federal Agency pursuant to the requirements set forth in Title 41 of Fixing America's Surface Transportation Act (FAST-41). The CCSC Project has been placed on the FAST-41 Infrastructure Projects Permitting Dashboard. When the EIS was initiated, the CCSC Project was also subject to Executive Order (EO) 13807: Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure projects, dated August 15, 2017, which required the Federal agency to complete the EIS within 2 years of the Notice of Intent. Although this E.O. has now been rescinded, the scheduling timeframe requirement of 2 years was codified in the Council on Environmental Quality's 2020 National Environmental Policy Act (NEPA) Implementing Regulation. The scheduling for the development of the EIS, including the Draft EIS comment period, was developed to comport with requirements of both NEPA and FAST-41. To ensure appropriate public engagement, the public has been encouraged to provide comments to USACE on the project during the August 2019 Public Notice, the EIS Scoping meeting in June 2020 that included 4 public meetings, and the Draft EIS in July 2022. During all three of these comment periods, the USACE has received a significant response from the public.
129	11	Does not believe the USACE and Port are being transparent when the public meeting was held on Port property in Corpus Christi and the short timeframe for the public to review the DEIS.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
129	12	Regarding concurrence of the overall purpose with the Cooperating Agencies, who are the Cooperating Agencies?	Cooperating Agencies are listed in Section 1.1 (Introduction) of the DEIS.
129	13	Please provide me and all the people who attended the public meeting and the general public with a letter stating: a.) who they are, b.) what exactly were they consulted on, c.) what exactly they agreed on, d.) what exactly did they disagree on, and f.) what did they acquiesced on?	Documentation of the public meeting will be included as an appendix in the Final EIS.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
129	14	The alternative left out and not considered is combining of all existing and proposed stations into one or two sites only, instead of granting rights and approving terminals for all. Terminals: Enbridge, Flint Hills, Buckeye, Cherniere LNG Exporter, and Bluewater.	The alternative analysis was developed in coordination with the cooperating agencies and is designed to address requirements in the 404(b)(1) guildines, MPRSA Need for Ocean Dumping and NEPA. The alternatives anlaysis is not designed to reevalute the economic assement made by the Applicant.
129	15	Does not believe the Port can safely execute this project. Provides examples if accidents that have occurred.	Thank you for your comment.
129	16	Does not believe the project will eliminate reverse lightering.	Thank you for your comment.
129	17	Believes that the forecast of 4,500,000 barrels per day is greed by these large companies and that the project must be aborted immediately.	Thank you for your comment.
129	18	Feels that critical issues were not studied like subsidence of existing structures and man-made foundations located in the vicinity of the dredging. All areas are geological sandbar formation where dredging would cause subsidence.	An extensive independent study was conducted by USACE in compliance with Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) regulations. These studies utilized the best available scientific information and reached objective, scientifically-based conclusions. Studies conducted for the CDP included: Sediment Transport Modeling Study (Appendix G), Vessel Wake Analysis (Appendix H), Hydrodynamic and Salinity Modeling Study (Appendix I), Ship Simulation Study (Appendix L), Propeller Scour Study (Appendix M), and Underkeel Clearance Study (Appendix N). Additional studies conducted by the Applicant include: Wetland Delineation, Aquatic Surveys, Threatened and Endangered Species Surveys, Marine and Cultural Resources Study, Water and Sediment Quality Study. The results of these studies were incorporated into the impacts (Section 4.0), Biological Assessment (Appendix D), and EFH Assessment (Appendix E) of the DEIS.
129	19	There is no mentions indicating and committing to the proper and adequate compaction with heavy equipment of the dredged material to provide some degree of reduction in erosion.	Best management practices will be used during construction such as turbidity curtains, silt fencing, construction matting, window restrictions, and biological monitors which would avoid and minimize indirect impacts associated with the project.
129	20	The Port does not commit to the construction of bulkheads/ concrete walls internal to the gigantic proposed ditch; throughout the length of this proposed foot print 13 miles or so. Or on the adjacent formations to protect on-land structures.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
129	21	On page v Volume I the EIS states "The no action alternative does not include improvements presented under the Applicants Proposed Action Alternative. Therefore, annual maintenance dredging to the CCSC would continue as scheduled" I say this comment is a spin and a lie because the proposed project does not provide any improvements. This comment is inserted here to create an illusion or mirage that the no-action alternative is bad because sediment distribution, and short-term sedimentation would continue and the proposed alternative of dredging the channel would eliminate this.	CCSC is a federally authorized navigation channel that has been regularly dredged since 1874. Currently, USACE civil works program maintenance dredges at least a portion of the Federal channel annually. The CDP will also require maintenance dredging at similar intervals to the existing conditions.
129	22	On page v Volume I the EIS states "Modeling of the Inner Channel indicates that Shoaling rates with the Applicant's Proposed Action alternative were comparable to that with the No-Action Alternative" but then the paragraph goes to say that the model did predict a 5 to 10 percent increase in sedimentation. This is a contradiction from one statement to the next. Requests the Port have a meeting with members of the community to explain the modeling.	The modeling indicate that shoaling rates for the inner channel were comparable to the existing condition, both the 2D and 3D model results indicate that project impact on sedimentation rates is limited to less than 10%.
129	23	On page vi Volume I the EIS states "Modeling of Applicant's Proposed Action Alternative indicates that channel deepening is unlikely to change mean water levels in the bay." but then in the same paragraph the EIS goes to say that the model did predict an increase, but that the increase only was less than 0.79 inches. This is a contradiction from one statement to the next. Requests the Port have a meeting with members of the community to explain the modeling. Concerned that some houses on Ingleside on the Bay already experience flooding especially when the VLCCs go by at higher speeds than allowable. No one enforces the speed. What will the true predicted gain in water level be on these houses?	Hydrodynamic and salinity modeling was conducted (see Appendix I). Overall, the impact of CDP on water level is insignificant. It is unlikely to increase the flood risk associated with changes in high tide or navigation risk associated with the changes in low tide and mean sea level in the Corpus Christi Bay. The impact on water level should be limited to the segment of the navigation channel from Point Mustang to Humble Basin. The value cited is a maximum value during a multi-month simulation, average values are expected to be much smaller as outlined in Appendix I.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
129	24	The EIS fails to consider cumulative impacts that would be created by these monster-sized desalination plants with its gargantuan volumetric rates being lifted from the Bay and the high salinity ones proposed to be returned to the same Bay as the recipient water body. There are currently 7 proposed: PCCA La Quinta Channel and Harbor Island; City of Corpus Christi La Quinta Channel and Inner Harbor; Corpus Christi Polymers Inner Harbor; Seven Seas Harbor Island; and City of Ingleside Poseidon on IOB shoreline. The EIS leaves out the two La Quinta Channel ones.	The EIS was updated to reflect updated information; information on Poseidon and Seven Seas desalination projects is lacking and is rumored to be no longer in progress.
129	25	The EIS says the project would allow more storm surge intensifying the velocity and increasing water levels and that with beach nourishment and the nearshore berms erosion would be offset and wave energy would be attenuated. Does not believe the results and requests the Port have a meeting with members of the community to explain the modeling.	Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with “planned future conditions” representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI’s modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI’s application of model parameters or inputs for the ADCIRC/SWAN models used in its study.
129	26	Water and Sediment Quality: Need to prove that the potential impacts of turbidity, DO, and salinity would only be localized and transient.	Increases in turbidity (which can lead to low DO) would be controlled with BMPs such as turbidity curtains and other measures intended to avoid and minimize water quality impacts. Appendix I includes information regarding project impacts to salinity.
129	27	The dredging is being done for VLCC to load hydrocarbons that would be coming from tank farms, pumping stations, and pipelines, that would emit very large quantities of air pollutants. Fail to mention this and thus neglect to include cumulative/aggregate impacts that would be produced by ancillary equipment.	Air quality impacts to Alternative 1 during construction are addressed in Section 4.1.9.2.2 Emissions From Construction Equipment and operation in Section 4.1.9.2.3 Operational Emissions. Section 5.4.5 (Cumulative Impacts) indicates that air impacts from industrial facilities, when combined with the proposed channel deepening's indirect air impacts, could contribute to cumulative air impacts.
129	28	Admits noise will increase significantly both temporarily and permanently, what will be the impact on the nearby communities?	Impacts to noise associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1.10.2.
129	29	Believes that the larger vessels and increased traffic will permanently increase turbidity thus decreasing DO impacting seagrass and marine fauna.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
129	30	EFH study is not complete and stating that turbidity would likely be temporary is a lie. Does not mention the lethality/mortality rates of all key marine organisms that live the areas affected by the proposed placement areas. No mention of fish surveys to determine quantities of marine species that would be affected by dredging and increased ship traffic and larger ships.	The EFH Assessment is being coordinated with the NMFS. Consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
129	31	Concerned how marine fauna would adversely affect socioeconomic and financial impacts on other industries way of life.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term impacts to recreational activities (e.g. fishing) from the construction of the project. Long-term adverse impacts to these activities are expected to be minor given that the Port is already an industrialized area and activites associated with the Port will continue in the future and will co-exist with cultural activities. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
129	32	**Cultural Resources:** 1) Who were the agencies that reviewed and commented? What were their findings? 2) Were there any documents from agencies confirming the claims/conclusions made by the USACE/Port? 3) Assume an intensive survey was necessary, Appendix F is just an extensive literature search and therefore the claims and conclusions lace credibility.	As noted in the Draft EIS, Section 4.3.2, archaeological survey data (being conducted by the Applicant), was not available for incorporation into the DEIS and therefore the discussion was incomplete and relied on available background information. The draft terrestrial and marine archaeology reports were provided on June 6, 2023. The EIS was updated to include a summary of the regulatory coordination, terrestrial and underwater field investigations, and regulatory determinations of effect.
129	33	USACE already lacks sufficient credibility with people and entities that are directly affected by other dredging projects. Example, USACE and MODS were sued by several tribal organizations, triggered by them putting at risk a sacred Karankawa site where over 39,000 archaeological artifacts were found.	Thank you for your comment.
130	1	The USACE should provide a revised EFH assessment to the NMFS HCD for review. The assessment should clarify, delineate, and quantify impacts to EFH by all habitat types (low tidal marsh, high tidal marsh, tidal mud flats, algal mats, and mangroves) at each of the proposed PAs.	EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
130	2	The USACE should provide clarification on the proposed in-kind compensatory mitigation to offset those impacts to each EFH by habitat type (low tidal marsh, high tidal marsh, tidal mud flats, algal mats, and mangroves) within all proposed PAs.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
130	3	The USACE should provide clarification as to where additional shallow water habitat will be created to offset tidal wetland impacts and SAV habitat besides what is presented in PAs SS1 and SS2.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
130	4	The USACE should identify the in-kind compensatory mitigation for direct and secondary EFH impacts (seagrass and oyster reef habitat) resulting from the proposed activities. The NMFS HCD recommends the USACE consider a mitigation compensatory ratio of 3:1 for SAV and 1:1 for oyster reef habitats. The NMFS HCD also requests the EFH mitigation plan be coordinated with us prior to issuance of the revised EFH assessment. To avoid additional mitigation for temporal impacts, the NMFS HCD also recommends the USACE consider requiring implementation of the mitigation plan concurrent with channel construction activities.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
130	5	The USACE should include a quality assurance plan outlining expected EFH and barrier island shoreline restoration goals, success criteria, and monitoring protocols in the revised EFH assessment.	NMFS-NOAA, a cooperating agency, concluded EFH consultation in November 28, 2022 with several Conservation Recommendations outlined in their August 9, 2022 letter.
130	6	The USACE should also include a comprehensive adaptive management plan to determine long-term EFH impacts following construction and operation of the proposed project components in the revised EFH assessment.	NMFS-NOAA, a cooperating agency, concluded EFH consultation in November 28, 2022 with several Conservation Recommendations outlined in their August 9, 2022 letter.
130	7	A definitive statement on the specific types of dredges to be used and the specific times of the year each dredge type will be used. This information should be consistent with any proposed conservation measures such as seasonal dredging windows.	Within Section 4.1 (which addresses conservation measures for dredging), text has been included describing the intended dredge method by channel segment as provided by the Applicant. This information is also supported with a new figure that shows proposed dredge methods by Channel Segment. Further, additional dredge information is provided, including equipment list, schedule, volumes, methods, and locations, in an attachment. Some of this information is repeated in Section 5.11.1 (describing “In-water” impacts).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
130	8	An expanded discussion on the information pertaining to cutterhead dredges used in colder months referenced in Dickerson and Piatkowski (2017) and Ramirez et al. (2017). Further, depending on this expanded discussion, consideration of proactive (versus reactive) relocation trawling activities in colder months should be examined as a potential conservation measure.	In Section 5.11.1 (describing "In-water" impacts) a statement has been included that, as per Ramirez et al., 2017, additional BMPs would be required, particularly during cold stunning events. Further, PCCA has provided an additional BMP regarding slower vessel speeds and observers with "stop work" authority to be employed during potential "cold stunning events." This additional BMP has been inserted into Section 4.1 (which addresses conservation measures for dredging).
130	9	A detailed table listing Galveston District dredging projects from 1995 through 2021 that includes not only the number of sea turtle takes by species via dredges, but additional information including dredging duration (days of work), cubic yards dredged during each project, and data on relocation trawling activity–including numbers of turtles identified by species captured–is required.	This information has been added as an attachment.
130	10	A table documenting sea turtle stranding numbers by species in the lower Texas coast, or in Nueces, San Patricio, and Aransas Counties.	This information has been added as an attachment.
131	1	In accordance with the general conformity regulations in 40 CFR Part 93, this proposed action was reviewed for air quality impact. The proposed action is located in Nueces County, which is currently designated as attainment/unclassified for the National Ambient Air Quality Standards for all six criteria air pollutants. General conformity requirements do not apply.	Thank you for your comment
131	2	We are in support of the project. The environmental assessment addresses issues related to surface and groundwater quality.	Thank you for your comment.
131	3	Any debris or waste disposal should be at an appropriately authorized disposal facility.	Debris and waste will be disposed in accordance with state and federal law.
132	1	Request a 90 day extension for the public comment period and to hold a Public Hearing in Port Aransas.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
133	1	PCCA provided USACE Terrestrial Archeological Survey Report on March 23, 2022, and it was not included or represented in the DEIS. PCCA still anticipates providing the Marine Archeological Survey Report to USACE later this month.	The USACE's review and coordination with the THC to verify the the Terrestrial Archeological Survey Report had not been completed and was not included in the DEIS. A discussion of the Terrestrial Archaeological Survey report has been added to Section 4.3.2.2 for the FEIS.
133	2	The Socioeconomic section misrepresented local municipality jurisdictions thereby misrepresenting the socioeconomic statistics for the region.	Tables in Section 3.5 of the DEIS mistakenly reported Port Aransas in Aransas County. This error has been corrected in the FEIS.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
133	3	Additional discussion is requested on the results of the ship simulations and the decision to not include the ship simulations from November 2021.	The purpose of the February 2022 ship simulations was to address the Port Pilots concerns regarding sufficient margin of safety that could be afforded by 120 MTBP tugs for the fully-laden VLCCs, with conclusions reported in Appendix L. The November 2021 ship simulations performed with 90 MTBP tugs has been reported by reference in the Final EIS as a precursor to February 2022 ships simulations.
133	4	**Executive Summary.** Acronym for Port is represented in three different ways and not consistent on the first page.	In the EIS, the Port of Corpus Christi Authority is referenced as PCCA or Applicant, when referring to the governing authority. The Port of Corpus Christ, when referring to the port facility, is referenced as Port. The first page of the Executive Summary was reviewed and Port is referenced correctly. The remainder of the EIS text has been checked to ensure proper usage of Port vs PCCA/Applicant.
133	5	**Acronyms and Abbreviations.** CCP should be CPP Coordinated Project Plan. Revise and move into alphabetical order.	Text has been revised.
133	6	**Section 1.0. Port of Corpus Christi Authority.** • Page 1-5 does have Authority in the name. Page 1-1 defines the Port of Corpus Christi Authority as PCCA or Applicant. • Page 1-5 defines PCCA as Port. If this is for the historical section only, that should be called out; however, on page 1-8 PCCA is referred to as Port - this is outside of the historical section. Please be consistent. • Page 1-9 WOTUS already defined - just use acronym here.	1 and 2) In the EIS, the Port of Corpus Christi Authority is referenced as PCCA or Applicant, when referring to the governing authority. The Port of Corpus Christ, when referring to the port facility, is referenced as Port. The first page of the Executive Summary was reviewed and Port is referenced correctly. The remainder of the EIS text has been checked to ensure proper usage of Port vs PCCA/Applicant. 3) WOTUS text has been revised.
133	7	**Proposed Action and Alternatives:** • Page 2-5 refers to 40 CFR but this is not in the references. Page 2-5 • Section 2.2.2 says deepening the CCSC to -79. This should be -77 as in section 2.2.1. • Page 2-9 cutterhead hydraulic pipeline "dredged" should say dredges. • Pages 2-10 and 2-11 Section 2.2.4 reads maintenance material would be mostly placed in the CC New Work ODMDS? • Page 2-12 Section 2.3.2 Alternative 2 states..."would include an array of SPM" indicate the number. same for Alternative 3, provide the number.	1) CFR regulations cited within the text of an EIS are not included in the reference section of the document. 2) Text has been revised. 3) Text has been revised. 4) Section 2.2.4, this is referring to maintenance dredged material, it is assumed that it will be mostly placed in the Corpus Christi New Work ODMDS. 5) In Section 2.3.1, array is described in paragraph 4, and in Section 2.3.2 the last sentence of paragraph 1: "To meet a 4.5 million bpd demand, there would have to be eight individual SPM buoys or four sets in an array as described above." In Section 2.4.2, array is described in the first paragraph, second sentence "Each set consists of two SPMs that would be serviced by either one or two pipelines from shore that would originate in Ingleside or Harbor Island facilities."
133	8	**Affected Environment, page 3-22.** CDP should be defined as the channel deepening project in the introduction.	Neither CDP or "channel deepening project" are mentioned on page 3-22. Channel Deepening Project (CDP) is defined on page 1-2 of the EIS.
133	9	**Freshwater Inflow, page 3-27.** Specify "global" sea level rise and changes in "local" freshwater inflow	Not clear what comment is referring to.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
133	10	**Noise, page 3-44.** "The main sound sources for the offshore potion of the channel include periodic infrequent channel maintenance dredging, more daily ocean-going vessels transit would be the main sound sources, and ambient wind- and wave-generated noise."- misspelled & sounds strange overall (3-45 middle). Page 3-52, section 3.2.12.3, Port of Long Beach is not a good comparison for noise generated from Port operations as they are a container port and PCCA moves bulk liquids, suggest a more comparable port for noise. Underwater noise section - should find a study closer to Texas for a reference instead of long beach California (they are the Pacific ocean and we are the Gulf, very different waters that affect underwater ambient noise levels).	This will be revised to "The sound sources for the offshore portion of the channel include periodic infrequent channel maintenance dredging, more daily frequent ocean-going vessels transit, and ambient wind- and wave-generated noise." Other literature that includes tanker transit underwater noise data and info will be sought to provide updated information. Temperature and salinity affect the speed of sound which is inversely proportional to sound intensity through seawater. Salinity would not expected to be significantly different in entirely marine conditions (33-35 ppt) between California and Texas, but temperature will. Other literature giving direct typical underwater sound measurements at Gulf ports that are tanker-dominated was not readily located. Info on hydrophone studies in the Gulf was from in the middle of the Gulf shelf shipping lanes vs around ports. The subject text regarding California port activity, however, was removed and replaced with typical underwater sound level and frequency spectrum data compared to typical effects spectra of mammals and other sound sources (i.e. weather wind/waves).
133	11	**Wetlands, page 3-54.** "Currents carry nutrients to the oysters and sediment and waste are filtered from the water by the oyster." - could be re-written.	Sentence is in Section 3.3.3.2.3 in Estuarine Habitats and Fauna. Text has been revised.
133	12	**Protected Resources, page 3-72.** "They were historically hunted but nowadays face threats such as collisions with vessels, habitat degradation, and reduced prey abundance from overfishing" (3-77)- not sure if we should change the word.	Text has been revised.
133	13	**Cultural Resources, page 3-90.** PCCA provided USACE Terrestrial archaeological survey results that were not included in the DEIS this survey should be included in the final EIS.	The USACE's review and coordination with the THC to verify the the Terrestrial Archeological Survey had not been completed and was not included in the DEIS. A discussion of the Terrestrial Archaeological Survey has been added in Section 3.4.3 for the FEIS.
133	14	**Cultural Resources, page 3-93.** At the bottom of Page 3-93 there is a sentence that concern me. It reads: " However, intensive survey is necessary to determine with certainty how a proposed action might impact submerged cultural resources."	A marine archeological survey is being conducted for the CDP. Although that report was not available for incorporation onto the DEIS, the statement in the DEIS reflects an accurate purpose for the survey. The marine archaeological survey was provided on June 6, 2023. The EIS has been updated: "After these recommendations, terrestrial and underwater archaeologists surveyed those undetermined areas. Their field data indicates that the CDP's proposed alternative would have no adverse effect on historic properties." has been added to the end of intro paragraph to 4.3.2. More extensive discussion of underwater and terrestrial survey and findings included in relevant subsections.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
133	15	**Socioeconomics, Section 3.5.** • The City of Port Aransas is not located in Aransas County, verify this did not skew the statistics for this section. • Entire section: Review all table data and call out information pertaining to county statistics due to the above misconception (what cities are being considered for Aransas & Nueces Co.). • Page 3-98 last paragraph: per capita income of Aransas Co. ($31,780) does not appear to be higher than the State of Texas ($32,206) but is mentioned to be. • Page 3-100 first paragraph: call out information language is unclear and doesn't specify which Co. is being discussed. • Page 3-100 last paragraph: language in second sentence unclear. • Page 3-101 last paragraph: Hispanic/Latino stats for Nueces and San Pat Co. seem to be reversed compared to data in table 3-27. • Page 3-105: The City of Port A info is included in the Aransas Co. subsections Police and Fire. • Page 3-107 2nd to last paragraph: 4th sentence on North beach location is unclear. Also same page, the second paragraph under Section 3.5.2.2.1, "One of the major economic factors is this area is tourism." First is should be "in". • Page 3-111 Existing Zoning & Land Use: Paragraph hops between info on Port A and Aransas Pass. Language unclear.	Tables in Section 3.5 of the DEIS mistakenly reported Port Aransas in Aransas County. This error has been corrected in the FEIS. In addition, the discuss in this section has been reviewed for accurancy regarding the description of cities within each county. Other corrections have been made to this section to address the other specific issues listed in this comment.
133	16	**Navigation, page 3-117.** DEIS states the ferry runs several times a day when in fact the ferry runs hourly, during peak season, the ferry runs almost continuously, DEIS should be updated to reflect the current schedule. The simulation demonstrated that 120Hp rotor tugs are to the pilots' liking, PCCA will still enact limitations on environmental conditions regards the power of configuration of tugs. PCCA agrees with the studies that the proposed tugs will allow safe to safely move in and out of Harbor Island.	The DEIS does not state that the ferry runs several times per day, it states that between two and six ferries a day are run. According to TxDOT, the Port Aransas route runs between two and six ferries a day, depending on traffic and season. The Port Aransas route operate 24 hours a day, 365 days a year, weather permitting.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
133	17	**Relative Sea Level Change, page 4-14.** "In summary, readily anticipated changes can be made in the existing and new placement areas and placement actions targeting BU operations and maintenance to adjust for gradual increase in sea level rise." This sentence is hard to follow. In general the entire proceeding paragraph is hard to follow. Speaking to the effects of RSLR on placement areas and BU separately would help.	Text clarifications were made to clarify discussion of RLSR, BU actions, and placement areas.
133	18	Wetlands and SAV, page 4-45. Unvegetated shorelines are not estuarine wetlands.	Unvegetated or sparsely vegetated substrates are not atypical of wetland systems that are routinely inundated, including tidal wetlands. The description that estuarine wetlands were "bounded by black mangroves or unvegetated shorelines" was provided by the Applicant in a wetland delineation report and the proper citation has been added.
133	19	Estuarine Habitats and Fauna, page 4-50. Dagger Island will not be protected under the CDP.	That is correct. This paragraph is describing the absence of BU features under the No-Action Alternative and that erosion would continue at Dagger Island.
133	20	**Wildlife Resources, page 4-58 and 4-59.** CDP may affect shoreline despite Baird 2022b study?	Removed reference to shoreline erosion since the Baird 2022b report mentioned that there would be no discernable increase in shoreline erosion from the CDP. Clarified that shoreline recession will still continue.
133	21	**Protected Resources, page 4-60.** • CDP may affect shoreline despite Baird 2022b study? (4-60 & 63). • Wouldn't limiting hopper dredge to December-March present a greater impact on resident turtles with potential stunning events/lower motility in colder water (4-62) resuspension of legacy contaminants indicates the dredge sampling showed contaminants which conflict with previous statements about preliminary sampling results (4-62) . • SS2 would protect Red knot (not designated) habitat as well (4-68)	1) Removed reference to shoreline erosion since the Baird 2022b report mentioned that there would be no discernable increase in shoreline erosion from the CDP. Clarified that shoreline recession will still continue. 2) Hopper dredging during the winter with fewer sea turtles in the area is still the reccomended conservation measure by NMFS. Impacts to sea turtles would be reduced if hopper dredging is not performed during a cold-stunning event and with the appropriate turtle avoidance measures and BMPs. Replaced reference to legacy contaminants with fine sediments. 3) Included Red knot habitat in the statement.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
133	22	**Cultural Resources, page 4-73.** • Same similar sentence here: "The reviewing agencies commented that the proposed CDP was not likely to affect non-archaeological historic-age cultural resources, but an intensive survey was necessary to assess certain project component's impacts on terrestrial and underwater archaeological resources." HOW DO THESE SENTENCES AFFECT THE SCOPE OF WORK OF THE SURVEYS OR THE DOCUMENT DEVELOPMENT SCHEDULE IF ADDITIONAL EXTENSIVE SURVEYS ARE REQUIRED? • At the bottom of page 4-73, there is a sentence reading:" The discussion below is incomplete because it does not include findings and recommendations related to the presence/ absence" WHAT DOES THIS SENTENCE MEANS? IS THE SESSION INCOMPLETE? • The first paragraph in section 4.3.2.1 contradictory paragraph in section 5.4.12.	A marine archeological survey is being conducted for the CDP. Although that report was not available for incorporation onto the DEIS the statements in the DEIS reflect an accurate purpose for the survey. The two sentences are stating the same thing that dredging could damage or destroy any cultural resources due to channel deepening, but have been revised to match. The marine archaeological survey was provided on June 6, 2023. The EIS has been updated: "After these recommendations, terrestrial and underwater archaeologists surveyed those undetermined areas. Their field data indicates that the CDP's proposed alternative would have no adverse effect on historic properties." has been added to the end of intro paragraph to 4.3.2. More extensive discussion of underwater and terrestrial survey and findings included in relevant subsections.
133	23	**Socioeconomics, page 4-83.** Third paragraph - "In the long term, the deepening of the CCSC would allow for the transit of VLCCs to deepwater berths on Harbor Island. These ships are larger than ships that currently transit the VLCC and may adversely impact the viewshed of the residents who live near the channel. There is expected to be a long-term beneficial impact to air quality and a long-term reduction in noise due to reduced lightering of Suezmax vessels." The second sentence has a incorrect grammar (red text) and incorrect statement since VLCCs have been transiting the CCSC going to Ingleside since 2018.	Paragraph has beenrevised to correct grammatical errors and description of current operations.
133	24	**Navigation, page 4-89.** • Second full paragraph on page 4-89 has a type-o, "This potential outcome if further reinforced by the fact Suezmax vessels meet…" Should be "is". • Second paragraph on page 4-90 also has a type-o, "Vessels maneuvers to assess…" Remove "s" on vessels. • Same paragraph, last sentence states scouring that may occur at this location can be mitigated with placement of armor protection. Is this on the north or south side and won't this be mitigated with Harbor Island east BU?	1 and 2) Typographic errors have been corrected. 3) This statement is for the area located at the confluence of the CCSC and Lydia Ann Channel, at Harbor Island on the southside of the Aransas Channel. HI-E has armor protection at the confluence of the Aransas Channel and Lydia Ann Channel, and is therefore is the area referenced by this statement. No correction is required.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
133	25	**Cumulative Impacts, page 5-4.** • Should explicitly state what phase of review each project is in (i.e. USACE review, authorized project, constructed, etc.) • Section 5.3.2.5 states that dredging of 70ac of the bay bottom would not impact endangered species, the DEIS should be revised to make a statement consistent with other determination effects on turtles from dredging large areas. • La Quinta Terminal permit is incorrectly represented as a container terminal despite the permit being modified for a multi-purpose dock and now constructed as a bulk materials and bulk liquids/RO-RO dock (5-10). • Mitigation is not proposed with Harbor Island (5-12). • TxDot Ferry section does not detail a proposed project, all other projects in the section are proposed, underway or recently constructed (5-20). • Harbor Island and La Quinta Desal facilities are 50 MGD and 30 MGD proposed facilities, respectively, not 10 MGD and 30 MGD as stated on page 5-22.	1) Projects are categorized as past, present, or reasonably foreseeable. There may be instances where a reasonably foreseeable project is already built, but determining which applicants of USACE permits have built their projects may be too costly and timely to execute with high degree of accuracy. Desktop confirmation searching recent aerial imagery and maps was used to improve categorization of reasonably foreseeable projects. 2) Information on ESA compliance for the South Texas Gateway Terminal has been added. 3) LaQuinta Terminal Project description was revised with readily accessible information. 4) Harbor Island Project and mitigation was revised with readily accessible information. 5) TXDOT ferry was included as it is a present project that has potential to contribute to cumulative impacts with the proposed alternative. 6) MGD amountswere revised.
133	26	**Cumulative Impacts, page 5-23.** Page 5-23 section 5.4.1 paragraph 2. Confusing sentence - please check. "Any changes in commercial or recreational traffic can resulting…."	Text has been revised.
133	27	**Cumulative Impacts, page 5-34.** Unclear statement about the wetland impacts was made, the statement should be revised that all direct wetland impacts would be from BU not dredging (5-34)	Text has been revised.
133	28	Table 5-15 is missing a #3 in the project group column	Text has been revised.
133	29	A table would be good to summarize where CEA are potentially anticipated	General and qualititative cumulative effects are provided in 14 tables within Section 5.4. The conclusion (Section 5.5) provides a summary of potential cumulative effects, and particularly calls out the tidal amplitude increase (as that analysis was quantitative).
133	30	Page 7-1 paragraph 4. First sentence speak to birds, third sentence leaves them out.	Text has been revised.
133	31	Rules and Regs are cited, but not referenced in reference section.	CFR regulations cited within the text of an EIS are not included in the reference section of the document.
133	32	Page 12-3 " Strawbridge PCCA…..Garza PCCA's" they should both read the same.	Thank you for your comment.
133	33	Mott McDonald, Triton, PCCA should be added to the list of preparers as they are all referenced as contributors in the DEIS.	These documents are part of the permit application from the PCCA, the USACE has used them to inform the evaluation. They are referenced throughout the EIS and included in the references of the EIS (Section 15.0).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
133	34	Formatting not consistent - spacing and author name entries. None of the regulations cited within the document are referenced.	Text has been checked and revised as necessary.
134	1	Concerned about how the project will negatively affect marine life.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
135	1	Concerned about how the project will negatively affect the environment.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
136	1	Concerned about how the project will negatively affect the environment.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
137	1	Project will not increase the resiliency of existing hurricane risk.	Not applicable to the CDP.
138	1	Project will not increase the resiliency of existing hurricane risk.	Not applicable to the CDP.
139	1	The project will not benefit the public.	Thank you for your comment.
140	1	Does not support the project being built.	Thank you for your comment.
141	1	Does not support the project being built.	Thank you for your comment.
142	1	Does not support the project being built.	Thank you for your comment.
143	1	More stagnant water and unnecessary increase in taxes.	Thank you for your comment.
144	1	Does not support the project being built.	Thank you for your comment.
145	1	Concerned that by not combining this project with the Axis Midstream and Harbor Island terminals that lesser amount of scrutiny is achieved as the other project are not requiring an EIS.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
145	2	Commenter says that an Ingleside facility employee said that was doubtful that partially loaded outbound VLCCs at Ingleside could top off at Harbor Island and potentially reduce or eliminate reverse lightering.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
145	3	Raising concerns about all three projects and the amount of dredged material they will all produce and that the other two (Axis Midstream and Harbor Island) are not requiring an EIS.	Past, present, and reasonably foreseeable future actions (these include Harbor Island and Axis Midstream) in the study area are discussed in Section 5.0.
145	4	Desalination project on Harbor Island will have serious, cumulative, and permanent impacts from more saline, dredging, construction, and dredged material placement.	The potential for cumulative impacts due to desalination projects is discussed in Section 5.4.2.
145	5	Believes the model prediction of 5-10 percent increase in sedimentation in certain reaches could be underestimated. Aerial photos show massive plumes of sediment being pushed into waterways by tugs positioning VLCCs into berths. This would likely add to sediment load, and increase turbidity far into the channel.	The impact of tug boat operations and tug-generated scour holes were investigated in the Ship Simulation Report (Appendix K). Those impacts have both spatial and temporal limits mostly resulting in relocation of sediment within the channel area, not increasing the overall sedimentation.
145	6	Concerned that the potential for a 17 percent increase in tidal amplitude would have a negative impact on the residential areas, businesses, ferry landings, nature preserve.	While the modeling of the CDP does indicate the greatest increase of tidal amplitudes (about 17%) in the Corpus Christi Channel near Humble Basin, the overall impact of the CDP on water level is insignificant. It is unlikely to increase the flood risk associated with changes in high tide or navigation risk associated with the changes in low tide and mean sea level in the Corpus Christi Bay. See Section 4.1.2.1 in the DEIS and Appendix I.
145	7	Concerned about the increase in salinity the modeling predicts and how this along with other factors, i.e. desalination, drought, reduced freshwater inflow, sea level rise, will impact the ecosystem.	Past, present, and reasonably foreseeable future actions in the study area are discussed in Section 5.0.
145	8	Concerned that the increase in salinity of 3 ppt and the desalination discharge will push oysters to the brink.	Past, present, and reasonably foreseeable future actions in the study area are discussed in Section 5.0. Modeling by Baird (2022) (Appendix I) indicate minor increases in salinity (less than 1 ppt) are anticipated under Alternative 1. The range of salinity change which is less than +/-3 ppt is within the proposed dredged channel. Average salinities in the study area range from 30 to 36 ppt, with dry years having salinity levels above 32 ppt and wet years around 25.5 ppt (Montagna et al., 2021). While oysters can survive in salinities ranging from 5 to 40+ ppt, they thrive within a range of 10 to 25 ppt. In areas where oysters are mapped, the salinity change was shown to be less than 1 ppt (see Appendix I) and are not anticipated to cause any long-term impacts as oysters have the ability to tolerate salinity ranges.
145	9	Surprised that RSLR at the tide gauge nearest the project (NOAA gauge 8774770) showed 0.23 inches per year.	Thank you for your comment.
145	10	“Except for impacts associated with dredging, surface water quality trends would not be altered by any of the alternatives.” Except for impacts associated with 46,300,000 cubic yards of dredging… what might those be?	Temporary impacts such as increased turbidity, suspension of nutrients, lowered dissolved oxygen consentrations as discussed in sections 4.1.4.1.2, 4.1.4.2.2, and 4.1.4.3.2.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
145	11	Would increased algal activity, hypoxia, and higher salinity levels from desalination discharges be more likely to cause "Red Tides"? Those are "localized and temporary, but devastating to marine life, birds, wildlife, human health, and not too good for tourism, either.	Red tide is caused by algae that grows out of control typically during warmer, summer months. It can be exasperated due to climate change and nutrient pollution from farming and landscaping. The discharge from desalination is not known to cause red tides.
145	12	Concerned that the water and sediment quality data used (1980-2002) to conclude impacts is outdated.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
145	12	Concerned that the water and sediment quality data used (1980-2002) to conclude impacts is outdated.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
145	13	Concerned that the testing of the sediments as described in the Sampling Analysis Plan is currently being done by the Port. Shouldn't this be done by a third-party?	A Sampling Analysis Plan for MPRSA Section 103 evaluation of sediment was developed to determine if the new work material sediments proposed to be dredged are acceptable for disposal in the New Work ODMDS. Included in that plan is the biological testing of sediment, including sediment toxicity and bioaccumulation. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. MPRSA requires that testing follow protocols outlined in Chapter 8 of the Green Book (EPA and USACE, 1998) and the Ocean Dumping Regulations, guidance testing including the Regional Implementation Agreement (RIA) (EPA and USACE, 2003). The EPA must concur with the findings in accordance with 40 CFR 227 prior to USACE approval. Testing in accodance with the SAP is conducted by certified labs utilizing standard testing practices developed by the USACE and EPA and described in the green book. The EPA will review the findings of the testing and conclude if the material is suitable for ocean disposal.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
145	14	Serious questions regarding sediment quality for placement other than in the ODMDS and it is important to scrutinize sediment quality for disposal at BU sites and how it would impact the ecosystem. This could be a violation of the Clean Water Act and NEPA.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
145	14	Serious questions regarding sediment quality for placement other than in the ODMDS and it is important to scrutinize sediment quality for disposal at BU sites and how it would impact the ecosystem. This could be a violation of the Clean Water Act and NEPA.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
145	15	Permanent and cumulative water quality impacts are likely if all three projects are permitted.	Past, present, and reasonably foreseeable future actions (these include Harbor Island and Axis Midstream) in the study area are discussed in Section 5.0.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
146	1	Groundwater and Surface Water Hydrology: Table 2-3 on page 2-9 seems to total about 17,201,600 cubic yards of material to be placed on shorelines, beaches, and upland areas as part of this project. The impacts may be "localized" since they would be in different areas, but because of the total volume, the clay content, and the fact that the sites are adjacent to waterways, the impact on groundwater and surface hydrology could be substantial.	*Commenter pulls a lot of direct information from the DEIS, but does not provide logical comments on what they find incorrect with the information. Groundwater and surface water hydrology associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1.5.2. Indirect impacts associated with BU activities would be localized but not extend beyond the dredged material placement sites and no long-term impacts are anticipated.
146	2	Soils-ES, page vii. Chapter 4-section 4.1.4.3.2. "Only beach quality sands from the CCSC should be placed as direct beach nourishment at locations previously breached by Hurricane Harvey." This should be changed to "Only beach quality sands from the CCSC WILL be placed as direct beach nourishment on Mustang and San Jose' Islands. Placing dredge spoils with varying amounts of clay on sand beaches would have extremely negative effects on human, bird, and marine life, especially the nesting of turtles, some threatened and some endangered.	Beach noutrishment activities, if authrized, must comply with local and state requirments to comply with the Department of Army permit.
146	3	The project is designed to serve one entity alone but then discusses other projects, i.e. the –54 foot project, Harbor Island Terminal. Not likely that VLCC could top off at Harbor Island reducing or eliminating reverse lightering - according to an Ingleside facility employee.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
146	4	Nowhere in the first 16 chapters of this document is there any mention of how this project might be funded. If the intent is to involve taxpayer funds, this should be stated clearly. This would be a serious omission of facts. Not in the public interest!	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, federal review of a navigation district's stated need for the project in the marketplace.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
146	5	Concerned that if the channel were deepened, Harbor Island would be more at risk than it is now, and the facilities farther up at Ingleside. In addition, contaminated soils on Harbor Island could be disturbed, dredged, or deposited elsewhere if the Port carries out the other projects they envision there.	Post construction, the capability of fully loading VLCCs at Harbor Island would result in a localized increase in indirect impacts from HTRW resulting from the use of the deeper berths for handling, storage, and transfer of petroleum products and other hazardous materials at Harbor Island.
146	6	The permit for a desalination plant discharging 95,600,000 gallons per day of brine and waste chemicals into the ship channel is a future threat that also needs to be addressed by more than a paragraph in Chapter 5.	The potential for cumulative impacts due to desalination projects is discussed in Section 5.4.2.
146	7	Concerned that the assumption in the EIS is that the Harbor Island and Axis Midstream projects have been constructed and that their impacts are not included in the EIS.	The Harbor Island Terminal and Axis Terminal are considered sufficiently likely to occur, or reasonably foreseeable projects. The DA permit evaluations for these projects are ongoing and their impacts are being evaluated and documented as separate federal actions. The DEIS analyzes a future environmental condition that is a likely scenario in the project area (i.e., both terminals will be constructed prior to the channel deepening project). This could serve as a basis for determining if the proposed project's predicted impacts are nonsignificant or not. Past, present, and reasonably foreseeable future actions (these include Harbor Island and Axis Midstream) in the study area are discussed in Section 5.0.
146	8	Air emissions presented on Table 4-11 on page 4-33 are concerning, considering that much of the dredging would be next to popular spaces with heavy public use, i.e. city and county parks, fishing jetties, beaches, and adjacent to the ferry landing, where people often spend long periods of time.	These are temporary one time emissions. The channel is currently dredged through this stretch every 2-3 years for maintenance and was recently dredged in 2020 for the 54-foot draft Federal project without reported incident. Dredge engines, even older ones, inherently must meet EPA emissions standards that are set for long term risk exposure, which are lower exposure limits than acute or short-term effect levels. Therefore, the temporary nature of these emissions aren't expected to pose short exposure health risk concerns. Also, consider that dredge workers have to work aboard, and emissions have to be controlled sufficiently to avoid acute and short term effects.
146	9	Operational Emissions, on page 4-35, section 4.1.9.2.3 reads, "The impact assessment focused on the change in lightering activity." However, lightering does not occur in downtown Port Aransas, it is done out in the Gulf. Once again, no VLCC's or Suezmax tankers are now loading at Harbor Island. The air quality impacts are presently from vehicles, ferries, recreational and tour boats, and passing vessels of all sorts. It's not clear to me if table 4-14 and table 4-15 are presenting the amount of emissions from VLCC's positioning, idling, and berthing at Harbor Island and the tugboats assisting them. I'm hoping that someone can figure this out. Unlike many descriptions in this DEIS, these emissions at Harbor Island would be "localized and permanent"!!	Table 4-14 and 4-15 is only isolating the effects and emissions of lightering vessel activity, expected to be mainly Suezmax vessels, which will be reduced by the deepening, not increased.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
146	10	Disagrees with the conclusions of the noise impacts and says that different section say different things: ES, Page viii; Chapter 4, section 4.1.10.1, page 4-38; Section 4.1.10.2.4; Chapter 2, page 2-10, in section 2.2.3; Chapter 4, Sections 4.1.10.2.1 and 4.1.10.2.2; Section 4.1.10.2.3.	Impacts to noise associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1.10.2.
147	1	Concerned that only one Public Meeting was scheduled and why it was held in Corpus Christi. Request two more meetings, one in Port Aransas.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
147	2	Why only 2 weeks were added to review the additional documents that were provided. Request more time to review the DEIS.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
147	3	I request an attitude change that recognizes that this project directly impacts me.	N/A
148	1	Section 4.2.2.2.2, page 4-50 states, "Dredging and placement activities conducted under Alternative 1 (Applicant's Proposed Action) would directly affect the estuarine habitats and fauna in the study area." Actually, Alternative 1 would affect estuarine habitats and fauna in the PROJECT area, causing a much more "localized" and higher impact than on the entire "study area".	*Commenter pulls a lot of direct information from the DEIS, but does not provide logical comments on what they find incorrect with the information. This is correct, text has been revised.
148	2	Concerned about the impact acreages listed in Table 4-17, page 4-44 and the Executive Summary, page ix, and that together they total over 4,500 acres of impacted area.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
148	3	Page 4-50 to 4-55 gives information on the Applicant's Proposed Action Alternative's effects on "Ecological and Biological Resources". It's difficult to separate these, in "the real world", but especially in this DEIS. Much of the information cited, published from 1973- 2005, is of a generic nature, and doesn't account for the combination of ALL these "cumulative effects" in very specific, very "localized" areas. A "Summary of Impacts" Table 4-21, pgs 4-92 to 4-100, lists, but tends to minimize them by also claiming they would be "temporary'. This proposed project is expected to take 5 years. Its combination of multiple impacts over multiple years in multiple close proximity locations of one interrelated system would have permanent and devastating effects.	References provided in Section 4.2.2.2.2 are specific to the topic being discussed and not generic. Using a more recent reference without going to the original sources is not sound science and therefore in some instances the original source of the information is being cited. Some recent papers have been published specific to the CDP since the Draft EIS was written, this information will be incorporated into the Final EIS. Past, present, and reasonably foreseeable future actions in the study area are discussed in Section 5.0.
149	1	Invasive Species in Ballast Water, page ix: "Under the Applicant's Proposed Action Alternative, most VLCC ballast water exchanges would be located around Axis and Harbor Island, increasing the risk of introducing invasive species."The Executive Summary fails to note the proximity to the nursery grounds of the bays, wetlands and seagrasses, as well as the "tidal toll road" through this spot. Releases in this strategic location would endanger ALL the bays in this system- from St. Charles and Copano to Aransas, Redfish, Nueces, Corpus Christi, and the Laguna Madre.	*Commenter pulls a lot of direct information from the DEIS, but does not provide logical comments on what they find incorrect with the information. Section 4.2.3.2 describes ballast water impacts of the Applicant's Proposed Action Alternative, however have revised the text the Executive Summary to point out Corpus Christi Bay.
149	2	Page 4-57, There are some assumptions to ballast water impacts that may prove wrong: lightering may still be required; and partially loaded VLCC's may NOT top off at Harbor Island. What is clear is that Alternative 2 greatly reduces the risk by releasing the ballast waters well offshore, where they would rarely impact the Corpus Christi Bay ecosystem.	Assumptions are based on the current knowledge of the Applicant's Proposed Action Alternative. If any changes are made by the Applicant, the information will be updated for the Final EIS.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
149	3	Wildlife Resources- ES page x and Chapter 4, section 4.24.2, page 4-58. Concerned about the impacts to sea turtles due to vessel traffic. Commenter does not believe that the project would reduce the amount of vessel traffic.	Impacts associated threatened and endangered species with the Applicant's Proposed Action Alternative are addressed in Section 4.2.5.2 and Appendix D. USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3).
149	4	Commenter does not believe that the project would reduce the amount of vessel traffic and believes this is a deliberate deception in the document. Believes the project would allow a larger number of larger vessels to export more oil faster compounding the effects of climate change and all the other negative impacts in the DEIS causing more damage to habitats.	Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
149	5	Page 4-58 and 4-59 read, "Larger vessels such as VLCC's going through the CCSC with their tugboats may increase shoreline erosion and degrade or reduce the amount of shoreline for use by birds and terrestrial wildlife." This has already been the case along the ship channel from Ingleside to Harbor Island for decades!	The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) indicate that the CDP would have minimal impacts to the shorelines along the CCSC.
149	6	While it is stated that the BU of dredged material is proposed to increase beach and wetland habitat and reduce shoreline erosion. What isn't noted here are any plans for vegetation on dredge spoils to match that which would be buried.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
149	7	All the information on sediment quality seems to relate to offshore placement, with no comments on testing or standards for onshore placement in or near beaches, wetlands, or estuaries. Even if no HTRW is present, that doesn't make it good for establishing habitat, however, it could possibly provide protection to shorelines and other areas.	Section 3.2.5.3, Table 3-8 provided a history of sediment quality assessments for the CCSC. Although they are evaluated for offshore placement, the results of testing are used for onshore placement. For the proposed CDP, sediment test analyses are ongoing to ascertain the suitability of placing the CDP's new work dredged material within the New Work ODMDS. Results will be included in the Final EIS. A Sampling Analysis Plan for MPRSA Section 103 evaluation of sediment was developed to determine if the new work material sediments proposed to be dredged are acceptable for disposal in the New Work ODMDS. Included in that plan is the biological testing of sediment, including sediment toxicity and bioaccumulation. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. MPRSA requires that testing follow protocols outlined in Chapter 8 of the Green Book (EPA and USACE, 1998) and the Ocean Dumping Regulations, guidance testing including the Regional Implementation Agreement (RIA) (EPA and USACE, 2003). The EPA must concur with the findings in accordance with 40 CFR 227 prior to USACE approval.
149	8	**Protected Lands- ES, page x, and page 4-60. Commenter concerned about:** • Added storm surge and shoreline development would result from the CDP under a No-Action, Applicant's Proposed Action, or Onshore/Offshore alternative. • Indirect impacts to the "Redfish Bay State Scientific Research Area", the "Mission-Aransas National Estuarine Reserve" and the "Port Aransas Nature Preserve." • Omitted is the possibility that Texas Audubon may hold some conservation easements on Harbor Island, "protected lands" that could well be impacted by developments there. • VLCC producing larger wakes which could degrade critical habitat for piping plover • Increased risk of spills with larger vessels • Incidental spills and runoff at several Harbor Island operations not included in the DEIS.	1) Included storm surge and shoreline development to referenced sections 2) Redfish Bay was designated a state scientific area by the TPWD in June 2000 to protect and study native seagrasses. The RBSSA contains the northernmost extensive stands of seagrass on the Texas coast. In May 2006, the "no-uprooting"/"no-Prop" regulation took effect in RBSSA. By September 2013, the "no-uprooting"/"no-Prop" regulation had been expanded statewide. While Redfish Bay remains a designated Scientific Area, all seagrass beds along the Texas coast have comparable protections laws. Seagrass beds are a special aquatic sites and will be evaluated in accordance with the 404(b)(1) Guidelines. 3) It is not known if Texas Audubon has conservation easements along Harbor Island. 4) Baird 2022b report mentioned that there would be no discernable increase in shoreline erosion from CDP and vessel wake. 5 & 6) Section 4.2.5.2.2 mentions the potential for crude oil and chemical spills as a result of larger quantities and increased vessel traffic.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
149	9	**Threatened and Endangered Species-ES pg x, and Chap 4, pg 4-61. Commenter concerned about:** • Does not mention the proposed alternatives plans are for dredging on a massive scale • Omits information on the amount of maintenance dredging • The 5 years to complete the project and 20 years or longer of maintenance dredging does not have "temporary" impacts. • Leaves out impacts from other Harbor Island Projects in the alternatives • Ignores impacts from increased vessel size and activity, VLCC/tugs are constantly stirring up sediments increasing turbidity • Section 4.2.5.2.2, page 4-62 have mixed messages on the effects on piping plovers and red knots	Impacts associated threatened and endangered species with the Applicant's Proposed Action Alternative are addressed in Section 4.2.5.2 and Appendix D. USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3). Past, present, and reasonably foreseeable future actions in the study area are discussed in Section 5.0.
150	1	**Appendix E,** page 4-3, 4.1.2. Commenter wants the first paragraph of this section rewritten and provides suggested revision.	Thank you for your comment. NMFS-NOAA, a cooperating agency, concluded EFH consultation in November 28, 2022 with several Conservation Recommendations outlined in their August 9, 2022 letter.
150	2	Concerned that the impacts are described as temporary and short-lived until construction is complete. Construction is expected to take 5 years working 20 hours per day, 7 days per week therefore does not believe the impacts are temporary. And maintenance dredging would continue with increased impacts, equaling less fish.	Impacts to EFH associated with the Applicant's Proposed Action Alternative are addressed in Section 4.2.5.3.2 and Appendix E. CCSC is a federally authorized navigation channel that has been regularly dredged since 1874. Currently, USACE civil works program maintenance dredges at least a portion of the Federal channel annually. The CDP will also require maintenance dredging at similar intervals to the existing conditions.
150	3	Commenter feels that the DEIS is not forthcoming with the impacts between the Executive Summary and Appendix E- Page 4-8, Section 4.2.4.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
150	4	The discharge of 95,600,000 gallons PER DAY of brine and waste chemicals from a Port of Corpus Christi desalination facility on Harbor Island could definitely impact these “localized” reefs.	The potential for cumulative impacts due to desalination projects is discussed in Section 5.4.2.
150	5	Concerned the loss of oyster reef would affect other species as described in Chapter 3, page 3-63.	Impacts to oysters associated with the Applicant's Proposed Action Alternative are addressed in Section 4.2.2.2.2.
151	1	**Migratory Birds and Marine Mammals.** Concerned that the 20 hours a day, 7 days a week for 5 years the project would take to construct would cause long-term impacts and not temporary as stated.	**Commenter pulls a lot of direct information from the DEIS, but does not provide logical comments on what they find incorrect with the information.* Migratory birds and marine mammals are mobile and would be able to avoid the immediate disturbed area.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
151	2	**Marine Mammals and Sea Turtles.** Does not believe that noise caused by the project would by temporary and localized, but rather permanent.	Impacts to marine mammals and sea turtles are described in detail in Appendix D (Biological Assessment). The Biological Assessment has been reviewed and approved by the agencies.USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3).
151	3	Changes in salinity, only tolerances for oysters have been noted to this point, what about other species?	Modeling by Baird (2022) (Appendix I) indicate minor increases in salinity (less than 1 ppt) are anticipated under Alternative 1. As described in the DEIS, most estuarine organisms occupying these environments are ubiquitous along the Texas coast and can tolerate a wide range of salinities (Pattillo et al., 1997). Additional information regarding salnity tolerances and salinity maximums for common fish, shellfish, wetlands, and submerged aquatic vegetation within the study area has been added to Section 3.2.3.4 (Salinity).
152	1	Request an extension to the DEIS review period and a public meeting held in Port Aransas and Aransas Pass.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
152	2	Misleading/incorrect claim, Applicants Purpose and Need Statement in Section 1.5.1 (first paragraph page 1-8). Does not believe the CDP is going to reduce lightering for entities past Harbor Island. The Ingleside area terminals are 10 miles past Port Aransas and Inner Harbor 20 miles further up and refers lightering would continue. These companies are not just going to stop.	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The Applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, Federal review of a navigation district's stated need for the project in the marketplace.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
152	3	Believes only the Port benefits from the channel deepening and they want to develop contaminated property on Harbor Island for an export terminal, essentially cutting off upstream suppliers while doing permanent, not temporary damage to the marine environment.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
152	4	Commenter cites information from public testimony on June 14, 1994.	Thank you for your comment.
152	5	Commenter cites information from the USACE letter to the Port on February 19, 2019 regarding the interdependency of the CDP, Harbor Island Facility, and Axis Midstream. Neither of the applications are complete at this time and states the Axis application is make believe since the contract was revoked so questions must be asked.	Thank you for your comment.
152	6	Cites Section 1.5.1, page 1-8 last paragraph and states it is intended to confuse everyone by mixing the 56-foot channel and proposed. The bond money and primary baker dropping out of the project and the USACE knew, questioning who the Port customers will be for this project.	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The Applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, Federal review of a navigation district's stated need for the project in the marketplace.
152	7	Cites Section 1.5.1, page 1-9 last paragraph and wants to know about the congestion for all marine traffic. Questioning if the Port does not have a right to shut down marine traffic, public highway.	Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
152	8	What happens to all stakeholder operations when there's a failure in the turning or berthing of a VLCC? The failure rate for ship simulations was almost 10%. In all failures, the ship ran aground on granite jetty rock. Without a doubt, the hull would be ruptured causing a massive oil spill, what happens to marine traffic then? Talk about delays, not to mention the environmental disaster!	The simulations conducted were intended to be challenging scenarios and any residual risks can be controlled by waiting on weather conditions to improve, adding additional pilots, requesting more tugs or more horsepower, and restricting traffic flow.
152	9	The Ship Simulation Report seems very fabricated to make the turning of ships work. To get it to work a tug boat was designed, but does not exist. Virtual, non-reality computer simulations are acceptable to the USACE and allowed in 33 CFR 320?	Ship simulations are typical for the purpose to develop and transfer understanding among the experienced pilot participants. The range and number of simulations are designed to adequately addressed the key parameters required to bring out the most important issues and objectives, to include applying necessary tug types and configurations. Operational limits and controls are typically imposed based on actual tug and ship capabilities and environmental conditions as informed by the ship simulation results.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
152	10	Says that contrary tides and currents were not included in Baird's H&H study - the model of the water currents presented at the public meeting - and are not mentioned or depicted in the models.	We are not sure what "contrary tide" means. We assume that this may mean eddies which form during flood and ebb tides, particularly near the termini of the jetties. The model simulates flood tides and ebb tides and does resolve eddies forming near the termini of the jetties. Seasonal variation of water level in the Gulf was also included in the model based on measured data.
152	11	Concerned that a 3 ppt salinity increase in the channel will increase the salinity in the Redfish Bay Scientific Area. This pass is the only one in the area, 3 ppt would cause impacts to most larvae and more damage to oyster populations. Attached USACE testimony from the SOAH hearing and various studies.	Modeling by Baird (2022) (Appendix I) indicate minor increases in salinity (less than 1 ppt) are anticipated under Alternative 1 in the Redfish Bay State Scientific Area. The range of salinity change which is less than +/-3 ppt is within the proposed dredged channel. Most estuarine organisms occupying these environments are ubiquitous along the Texas coast and can tolerate a wide range of salinities (Pattillo et al., 1997). Average salinities in the study area range from 30 to 36 ppt, with dry years having salinity levels above 32 ppt and wet years around 25.5 ppt (Montagna et al., 2021). While oysters can survive in salinities ranging from 5 to 40+ ppt, they thrive within a range of 10 to 25 ppt. In areas where oysters are mapped, the salinity change was shown to be less than 1 ppt (see Appendix I) and are not anticipated to cause any long-term impacts as oysters have the ability to tolerate salinity ranges. Redfish Bay was designated a state scientific area by the TPWD in June 2000 to protect and study native seagrasses. The RBSSA contains the northernmost extensive stands of seagrass on the Texas coast. In May 2006, the “no-uprooting”/”no-Prop” regulation took effect in RBSSA. By September 2013, the “no-uprooting”/”no-Prop” regulation had been expanded statewide. While Redfish Bay remains a designated Scientific Area, all seagrass beds along the Texas coast have comparable protections laws. Seagrass beds are a special aquatic sites and will be evaluated in accordance with the 404(b)(1) Guidelines.
152	12	USACE provided the public an unrealistic 45 days to review the DEIS, gave an additional 18 days only because of adding additional documents.	USACE has followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
152	13	DEIS claims the BU placement and most impacts to be temporary. The DEIS is grossly inadequate and fails to adhere to 33 CFR 320, the Clean Water Act, and NEPA requirements.	Direct impacts from BU placement are disclosed in Section 4.2 (Ecological and Biological Resources) and acres of impacts are summarized in Table 4-16. An extensive independent study was conducted by USACE in compliance with Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) regulations. These studies utilized the best available scientific information and reached objective, scientifically-based conclusions. Results of the study are included in the DEIS. Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), Appendix E (EFH Assessment), Appendix G (Sediment Transport Modeling), Appendix H (Vessel Wake Analysis), Appendix I (Hydrodynamic and Salinity Modeling), Appendix L (Ship Simulation Report), Appendix M (Propeller Scour Study), and Appendix N (Underkeel Clearance Study).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
153	1	Concerned about the wait time for the ferry for folks commuting to and from for work and how that could impact businesses.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
153	2	Concerned about the environmental impacts.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
154	1	Acknowledging receipt of email was cc'd on from Cathy Fulton on August 6, 2022, 2:58PM.	N/A
155	1	Requests an extension of the DEIS review period to allow for more time to review the added amendments.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
155	2	Because Port Aransas will be significantly impacted by Alternative 1, requests a special hearing be held in Port Aransas before the FEIS.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
156	1	Feels the plan is based on special commercial interests and ignores the common interests for work only for themselves and their profits.	Thank you for your comment.
156	2	Concerned that Corpus Christi Bay and surrounding estuary will be negatively impacted.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
156	3	Concerned about the increased risk to property and residents during the hurricanes and will be a burden that will increase the rising insurance costs and the burden of petrochemical pollution due to exacerbated flooding as seen during Harvey and the Houston Ship Channel.	Impacts associated with storm surge effects with the Applicant's Proposed Action Alternative are addressed in Section 4.1.3.4.2 Storm Surge Effects.
156	4	Concerned about the proposed use of dredged material and potential contaminants that would not be safe for adding to local beaches and waterways and that could cause issues to the ecosystem and people swimming in the water.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
156	4	Concerned about the proposed use of dredged material and potential contaminants that would not be safe for adding to local beaches and waterways and that could cause issues to the ecosystem and people swimming in the water.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
156	5	Concerned about potential water quality, air quality, bay health, and way of life, and an deadly diseases now that we fear from pollution exposure.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
156	6	Requests action taken that will give experts in experts in the marine ecology, air quality, weather, local cancer and birth defect rates, and other pertinent issues more time to study the real effects of this project.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
156	7	Requests Public Meetings in Port Aransas and Aransas Pass and more time to review the DEIS.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
157	1	Provides a report by Ward and Armstrong (1997, https://www.cbbep.org/publications/virtuallibrary/CCBNEP-23.pdf) that would like reviewed for the project.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
157	2	Requests input from scientists who have worked in the study area.	An extensive independent study was conducted by USACE in compliance with Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) regulations. These studies utilized the best available scientific information and reached objective, scientifically-based conclusions. Studies conducted for the CDP included: Sediment Transport Modeling Study (Appendix G), Vessel Wake Analysis (Appendix H), Hydrodynamic and Salinity Modeling Study (Appendix I), Ship Simulation Study (Appendix L), Propeller Scour Study (Appendix M), and Underkeel Clearance Study (Appendix N). Additional studies conducted by the Applicant include: Wetland Delineation, Aquatic Surveys, Threatened and Endangered Species Surveys, Marine and Cultural Resources Study, Water and Sediment Quality Study. The results of these studies were incorporated into the impacts (Section 4.0), Biological Assessment (Appendix D), and EFH Assessment (Appendix E) of the DEIS.
157	3	Consider coming to Port Aransas, Aransas Pass, and including more local residents in the discussions about the project.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
158	1	Attached photos of VLCC and LNG ship wakes. Believes the Vessel Wake Analysis waters down vessel wakes and the effects to shorelines.	The results of the Vessel Wake modeling and analysis (Appendix H) were reviewed and endorsed by the pilots. Note also that the outcomes of the study are comparative, assessing the additional impact of the CDP by comparing Future Without Project and Future With Project channel scenarios.
159	1	Attached Remand Closing Document from the second contested case hearing with SOAH in April 2022 regarding pollution our public waters with brine discharge, there is information related to water quality, channel currents, Port Aransas economy, marine life, etc. Attached a white paper from Dr. Buskey that explains in plain terms the problems estuarine dependent larvae encounter to survive travel through the ship channel.	Thank you for your comment.
159	2	I wish to remind you, you stated at the June 16, 2022 meeting that multiple comments can be submitted and all comments will be read and considered.	All comments submitted during the 60 day public comment period were read and documented in a comment response matrix. Documentation of the public meeting will be included as an appendix in the Final EIS. All comments are taken into consideration and if determined significant are addressed in the Final EIS.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
159	3	Need extensions on all applications concerning Harbor Island in the city limits of Port Aransas: CDP SWG-2019-00067, Harbor Island SWG-2019-00245, and Axis Midstream SWG-0019-00789.	An extension for time to comment on the CDP DEIS was granted. The otheractions are being analyzed under separate applications and are not part of the CDP.
159	4	Support an offshore SPM. Do not support exporting oil off Harbor Island because of potential impacts to the marine fisheries.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
159	5	Harbor Island is a critical juncture of 3 channels: the ship channel, Aransas Channel, and Lydia Ann Channel; called the "Ecological Hotspot" due to primary larval flow from the Gulf to Redfish Bay, concerned about the impacts the project will have on the ecosystem.	Impacts to estuarine organisms associated with the Applicant's Proposed Action Alternative are addressed in Sections 4.2.2.2.2, 4.2.5.3.2, and Appendix E. EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
159	6	The Port Aransas economy is almost solely based on tourism. Concerned the project will impact fish and wildlife that people come here for.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
159	7	Believes the only people who will benefit the CDP are the Port, Lone Star Ports, and Axis Midstream. The people of Port Aransas will get nothing.	Thank you for your comment.
159	8	Concerned about the contamination on Harbor Island.	The contamination was identified in the Tier I analysis conducted in the development of the SAP. As a result, the EPA required the sediment testing be condcuted on discrete samples rather than composited samples to prevent potential contamination from being diluted in the testing protocols.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
159	9	Concerned how a hurricane would impact an oil export facility on Harbor Island.	Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with "planned future conditions" representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI's modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI's application of model parameters or inputs for the ADCIRC/SWAN models used in its study.
159	10	Request the permit application be denied and asks that the lease agreements with the Carlyle Group and Lone Star Ports be looked into.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
159	11	Request that the communities concerns be addressed with a true, actual response and not a list of statistics.	All comments submitted during the 60 day public comment period were read and documented in a comment response matrix. Documentation of the public meeting will be included as an appendix in the Final EIS. All comments are taken into consideration and if determined significant are addressed in the Final EIS.
159	12	Have over 22,000 signatures against the proposed heavy industrial develop for crude oil export and a desalination facility, that will dump 96,500,000 gallons per day, hypersaline water, into the ship channel.	Not applicable to the CDP.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
160	1	Have sent numerous comments via registered mail to your post office box listed in regards to the dredging at the Port of Corpus Christi. It has come to our attention that they have not been received by you. Can you pick up these comments so we can get confirmation. Response from USACE stating that they are receiving comments at that PO Box and have reviewed all the comments received but there were none from For the Greater Good or Chris Phelan.	Thank you for your comment. Comments were resubmitted and verified to have been received.
161	1	Request a contested hearing.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
161	2	Concerned the CDP will destroy the bays and ecosystem.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
161	3	Concerned about increase traffic on the channel.	Under the Applicant's Proposed Action Alternative, there would be no increase in VLCC vessel traffic and no change to the VLCC one-way traffic restrictions. However, due to reductions in reverse lightering there will be a decrease in tanker vessel traffic, by reducing the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operation.
161	4	Concerned about impacts to small local businesses and families that live here.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism.
162	1	DEIS Section 2.3.1, 3rd paragraph. This applies to inshore terminals too. All the same procedures including maintenance and inspection will be required. The same issues with delays and contracts will also apply.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
162	2	DEIS Section 2.3.1, 3rd and 4th paragraphs. Does not feel the number add up and it would be 64 VLCC loads per month. Is the applicant claiming the nonexistent terminal on Harbor Island could service 64 VLCC's per month? A very generous hypothetical would be the terminal could load 30 VLCC's/month, which equates to 2,000,000 bpd, not 4.5 million bpd. Where is this projected 4.5 million bpd originating? I personally think it is someone throwing darts. Are the other established facilities' exports factored into the 4.5 bpd? What about the supply from the Bluewater project, is it factored into the 4.5 million bpd?	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
162	3	Feels the scope of Alternative 2 is skewed and misrepresents the reality of present and future conditions. The Port's projections of 4.5 million bpd for export oil appears to factor in all possible exports from operators, but hogs the numbers for itself. How would 8 SPMs be operated? Is the POCCA proposing to own and lease them? What about cost analysis and comparison to other alternatives? Since Alternative 1, 2 and 3 would require public money, how much are we talking?	The alternative analysis was developed in coordination with the cooperating agencies and is designed to address requirements in the 404(b)(1) guildines, MPRSA Need for Ocean Dumping and NEPA. The alternatives anlaysis is not designed to analyze or reevalute the economic assement made by the Applicant.
162	4	Request more time be added to the review period and to have Public Meetings in both Port Aransas and Aransas Pass.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
163	1	Does not believe the DEIS is addressing potential indirect impacts of the project (increases in tidal amplitude, salinity, and storm surge) to the Lydia Ann Lighthouse.	The Lydia Ann Lighthouse is a cultural resoucre, USACE and SHPO determined the lighthouse will not be affected by the project and are discussed in Section 4.3.2. Discussed in section 4.3.2 "The Tarpon Inn and Aransas Pass Light Station are not likely to be impacted because they are more than a half mile from the nearest placement area (0.75 miles and 0.55 miles, respectively)..." "Furthermore, beach nourishment activities (MI and SJI) are likely to extend the current shoreline seaward, protecting the islands from rising sea levels and reducing hurricane-related storm surge. ..."

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
164	1	DEIS Chapter 3, on pages 3-97, 3-98, 3-100, 3-102, 3-105, 3-110, and 3-111. Without any notice to, or consent of the residents, the authors have relocated the City of Port Aransas from Nueces County to Aransas County. In addition, they have blurred the boundaries between the cities of Corpus Christi, Port Aransas and Aransas Pass on Mustang and Harbor Islands with confusing language on pages 3-110 and 3-111.	*Commenter pulls a lot of direct information from the DEIS, but does not provide logical comments on what they find incorrect with the information. Tables in Section 3.5 of the DEIS mistakenly reported Port Aransas in Aransas County. This has been corrected in the FEIS. In addition, the discussion in this section has been reviewed for accurancy regarding the description of cities within each county. Other corrections have been made to this section to address the specific issues listed in this comment.
164	2	In Chapter 4, page 4-79 under “Land Use” It states “Areas closest to the channel include a mix of maritime industry, Port-related properties, and undeveloped areas.” Notably omitted is residential, commercial, recreational, and nature preserve areas.	Thank you for your commment. The desccription of land use near the channel has been revised to include additional categories.
164	3	Section 3.5.3.2.2, page 3-111, for all intents and purposes, the Nature Preserve does share a border of much less than 100 feet from the CCSC. Once again, the does not present a clear picture of the REAL impact this project would have on the REAL economic driver of the Region of Influence - TOURISM.	Thank you for your commment. Sections 3.5.3.2.2 has been revised for the FEIS to accurately describe the location of the Nature Preserve.
164	4	Chapter 3, page 3-107 - information isn't up to date or represent real facts. Are the authors considering all tourist activity from King Ranch to Padre Island, Port Aransas, Aransas Pass, Rockport, and Fulton as Corpus Christi tourism? Should present more recent data.	Thank you for your commment. The discussion of recrational and tourism has been revisited and revised to more accurately represent activities in the study area.
164	5	The negative effects this proposed project would have on fishing, boating, ecotourism, beachgoers, and seafood consumption are NOT addressed in the Executive Summary, DEIS Chapter 3, or Chapter 4.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
165	1	Stating that no adverse impacts are expected under the Applicants Proposed Action Alternative. Taking into account the two marine terminals included in the NO-Action (page 4-87), Applicant's Proposed Action (page 4-89) and Inshore/Offshore Alternatives (page 4-91), this is a gross miscalculation or outright misinformation. When exports are expected to increase how can there be no increase in vessel traffic?	*Commenter pulls a lot of direct information from the DEIS, but does not provide logical comments on what they find incorrect with the information. Due to reductions in reverse lightering there will be a decrease in tanker vessel traffic, by reducing the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operation.
165	2	Does not believe that turning and hauling huge ships into berths next to the ferry in "nominally sufficient" width channels will disrupt ferry traffic less than lightering ships at Harbor Island, which does not currently happen, and is only included for comparison.	USACE is coordinating with TxDOT to determine if ferry operations will be impacted and what, if any, measures need to be implemented to reduce or mitigate any potential operational impacts.
165	3	Concerned about the 36 percent tidal range change with the cumulative impacts.	The potential for cumulative impacts due to the tidal range change is identified in Section 5.4.2.
165	4	Concerned that dredged material is not actually beneficial and the Port is not proposing mitigation.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
165	5	Believes the USACE has done a poor job with coordination and public involvement. Does not like the Scoping meetings were held as Zoom meetings and that the only Public Meeting was not in Port Aransas. Also does not like that the comment period was only extended 2 weeks.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
165	6	Suggests reviewers ask the USACE record all citizen comments they have received concerning the oil terminals proposed for Harbor Island and the CDP projects.	All comments submitted during the 60 day public comment period for the CDP were read and documented in a comment response matrix. Documentation of the public meeting will be included as an appendix in the Final EIS. All comments are taken into consideration and if determined significant are addressed in the Final EIS. The direct impacts associated with the terminals are bring reviewed under a separate NEPA document but are included in Section 5.0 Cumulative Impacts of the EIS.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
166	1	How will USACE and Port manage dredging activities and the position and placement of the "spoils" around and on Port Aransas beaches?	A Dredged Material Management Plan (DMMP) outlines the applicant's approach to placing materials. Appendix C includes the current DMMP; however, a revised, updated DMMP will be included in the FEIS.
166	2	Request that another Public Meeting be held in Port Aransas.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
167	1	Concerned about the impact to the ferry the project would have. Thinks the system will be shut down and that would impact businesses and schools.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
168	1	Concerned about the impacts to the ferry the project would have; its impacts on emergency vehicles, traffic backups and further emissions being released as a result.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
168	2	Wants the project located to an area that would not have impacts to the ferry.	Thank you for your comment.
169	1	Concerned about how the 36 percent increase in tidal range would impact the Aransas Pass Light Station District, also known as the Lydia Ann Lighthouse.	The potential for cumulative impacts due to the tidal range change is identified in Section 5.4.2. The Lydia Ann Lighthouse is a cultural resoucre, USACE and SHPO determined the lighthouse will not be affected by the project. The modeling of the future with project does indicate the greatest increase of tidal amplitudes (about 17%) in the Corpus Christi Channel near Humble Basin, the overall impact of the CDP on water level is insignificant. The cumulative impacts for the CDP show a 36% increase in tidal amplitude at the Inner Channel. The lighthouse is not located on this section of the channel and therefore no impacts are anticiptaed. See Section 4.1.2.1 in the DEIS and Appendix I.
169	2	Hope the reviewing agencies receive a record of all the comments made regarding the proposed CDP, the proposed oil terminals, and public meetings.	All comments submitted during the 60 day public comment period for the CDP were read and documented in a comment response matrix. Documentation of the public meeting will be included as an appendix in the Final EIS. All comments are taken into consideration and if determined significant are addressed in the Final EIS.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
170	1	Concerned about the impacts to the ferry the project would have; its traffic backups due to shutdown, impacting jobs and businesses.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
170	2	Wants the project located to an area that would not have impacts to the ferry.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
171	1	Concerned about the impacts to the ferry the project would have; its traffic backups due to shutdown, impacting jobs and businesses.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
172	1	Concerned about the impacts to the ferry the project would have; negatively impacting the coming and goings of residents and tourists.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
172	2	Opposed the proposed ODMDS and placement sites due to the negative impact on the ecosystem and ultimately on tourism.	Thank you for your comment.
173	1	Concerned about the negative environmental impacts on Corpus Christi Bay, seagrass, and estuaries.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
173	2	Concerned about the oyster business that was once thriving before being poisoned by zinc.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
173	3	Concerned that dredging will bring up organic and inorganic pollutants that would impact the placement sites. Attached a study regarding pollution following Hurricane Harvey.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
173	3	Concerned that dredging will bring up organic and inorganic pollutants that would impact the placement sites. Attached a study regarding pollution following Hurricane Harvey.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
173	4	Request Public Meetings be held in Port Aransas and Aransas Pass.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
174	1	Concerned about the storm surge if the channel is dredged that deep.	Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with "planned future conditions" representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI's modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI's application of model parameters or inputs for the ADCIRC/SWAN models used in its study.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
174	2	Concerned about the impact to the ferry, traffic will be a mess.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
174	3	Concerned about placing dredged materials on the beach.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
174	3	Concerned about placing dredged materials on the beach.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
175	1	Concerned about the impact to the ferry traffic and interruptions will create delays and backup traffic for miles, could impact businesses with people trying to get to their jobs.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
175	2	Any accidental oil spill would be an ecologic disaster for the whole CC Bay, and negatively affect the City of Port Aransas.	Current operations in the Corpus Christi Ship Channel already present a risk of oil spills. The CDP could increase those risks and are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, and Section 4.5 Navigation.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
175	3	Concerned about dredged material being placed on beaches that would ruin the attractiveness of the vacation town.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
175	3	Concerned about dredged material being placed on beaches that would ruin the attractiveness of the vacation town.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
175	4	Offshore loading should be considered.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
176	1	Does not support the project and believes it will endanger human life and impact the economy.	Thank you for your comment.
177	1	Concerned about the maritime safety issues because of the geographical situation.	Operational limits and controls are typically imposed by ACC Pilots, USCG, and Harbor Master based on tug and ship capabilities ane environmental conditions.
177	2	Concerned about the ecological and environmental damage to sea life and the economy.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
177	3	Concerned the project will not benefit local residents and impact tourism and the sports fishing industry.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
177	4	Move this facility offshore.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
178	1	Email did not contain any comments.	N/A

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
179	1	Concerned the ferry will be impacted.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
179	2	Does not want clay placed on the beaches.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
179	2	Does not want clay placed on the beaches.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
180	1	Concerned the ferry will be impacted by the project; impact emergency vehicle access, back ups on the highway, and add emissions to the environment.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
181	1	Expressing support of this project and ask that the Port receive favorable consideration.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
182	1	Opposed to the project are requests it be relocated to an area that would not impact the highway, ferry, and community.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
183	1	Opposed to the project as it will negatively impact the beaches, workers, and wildlife.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
184	1	Concerned about the environmental impacts the project will have, including recreational and commercial fishing.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
184	2	Concerned about depositing dredged material on beaches and in close proximity offshore and the environmental impacts this will have.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
184	2	Concerned about depositing dredged material on beaches and in close proximity offshore and the environmental impacts this will have.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
184	3	Concerned the local economy and tourism will be impacted as a result of the project.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism.
185	1	Concerned about the impacts to the ferry the project would have; its impacts on emergency vehicles, traffic backups and further emissions being released as a result.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
186	1	Concerned about the impacts to the ferry the project would have; its impacts on emergency vehicles, traffic backups and further emissions being released as a result.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
187	1	Concerned the project will cause an increase risk of spills, cause erosion and damage to land, storm surge and tidal inlets will have negative impacts, altered composition of the water will harm marine life, negative impacts to threatened and endangered species.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), Appendix E (EFH Assessment), Appendix G (Sediment Transport Modeling), Appendix H (Vessel Wake Analysis), Appendix I (Hydrodynamic and Salinity Modeling), Appendix L (Ship Simulation Report), Appendix M (Propeller Scour Study), and Appendix N (Underkeel Clearance Study).
187	2	Concerned that tourism, fishing, transportation, tourism, and employment will be impacted.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
187	3	Concerned about the impact to the ferry; traffic, workers unable to get to work, businesses suffering.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
187	4	An offshore terminal can accomplish the transfer of crude oil without the major devastation of the current project.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
188	1	Concerned about the negative impact to the ferry for workers, tourists, and businesses.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
189	1	Concerned the project will destroy the estuaries.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
190	1	Requests two more Public Meetings be held in Port Aransas, and Aransas Pass.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
191	1	Does not support the project being built.	Thank you for your comment.
192	1	Does not support the project being built.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
192	2	Request a Public Meeting be held in Port Aransas or Aransas Pass.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
192	3	Provide the public ample time to review the volumes of EIS pertaining to this project.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
192	4	Provide the public with answers from experts regarding dredged material placement and the effects those will have on the surrounding communities.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
192	4	Provide the public with answers from experts regarding dredged material placement and the effects those will have on the surrounding communities.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
193	1	Concerned about the impacts to the ferry the project would have; its impacts on emergency vehicles and traffic backups as a result.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
194	1	Concerned about the impacts to the ferry the project would have; its impacts on emergency vehicles and traffic backups as a result.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
195	1	The USACE provided the public with an incorrect address to which the community could mail in comments. Feels the USACE has little regard for people's time and participation.	Although an error in the address, the USPS does continue to deliver mail to that address. Once the error was identified, the USACE took extra steps to verify the comments of concen had been recieved.
195	2	Requests a Public Meeting be held in Port Aransas or Aransas Pass.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
195	3	Especially concerning are the issues regarding the lack of analysis of the 35 borings for toxic metal content or for hazardous organic toxins, and the Port's and USACE's lack of clear plans for placement of dredge spoils, volume of dredge spoils, and effects of that placement on area beaches used by many for recreational purposes.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
195	3	Especially concerning are the issues regarding the lack of analysis of the 35 borings for toxic metal content or for hazardous organic toxins, and the Port's and USACE's lack of clear plans for placement of dredge spoils, volume of dredge spoils, and effects of that placement on area beaches used by many for recreational purposes.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
196	1	Concerned about the negative impacts to Corpus Christi, Red Fish, and Aransas bays and how the hydrology of the pass will impact water quality harming the ecosystem.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), Appendix E (EFH Assessment), Appendix G (Sediment Transport Modeling), Appendix H (Vessel Wake Analysis), Appendix I (Hydrodynamic and Salinity Modeling), Appendix L (Ship Simulation Report), Appendix M (Propeller Scour Study), and Appendix N (Underkeel Clearance Study).
196	2	Concerned tourism will be impacted.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism.
196	3	Concerned about harming Whooping Crane expanding critical habitat and impacts to their food source.	Impacts associated threatened and endangered species with the Applicant's Proposed Action Alternative are addressed in Section 4.2.5.2 and Appendix D. USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
196	4	Concerned that dredged material is being used "beneficially" and that it only degrade the ecosystem.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
196	4	Concerned that dredged material is being used "beneficially" and that it only degrade the ecosystem.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
196	5	Wants the project taken offshore.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
196	6	Concerned that larger ships will damage the shoreline along the channel.	The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) indicate that the CDP would have minimal impacts to the shorelines along the CCSC.
196	7	Concerned that the deeper channel will create a larger volume of water during storm surge that would add to flooding in the region. Deepening creates vulnerability to hurricane impacts.	Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with "planned future conditions" representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI's modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI's application of model parameters or inputs for the ADCIRC/SWAN models used in its study.
196	8	Concerned larger ships will pose more risks to oil spills that would threatened the estuaries.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
196	9	Concerned about what the project will do to the local economy, fishing, tourism, etc.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
196	10	A video Public Meeting is no substitute for in-person. Delay the project until we can have proper input.	The in-person public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
197	1	Concerned the project would cause immense environmental damage.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
197	2	Concerned the project would endanger the fishing and tourism industries.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
197	3	Concerned the project would constrain vessel traffic in the channel leading to oil spill hazards.	Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster’s office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements. Impacts of oil spills associated with the Applicant's Proposed Action Alternative are addressed in Section 4.0.
197	4	Wants the project taken offshore.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE’s final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
198	1	Opposes the project and feels it would destroy everything that is so special about this place.	Thank you for your comment.
198	2	The project will create major disruptions for our harbor, and our restaurants and nightly activities will be overwhelmed with light pollution that takes away from your experience.	Thank you for your comment. The CDP is not expected to have any impact on light pollution as this is strictly a channel deepening, no infrastructure is being built.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
199	1	Concerned about the impacts to the ferry the project would have; its on tourism, businesses, and employees, and folks trying to get on and off the island.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
200	1	Concerned about the impacts to the ferry the project would have; its impacts on emergency vehicles, traffic backups and further emissions being released as a result.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
201	1	Concerned about the impacts to the ferry the project would have; traffic shut downs, schools, businesses, commuters.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
202	1	Concerned about mitigating the negative impacts of the project.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
202	2	Concerned that we state minor adverse impacts to benthos and fish…. But these impacts would be temporary (page 7-1, Section 7). Believes this is a hopeful statement and that it is unsubstantiated.	Impacts to estuarine organisms associated with the Applicant's Proposed Action Alternative are addressed in Section 4.2.2.2.2 and Appendix E Essential Fish Habitat Assessment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
202	3	Dredged material placement will not enhance local habitat quality despite the possibility of erosion over time without additional material. Does not believe placing sediments create functional habitat. Feels that the restitution for the ecological impacts has been dismissed entirely. Commenter provides an example of the Port of Grays Harbor (1990) where the USACE was sued. This project open the USACE up to a similar lawsuit and the required mitigation for multiple species impacted by the dredging.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
203	1	Concerned this will mean the end to businesses and force families to move off the island which will ruin the school district.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism.
203	2	Concerned the project will impact the ferry, causing major delays in assessing the waterway which would be a detriment for fishing guides and customers as well as other businesses on the island.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
204	1	Concerned about the impacts to the ferry the project would have; its impacts on emergency vehicles, traffic backups and further emissions being released as a result.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
205	1	Concerned the project will be harmful to the residents and tourists in Port Aransas.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section Section 4.4 Socioeconomics.
206	1	Opposed to the project and concerned it would be a detriment to the people and environment of the area.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
207	1	Does not support the project being built.	Thank you for your comment.
208	1	Wants the project taken offshore.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
208	2	Did not include any details regarding the polluted water and soil that would be removed. It has not changed since when it was declared highly toxic.	Impacts to water and sediment quality associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1.4. A Sampling Analysis Plan for MPRSA Section 103 evaluation of sediment was developed to determine if the new work material sediments proposed to be dredged are acceptable for disposal in the New Work ODMDS. Included in that plan is the biological testing of sediment, including sediment toxicity and bioaccumulation. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. MPRSA requires that testing follow protocols outlined in Chapter 8 of the Green Book (EPA and USACE, 1998) and the Ocean Dumping Regulations, guidance testing including the Regional Implementation Agreement (RIA) (EPA and USACE, 2003). The EPA must concur with the findings in accordance with 40 CFR 227 prior to USACE approval.
208	3	There are two births so there should be two turning circles.	Thank you for your comment.
208	4	Where will the newly designed larger tugs be birthed when they are not guiding a ship?	Berthing locations for the tugs is currently undefined. However, the Final EIS will provide comparisons of the berthing size requirements for each tug size.
208	5	The turning basin is going to interfere with ferry operations. Concerned about the already existing long wait lines and the people that use the channel that will be denied access. Could cause issues during an emergency with only 2 ways off the island.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
208	6	Concerned the deep channel will destabilize the ferry landing.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
208	7	Concerned about the impact on Port Aransas that include visual quality, tourism, real estate, and community. Should be required to include the economic impact on the area, what will happen to the value of homes.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism. The section also includes an evaluation of impacts on land uses. This discussion has been expanded to consider indirect impacts on real estate and property values.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
209	1	Requests the USACE follow their guidelines and allow the public ample time to review the documents, two Public Meetings held after 120 days have passes since the final release of the DEIS. One meeting at 10AM in Port Aransas or Aransas Pass and the other in late afternoon in the location not selected for the morning meeting. Requests a 90 day extension of the comment period.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
209	2	Explain how TxDOT has reviewed and approved the proximity of the VLCC berths.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
209	3	Commenter does not like all the permits in and around Port Aransas and Harbor Island and says it is the responsibility of the USACE to find a reason to agree with these project, but only after exhausting any and all other alternatives such as taking it offshore.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
209	4	Did not like that the Scoping Meetings were held virtually and felt they discriminated against those who are not technically savvy.	Scoping meetings were held within months of the beginning of the Covid-19 pandemic. Scoping comments were also accepted in writing, electronic mail, and through a toll free telephone service.
209	5	The ferry traffic will be disrupted and endanger the lives of the citizens of the state of Texas.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
209	6	Need to realize that the Port keeps stating that Harbor Island historical use was the same as they are proposing today, this is false.	Not applicable to the CDP.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
209	7	All proposed permits should be handled as one and their environmental impacts be combined. Concerned that the impacts to the Redfish Bay Scientific Research Area, Aransas Channel, Gulf of Mexico, CCSC, Lydia Ann Channel are not being considered for all three projects.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis. Redfish Bay was designated a state scientific area by the TPWD in June 2000 to protect and study native seagrasses. The RBSSA contains the northernmost extensive stands of seagrass on the Texas coast. In May 2006, the "no-uprooting"/"no-Prop" regulation took effect in RBSSA. By September 2013, the "no-uprooting"/"no-Prop" regulation had been expanded statewide. While Redfish Bay remains a designated Scientific Area, all seagrass beds along the Texas coast have comparable protections laws. Seagrass beds are a special aquatic sites and will be evaluated in accordance with the 404(b)(1) Guidelines.
209	8	Concerned about impacts to wetlands, cites information on wetlands from 33 CFR 320.4(4).	Impacts to wetlands/seagrass associated with the Applicant's Proposed Action Alternative are addressed in Section 4.2.1.2.
209	9	Concerned about the impacts to whooping cranes as a result of the project and asks the USACE to do a detailed EIS to address the BU site SS2 that will receive dredged material. Concerned about the impacts to piping plovers, sea turtles, red know, manatee and the impacts to those.	Impacts associated threatened and endangered species with the Applicant's Proposed Action Alternative are addressed in Section 4.2.5.2 and Appendix D. USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3).
209	10	Keeping all three projects separate does not show cumulative impacts.	Past, present, and reasonably foreseeable future actions (these include Harbor Island and Axis Midstream) in the study area are discussed in Section 5.0.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
209	11	Concerned about contaminants that still remain on Harbor Island.	The contamination was identified in the Tier I analysis conducted in the development of the SAP. As a result, the EPA required the sediment testing be condcuted on discrete samples rather than composited samples to prevent potential contamination from being diluted in the testing protocols.
209	12	Concerned about the vessel wakes the larger VLCCs will produce and how that will impact recreational boats in the channel.	The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) assessed the additional impact of the CDP by comparing Future Without Project and Future With Project channel scenarios. The analysis indicates that the CDP would have minimal additional impacts to the shorelines along the CCSC. The CDP will not increase vessel sizes, but increase the frequency of larger vessels by around 5%.
209	13	Commenter concerned about the impacts the desalination plant will have if the project is approved.	The potential for cumulative impacts due to desalination is identified, particularly during drought in Section 5.4.2.
209	14	Concerned about the location of dredged material.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
209	14	Concerned about the location of dredged material.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
209	15	Would like to remind the USACE that we were told that all comments made in 2019 to current would be considered before rendering a decision. If in fact you do not grant another Public Hearing, I respectfully submit these comments that are lacking in completion due to time constraints.	While the USACE did not include all comments submitted during the 2019 initial public notice in an appendices of the DEIS, all substantive comments submitted during the initiial public notice, scoping period, and DEIS commment period are considered.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
210	1	Concerned that the ferry is already overloaded with traffic leading to long wait times. Port Aransas is too small to have this by the ferry and in the channel so close.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
210	2	Concerned about the environmental impacts.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
211	1	Points out that the Port admits that there is a least environmentally damaging practical alternative that would require virtually no dredging and therefore would have less adverse impact on the aquatic ecosystem. Appendix N (404(b)(1) Evaluation) does not contain an evaluation of the LEDPA. The Final EIS must include an evaluation of the project alternatives in the context of the least environmentally damaging discharges if it is to demonstrate compliance with the 404(b)(1) Disposal Site Guidelines. The Project's purposes can be achieved with an offshore terminal which would have significantly less adverse impacts from the discharge of dredge and fill materials. Even if an offshore terminal would result in some discharges of dredged or fill material in ocean waters, it would have significantly less adverse impact on the aquatic ecosystem than the proposed discharges from the deepening of the channel and dredging of 17.1 million cubic yards of clay and 29.2 million cubic yards of sand. The Final EIS must fully address this.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
211	2	**Analysis of Dredged Material.** Section 4.1.4, the Draft EIS discusses the potential impact on water and sediment quality. Yet, the Corps has decided not to analyze whether impacts from chemical contaminants such as heavy metals, synthetic organic compounds, and nutrients, may occur due to dredging activities associated with the Channel Deepening Project. Instead, it appears the Corps' intends to rely on analyses conducted 20-42 years ago. The Draft EIS states that "measurable impacts from chemical contaminants such as heavy metals, synthetic organic compounds, and nutrients are not expected to occur with dredging activities associated with [the Applicant's Proposed Action Alternative]." This is not supported by the record.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
211	2	**Analysis of Dredged Material.** Section 4.1.4, the Draft EIS discusses the potential impact on water and sediment quality. Yet, the Corps has decided not to analyze whether impacts from chemical contaminants such as heavy metals, synthetic organic compounds, and nutrients, may occur due to dredging activities associated with the Channel Deepening Project. Instead, it appears the Corps' intends to rely on analyses conducted 20-42 years ago. The Draft EIS states that "measurable impacts from chemical contaminants such as heavy metals, synthetic organic compounds, and nutrients are not expected to occur with dredging activities associated with [the Applicant's Proposed Action Alternative]." This is not supported by the record.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
211	3	Analysis of Dredged Material. The Draft EIS fails to mention that Harbor Island was previously the site of Exxon and Fina bulk fluids export facilities, including tank farms, petroleum pipelines, loading and unloading facilities, and docks. According to documents obtained from the RRC, there are at least three areas on the former Exxon site where the most recent analysis found total petroleum hydrocarbons ("TPH") in excess of 10,000 mg/kg. (Information is included along with citations. The information is also attached to the letter. Refer to letter for specifics.) This information demonstrates that the dredged material from the Harbor Island area is not suitable for disposal in compliance with the Disposal Site Guidelines. Neither the Applicant nor the Port have conducted any analysis to determine if contamination from these sites or other industrial activities may have impacted potential dredge material for the CDP. The FEIS should fully evaluate anticipated dredged materials and should specifically explain to the public how the RRC can determine that the disposal of contaminated soil from Harbor Island would lead to pollution, yet the Corps can claim that "measurable impacts… are not expected" from dredged material immediately adjacent to Harbor Island. No such statement can credibly be made absent a full evaluation of the soils in the channel that will be dredged, and the DEIS does not reflect such an evaluation.	Impacts to water and sediment quality associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1.4. A Sampling Analysis Plan for MPRSA Section 103 evaluation of sediment was developed to determine if the new work material sediments proposed to be dredged are acceptable for disposal in the New Work ODMDS. This information was included in detail in the Tier I analysis included in the SAP (Appendix J). The testing results will be included in the Final EIS. MPRSA requires that testing follow protocols outlined in Chapter 8 of the Green Book (EPA and USACE, 1998) and the Ocean Dumping Regulations, guidance testing including the Regional Implementation Agreement (RIA) (EPA and USACE, 2003). The EPA must concur with the findings in accordance with 40 CFR 227 prior to USACE approval.
211	3	The Draft EIS contains no explanation of what changed since the EPA's original comments that would make the information provided by the Applicant sufficient to allow the Corps to make a legally defensible permit decision. Was the Application changed? Did the Applicant supply additional information that was not in the Application? Was further testing conducted? The Final EIS should explain in detail how the Applicant has met the legal standards required under EPA's Disposal Site Guidelines, in light of EPA's prior concerns.	Impacts to water and sediment quality associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1.4. A Sampling Analysis Plan for MPRSA Section 103 evaluation of sediment was developed to determine if the new work material sediments proposed to be dredged are acceptable for disposal in the New Work ODMDS. This information was included in detail in the Tier I analysis included in the SAP (Appendix J). The testing results will be included in the Final EIS. MPRSA requires that testing follow protocols outlined in Chapter 8 of the Green Book (EPA and USACE, 1998) and the Ocean Dumping Regulations, guidance testing including the Regional Implementation Agreement (RIA) (EPA and USACE, 2003). The EPA must concur with the findings in accordance with 40 CFR 227 prior to USACE approval.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
211	4	The USACE did not conduct an independent analysis of the project need. DEIS assumes the need for the Axis and Harbor Island terminal and assumes that Applicant's statements about the need for the project are correct without providing substantive analysis. The USACE must make an independent analysis, as required per 33 CFR 320.4(a)(2), of the public interest and public need for the project. To make that determination, the Corps must consider the reasonably foreseeable impacts of each proposed activity and its intended use, and this consideration must reflect "all those factors which become relevant in each particular case," including general environmental concerns, wetlands, fish and wildlife, food production, and the needs and welfare of the people. Greenhouse gas emissions, climate change, and the public's use of natural resources plainly fit within these factors. The Final EIS should include the information relied upon by the Corps in its independent analysis, and a detailed discussion of such analysis, that reflect full consideration of whether the Project will be in the public interest.	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, federal review of a navigation district's stated need for the project in the marketplace.
211	5	Permit to be denied if not in compliance with 404 Guidelines. EPA has already noted that it is unclear whether the information provided by the Applicant "will sufficiently enable the Corps to make a legally defensible permit decision in regard to compliance with the [EPA's 404(b)(1) Guidelines for the Specification of Disposal Sites for Dredged or Fill Material]." As noted previously, the Corps should explain how the EPA's concerns were specifically rectified and what changes were made that would allow any conclusion that the Application is sufficient for legally defensible permit decision.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
211	6	The Corps' public interest review does not appear to have considered emissions and climate impacts from upstream oil production and downstream combustion. The Corps' regulations expressly direct it to consider the "reasonably foreseeable" impacts of the Project's intended use— transporting crude oil. There is no doubt that the dredging is designed to allow the greater production and shipping of oil. The Corps fails to explain why emissions from the increased production of oil are not reasonably foreseeable impacts of transporting oil from producers to users.	The global extraction, trasportation, and consumption of crude oil is outside of the USACE's Scope of Anaylsis, as defined in 33 CFR 325 Appendix B, for the proposed CDP.
211	7	The USACE should consider less impactful alternatives. Because the Project is not water dependent, "practicable alternatives that do not involve special aquatic sites are presumed to be available, unless clearly demonstrated otherwise." It does not appear the Corps has taken into consideration such practical alternatives that do not involve special aquatic sites. Each and every one of the proposed alternatives involve impacts to special aquatic sites. Not only has the Corps failed to even consider these alternatives, but the Corps has failed to rebut the presumption laid out in its own regulations, that such practical alternatives which do not involve a discharge into special aquatic sites will have a less adverse impact on the aquatic ecosystem. In the Final EIS, the Corps must more fully evaluate the practical alternatives. To comply with its own regulations, the Corps must justify any approval of the Applicant's Proposed Action Alternative, given the number of practical alternatives which do not involve a discharge into special aquatic sites and which will have a less adverse impact on the aquatic ecosystem. Currently, the Draft EIS does not contain such an analysis.	The USACE acknowledges in Section 1.0 that the project does not require siting or proximity to special aquatic sites, but the 404b1 guidlines only apply to the portion of the project that is subject to Section 404, i.e the discharge of dredged material. To those ends, the Applicant has looked at a range of dredged material placement options, many of which do not impact special aquatc sites. For example the ODMDS, beach noursihment sites, and nearshore berms were, the majority of the dredge material will be placed, do not impact special aquatic sites as defined in the 404b1 guidelines.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
211	8	**Salinity.** Desalination facilities discussed in the cumulative impacts, on page 5-21 state 20 million gallons per day facility proposed on Harbor Island. This statement is incorrect, the Port's proposed desalination facility will discharge an average of 96 million gallons of brine wastewater per day. This fact is undisputed and is reflected in the record of the state agency proceeding for which the desalination wastewater discharge permit is being sought. Furthermore, the Port's draft permit from the Texas Commission on Environmental Quality would allow to discharge a maximum of 110 million gallons per day of brine wastewater. The Final EIS should evaluate the cumulative impacts of the CDP, as well as the desalination facilities, on salinity within the Corpus Christi Ship Channel and surrounding bays using the actual permitted amount of brine waste water discharge.	Text has been revised to reflect latest project information. The EIS discloses the potential for cumulative effects to salinty as a result of channel deepening and desal projects, particularly during drought. The potential for cumulative impacts due to desalination projects is discussed in Section 5.4.2.
211	9	**Safety and Additional Public Interest Impacts.** The statement that the channel will be limited to one-way traffic when a VLCC would fill shows a misunderstanding of what actually will occur. In order to meet the increased demand, this safety solution proposed by the USACE really would limit the channel to one-way traffic when VLCCs are filling, the Corpus Christi Ship Channel would effectively be limited to one way traffic permanently. Whether it is one way into Corpus Christi Bay, or one way to the Gulf, surely this is not a practical solution.	One-way traffic is imposed during VLCC transits, not when berthed and loading. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
211	10	The Final EIS must include a detailed analysis and modeling that demonstrates operating time impacts to ferry service from VLCC ingress, docking, loading, and egress. The Draft EIS provides a narrative discussion, but lacks substantive analysis. The Draft EIS states that the duration of typical VLCC docking operations at other berths within CCSC are estimated at 30 minutes. Where does this information come from? How much longer will ferry traffic have to wait in line to use the ferry? How much longer will ferry transport take? If ship traffic is limited to one-way traffic when VLCCs are filling, how will that impact ferry transport? The Draft EIS simply does not evaluate this, but it is a critical element of the impact of the dredging proposal. Therefore, the Final EIS must address it in detail.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
211	11	The FEIS should more fully address the potential impacts to tourism and fishing from dredging and the transport of VLCCs through the ferry path. The DEIS fails to discuss how the channel deepening and the transport of VLCCs will address each of those. Any impacts to ferry operations have the potential to significantly impact tourism. These considerations must be evaluated more fully, as they are clear public interest factors	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. *Response continues on next row.*

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
211	11	The FEIS should more fully address the potential impacts to tourism and fishing from dredging and the transport of VLCCs through the ferry path. The DEIS fails to discuss how the channel deepening and the transport of VLCCs will address each of those. Any impacts to ferry operations have the potential to significantly impact tourism. These considerations must be evaluated more fully, as they are clear public interest factors	Under the proposed project, it anticipated Axis Terminal's inbound/ outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
211	12	The DEIS does not contain a thorough risk assessment of all of the potential risks associated with VLCCs coming through a narrow channel routinely used by the public. The Final EIS must contain a more detailed and full risk assessment evaluating all potential risks associated with the presence of such large vessels coming through a narrow channel relied upon for tourism and fishing.	Without providing which risk we missed we are unable to identify which additional risks we should include. Ship simulations were performed on the proposed project's laden VLCC vessel, see Appendix L.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
211	13	Disagree that the CDP, Harbor Island Terminal, and Axis projects are not a single and complete project and request the USACE re-evaluate whether these should be considered a single and complete project. Request that the Corps provide specific details as to what changed from its initial conclusion that the three Projects should be considered a single and complete project to its position today where they are being treated as a separate projects and only one – the CDP – is even being required to conduct and EIS. Commenter provides additional information on why these projects are dependent upon each other and related and must be evaluated as one. See comment letter. Regardless of whether the Corps considers the projects a "single and complete" project, there can be no reasonable disagreement that the other two projects are dependent upon, and will flow from, the approval of the dredging project. Therefore, the impacts of those projects are a "reasonably foreseeable" result of any approval of the dredging project. Thus, the Corps must consider the impacts of the other two projects. If the Corps fails to include such a full evaluation of all three projects, the Corps should explain why it is not considering the impacts of the three projects.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
211	14	In its application the Port considers, alternatives to the CDP, which include two offshores options. Interestingly, when making the argument that the two offshore options (addressed in more detail below) are somehow more environmentally damaging than a project directly within a sensitive bay system complex made up of Corpus Christi, Aransas, and Redfish Bays (the "Bay Systems"), the Port considers environmental impacts from other related facilities. Examples: new pipelines, spillage, higher vapor and CO2 emissions. Agree with the Port that related and interdependent projects should be considered as part of the EIS evaluation. Thus, when the Port suggests that the location of pipeline construction, contamination related to spills, and air quality impacts from terminal operations should be considered in the evaluation of the offshore options, that same logic should also apply when evaluating the Port preferred alternative proposed by the application. If all related necessary activities are considered when evaluating the impact of alternatives, they must also be considered when evaluating this application and the related necessary activities. Thus, the impacts of the pipeline construction related to the Axis Project, the impacts of air quality emissions from loading and unloading at the Harbor Island, the impacts of Channel Deepening and dredged material placement, and the proximity of these facilities to population centers and sensitive estuarine features should also be evaluated together.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
212	1	Requests an extension on the comment period and to hold a Public Meeting in Port Aransas.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
213	1	Unless the other project are included (Harbor Island and Axis) this is a project to nowhere and this application is incomplete according to USACE guidelines.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
213	2	Impacts to traffic and ferry operations on state highway 361, namely further traffic delays due to VLCC operations for turning, maneuvering and docking. Impacts to ferry landings on both sides of the ship channel and possible undermining to the stability of those landings.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
213	3	Oil/chemical spills in and around Redfish Bay State Scientific area and around ferry landing.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter. Redfish Bay was designated a state scientific area by the TPWD in June 2000 to protect and study native seagrasses. The RBSSA contains the northernmost extensive stands of seagrass on the Texas coast. In May 2006, the “no-uprooting”/”no-Prop” regulation took effect in RBSSA. By September 2013, the “no-uprooting”/”no-Prop” regulation had been expanded statewide. While Redfish Bay remains a designated Scientific Area, all seagrass beds along the Texas coast have comparable protections laws. Seagrass beds are a special aquatic sites and will be evaluated in accordance with the 404(b)(1) Guidelines.
213	4	Emergency evacuation in the event of explosions or chemical releases. There are only 2 ways off the island and one route is the ferry system, which would shut down in a catastrophic event, leaving only 1 route off the island. An event like an explosion on a busy summer weekend could threaten tens of thousands of people.	These conditions exist currently in an active port.
213	5	Wants a better study with real research to be conducted on the Port's overreaching projections for oil export, especially given the significant highs/lows of Texas oil market.	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, federal review of a navigation district’s stated need for the project in the marketplace.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
213	6	True projections on impacts to the tourist-based economy of Port Aransas. The Port pays ZERO property and sales tax, ZERO. Port Aransas will not receive compensation from a facility on Harbor Island and there is no export tax on oil. Port Aransas businesses supply thousands of jobs based on tourism;	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism.
213	7	There is no mention of the desalination plant the Port plans to build. The brine discharge of 95,600,000 gallons/day would be in the ship channel directly located where VLCCs would be docked. This can't be ignored in the EIS.	Specific desal plants that are past, present, or reasonably foreseeable are presented in Section 5.3.8. Text has been revised to reflect latest project information. The potential for cumulative impacts due to desalination projects is discussed in Section 5.4.2. Although beyond the scope of this EIS, desalination permits require state water quality permits (from TCEQ) and authorizations and will undergo federal and state agency coordination and approvals (including National Marine Fisheries Service to ensure avoidance and minimization to Essential Fish Habitat). Desalination projects will not recieve authorization without demonstrating compliance with state water quality standards and compliance with other state and federal laws pertaining to coastal resources. EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
213	8	Impacts to all threatened and endangered species, as well as their habitats, along with seagrass beds and wetlands, must be factored.	Impacts associated threatened and endangered species with the Applicant's Proposed Action Alternative are addressed in Section 4.2.5.2 and Appendix D. USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
213	9	Short and long-term impacts to the health and well being of Port Aransas residents.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism.
214	1	Concerned about the impacts to wildlife and the economy and impacting the health and wellbeing of residents.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
214	2	The interruption of the ferry service would significantly impact the workers on both sides, from restaurant workers to teachers; people come across the ferry from North Padre to Aransas Pass.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
214	3	Erosion damages, spills, pollution and the well documented chronic health issues related to oil and gas industry facilities will be imminent with the approval of this build.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
214	4	Concerned about the negative impacts from reduced fishing, shrimping, and bay fishing tours that could end generations of blue collar jobs.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
215	1	The ferry traffic is already extremely busy, and interruptions caused by VLCC maneuvering would create intolerable delays and back up traffic for miles.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
215	2	Any accidental oil spill would be an ecologic disaster for the whole Corpus Christi Bay, and negatively affect the City of Port Aransas.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
215	3	Concerned about dredged being placed on the beaches and would ruin the attractiveness of this vacation town.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
215	3	Concerned about dredged being placed on the beaches and would ruin the attractiveness of this vacation town.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
215	4	Consider taking it offshore.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
216	1	Concerned about the impacts to tourists, residents, ship channel traffic, ferry, and emergency vehicles.	Impacts to tourists, residents, and ship channel traffic associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4 Socioeconomics and Section 4.5 Navigation. USACE is coordinating with TxDOT to determine if ferry operations will be impacted and what, if any, measures need to be implemented to reduce or mitigate any potential operational impacts.
216	2	Concerned about the dredged material that will wash up on their beaches.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
216	2	Concerned about the dredged material that will wash up on their beaches.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
217	1	Concerned about how everyone that uses the ferry will be impacted. If all maritime traffic is suspended during an arrival or departure of a VLCC this would halt ferry traffic for long periods.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. *Response continues on next row.*
217	1	Concerned about how everyone that uses the ferry will be impacted. If all maritime traffic is suspended during an arrival or departure of a VLCC this would halt ferry traffic for long periods.	Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
217	2	DEIS is not complete and should be withdrawn, corrected, and peer reviewed. The USACE is being paid to fast track this permit.	The USACE's evaluation of the proposed CDP is not included in the WRDA 2014 agreement with the PCCA.
218	1	Requests a Public Meeting in Port Aransas.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
219	1	Requests an extension of the comment period and to hold a Public Meeting in Port Aransas.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
219	2	Increases in turbidity and silting will destroy seagrasses and aquatic habitat, impacting commercial and recreational fishing and birding.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
219	3	Project and maintenance dredging creates noise, smells, and light pollution, increases sedimentation, displaces wildlife, and impacts communities.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). CCSC is a federally authorized navigation channel that has been regularly dredged since 1874. Currently, USACE civil works program maintenance dredges at least a portion of the Federal channel annually. The CDP will also require maintenance dredging at similar intervals to the existing conditions.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
219	4	Coastal communities will experience increased flooding, storm surge, and ship wakes, with 492 acres (unknown location) being "inundated".	The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) indicate that the CDP would have minimal impacts to the shorelines along the CCSC. Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with “planned future conditions” representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI’s modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI’s application of model parameters or inputs for the ADCIRC/SWAN models used in its study.
219	5	300 acres of wetlands, seagrasses, and shorelines will be destroyed in Redfish Bay - with no plans for mitigation or compensation.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
219	6	5,000 acres of benthic habitat near Mustang and St. Jose Island beaches will be covered by dredge material, affecting sport fishing.	Thank you for your comment.
219	7	Increased salinity in the bays will add to brine discharges from costly desalination plants (one on Harbor Island just approved by TCEQ).	The potential for cumulative impacts due to desalination projects is discussed in Section 5.4.2.
219	8	46 million cubic yards of dredged spoil will be placed on Mustang and San Jose Islands beaches, just offshore in the Gulf, and in Redfish Bay.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
219	9	Up to 4 VLCCs at a time will be fully-loaded with crude oil at Harbor Island, causing ship congestion and ferry delays.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
219	10	There is no cost information or socioeconomic justification for this taxpayer funded project. How does the public benefit exactly?	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, federal review of a navigation district's stated need for the project in the marketplace.
219	11	Bigger hazardous, toxic, and radioactive waste spills, explosions, and accidents more likely with full onshore loading of VLCCs (very large crude carriers).	Impacts to HTRW associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1.8.2 HTRW.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
219	12	Port of Corpus Christi touts "beneficial use" (BU) of potentially toxic dredge (spoil islands) to protect eroding shorelines from climate change, which is being worsened by industrialization and "channelization" (channel deepening that has already occurred).	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
219	12	Port of Corpus Christi touts "beneficial use" (BU) of potentially toxic dredge (spoil islands) to protect eroding shorelines from climate change, which is being worsened by industrialization and "channelization" (channel deepening that has already occurred).	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
219	13	Instead of enabling the transition to clean energy, this project will increase fossil fuel emissions that cause global warming.	The global extraction, trasportation, and consumption of crude oil is outside of the USACE's Scope of Anaylsis, as defined in 33 CFR 325 Appendix B, for the proposed CDP.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
219	14	If approved, the project will pave the way for further deepening, widening, and lengthening - with more and bigger ships and petroleum industries.	Thank you for your comment.
219	15	Significant disruption in terms of noise and air pollution from dredging - once deepened, the dredging will go on in perpetuity.	Air quality and noise impacts under Alternative 1 are described in detail in Sections 4.1.9.2 and 4.1.10.2 in the DEIS. CCSC is a federally authorized navigation channel that has been regularly dredged since 1874. Currently, USACE civil works program maintenance dredges at least a portion of the Federal channel annually. The CDP will also require maintenance dredging at similar intervals to the existing conditions.
219	16	Increased ship traffic and larger ships with deeper drafts will cause more erosion from ship wakes and more air pollution.	The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) assessed the additional impact of the CDP by comparing Future Without Project and Future With Project channel scenarios. The analysis indicates that the CDP would have minimal additional impacts to the shorelines along the CCSC. The CDP will not increase vessel sizes, but increase the frequency of larger vessels by around 5%. Air quality operational emissions are expected to be reduced by 78 percent with Applicant's Proposed Action Alternative due to the change in lightering demand.
219	17	Magnitude of catastrophes will increase due to ship collisions, explosions, or terrorist acts that involve fully-loaded VLCCs (very large crude carriers).	Impacts to navigation associated with the Applicant's Proposed Action Alternative are addressed in Section 4.5.2 Navigation.
219	18	Increased levels of storm surge and speed of currents will worsen impacts of tropical storms and flooding events.	Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with “planned future conditions” representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI’s modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI’s application of model parameters or inputs for the ADCIRC/SWAN models used in its study.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
219	19	Build up of spoil islands from potentially toxic sediment will obstruct views and mix with beach sand, affecting tourism at Port Aransas.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
219	19	Build up of spoil islands from potentially toxic sediment will obstruct views and mix with beach sand, affecting tourism at Port Aransas.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
219	20	Even more petrochemical facilities will locate in Corpus Christi Bay, further harming air and water quality in the Coastal Bend.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
220	1	Concerned about the impact the project will have on the environment.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
221	1	Concerned about project causing asthma-causing pollutants.	Impacts to air quality associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1.9.2 Air Quality.
221	2	Concerned about the impact the project will have on fish and wildlife.	Impacts to fish and wildlife associated with the Applicant's Proposed Action Alternative are addressed in Section 4.2 Ecological, Biological Resources, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
222	1	Concerned about the impact the project will have on fish and wildlife.	Impacts to fish and wildlife associated with the Applicant's Proposed Action Alternative are addressed in Section 4.2 Ecological, Biological Resources, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
223	1	Concerned about the impact the project will have on fish and wildlife.	Impacts to fish and wildlife associated with the Applicant's Proposed Action Alternative are addressed in Section 4.2 Ecological, Biological Resources, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
224	1	Increase exposure to toxic dumps and explosions.	Impacts to HTRW associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1.8.2 HTRW.
225	1	Offering help on the project.	Thank you for your comment.
226	1	Want to keep the coast clean.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
227	1	Any dredged spoils placed upon our beaches by law must pass a strict minerology match as approved by both the State of Texas as well as our city council. There will be no exceptions for this requirement.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
227	1	Any dredged spoils placed upon our beaches by law must pass a strict minerology match as approved by both the State of Texas as well as our city council. There will be no exceptions for this requirement.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
227	2	The council is absolutely opposed to any ferry operations delays due to dredging, no matter how short a duration.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
227	3	Council is absolutely opposed to any restrictions being placed on boaters due to dredging.	Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
227	4	Deepening of the ship channel will most definitely cause channel slope erosion over time. The deepening should have zero net impacts to our shoreline facilities both public and private.	Appendix L of the EIS (Propeller Scour Study): Area 3a (Tug) resulted in a maximum scour potential of 747.78 mm (2.45 ft) and may be a concern for slope stability and undermining of the wall located on the shoreline. Area 3b (VLCC) resulted in a maximum scour potential of 3787.15 mm (12.43 ft) and may be a concern for slope stability and underkeel clearance due to sediment deposition. Baird recommends that as Area 3 developed the largest scour potential, a monitoring program be put in place to monitor scour adjacent to the wall at the shoreline and slope stability at the toe of slope. Furthermore, the potential for propeller scour to uncover buried pipelines and cables should also be analyzed.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
227	5	The deepening of the channel should have zero impacts increasing storm surge impacts to the city. We demand that channel projects should all provide for improved storm surge protection, not worsening.	Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with "planned future conditions" representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI's modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI's application of model parameters or inputs for the ADCIRC/SWAN models used in its study.
227	6	The deepening should have zero impacts to the natural environment and to the entire fisheries community.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
228	1	Chapter 3.5 Socioeconomic Conditions data needs to be reanalyzed. The proposed project (Alt 1 in the EIS) is in the Port Aransas City limits in Nueces County. Tourism is the 2nd largest private employer in the Coastal Bend, 2nd only to the health industry. There were mistakes on p 3-98 saying that ….in Aransas County, which Port Aransas is located within. Tables 3-25, and 3-27 show that Port Aransas is in Aransas Co. This same issue based on county may affect all the tables, compromising the economic data.	Tables in Section 3.5 of the DEIS mistakenly reported Port Aransas in Aransas County. This error has been corrected in the FEIS. In addition, the discussion in this section has been reviewed for accurancy regarding the description of cities within each county. Other corrections has been made to this section to address the specific issues listed in this comment.
228	2	Concerned about the visual changes from an industrial complex within the city.	An industrial complex is not part of the CDP.
228	3	Concerned about air quality degradation and light and noise pollution.	Air quality and noise impacts under Alternative 1 are described in detail in Sections 4.1.9.2 and 4.1.10.2 in the DEIS.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
228	4	Concerned about habitat degradation that would result from dredging (construction and maintenance) and spoil on beaches.	Direct impacts from the proposed project are disclosed in Section 4.2 (Ecological and Biological Resources), Appendix D (Biological Assessment), and Appendix E (EFH Assessment), and acres of impacts resulting from placement actions are summarized in Table 4-16. USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
228	5	MI is not needed since that part of beach is accreting and has already replaced losses from Harvey, additionally it would interfere with year-round use by the public.	Thank you for your comment.
228	6	Increased surge and water elevation is predicted to be a gain of 3.5 inches in a Cat 4 Hurricane, inundating an area up to 492 acres. “In addition, a hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island.” Which is in Port Aransas. These changes are guaranteed to increase flooding in Port Aransas that would affect homes and businesses.	Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with “planned future conditions” representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI’s modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI’s application of model parameters or inputs for the ADCIRC/SWAN models used in its study.
228	7	Concerned about increased incidences of oil and chemical spills that accompany filling and moving VLCCs.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
228	8	Concerned about increased Ship and tugboat wake due to increased size of vessels, in a narrow channel.	The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) assessed the additional impact of the CDP by comparing Future Without Project and Future With Project channel scenarios. The analysis indicates that the CDP would have minimal additional impacts to the shorelines along the CCSC. The CDP will not increase vessel sizes, but increase the frequency of larger vessels by around 5%.
228	9	Concerned about increased ferry waits times, a serious problem for the workers commuting to Port Aransas who work in the service industry (restaurants, bars, shops that support tourism). Why was this not considered since the current ship traffic already causes delays: turning and docking VLCCs will take even more time than a passing ship.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
228	10	Alternative 2 is the only alternative that will not suppress the economy.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
228	11	The Applicant's Proposed Action Alternative 1 would directly affect vast acreages of estuarine habitat, fauna, and Essential Fish Habitat in the project area, with corresponding negative impacts on populations in the entire study area.	Impacts to estuarine organisms associated with the Applicant's Proposed Action Alternative are addressed in Sections 4.2.2.2.2, 4.2.5.3.2, and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
228	12	"Alternative 1 would result in permanent loss of open-bay bottom habitat. … Since impacts would be temporary…". Define temporary. Do you have scientific evidence to back this up?	Impacts to estuarine organisms associated with the Applicant's Proposed Action Alternative are addressed in Sections 4.2.2.2.2. Scientific studies were used to determine impacts and are cited within the text.
228	13	Impacts to fisheries and habitats should not be considered temporary with construction dredging occurring 20 hours per day, 7 days per week for 5 years then maintenance dredging every 2 years. Many of these species are "short-lived"; interrupting their life cycle multiple times, and/or for extended periods of time, will result in declines in their populations. There is no way that current populations of fish and shellfish can be maintained with Alternative 1 and will have major impacts on the economy, recreational and commercial fishing. Maintenance dredging will generate additional material and add to that, changes in the seagrass habitats particularly in Lydia Ann Channel, due to increased sedimentation from dredging, and the VLCCs and their Tugboats. This sediment would be moved by tides into seagrass nursery habitats.	Impacts to wetlands/seagress, estuarine organisms, and socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in section 4.2.1.2, 4.2.2.2.2, 4.4.2, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter. CCSC is a federally authorized navigation channel that has been regularly dredged since 1874. Currently, USACE civil works program maintenance dredges at least a portion of the Federal channel annually. The CDP will also require maintenance dredging at similar intervals to the existing conditions.
228	14	USACE (2003) found that CCSC material in the project area is sufficient to be used for BU, however, USACE 1978 reported significant levels of cadmium, mercury, and zinc. Maps showed the movement and similar scenario could occur in the turning and docking basin at Harbor Island. The importance of measuring the sediment toxicity load in dredged soils, as well as the toxicity of sediment that is proposed to be removed from Harbor Island for the VLCC Docking facility should be emphasized.	Impacts to water and sediment quality associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1.4. A Sampling Analysis Plan for MPRSA Section 103 evaluation of sediment was developed to determine if the new work material sediments proposed to be dredged are acceptable for disposal in the New Work ODMDS. Included in that plan is the biological testing of sediment, including sediment toxicity and bioaccumulation. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. MPRSA requires that testing follow protocols outlined in Chapter 8 of the Green Book (EPA and USACE, 1998) and the Ocean Dumping Regulations, guidance testing including the Regional Implementation Agreement (RIA) (EPA and USACE, 2003). The EPA must concur with the findings in accordance with 40 CFR 227 prior to USACE approval.
228	15	Recommend an analysis of the effects of heavy metals (and other pollutants that may be identified in the final EIS) on the larval and post larval stages of those species known to depend upon the channel for transport into the bays. A Professor at UTMSI in Port Aransas, Kristen Nielsen Bridges is a toxicologist who investigates the effects of heavy metals on early life stages of marine organisms. She might be available to conduct such an analysis.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
229	1	Request to extend the comment period so a thorough review can be done.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
229	2	Request another Public Meeting be held in Port Aransas or Aransas Pass.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
229	3	Flaw in the DEIS is not including the impacts of the construction of the marine terminals on Harbor Island. The applicant's stated need for the proposed channel deepening is to meet current and forecasted demand for U.S. produced crude oil. The purpose of PCCA's Proposed Alternative is to facilitate onshore loading of VLCCs. Onshore loading will only occur after the marine terminals are built.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
229	4	Concerned about the impact the project will have on the ferry when the VLCC's are berthing.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
229	5	Concerned about the closing of the ship channel when the VLCC's are berthing.	Thank you for your comment.
229	6	Impacts of the marine terminals will not be short-term and must be considered fully in the DEIS.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
230	1	Concerned about the impact the project will have on the ferry; traffic delays and backups, commuters trying to get to their jobs.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
230	2	Concerned that accidental oil spills would be an ecological disaster for the bay and negatively affect Port Aransas.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
230	3	Concern that dredges will be positioned in proximity of the beaches and will ruin the attractiveness of this vacation town.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
230	3	Concern that dredges will be positioned in proximity of the beaches and will ruin the attractiveness of this vacation town.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
230	4	Offshore loading should be considered.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
231	1	Requests Public Meetings in Port Aransas, Rockport, and Aransas Pass to fulfill the USACEs obligation to explain the DEIS and request the comment period be extended until all of the DEIS documents are finalized.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
231	2	**Purpose and Need (see comment letter for specific examples and citations provided).** Applicants purpose is short-sighted and misaligned with climate change and the health and welfare of the people. Points out that the 2003 DIS included oil imports, agriculture, and container ship terminals. It is forecast that electric vehicles could take greater percentages of global sales. President Biden is considering limiting fossil fuel exports, how does this incorporate into the purpose? And the new climate bill that just passed on August 7?	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, federal review of a navigation district's stated need for the project in the marketplace.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	3	**Purpose and Need (see comment letter for specific examples and citations provided).** How can the Applicant's need "to meet current and forecasted demand…" when their own data forecasts no such information only 18 months ago (info from Port's slide show shown)? Was the DEIS of over 3000 pages, initiated under an alternate narrative? Is the deepening to 80' at Harbor Island the true Purpose of the permit or does the Port plan to issue multiple permits to deepen the ship channel to Ingleside and later into the Inner Harbor? What additional data is missing from the DEIS related to the "Purpose" and future uses? Shouldn't all applicants forecast information be included in the DEIS? Today, on August 9, 2022, Enbridge is scheduled to present its proposal of Blue Hydrogen at Ingleside City Council. Shouldn't this new industry and its ramifications be included in the DEIS?	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The Applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, Federal review of a navigation district's stated need for the project in the marketplace.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	4	**Purpose and Need (see comment letter for specific examples and citations provided).** See Oil Prices Chart below illustrating the short-term duration of higher crude oil prices followed by dramatic price declines. How can the purpose be justified using today's crude pricing when the project would not even be built for 5-10 years later? The G-7 ministers met May 18-19, 2022 where the U.S. agreed to stop spending tax dollars to support international fossil fuel projects. How can the project's "Purpose" be in opposition to global fossil fuels phase out projections necessary to meet climate change goals? Does the project costs and risks warrant the short-term vision for a Purpose that will contribute to global climate change and RSLC? What is the WTI crude oil price that is necessary that keeps this project viable? What volumes of oil coming through pipelines to Harbor Island are needed for a viable Purpose? Is the true Purpose of the permit REALLY for only two VLCC terminals on a dredging project or is there more information that the applicant has not told the public? This Purpose and Need is for a project so unprecedented in scope with such a tremendous unpredictable outcome for the public. The current 54' channel depth has not been fully evaluated as to its affects on tides and storm surge since it has yet to be completed. How can accurate modeling be accomplished with limited data points? WTI price fluctuations are highly variable and rarely projected accurately, the Purpose and Need cannot be justified using this argument.	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The Applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, Federal review of a navigation district's stated need for the project in the marketplace.
231	5	**Purpose and Need (see comment letter for specific examples and citations provided).** Even more uncertainty for the Purpose is the major concern for WTI crude prices are earthquakes in west Texas due to fracking. If the Permian Basin was to shut down their disposal wells, a collapse of the oil production would certainly take place creating a serious risk to a consistent flow of oil volumes enough to accommodate not only oil exports but U.S. refining capacities.	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The Applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, Federal review of a navigation district's stated need for the project in the marketplace.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	6	Pipeline capacity, pipeline to Harbor Island permitting are succinct issues and begs the question of Alternative 3, how does the DEIS answer the following statement: "With no new pipeline projects capable of bringing crude oil to Corpus Christi having been announced, proposed, or in any stage of permitting, how does the 4.5MM bpd export estimate become achievable when current pipeline capacity is 2.4MM bpd? The Port is proposing that PCCA exports could grow to 4.5MM bpd in 2030 from 1.63MM bpd in 2021. Current pipeline capacity to PCCA is 2.4MM bbls so they are saying 2 new (1MM bpd) pipelines would get 4.5MM bbls to Corpus by then? Also, what about the other Industries share in Inner Port, Ingleside, and Blue Water. It is a false premise to consider 4.5 bpd? These questions undermine the entire Permit and DEIS."	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The Applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, Federal review of a navigation district's stated need for the project in the marketplace.
231	7	How would the export oil plans for Port Lavaca that would take up oil slated for the Purposed Corpus Christi oil pipeline capacity?	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The Applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, Federal review of a navigation district's stated need for the project in the marketplace.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	8	Why is the Harbor Island Terminal not included in the study nor the pipelines that would be required to supply the oil? Axis Midstream oil pipeline that would be going through Redfish Bay State Scientific Area is already a hotly contested issue. Are there assurances that any pipeline would reach Harbor Island and supply the Purpose?	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis. Past, present, and reasonably foreseeable future actions in the study area are discussed in Section 5.0. Redfish Bay was designated a state scientific area by the TPWD in June 2000 to protect and study native seagrasses. The RBSSA contains the northernmost extensive stands of seagrass on the Texas coast. In May 2006, the "no-uprooting"/"no-Prop" regulation took effect in RBSSA. By September 2013, the "no-uprooting"/"no-Prop" regulation had been expanded statewide. While Redfish Bay remains a designated Scientific Area, all seagrass beds along the Texas coast have comparable protections laws. Seagrass beds are a special aquatic sites and will be evaluated in accordance with the 404(b)(1) Guidelines.
231	9	Alternative 3 (2.4.1) states that some inshore berthing would be required at Harbor Island and Ingleside to partially fill VLCC which would then go to the offshore SPM to fully load. The question is, if the VLCC could fully load at the SPM why would it make the trip in shore to partially load at Harbor Island or Ingleside?	There are a wide range of possibile combinations of onshore and offshore that can be used to reach their objective. USACE describes the most likely operations, but understands that the economics may temproarily or permanently change the operations at any time and the DEIS does not speculate or document the entire range of possibilities.
231	10	How are the economics projections for the VLCC facilities evaluated with so many uncertainties? How does the DEIS address cost overruns like those that have happened for many USACE projects? Commenter provides examples of USACE projects that have failed.	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port ommission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, federal review of a navigation district's stated need for the project in the marketplace.
231	11	What assurances does the Coastal Bend have, given the fatalistic DEIS approach, that climate change and RSLC will occur, that this unique project would not enhance catastrophic ecological events upon the public? - commenter cites information from Cathy Fulton.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	12	Why is this subject the one of least investigated by the DEIS? What was learned in the investigation that would protect safety, property and welfare of people that was omitted? Rapid withdrawing of storm surge waters would also create greater erosion potential and is not discussed in detail in the DEIS. Would be helpful to include the NOAA storm surge map of potential inundation. Does the DEIS address the potential pollution impact if the tank farm is washed away and the overall threat to the area? Given that larger storm surges are in the Coastal Bend history with surges as high as 16.01', shouldn't the threat of a catastrophic environmental pollution issue outweigh the short-term defined purpose?	Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with "planned future conditions" representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI's modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI's application of model parameters or inputs for the ADCIRC/SWAN models used in its study.
231	13	**Comments of Storm Surge Effects datums on Figure 3-5 is dated 2016.** Why is this map only showing a few storms through 2016? Should not the DEIS provide datums for other named storms that have affected the region including Hurricane Harvey and tropical storms/hurricanes through 2021? Is the DEIS trying to hide this vital information? Will the DEIS include Hurricane Allen that had many barrier island wash-over events? A similar storm could wash away property all along Padre Island (Padre) and Mustang Island (MI). Why does the DEIS completely ignore discussions on storm surge effects for Rockport, Fulton, Aransas Pass, Padre Island including Port Aransas and North Padre, Ingleside on the Bay, North Beach and Flour Bluff? What about tropical storms surge data? Ingleside on the Bay had two events of ~4' in 2020! What erosion and damage estimates for Ingleside on the Bay would be caused by vessel traffic during storm surges? Was Ingleside on the Bay omitted from the DEIS on purpose? Ingleside on the Bay had a hurricane surge of 11.39' and yet not included in the risks associated with the deeper, 70.2% larger channel opening that would increase the velocity of storm surge. Why? Shouldn't the DEIS include all tropical and hurricane storm surges within the area associated with the deepening? Hurricane Harvey had a USGS survey water mark of 6.4' near Port Aransas. Why does the DEIS exclude other visual storm surge surveys of Hurricane Harvey in their report?	The figure shows what the Gulf Of Mexico Peak Surge Database at SURGEDAT has (https://surge.climate.lsu.edu/data.html#GOM_DB) Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with "planned future conditions" representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI's modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI's application of model parameters or inputs for the ADCIRC/SWAN models used in its study.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	14	**Section 3.3.5.1 Protected Lands** – The DEIS has left off Ingleside Cove Sanctuary, and Redfish Bay State Scientific Areas. Why were these significance protected areas left out of the DEIS? What will be done to protect these areas now and if this project is allowed?	The Redfish Bay State Scientific Area and Ingleside Cove Sanctuary will be added to sections 3.3.5.1 and 4.2.5.1 for the Final EIS. Redfish Bay was designated a state scientific area by the TPWD in June 2000 to protect and study native seagrasses. The RBSSA contains the northernmost extensive stands of seagrass on the Texas coast. In May 2006, the "no-uprooting"/"no-Prop" regulation took effect in RBSSA. By September 2013, the "no-uprooting"/"no-Prop" regulation had been expanded statewide. While Redfish Bay remains a designated Scientific Area, all seagrass beds along the Texas coast have comparable protections laws. Seagrass beds are a special aquatic sites and will be evaluated in accordance with the 404(b)(1) Guidelines.
231	15	**Section 3.4 Shoreline Change** – Why does the map not include years through 2021? In the year 2020, multiple high tidal events occurred. What data has been collected to include the 54' ship channel depth and erosional affects?	At the time of the writing of the Draft EIS the data was only available through 2019 (Paine and Caudle, 2020).
231	16	**Section 3.5 Socioeconomic Conditions** – This section is flawed in that it does not include Ingleside on the Bay, a community that will be directly affected by tide increases, vessel traffic and storm surges. What plan does the DEIS have for IOB as it relates to the deepening effects?	Thank you for you comment. Section 3.5 has been revised to include Ingelside on the Bay. In addition, the discussion of impacts in chaper 4 have been revised to include impacts that are relevant to IOB.
231	17	What about damage models for ship traffic wakes? Why are models of fully loaded VLCC with drafts of 68' included to Ingleside terminals in the DEIS? Is this a future project not included in the DEIS? What about wake effects along IOB and the CCSC? What about La Quinta wake effects to property owners? How does the model include small watercraft endangerment issues?	The primary areas for which change of the natural shoreline is being assessed are west of the Applicant's proposed Channel Deepening Project (that will establish a 75 foot channel up to the Harbor Island Terminals). Beyond the Channel Deepening Project footprint extent the Existing, No Action and Proposed Project scenarios depict a channel configuration that follows the Corpus Christi Ship Channel Improvement Project campaign currently being executed by the USACE with a navigable depth of 54 foot along the full length of the channel. To navigate these channel lengths in-shore of the Applicant's proposed Channel Deepening Project footprint, VLCC's will be required to restrict their draft to 52 foot. Thus, the ship wake modeling evaluation is limited to the channel extents of the Applicant's proposed Channel Deepening project footprint. Affects to small watercraft should be accounted for by operational limits and controls imposed by ACC Pilots, USCG, and Harbor Master.
231	18	Vessel dimensions used in the vessel wake analysis were a draft of 68 feet. There are no lightering agreements in place with Flint Hills as per public meeting. Why does the DEIS keep using this argument when it does not make economic sense? Was this at the insistence of the POCC? How can this statement be included in the DEIS for emissions when there are no facts?	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	19	Since we do not have long term data on the effects of the 54' depth on tides, storm surges and erosional processes, how accurate are the models for 80' if they do not have data 54'? What do the tide gauges in CC Bay at Enbridge Ingleside pier and Lexington indicate about tide predictions now that most of the ship channel has been deepen to 54'?	At the time of the model studies the 54 ft channel project construction was still progressing and insufficient data was available to evaluate predictions versus post-project measurements.
231	20	Does the DEIS recognize that impacts are occurring in the form of seagrasses lost in Redfish Bay and Ingleside on the Bay from vessel traffic? Google maps and my personal witness of these areas, documents the staggering loss of seagrasses and deep scarring resulting from vessel wakes.	Section 3.3.2.3 (Wetland Trends) describe the factors threatening wetland environments.
231	21	Beneficial use (BU) areas have yet to be proven to be a reliable form of mitigation given that the materials used are silty and clayey and will continue to muddy the water. Where does the DEIS prove that BU is a viable seagrass habitat and not solely as another disposal area of dredge materials?	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	21	Beneficial use (BU) areas have yet to be proven to be a reliable form of mitigation given that the materials used are silty and clayey and will continue to muddy the water. Where does the DEIS prove that BU is a viable seagrass habitat and not solely as another disposal area of dredge materials?	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
231	22	RLSC is an erosional event in passive margins along the Gulf Coast. How many feet of Padre and SJI have been lost (retreated) over the past 10, 20, 30,40 and 50 years? How are these compared to the modeling and RSLC forecasts? Are the models forecasting for erosion WHEN the project would be scheduled to be completed? What is the erosional forecast for shorelines along Redfish Bay, IOB, Ingleside Cove Sanctuary, Lydia Ann Channel and adjacent waters? Do the models include shoreline erosion utilizing data for an increase in tropical storms, hurricanes and the accompanying storm surges? How are the spoil islands shorelines along the CCSC contributing to channel maintenance for future erosion modeling? What happens to the silt and clay as it is suspended in the water column and how does it affect seagrass beds over time?	RSLC baseline information is described for the study area in Section 3.2.4.2. RSLC impacts associated with the Applicant's Proposed Action Alternative are described in Section 4.1.3.2. Table 4-6, page 4-14 shows the estimated RSLC over 100 years (years 20, 50, and 100) according to NOAA (Tides and currents sea level trends Gulf Coast. https://tidesandcurrents.noaa.gov/sltrends/). Sea level change would not have a negative effect on the performance of the deepened channel as more depth in the channel would result from the forecasted change. The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) assessed the additional impact of the CDP by comparing Future Without Project and Future With Project channel scenarios. The analysis indicates that the CDP would have minimal additional impacts to the shorelines along the CCSC. Impacts to wetlands/seagrass with the Applicant's Proposed Action Alternative are addressed in Section 4.2.1.2.
231	23	Would the dredge spoil offshore of Port Aransas move northward and into the proposed ship channel based upon sediment accumulations on the southside of the Jetty and the current flow?	The potential Impact of the ODMDS Mound on Channel Sedimentation has been discussed in Section 6.2.3 of the Sediment Transport Modeling Report. The model did not indicate any significant movement of the dredge spoil mound northward or into the ship channel.
231	24	Where does the DEIS show the effects of seagrasses and marsh habitat loss as a result of the dredging project?	Impacts to wetlands/seagrass associated with the Applicant's Proposed Action Alternative are addressed in Section 4.2.1.2.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	25	Vessel Wake cites Schiereck 1993 – POCC has the more recent Mott MacDonald study dated 1/13/2020 that discusses vessel wakes that has not been cited in this DEIS. See Figure D below. Why is this important study omitted from the DEIS? What other vessel studies by the POCC and USACE have NOT been included in the DEIS? Why has Ingleside on the Bay been omitted from the DEIS concerning vessel wake studies? Why only short-term modeling for wake effect? Why doesn't the DEIS study include long-term wake effect modeling that includes RSLC? What effects will larger, more frequent vessel traffic have on tidal measurements and erosion along the CCSC?	The long-term effects for vessel wakes were accounted for by modeling multiple vessels per year. RSLC is not expected to have a substative effect on vessel wakes and may even decrease them slightly due to larger underkeel clearance.
231	26	DEIS predicts the tidal increase of 0.79 inches in Redfish Bay, an increase of 11%. What are the tidal increases in Ingleside on the Bay and Ingleside Cove utilizing data from the deepening to 54'? Are your models including the Lexington and Enbridge pier tide gauges? Does the modeling include the tidal changes resulting from the newly dredged large spoil island in Redfish Bay? (Photo taken 7/2022)? Where is the modeling for tidal and storm surge currents when narrowing of the POCC channel in Redfish Bay? Wouldn't the tidal and storm surges project further into Corpus Christi Bay? Are vessel wakes expected to elongate this spoil parallel to the ship channel? Would this longer-term effect change tidal/storm surge modeling?	The tidal impacts (increases) caused by the channel deepening project decrease with the distance from Aransas Pass. The tide increase in Ingleside, Lexington, etc is less than 2 centimeters (see Section 4.11 in Appendix I). Section 6 in Appendix I describes the impacts from the authorized 54-foot deepening project versus the proposed 75-foot deepning project.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	27	Figure 4.1 in the DEIS is flawed, shows no effect to Aransas Bay toward Rockport and Fulton. Water depths going north behind SJI are much shallower, having a nearly no circulation on the north end. Aransas Bay would logically have a greater impact from tidal flows (as does Corpus Christi Bay) given the depth of Lydia Ann Channel (15-25') and the proximity to the project. Would not the least resistance of tidal flow go towards - Lydia Ann and La Quintal Channels thus changing the model numbers for all modeled sites? Furthermore, Flour Bluff/Laguna Madre is ~16.5 miles away and received a higher tidal range than Aransas Bay located only 5.5 miles from the project! Is this a deliberate error by the Port to prevent all affected parties from participating in comments? What other mistakes have been made on the tidal table as it concerns Rockport, Fulton, Aransas Pass, City by the Sea, Bahia Bay, Ingleside Cove and IOB? Models were derived from a higher tide event over a few days. During King Tides and storm surges, what are the predicted water levels at the modeled sites and how was this calculated? Why is Aransas Bay only nominally mentioned in the DEIS? What does short-term modeling and Secondary long-term modeling mean? Is RSLC with the great tidal velocities including erosional processes included? Are the models utilizing recent data from the 54' deepening'? How can the DEIS know what to input in the 80' deepening modeling if data hasn't been collected and included in the evaluation for the deeper 54' channel depth?	The incorrect figure from the DEIS is referenced by the commenter. The modeling presented in the DEIS was calibrated based on measurements of water levels and current velocities both prior to and during the development of the 54 foot deepening project using the best available bathymetry data. The water level impact analysis is based on outcomes of model runs considering with and without project conditions over a extended period as described in the modeling report (Appendix I).
231	28	Figure 4-4 - Rockport and Aransas Bay are included in the evaluation, but data is cut off. Why was the data cut off at Aransas Bay for the DEIS? Why wasn't the tide gauge at Port Ingleside utilizes for the DEIS study? - see comment letter for additional information	There is no Figure 4-4 in the DEIS. In the impact maps throughout the Hydrodynamic and Salinity Modeling Study (Appendix I), we used transparent colors for impact change less than a certain value as shown in the legend (0.5 cm in this case) to indicate the insignificant impacts caused by CDP. Tide data at Port Ingleside (NOAA#8775283 Enbridge, Ingleside, TX) was not used because there was no tide data availabe in the period from 2018 to 2020.
231	29	Data is flawed given the depth behind SJI and depth of Aransas Bay that would have received higher tidal flows. QUESTIONABLE MAPPING IN ARANSAS BAY. Should the DEIS find another contractor to map the ranges since this is purported to be Baird's own mapping tool and has omitted the northern area of the affected area? - see comment letter for additional information	The best available bathymetry data was used for all areas, it is not believed that higher resolution or newer bathymetry data in Aransas Bay would significantly change the model results

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	30	Saltwater intrusion based upon RSLC and wakes from larger, more frequent vessels would change the coastal vegetation and thus impact birds and aquatic life that relies on this habitat. What salinity projections does the USACE have since the POCC has approval for a desalination facility at Harbor Island? Are the desalination discharge of brine numbers for La Quinta and Inner Harbor included in the salinity models? Has the TWPD and USFWL commented on this potentially catastrophic issue of saltwater intrusion and how is the DEIS addressing any concerns? Dr. Kirk Cammarata's study on seagrasses near IOB, reported a notable higher salinity measurement from prop wash as deeper channel waters would have higher salinity levels. Has the DEIS measured salinities at different depths within the CCSC? Having this data may affect your salinity models.	Desal plant discharges were not included as it is understood that they have not yet been permitted so are not part of baseline conditions. We do not have information on the proposed desal plants. The impact of CDP on salinity is very small (< 1 ppt in average) and the impact is limisted in the project area (i.e., Aransas pass)
231	31	What has the DEIS done to calculate the cumulative effects of salinity? How could the DEIS state that this is not a probable impact of the project given that desalination is actively being pursued within the Coastal Bend and project area?	The potential for cumulative impacts due to desalination projects is discussed in Section 5.4.2. The effect of channel deepening on the hydrosalinity gradient was modeled. Incorporating effects of other future desal projects is beyond the scope of the EIS; however, the EIS does disclose the potential for cumulative effects to salinty, particularly during drought.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	32	The USACE makes and excellent point in that climate extremes will occur. How does the DEIS justify the effects that an oil export facility would increase greenhouse gas emissions and contribute to climate change? Would not this be a perfect opportunity for the USACE to change course and develop a plan to protect the Coastal Bend instead of creating direct impacts limited to a short-term goal of oil exports and greater climate greenhouse gases emissions? Isn't the USACE involved in the Ike Dike near Galveston? The $ 31 billion Ike Dike was recently passed by the Senate to protect the upper Texas Coast. Why is this project that services the fossil fuel industry be prioritized instead of the Coastal Bend residents? What plans does the USACE have for the Coastal Bend communities long term protection from RSLC since the USACE ignores climate change damaging effects with the DEIS? Why does the DEIS have a fatalistic view of the future and yet promote the exact causes for climate change with this fossil fuel project? What is the tipping point for a "go, no go" for the project as more climate data becomes available? *See comment letter for additional information.*	The CDP is a private project proposed by the PCCA. The Federal action involving the USACE is a permit decision pursuant to Section 103 of MPRSA, Section 404 of CWA and Section 10 of RHA.
231	33	USACE's sea level data is distorted and averages for the past 40 years instead of utilizing the inflection point of the upward curve of rising sea levels since the year 2000. What would be the projected RSLC utilizing the inflection point of the upward curve of rising sea levels since the year 2010? What are the RSLC predictions for Port Aransas, Fulton, City by the Sea, Bahia Bay, Aransas Pass, Ingleside on the Bay, Ingleside Cove Sanctuary, Portland shoreline, North Beach and Flour Bluff? What changes would be made to the permit if the RSLC calculated in the next few years to be in the High range? Would the USACE halt the permit and focus on the Priorities of People instead of fossil fuel industry? *See comment letter for additional information.* Cites a Mott MacDonald 2020 study regarding RSLR impacts to Ingleside on the Bay.	RSLC baseline information is described for the study area in Section 3.2.4.2. RSLC impacts associated with the Applicant's Proposed Action Alternative are described in Section 4.1.3.2. Table 4-6, page 4-14 shows the estimated RSLC over 100 years (years 20, 50, and 100) according to NOAA (Tides and currents sea level trends Gulf Coast. https://tidesandcurrents.noaa.gov/sltrends/). Sea level change would not have a negative effect on the performance of the deepened channel as more depth in the channel would result from the forecasted change.
231	34	Did the DEIS model sedimentation, storm surge and tidal influences using the High 2.54' in 20 and 50 years?	Future sea level rise scenarios were not assessed for the various models and are not believed to significantly impact the results, particularly for sedimentation.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	35	Ingleside on the Bay Vessel Wake – Commercial vessels pass through the CCSP and La Quinta daily. With higher tidal velocities, larger vessels, the erosion and damage to property is greatly enhanced. DEIS fails to identify these issues nor mentions IOB in their wake model. Boats have been overturned, waves wash up on porches and siltation from retreating wakes fill in canals at IOB.	The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) assessed the additional impact of the CDP by comparing Future Without Project and Future With Project channel scenarios. The analysis indicates that the CDP would have minimal additional impacts to the shorelines along the CCSC. The CDP will not increase vessel sizes, but increase the frequency of larger vessels by around 5%.
231	36	**4.1.3.3 Severe Storms and Hurricanes** - DEIS expects a 30% increase in potential storm damage by 2100. Published in the journal of Science Advances April 27. 2022, storms could double by 2050. Please update your DEIS. https://tucson.com/weather/intense-hurricanes-and-typhoons-could-double-by-2050-in-nearly-all-regions-of-worldscientists/article_9551e44b-b279-5c2f-b091-b547e8339a0c.html	According to the citation provided "The only regions where the scientists didn't see intense tropical cyclones doubling in the future was the Gulf of Mexico." Information from this article was not incorporated into the FEIS as the FEIS cites NOAA and other researchers that indicate an increase in frequency and intensity of storms.
231	37	4.1.3.4 Storm Surge Effects - USACE states that barrier islands and coastal wetlands…are prone to future erosion, fragmentation and loss resulting from continued coastal development. Are the future impacts of the deepening of channel to 80', included in this statement? "Impacts related to storm surge exacerbate these existing stressors and can result in major changes to barrier island shorelines." Channel deepening will cause higher tidal velocities, greater tidal increases as well as storm surge. How does this project align with the USACE Mission statement helping to reduce disaster risk and prioritizing people?	Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with “planned future conditions” representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI’s modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI’s application of model parameters or inputs for the ADCIRC/SWAN models used in its study. Storm surge changes for Gulf shorelines of barrier islands is predicted to be negligible.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	38	4.1.3.4.1 HRI Modeling - What the definition of "ongoing dredging project conditions"? What year was the modelingby HRI conducted? What parameters were used in the modeling? Are there other models reviewed by USACE or Baird and will you provide them? Whom at Baird did the analysis? What is their educational background and area of focus for storm surge? Given the wide variability of storm/hurricane directions, intensity, surge parameters and tidal influences, how can the DEIS justify that the HRI modeling of using only two synthetic storms to evaluate Corpus Christi Bay? What direction, speed are the synthetic storm paths? What are the effects if two or more consecutive (same year) hurricanes strike the Coastal Bend area with the project in place? Should not the modeling include large surges that wash over the barrier island and the contributing effects of the project? Did the models include Hurricane Ike type storm for comparisons in the modeling? The $ 31b Ike Dike was recently passed by the Senate to protect the upper Texas Coast. Why is this project that services the fossil fuel industry be prioritized instead of the Coastal Bend residents? *Comment continued on next row.*	Baird reviewed Subedee and Gibeaut (2021). Ongoing project is defined as: Ongoing Project Scenario (OPS): "The OPS configuration represents the currently ongoing channel improvement project scenario that will be completed soon. This scenario has a depth of -54 feet with -2 ft. advance maintenance and -2 ft. allowable overdepth, resulting in a total depth of -58 ft. (MLLW) for the CCSC. The barge shelves along the CCSC have a depth of -14 ft. with -2 ft. advance maintenance and -2 ft. allowable overdepth, resulting in a total depth of -18 ft. (MLLW). The LQC has a depth of -47 ft. with -2 ft. advance maintenance and -2 ft. allowable overdepth, resulting in a total depth of -51 ft. (MLLW). The OPS configuration is represented in the model by updating the ES bathymetry with -58 ft. (MLLW) along the CCSC, -18 ft. (MLLW) along the barge shelves and -51 ft. (MLLW) along the LQC. This scenario reflects the selected plan documented in Corpus Christi Ship Channel, Texas, Channel Improvement Project, Final Feasibility Report and Final Environmental Impact Statement (USACE, 2003). " The Baird review was conducted by Onur Kurum, PhD and Keith Roberts, PhD. Both experts in storm surge numerical modeling with background in Civil/Coastal Engineering and Atmospheric Science respectively. Baird's review focused on the correct application of the numerical models and not policy. *Response continued on next row.*
231	38	The DEIS has provided tidal tables for different areas impacted by the project. Why has the DEIS left out a table for storm surge impacts for Rockport, Fulton, Aransas Pass, Padre Island including Port Aransas and North Padre, IOB, North Beach and Flour Bluff areas? Will the table include RSLC over the next 5, 10, 15, 20 and 50 year periods?	Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with “planned future conditions” representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	39	Concerned the degradation of water quality due to silt plumes (*see comment letter for figures*) and how that will impact seagrass in the area. Cites a TPWD 2019 letter that expresses concerns regarding indirect and cumulative adverse effects to seagrass in the area. USACE has done nothing to protect the seagrasses in the area. How do you guarantee that the CWA and the CAA laws will be followed, and violators will be prosecuted instead of ignored? Based upon the Water Quality section in the DEIS, would the USACE include a seagrass study conducted along the shoreline from Enbridge to Ingleside on the Bay by Dr. Kirk Cammarata TAMUCC? Mention of prop wash at Harbor Island in the DEIS is downplayed by the proposed modeling and there is a correlation between loss of seagrasses and ship docking operations. Why has the USACE ignored the impact of vessel prop wash siltation on coastal waters? Provides examples of siltation from prop wash and PA over flow. Is this the status quo for the USACE's operations? What other agencies would be involved in addressing these violations and assessing penalties? Who would intercede to assess mitigation for loss of seagrasses? Are you aware that the Port filed an injunction for this violation? Who is responsible for enforcing the CWA for this violation? Does the USACE keep track of the seagrass loss as a result of their permit approvals? What assurances do we have that enforcement of dredging permit guidelines and adherence to the CWA will be followed? Why has USACE not followed the CWA?	Additional review of HRI's modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI's application of model parameters or inputs for the ADCIRC/SWAN models used in its study.
231	40	Sediment transport modeling (Figure 4.1) shows high sediment suspension in an area that is mitigation for seagrass lost for the USACE Enbridge Pier. Will the USACE reverse its stance to utilize this area for seagrass mitigation? How can the Port utilize this area for seagrass mitigation knowing all along the high sediment load? What does "above average wind" in the modeling mean as it is compared to historical data? What was the scaling factor numbers and how were they calculated? Have there been other models run since 2015 over 7 years ago? Given climate change, there are predictions of higher winds due to dryer conditions, more numerous and powerful storms. How was this information included in the long-term modeling? Was RSLC included in the modeling?	Future wind field changes associated with climate change were not assessed. Mitigation is addressed in Section 6.0 of the DEIS.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	41	High suspended sediments are known to bury seagrasses and prevent growth and in some cases kill off seagrasses. Did the POCC disclose this critical information to USACE, TPW and Enbridge for SWG 1995-02221? The POCC leased 20 acres for Seagrass Mitigation License exactly at this location along the Portland shoreline to Enbridge (MODA) for January As part of the DEIS for this permit, how does this blatant oversight affect the EPA, USFWL, and TPW in their evaluation of this permit? The DEIS states that much of the data was supplied by the POCC. How was the seagrasses data qualified by other agencies for the DEIS?	The Enbridge project is not included in the Scope of Analsyis for the proposed CDP.
231	42	**Sediment Quality:** Because testing of sediment quality is extremely important, why not use a third party to analyze the biological testing of sediment instead of the USACE permit stakeholder? Does the Port edit the data before releasing to the DEIS? When will the data be released and shouldn't all the data be included instead of piece-meal? What about testing the sediment after the dredge spoil is in the containment dikes?	Impacts to water and sediment quality associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1.4. A Sampling Analysis Plan for MPRSA Section 103 evaluation of sediment was developed to determine if the new work material sediments proposed to be dredged are acceptable for disposal in the New Work ODMDS. Included in that plan is the biological testing of sediment, including sediment toxicity and bioaccumulation (Freese and Nichols, Inc., 2021b; Appendix J). This testing is currently being conducted by PCCA. The information will be updated for the Final EIS. MPRSA requires that testing follow protocols outlined in Chapter 8 of the Green Book (EPA and USACE, 1998) and the Ocean Dumping Regulations, guidance testing including the Regional Implementation Agreement (RIA) (EPA and USACE, 2003). The EPA must concur with the findings in accordance with 40 CFR 227 prior to USACE approval.
231	43	**Emissions from Construction Equipment:** Could the dredges be equipped to reduce emissions? What type of fuels are being used and are they low in sulfur? Since these emissions are estimated could the DEIS actually measure for assurances that the public is protected? See comment letter for figures shown on Particulate Matter (PM). Wouldn't PM be subject to air emissions contribution for the DEIS? Have these been tested and where are the results?	The project area is not in a Non-Attainment Area (NAA) where TCEQ or EPA could compel such equipment. Large dredges of the scale necessary are limited in nuber, so requirements or mandates to use only the newest emission standard equipment are limited in practicality considering both equipment availability and bid cost feasibility. A statement will be included that non-road engines should be compliant with 40 CFR 89 and 1039 and that USACE will rely on EPA and TCEQ to assure compliance through their respective CAA regulatory and enforcement programs.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	44	**Operational Emissions:** DEIS states: "For VLCCs originating at Ingleside, Alternative I would eliminate the lightering if those terminals made arrangements with Harbor Island terminals to top off light-loaded VLCCs instead of continuing lightering or using offshore SPMs to top off." This statement is false. Where are the agreements for lightering? Flint Hills was asked during a Public Meeting on July 13, 2022 about lightering, they flatly said this was not in their plans. This issues is a major reason for the VLCC terminal at Harbor Island and yet unsupported in the DEIS.	The DEIS was describing the assumption of lightering activity for VLCCs. Plenty of industry material has documented the use of reverse lightering to fully load half-loaded VLCCs out at sea, in the Corpus Christi designated lightering zone in particular. A 2018 Columbia University Energy Policy paper reported an increase in reverse lightering since the export ban lifted in 2016 from 6 VLCCs a year to 8 per month. A 2019 article reported oil analytics form Vortexa estimating 39 reverse lightes in the month of July that year. Corpus Christi and Houston form the majority of US crude oil export tonnage currently per US census trade data. Regarding Flint Hills Ingleside terminal, it currently does not have a VLCC berth, as it submitted a USACE permit application in 2021 to dredge their docks and install dolphins and piles to make it Suezmax capable, which is smaller than VLCC. There was contemplation of eventually building a VLCC dock back in 2018 per articles, but this has not yet happened.
231	45	Construction of the VLCC terminal at Harbor Island would create greater VOC emissions of 23,559 tons instead of zero VOC emissions. Given climate change risks with fossil fuels, greenhouse gases and potential oil spills, the Alternative 2 could be denied.	The 23,559 tons cited are not VOC emissions at any Harbor Island terminal, but the emissions at a conceptual offshore single point mooring terminal (Alternative 2), due to the less-controlled nature of VLCC loading out at sea. Alternative 2 would conceptually replace terminals at Harbor Island with 8 SPMs offshore. The proposed channel deepening of Alternative 1 would be in lieu of Alternative 2 and would reduce these emissions by approximately 78%. The Applicant is proposing Alternative 1.
231	46	Vapor recovery units (VRU) are well documented to show incomplete vapor combustion to remove harmful emissions especially in the Ingleside area. Are VRU's impact to the residents of Pt. Aransas considered in the DEIS?	VRUs are not part of the proposed project. VRUs required for new source permits for crude oil terminals have to demonstrate a minimum 95% removal as discussed for vapor recovery controls in general in Section 4.1.9.1. VRUs typically are mechanical or liquid, and not combustion. Other control methods actually require greater removal or destruction, such as flares requiring 98% or greater combustion. To make the wording more accurate in this section, the sentence "At onshore terminal facilities, air permits require vapor recovery controls capable of 95 percent or more recovery of these emissions." will be edited to say "vapor recovery or destruction controls." Because the proposed action is channel deepening and the terminals with VRUs would be in place regardless of the channel deepening, the VRUs' impacts are not discussed and are the purview of the terminals' NEPA documents. Other controls typically required at crude terminals include sealed floating roof storage, leak detection & inspections. TCEQ & the EPA have final determination of the permit and control requirements for those terminals. Again, these terminals would be constructed whether or not the channel deepening occurs.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	47	Has the USACE measured the noise level from multiple tugboats plus the pumps and VRUs at the Ingleside Facility? Where in the DEIS is data actually measured instead of estimated? What about prop wash siltation? What about erosion and property damage at IOB?	Ambient in-air noise monitoring occurred for the baseline and is described in Section 3.2.12.2. Long-term sound level monitoring location are shown in Figure 3-11, monitoring stations were located at the Channel View Condominiums in Port Aransas, one at Pioneer RV Beach Resort, and one at the Bahia Marina in Ingleside on the Bay. Impacts to noise associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1.10.2, including dredging, placement, operations, and vessel loading impact. With regard to noise from berthing and loading activity from Ingleside, this DEIS concerns facilities at Harbor Island, not Ingleside.
231	48	Please review TCEQ complaints of oil spills, noise, light pollution, emissions and silt disbursement from the dredging activities near Ingleside on the Bay, Texas 2020, 2021 and 2022. Why does this section only cover noise not the direct impact of dredging?	The suggested comment will be taken into consideration. Impacts to noise associated with dredging with the Applicant's Proposed Action Alternative are addressed in Section 4.1.10.2.1.
231	49	Do you agree that seagrasses are being covered by dredging silt in Redfish Bay along Dagger Island? Lack of enforcement of the permit requirements are well documented for years along IOB. Oil spills, from dredging operations is certainly an impact and there have been multiple oil spills along the IOB shoreline as shown in Figure A 4.1.10.2.1 (*see comment letter*).	Thank you for your comment.
231	50	The DEIS fails to mention the impact from silt plumes covering seagrasses in Redfish Bay State Scientific Area. A series of figures will document our concerns with this oversight. Why isn't silt plume and seagrass degradation not included in the DEIS? Why dredge curtains were not deployed in the spoil being dumped in Redfish Bay on the north side of the ship channel? *See comment letter for figures and additional information regarding this comment.*	The Redfish Bay State Scientific Area has been added to Protected Lands sections 3.3.5.1 and 4.2.5.1 for the Final EIS. Redfish Bay was designated a state scientific area by the TPWD in June 2000 to protect and study native seagrasses. The RBSSA contains the northernmost extensive stands of seagrass on the Texas coast. In May 2006, the "no-uprooting"/"no-Prop" regulation took effect in RBSSA. By September 2013, the "no-uprooting"/"no-Prop" regulation had been expanded statewide. While Redfish Bay remains a designated Scientific Area, all seagrass beds along the Texas coast have comparable protections laws. Seagrass beds are a special aquatic sites and will be evaluated in accordance with the 404(b)(1) Guidelines. The Applicant's DMMP (Appendix C) includes BMPs that would be deployed during dredging and placement, including turbidity curtains.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	51	Figure in comment letter that shows the a silt plume impacting seagrass along Dagger Island and into the Redfish Bay Scientific Area creation of BU. Clearly a violation of the CWA as seagrasses are buried in silt. When will the USACE take responsibility for these activities and what are the mitigation processes? Is the Port responsible for these actions as they have environmental staff that should be monitoring this activity? Is this BU silt plume potential damages reported in the DEIS for the channel deepening? Contrary to DEIS reporting that the plume only travels 0.75 miles, these photos indicate at least 6 miles of plume along CCSC, Dagger Island and all the way to Port Aransas Causeway! Is this the stewardship of the USACE we can expect for this permitted project? Is BU calculated utilizing the entire dredge spoil island? What about ship wakes erosion?	Without proper context, the USACE cannot verify the information provided represents a potential unauthorized activity under the Clean Water Act or non-compliance with an authorized DA permit. USACE reviewed our records of the area in question and did not find any activities reported to USACE that were within USACE's federal control and respnsibility. Placement locations, including proposed BU, are described in the DMMP (Appendix C). Vessel Wake Study can be found in Appendix H.
231	52	Does the DEIS have seagrass maps of established seagrass meadows prior to any dredging activity in Redfish Bay? Google Map dated 1/2011 Figure D 4.1.10.2.1 (*see comment letter*), shows seagrasses on both sides of ship channel. What data does the DEIS and USACE for pre and post dredge spoil in Redfish Bay? What mitigation is planned for the loss of seagrasses in this area? Was this dredging operation occurring during cold weather months when sea turtles and manatees were more vulnerable? THESE ARE IMPORTANT QUESTIONS FOR THE PUBLIC TO UNDERSTAND AS THE PAST HISTORY OF DREDGING AND SPOIL DISPOSAL ARE CLEARLY VIOLATIONS OF THE CLEAN WATER ACT AND DEDGRADATION OF THE ECOSYSTEMS. Where is the mitigation for the loss of the seagrass meadows? Is this the same practice that USACE will utilize for the deepening permit? What government agency will investigate past practices and release to the public their findings? How can anyone accept the proposed deepening with these oversights by USACE?	Wetlands and other Waters of the U.S. are shown for the study area in Figure 3-16. USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3). EFH (includes seagrass) consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter. A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	53	Who will govern the agencies responsible for violations from dredge spoil disposal on fragile and protected ecosystems?	The USACE conducted an extensive independent study in coordination with the Cooperating Agencies and soliciting comments from Federal, State, and the public. The EPA, NOAA, USFWS, and USCG are Cooperating Agencies in the development of the EIS. A cooperating agency is a Federal agency that has jurisdiction by law or special expertise with respect to the proposed project. Cooperating agencies must assume responsibility for the development of information and the preparation of environmental analyses early in the process.
231	54	The USACE has ignored seagrass protection as it pertains to the Enbridge Pier Permit SWG-1995-02221 as well as failed to respond to complaints from maintenance dredging overflow on Berry Island. What assurances does the public have that rules for seagrass protection will be enforced? What type of penalties will be assets from the damage done along Dagger Island, RBSSA, Ingleside on the Bay and Berry Island seagrasses loss? Turbidity does not cease as erosion to spoil islands continues from ship wakes and tides. How does the DEIS qualify this statement with examples along islands and spoil islands near the ship channel? What affects are noted by seagrass maps, studies and agency's reports? NMFS disagrees with DEIS assessment. "However, those impacts are expected to be temporary with the long-term objective of protecting and expanding these habitats.". Placement of dredged material in SAV or wetlands is a permanent impact. (Brian Rosegger - Environmental Compliance Marine Habitat Resource Specialist Contractor with ERT in support of NOAA Fisheries Directorate Office U.S. Department of Commerce)	The Enbridge project is not included in the Scope of Analysis for the proposed CDP. Comments from NOAA and EPA are addressed separately.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	55	Comments on Sediment Transport Modeling (Section 2.1.3 and figs 2.8 and 2.11). Sediment Data has been incorrectly evaluated and provides false information to the DEIS based upon USACE Unified Soil Classification. Are the 2015 sediment samples the most recent data? I am an eyewitness that had observed coring along the ship channel much more recently and asking why these samples are not included in the DEIS? Does the Port have them and not releasing the information? Why are the samples missing from BU area in Redfish Bay towards Ingleside on the Bay as shown on Figure 2.8 while the coring from Redfish Bay towards Port Aransas are in shorter intervals? Do you agree that Figure 2.11 is an averaging and gross generalization of silt content based upon limited number of samples depicted in Figure 2.8? Should this mapping be corrected with more recent boring samples that were taken along the ship channel? Have these sediment samples been evaluated for toxic metals and chemicals as they are prone to become air borne?	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	55	Comments on Sediment Transport Modeling (Section 2.1.3 and figs 2.8 and 2.11). Sediment Data has been incorrectly evaluated and provides false information to the DEIS based upon USACE Unified Soil Classification. Are the 2015 sediment samples the most recent data? I am an eyewitness that had observed coring along the ship channel much more recently and asking why these samples are not included in the DEIS? Does the Port have them and not releasing the information? Why are the samples missing from BU area in Redfish Bay towards Ingleside on the Bay as shown on Figure 2.8 while the coring from Redfish Bay towards Port Aransas are in shorter intervals? Do you agree that Figure 2.11 is an averaging and gross generalization of silt content based upon limited number of samples depicted in Figure 2.8? Should this mapping be corrected with more recent boring samples that were taken along the ship channel? Have these sediment samples been evaluated for toxic metals and chemicals as they are prone to become air borne?	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
231	56	Commenter feels there are major flaws with the Fugro 2019 Geotechnical Data, specifically how this information will be used for dredge spoil. Specific examples and information are given in the comment letter. *See comment letter for additional information.* The net affect of this error is that dredge spoil contains more silt and clay than postulated in the DEIS and would suspend in the water column over a period of years, not months. Based upon the enormous volume of dredge spoil, plumes of muddy water will cover beaches, seagrasses and marshes time and time again. Offshore of MI and SJI ponding of muds would occur in the low energy swales between sand bars eventually to be re-worked during storms and high wave events and deposit on beaches. The barrier island sand ecosystem would be altered. Dredge spoil sediments would affect the beaches and bays for years, a 404 CWA violation in the making.	The commenter did not provide documented evidence as to why they believe the 2019 geotechnical data is erroneous. As shown in Section 2.1.3 of the Sediment Transport Modeling Report (Appendix G), the available sediment sampling information also indicate that the bed sediment in the jetty channel is mostly sandy.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	57	Also flawed is the lack of sieve analyses for a majority of the borings. See example as shown above for BH-22. Although stratum descriptions of the cores are documented, the tables report of only two samples of the % passing #200 sieve. Does the DEIS recognize this error? Why was this incredibly import aspect of the dredge spoil overlooked? Was this some sort of deception on the part of the applicant or Fugro? What ethics parameters are utilized for this contractor and other contractors used in the DEIS? What is important here is that data conclusively shows that silts and clay and will be highest percentage of material throughout the dredging spoil deposits. The Fugro report fails the basic sediment classification and brings into questions other studies and models. *See comment letter for additional information.* USACE Soil Classification Plates 4 and 5 illustrate the Grain Size Group on a curved graph. Even BH-21 and BH-22 to not meet the criteria for SP designation and be of the poorer classification SM. This elevates the silt and clay percentages above sand percentages as proposed. This is a fatal flaw of the DEIS.	Thank you for your comment.
231	58	Wetland loss is expect to continue and yet the DEIS makes no effort to curb this loss but only increases its likelihood with this project. Does this project with the stated increase in tidal and storm surge flows provide additional assurances that the impacts of RSLC and effects on the ecosystem are guaranteed? The ecosystems begin with seagrasses, the nurseries that provide the protection of larvae and provides habitat for the food chain. How does turbidity affect oxygen concentrations in the water given that seagrasses use photosynthesis?	Discussions on how water quality impacts (such as turbidity and lower DO) can effect various aquatic resources are disclosed in Sections 4.1.4, 4.2.1 - 4.2.4, and 5..4.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	59	The DEIS states that wetland loss would increase with hydrology alterations and SLC. USACE Dredging operations would continue to have an impact on aquatic communities. What impact has the current dredging to 54' had on the aquatic communities and how is this documented? How does the USACE prepare for these events to protect the Coastal Bend after the project is constructed? Why is this project more important than preserving and adapting to the anticipated dangers of erosion, SLR and loss of habitat?	RSLC baseline information is described for the Study Area in Section 3.2.4.2. RSLC impacts associated with the Applicant's Proposed Action Alternative are described in Section 4.1.3.2. Table 4-6, page 4-14 shows the estimated RSLC over 100 years.
231	60	Ingleside Cove Sanctuary is not listed and has not been included in tidal studies, storm surge and wake affect caused by vessels. Enbridge maintenance dredging caused a huge plume of silt that covered seagrasses in the Sanctuary. When will the USACE include this valuable ecosystem in its DEIS study? Wake displacement from vessels is causing surges within the canals and along La Quinta shoreline at IOB. RSLC will increase the likelihood of erosion and loss of property as well as habitat loss. How does the USACE intend to protect Ingleside Cove Sanctuary?	Ingleside Cove Sanctuary has been added to sections 3.3.5.1 and 4.2.5.1 for the Final EIS.
231	61	Silt plumes from dredging and vessels docking have already caused loss of seagrass meadows in IOB and Redfish Bay. How can the public trust an agency that does not enforce its permitted requirements? The DEIS states that "fish are motile". Since dredging is year around, will the USACE protect the larvae phases of fish and invertebrates? Dr. Edward J. Buskey UTMI reminds us that planktonic larvae have weak swimming skills and are too small to migrate back into nurseries on their own. With high tidal velocities, higher turbidity from dredging and ship traffic, what are the mortality rates expected for this project?	Additional information has been added to sections 4.2.2.2, 4.2.5.3, and Appendix E (EFH Assessment) regarding larval fish. EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	62	"The permit indicated that seagrass present in the west slip area would not be disturbed." This statement is untrue. USACE accepted this MODA permit (SWG-1995-02221) that is for building a second pier over seagrasses and wetlands. This statement insinuates that only maintenance dredging to be performed and completely ignoring the seagrass degradation data. Documentation by TAMUCC Dr. Kirk Cammarata has presented his findings that there is a net loss of seagrasses adjacent to and extending towards IOB since the study began in December 2020. Here are some of Dr. Cammarata's findings. Does the USACE disagree with the images provided in the study? How long has the USACE been aware of the impact to seagrasses west of Enbridge? *See comment letter for additional information.*	This seems to be in reference to another permit evaluation outside the scope of the prposed CDP.
231	63	Based upon the foregoing, USACE was aware of the adverse effects to the large area of seagrasses. Do you agree that this information was ignored? If not, what actions were performed by the USACE to stop the loss of seagrasses? My point and question are, will this type of response continue on the permit we are addressing in the DEIS? Should there be letters of reprimand for the USACE person or persons that have ignored and failed to enforce the Clean Water Act designed in part, to protect seagrasses? What about other agencies like the POCC that had foregoing knowledge of this? How will the seagrasses lost across IOB be mitigated and penalties assess?	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	64	**Migratory Birds –** DEIS states that increase turbidity and disperse prey possibly reducing the foraging efficiency of some sight-feeding migratory seabirds…" What happens to the juvenile seabirds and extra burden placed on the breeding that turbidity will have? Do you have documentation of seabird survival rates when large areas are affected by dredging especially near Pelican Island? Shoreline erosion will increase, and ship wakes could cause higher mortality rates among the species that breed near the waterline. Does the DEIS have data to ensure that these protected species are safe? Whooping Crane is expanding its territories and there are frequent sighting around Port Aransas. If estuaries are being threatened by this project, wouldn't this endangered species deserve more study and protection?	1) Turbidity from the dredging activity will be temporary and localized to the immediate area. Adult and juvenile seabirds would forage in undisturbed areas until turbidity improves and fish return. There is currently no known documentation or studies of seabird survival reates near Pelican Island. 2) The Baird 2022b report mentioned that there would be no discernable increase in shoreline erosion from the CDP. Shoreline recession will still continue.
231	65	**Navigation** – Port Aransas is the gateway to the Gulf of Mexico as well as inland lagoonal waters behind the barrier Padre Island. The convergence of CCSC, Lydia Ann Channel, Conn Brown Channel plus the Intracoastal Canal, La Quinta and numerous small and large vessel harbors throughout the Coastal Bend. The DEIS should include the increase in hazards from the increase in vessel traffic in all forms not just commercial vessel traffic. The hazards should include dredging operations, barge traffic in determining the treat to boaters as well as oil spills from collisions. On March 15, 2021 crude oil tanker Riverside lost power and crashed into Enbridge Ingleside pier (formerly MODA) causing approximately 80'of the pier's end to collapse into the water (see comment letter for sequence of events).	Due to reductions in reverse lightering there will be a decrease in tanker vessel traffic, by reducing the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operation. During project construction there may be temporary increases in marine vessel traffic associated marine construction and dredging.
231	66	What are the probability of vessel collisions and oil spills with this project? How is the damage assessment modeled in terms of environmental and property to residents affect? What spill control measures are in place now and if the deepening occurs? What is the risk of collision now that the ship channel is deepened to 54' from 47'? What assurances can the USACE give to small boaters that navigate around Harbor Island if the permit is allowed? How will the Cheniere LNG tankers reported increase to 300 tankers per year, affect navigational risks?	Spill control and response measures are governed by USCG and the Harbor Master. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	67	What about ferry traffic delays and loss of tourist revenues?	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
231	68	Mitigation efforts are poorly designed and controlled by the Port. Images below (see comment letter for photos) show the lack of seagrass development due to high turbidity and high siltation rates that bury seagrasses reducing photosynthesis. Commenter provides examples of mitigation. Will this type of mitigation be utilized for the DEIS give the BU silt and vessel traffic will not sustain long-term seagrass growth? Based upon the documentation of the loss of habitat, specifically seagrasses, mitigation should be proposed and expanded as other areas are impacted. How will the DEIS grade the progress including BU spoil deposits?	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
231	69	Where are the costs associated with the project in the DEIS?	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port ommission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, federal review of a navigation district's stated need for the project in the marketplace.
231	70	Why are there documents delayed or incomplete in the DEIS that requires the public to review at a later date?	Without specifically stating which documet is incomplete or delayed in the DEIS we are unable to respond. Many documents were circulated with the DEIS in the appendices and additonal documents were readily available and provided to the public upon request.
231	71	Why are sections in the 2003 EIS Ship Channel Deepening removed from the DEIS?	Not applicable to the CDP.
231	72	Prefer Alternative 2, offshore single point mooring.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the Final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
232	1	VII executive summary: "Beneficial use of dredged material would result in direct impacts to wetlands and SAV; 106.3 acres of SAV within SS1, 18.7 acres within HI-E, and 25.3 acres within PA4." This sentence is unclear. The first part of the sentence indicates direct impacts to wetlands and SAV but the totals reported here (106.3 + 18.7 + 25.3 = 105.3 acres) are only given for SAV. What are the total direct impacts to wetlands?	** Commenter wants all questions from Coordinating Agencies addressed and has pulled these comments that were included in Appendix B6 of the DEIS for her comments.* Aquatic resource impacts are shown in Table 4-16 in Section 4.2 of the EIS.
232	2	VIII Executive Summary: "there would be no major impacts to existing wetlands or SAV." This confuses the reader, as it implies that the project would have no major impacts. Though not derived from dredging, impacts to existing wetlands and SAV during dredge material placement would result in impacts.	Impacts to wetlands/seagrass associated with the Applicant's Proposed Action Alternative are addressed in Section 4.2.1.2.
232	3	"However, those impacts are expected to be temporary with the long-term objective of protecting and expanding these habitats." NMFS disagrees. Placement of dredged material in SAV or wetlands is a permanent impact.	Text was revised with additional information from the Applicant to indicate direct and indirect impacts.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
232	4	"As alternatives are identified that result in fewer direct impacts to aquatic resources, it is unclear how the applicant's preferred alternative will be reconciled with the requirement to identify a least environmentally damaging practical alternative as part of the CWA 404 permitting process which is referenced in the ADEIS and in Appendix N - 404(b)(1) Guidelines Evaluation."	Thank you for your comment.
232	5	"Finally, the position that other project alternatives utilizing newly created dredged material placement areas would result in significantly more impacts is noted. However, it is also noted that other alternatives exist that would impact significantly fewer aquatic resources and limit the need for mitigation and/or beneficial use to offset those impacts."	Thank you for your comment.
232	6	Air Quality and Green House Gas emissions are not addressed. This proposed Project would result in a cumulatively considerable contribution to air quality and GHG emissions. The DEIS does not properly evaluate the projects contribution to cumulative impacts of air quality, and has not included a plan on feasible environmental control measures to reduce air quality impacts within the vicinity of the channel deepening and reduce GHG emissions that contribute to global climate change.	Air quality impacts under Alternative 1 are discussed in Section 4.1.9.2 of the DEIS. Greenhouse Gas emissions are addressed in the FEIS.
232	7	**Appendix N 404 Evaluation:** Section 404 of the CWA governs the discharge of dredged or fill material into waters of the U.S. A Section 404(b)(1) evaluation is minimally prepared and included in the appendix. The 404(b)(1) evaluation does not demonstrates the preferred alternative and dredge plan complies with the 404(b)(1) guidelines. The preferred alternative #1 is not the least environmentally damaging practicable alternative (LEDPA).	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the Final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
232	8	Coastal Zone Management Act: The approval of this project is not consistent with the State of Texas Coastal Management Program in that it disturbs/destroys wetland and seagrasses without a proven recovery plan, with no monitoring, and years of lack of productivity that will impact crucial breeding and fishing areas and offering NO mitigation.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
232	9	**Wetlands:** The statement that Channel Deepening would not impact Coastal Wetlands is totally misleading. Since Tidal wetland and freshwater wetlands are part of the Coastal Wetland classification. Please provide the wetland map that was used to determine this classification of disturbed wetlands. Please explain how damage to that type of wetland is not considered as part of the 404 USACE responsibility for ensuring "no net loss" of wetlands by requiring permit applicants to make every effort to avoid and minimize aquatic resource impacts and provide compensatory mitigation to offset any permitted impacts. In the Mott Macdonald's Waters and Wetland Study, 2021 that is cited in this DEIS; it states in section 3.1.2 that "As directed by PCCA, the waters and wetlands delineation survey was only conducted to the PSA boundaries and did not extend onto private property, even if the wetland extended beyond the PSA boundaries." As such the total impact to wetlands is not included in this DEIS. Impacts from dredge placement are noted to be seen up to 1 kilometer from the placement site. Still the study provided shows wetlands delineated totaling 745.911 acres that are subject to 404 regulations.	Text has been clarified to indicate that the channel dredging would not have direct impacts to wetlands. Section 4.2.1.2 distinguishes that dredging will result in indirect impacts to wetlands through turbidity increases and that placement actions will have a direct impact on both tidal and non-tidal wetlands.
232	10	The salinity levels predicted for this 404 do not include the brine discharge from the Port of Corpus Christi Desalination plant that will discharge hundreds of millions of gallons into the channel right off Harbor Island. Salinity levels increase of 3ppt is significant and that is not in addition to the brine that will be resuspended by the additional VLCC and tug boats maneuvering to dock the VLCC adjacent to the desalination facility. This permit should not be granted without a comprehensive study that included the proposed and nearly permitted desalination facility that will be changing the qualities of the water dramatically.	The potential for cumulative impacts due to desalination projects is discussed in Section 5.4.2. The effect of channel deepening on the hydrosalinity gradient was modeled. Incorporating effects of other future desal projects is beyond the scope of the EIS; however, the EIS does disclose the potential for cumulative effects to salinty, particularly during drought.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
232	11	"Turbidity increases from construction of Alternative 1 would be temporary and local." This statement is contradictory to what has been stated previously and what is stated below. Increase salinity will have long term effects on oysters as in makes the oyster more susceptible to disease and predation. In addition to turbidity having indirect impacts to 32 acres. How will these impacts or potential impacts be mitigated for or monitored to ensure the proposed impacts are only temporary and no additional mitigation is necessary for loss of oyster reefs?	Impacts to estuarine organisms associated with the Applicant's Proposed Action Alternative are addressed in Sections 4.2.2.2.2, 4.2.5.3.2, and Appendix E. A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
232	12	Please explain how coastal wetlands are separated from tidal wetland and freshwater wetlands and how damage to that type of wetland is not considered as part of the 404 USACE responsibility for ensuring “no net loss” of wetlands by requiring permit applicants to make every effort to avoid and minimize aquatic resource impacts and provide compensatory mitigation to offset any permitted impacts. In the Mott Macdonald’s Waters and Wetland Study, 2021 that is cited in this DEIS; it states in section 3.1.2 that “As directed by PCCA, the waters and wetlands delineation survey was only conducted to the PSA boundaries and did not extend onto private property, even if the wetland extended beyond the PSA boundaries.” As such the total impact to wetlands is not included in this DEIS. Impacts from dredge placement are noted to be seen up to 1 kilometer from the placement site. Still the study provided shows wetlands delineated totaling 745.911 acres that are subject to 404 regulations.	Section 4.2.1.2 distinguishes that dredging will result in indirect impacts to wetlands through turbidity increases and that placement actions will have a direct impact on both tidal and non-tidal wetlands. Applicant has provided sufficient delineation information for the project footprint.
232	13	**Permit Application (January 3, 2019) 401 Tier 2 Questionnaire, Page B-6, Water Quality Impacts:** It is not possible for the Port of Corpus Christi to make this statement as the facility that will be producing hundreds of millions of gallons of brine discharge has yet to be constructed. If the dredging occurs after the construction of the desalination plant, heavy salt sediments will be captured in the brine and deposited in the Placement Areas. This has not been considered. Even if the channel is dug before the facility is built, the maintenance dredging required for the channel will be dredging this discharged material and needs to be considered.	The proposed project described in the DEIS does not unclude a brine discharge. CCSC is a federally authorized navigation channel that has been regularly dredged since 1874. Currently, USACE Civil Works program maintenance dredges at least a portion of the Federal channel annually. The CDP will also require maintenance dredging at similar intervals to the existing conditions.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
232	14	**Permit Application (January 3, 2019) 401 Tier 2 Questionnaire, Page B-6, Water Quality Impacts:** Response does not discuss settling of solids or adequately details how the dredge material will be placed to protect nearby wetlands and seagrasses. The Port of CC has a history of allowing unfiltered unsettled dredge material to spill into Redfish Bay. The response states that it will determine where use of settlement dikes and silt curtains will be used if appropriate and applicable, not if required and a best practice to mitigate damage to marine life and seagrasses.	Best management practices will be used during project construction such as turbidity curtains, silt fencing, construction matting, window restrictions, and biological monitors which would avoid and minimize indirect impacts associated with the project. These will include those developed by the USACE and EPA including resuspension control measures may be used to reduce impacts to the water column during construction activities (Bridges et al., 2008).
232	15	**Permit Application (January 3, 2019) 401 Tier 2 Questionnaire, Page B-6, Water Quality Impacts:** The response does not state how they will protect these adjacent seagrasses from siltation during the dredge placement. They claim the impact from the placement will be temporary, but studies show that it takes up to 4 years for seagrasses beds to recover from dredging and it is recommended that dredge placement be located at least 1 kilometer from healthy seagrasses. Please note, this beneficial use being claimed in this response can be accomplished with other currently permitted maintenance dredge activities. The beneficial use being cited as the reason for why this permit is preferred to the off-shoring mooring option is false, and should not be used to justify impact to special aquatic environment when the benefit does not require the Proposed Alternative to be received.	Best management practices will be used during project construction such as turbidity curtains, silt fencing, construction matting, window restrictions, and biological monitors which would avoid and minimize indirect impacts associated with the project. These will include those developed by the USACE and EPA including resuspension control measures may be used to reduce impacts to the water column during construction activities (Bridges et al., 2008).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	1	Concerned about the storm surge if the channel is dredged that deep. Experiences a storm surge of up to 4 feet, inundating a quarter of IOB throughout the 2020 hurricane season. The Channel segment from the Gulf to Port Aransas has just been deepened from 47-feet to 54-feet in March 2020. Both modeling and historical research show that channel deepening will only make things worse, posing existential threats to coastal communities like Port Aransas and IOB.	Channel dredging can help storm surge drainage but could also facilitate ingress. Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with "planned future conditions" representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI's modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI's application of model parameters or inputs for the ADCIRC/SWAN models used in its study.
233	2	Commenter provides information received via correspondence with Dr. Stefan Talked who said they world not be surprised if channel deepening actually helped water escape flooded areas (depends a lot on local geometry probably). A bigger ditch 'drains the swamp' more quickly. This is what we see in Jacksonville, Florida, with Hurricane Irma. The flip side of the coin is that a deepened channel (bigger ditch) allows more ingress as well, so that a big storm surge (such as the 1900 Galveston hurricane) could become more serious upstream." He said that historical tide records would "prove the case, one way or the other". In fact, he demonstrated for USACE Portland how to conduct such a study (Talked & Jay, 2017). Provides a summary of some key findings from recent channel deepening research (see Table 1 in comment letter).	Agree that size of channel affects both ingress and egress of storm surge, this is captured in the SWAN+ADCIRC modeling. Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with "planned future conditions" representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI's modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI's application of model parameters or inputs for the ADCIRC/SWAN models used in its study.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	3	In Appendix I: Hydrodynamic & Salinity Modeling, 3D modeling by Baird & Associates compared two future states: Future with Project (to 75+ ft) with Future without Project (to 54' currently in construction). Thus, their study's conclusions do not reflect changes from the current baseline state (47'). Even then, modeling showed increased conveyance capacity in Aransas Pass, tidal exchange increase of 8% between the bay and the GOM, cumulative significant impact of tidal amplitude of 36% at the inner channel (14 cm max) and 26% (8 cm max) at Corpus Christi Bay, and increased range of salinity change +/-4 PSU.	Scope of assessment was change relative to the authorized 54 foot project. Section 6 describe the cumulative impact of Future With Project based on the current baseline.
233	4	HRI modeling conducted Corpus Christi, and Nueces Bays and 0.04 inches increases in water level. Table 2 compares findings from these two studies (see comment letter). Due to relative sea level rise of 0.02 feet/year and increasing (Sweet et al., 2017), Subedee and Gibeaut ominously conclude "it is expected that water level and tide range increases caused by channel deepening will be overwhelmed by increases from other causes in a few years" (p. 48). But does that make channel deepening okay?	It is assumed these can be superimposed (i.e. no non-linear effects), but cannot really address if that makes the project ok or not.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	5	Many Coastal Bend communities, including Port Aransas, Ingleside, Aransas Pass, and Ingleside on the Bay, are located in flood plains. Harbor Island, where the Port of Corpus Christi Authority (PCCA) is planning to entice more oil terminals to be built, is also in a flood plain. How does it make any sense to knowingly construct a ship channel as deep as the Suez Canal to reach NEW oil tanks and pipelines yet to be built in a flood plain, where a catastrophic hurricane like 2017's Hurricane Harvey can result in explosions and spills, causing untold environmental damage and loss of aquatic habitat and wildlife? Putting more industrial development on Harbor Island will remove the important protective role this critical floodplain plays during storm events and storm surge. Have emergency planners and city planners from Nueces and San Patricio Counties, Port Aransas, Ingleside on the Bay, Ingleside, and Aransas Pass even been engaged in discussions about this project? Jennifer Hilliard, IOBCWA's Treasurer and a licensed architect, is Chair of IOB's Planning and Zoning Commission. Sara Williams is San Patricio County's emergency manager. What do they, and the governing bodies of the Coastal Bend cities and counties, have to say about constructing MORE oil terminals in flood plains in harm's way?	The County Floodplain Administrator will make final determiation on floodplain impacts. USACE's review of the proposed CDP is compliant with EO 11988.
233	6	A thorough Hydrologic and Hydraulic System Analysis (H&H) needs to be performed in accordance with USACE Section 408 11(c)(2). This needs to take into account the entire channel configuration throughout the Coastal Bend Bays and Estuary system – the Corpus Christi Ship Channel, the La Quinta Channel, and all of the connected bays and estuaries. With hydrological channel modifications a threat to both human communities and to the environment, historical data on tides and storm surge from previous channel deepening likely readily available, and concern for storm surge impacts on communities a known issue brought up during scoping, it is disappointing that a thorough H&H was not performed as part of this Draft EIS.	A Hydrodynamic and Salinity Modeling Study, a type of hydrologic and hydraulic modeling, was performed for the CDP and was included as Appendix I in the DEIS. This study was conducted using the best available scientific information and reached objective and scientifically-based conclusions.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	7	Concerned that permit activities in the region are being rolled out one at a time instead of as connected actions: two CCSC projects, Harbor Island Desal Plant, La Quinta Desal Plant, La Quinta Channel Extension and Widening, and leased seagrass mitigation areas of Port-owned submerged property. Inner Harbor and Packery Channel are also part of this connected system.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
233	8	Cumulative Impacts identifies 42 projects in the 4-county study area. However, that is an incomplete list and the discussion was shallow. The Port has recently entered into several MOUs for activities such as, but not limited to, carbon capture and sequestration (CCS), blue hydrogen, and decarbonization and energy transition. The Port likely has a good idea of how these projects will unfold, and most will involve use of the ship channels in some way. Sequestration locations under the bay floor are likely to be considered as part of CCS; blue hydrogen projects require freshwater, likely from desalination plants on the ship channels; energy transition means getting away from crude oil altogether, which would impact the very economic justification for this channel deepening project! *See comment letter for additional details.* Cites press release for the Port's response to the IPCC Report on Climate Change - "The Port of Corpus Christi has committed to developing much needed infrastructure to collect and pressurize CO2 for injection in permanent geological storage formations offshore in the Gulf of Mexico." What does this mean for Coastal Bend communities? It sounds like the Port, is offering up the Coastal Bend to be the dumping ground for all privately-generated carbon emissions, but with no compensation to the communities potentially placed further in harm's way. Who is paying for this infrastructure? This was not disclosed in this DEIS. Port should be much more forthcoming.	The EIS has been revised with the latest reasonably foreseeable projects within the Study Area including PCCA's carbon capture and blue hydrogen projects.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	9	Numerous industrial activities are occurring along the La Quinta Ship Channel. This includes two desalination plants – one by the Port and one by the City of Corpus Christi, discharging 57 and 166 MGD of brine respectively (more than indicated in Cumulative Impacts). Yet the DEIS Cumulative Impacts section does not mention impacts on salinity and avoids discussing the environmentally sensitive La Quinta location altogether – stating only with regard to the City of Corpus Christi's two proposed desal plants that "the proposed location within the Inner Harbor avoids direct impacts to coastal resources due to the industrial setting". IOBCWA was recently granted affected party status in a TCEQ Contested Case Hearing against the Port's proposed La Quinta desal plant water rights permit.	Text descriptions of proposed discharges has been revised with the latest project information. The effect of channel deepening on the hydrosalinity gradient was modeled. Incorporating effects of other future desal projects is beyond the scope of the EIS; however, the EIS does disclose the potential for cumulative effects to salinty as a result of channel deepening and desal projects, particularly during drought.
233	10	*See comment letter for all details provided pertain to this comment.* The Cumulative Impacts section on Moda (former owner) states there is "no impact" to cultural resources. Enbridge is also planning to construct a $3 billion blue hydrogen facility on the former Navy Base property. The Cumulative Impacts section on Enbridge needs to be updated to reflect new ownership and activities. Flint Hills also has an open permit request to deepen their berths, which is not mentioned in the DEIS. South Texas Gateway Partners is already in full operations, having recently added new berths.	The description has been updated to reflect the new owner and the Flint Hills project to deepen their berths is mentioned in Table 5-1. Text description of this action have been added to Section 5.3.2.
233	11	IOB featured prominently on the formal presentation for this project, but the City Council of IOB was not notified. My FOIA request to USACE related to the La Quinta Channel project was outright denied, as was a request by Healthy Gulf. Anything happening to the La Quinta Channel by the Port and by the industries accessing the channel should be considered "connected actions" with the CCSC actions. Without this basic infrastructure, these companies cannot fully operate. This is one connected channel system that traverses an estuary system deemed by the EPA as being of national significance and touches many communities.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	12	As it stands now, the proposed new round of CCSC channel deepening is a "channel to nowhere". The only oil terminals already existing are located adjacent to IOB, which this segment of the channel doesn't reach. Are we to believe the Port has no plans to keep on going? Why won't USACE release the information on La Quinta Channel? The City of Ingleside on the Bay is not even listed in Appendix P – despite our numerous comments in 2020 on this project. IOB is NOT the same city as, or part of, the City of Ingleside.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
233	13	The Port of Corpus Christi prevailed in a second round of TCEQ Contested Case Hearings to discharge 95.6 million gallons a day (MGD) of brine into the CCSC (according to the Port's 2018 Public Notice) as part of their planned Harbor Island desalination plant. This is way more than the 10 MGD mentioned in the Cumulative Impacts section. USACE rightfully identified that power needs for desal are in scope for this DEIS and that another EIS will be likely for the outfall, but there is NO MENTION in the DEIS about the cumulative impacts on salinity levels in the Bay, when coupled with increased salinity intrusion from the Gulf of Mexico from having a deepened channel. Baird's Hydrodynamic and Salinity Modeling Study doesn't even mention ANY of the 6 desalination plants proposed for Corpus Christi Bay (2 by the Port, 2 by the City of CC, one by City of Ingleside & Poseidon, and one by CC Polymers).	Text descriptions of proposed discharges has been revised with the latest project information. The effect of channel deepening on the hydrosalinity gradient was modeled. Incorporating effects of other future desal projects is beyond the scope of the EIS; however, the EIS does disclose the potential for cumulative effects to salinty as a result of channel deepening and desal projects, particularly during drought.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	14	The two oil terminals proposed on Harbor Island, all the pipelines proposed to cross Redfish Bay to Harbor Island on their way to proposed offshore oil terminals (e.g., Bluewater), and the multi-purpose terminal at Taft need to be considered as connected actions.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
233	15	USACE and Port of Corpus Christi strategies of splitting up connected actions, refusing FOIA requests, holding public hearings in-person only at inconvenient locations, refusing to extend review and comment periods, failing to send notice to affected city governments, and not meeting with city planners and emergency personnel of coastal cities already threatened by climate change do not indicate honest efforts at community engagement.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
233	16	The impact on health in IOB and Port Aransas residents and visitors is directly relevant to this permit because it represents a cumulative impact of a number of industrial projects already in existence (mostly since the lifting of the oil export ban in 2015) and yet-to-come – especially if the Proposed Project is approved. Much of the emissions can likely be attributed to increased shipping activity. When docked, these ships should be required to use shore power; as it is, the diesel from generators is floating into nearby communities. This will have a harmful effect not only on human health, but also on tourism and recreation in Port Aransas. We already experienced this ourselves in IOB, and I hate to see Port Aransas ruined because of the increased ship traffic emissions.	Section 5.4.5 describes potential cumulative effects that could result from this and other projects that can impact air quality.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	17	Concerned about the safety for boaters and swimmers in the channels in IOB due to the increased ship traffic.	Due to reductions in reverse lightering there will be a decrease in tanker vessel traffic, by reducing the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operation.
233	18	Concerned about the impacts from ship wakes from increased ship traffic.	The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) assessed the additional impact of the CDP by comparing Future Without Project and Future With Project channel scenarios. The analysis indicates that the CDP would have minimal additional impacts to the shorelines along the CCSC.
233	19	These concerns about boater safety and beach erosion due to increased ship traffic also do not bode well for tourism and recreation at Port Aransas.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism. Under the Applicant’s Proposed Action Alternative, there would be no increase in VLCC vessel traffic and no change to the VLCC one-way traffic restrictions. However, due to reductions in reverse lightering there will be a decrease in tanker vessel traffic, by reducing the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations, thereby reducing commercial and recreational marine vessel transit conflicts.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	20	The placement of massive amounts of dredged materials just offshore from Mustang Island is also of concern. Not only will this attenuate desired wave action on the beach and affect sea turtle presence (both popular draws for tourists), but clay is likely to mix in with the beach sand, causing a mess for beach goers. Placement of offshore breakwaters, as was done in IOB in 2014, would be more protective of shorelines than creation of more loose spoil islands.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
233	20	The placement of massive amounts of dredged materials just offshore from Mustang Island is also of concern. Not only will this attenuate desired wave action on the beach and affect sea turtle presence (both popular draws for tourists), but clay is likely to mix in with the beach sand, causing a mess for beach goers. Placement of offshore breakwaters, as was done in IOB in 2014, would be more protective of shorelines than creation of more loose spoil islands.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	21	Surprised that plans to restore estuarine/aquatic habitat at Pelican and Dagger Islands and other sites were removed from this project. Dredge placement plans including filling in wetlands that were originally created from dredged spoil, claiming these former DMPAs as being of "lower value" so as not to require mitigation. IOB President Patrick Nye has reported the massive expansion of spoil islands that are in continuous industrial use, with loose sediment spilling over into surrounding waters, suffocating seagrasses. The DEIS should acknowledge that dangers that spoil island create.	Thank you for your comment. Impacts from placement actions from the proposed CDP, such as water quality effects, are disclosed in Section 4.1.4, 4.2.1, 4.2.2. Cumulative effects from the proposed CDP and other dredging/placement projects are disclosed in Section 5.4.
233	22	Ship wake impacts will only get worse with more, larger, and fully loaded ships traversing both the CCSC and the La Quinta Channels. But it's impossible to say by how much. In Appendix H: Vessel Wake Analysis, it was acknowledged that modeling was limited because Boussinesq equations could not appropriately model impacts of wave propagation of tankers at over 50' depth. Fully-laden VLCCs require 70' depth. IOB residents Sheila and Jim Walton and Tom and Michelle Mack have video showing that both the CCSC and La Quinta Channel are sources of "concussion waves" that come ashore, damage bulkheads, and force seawater into yards. How much worse will this impact be on IOB with an even deeper CCSC? Unpredictable (but likely worsened) ship wake impacts from a deepened channel will cause significantly adverse effects to economic (property) values.	The limitation relating to wave depth relates to the modeling of secondary wakes only. The modelling approach for secondary wakes, while limited, is considered realistic as in reality propagation of these short period waves are unaffected by the relatively deep channel depth (>50ft). Capping the depth, as was done for the study, does not alter this outcome, but allows for the underlying Boussinesq equations to be solved. It is noted that this was done for the secondary wake simulations only and not the primary drawdown wave simulations which are the principal driver for bed and shoreline change along the CCSC. Beyond CDP extent the baseline Future Without Project and Future With Project scenarios depict a channel configuration following the maintenance dredging campaign currently being executed by the USACE with a navigable depth of 54 feet along the full length of the channel. To navigate these channel lengths, VLCC's will be required to restrict their draft to 52ft. The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) assessed the additional impact of the CDP by comparing Future Without Project and Future With Project channel scenarios. The analysis indicates that the CDP would have minimal additional impacts to the shorelines along the CCSC.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	23	Despite claiming that reduction of reverse lightering events to reduce air emissions is the goal, the DEIS outright admits that "More efficient transport of crude in greater volumes is the impetus for the Port to deepen the channel to accommodate fully loaded VLCCs." This project will result in MORE ship traffic, not less. Among the 130 "lightering events" in 2019, how many of them resulted in accidents or spills? Why is this data not provided? Does it really make economic sense to deepen a ship channel to reduce (not even prevent) so few events, wreaking havoc on the estuarine bay system and coastal communities available for free public use, in order to increase efficiency for private petroleum companies?	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The Applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, federal review of a navigation district's stated need for the project in the marketplace.
233	24	Feels that the results of the ship simulation leave cause for concern. *Commenter cites specific recommendations and conclusions from the report, but does not provide comments as to what the issues with those are.*	Ship simulations are typical for the purpose to develop and transfer understanding among the experienced pilot participants. The range and number of simulations are designed to adequately addressed the key parameters required to bring out the most important issues and objectives, to include applying necessary tug types and configurations. Operational limits and controls are typically imposed based on actual tug and ship capabilities ane environmental conditions as informed by the ship simulation results.
233	25	The basic purpose of this project is "To safely, efficiently, and economically export current and forecasted crude oil inventories via VLCC". Deepening a narrow and shallow public ship channel, that is highly used for recreational purposes, in order to accommodate fully-laden VLCCs plus 5 tugboats each, while threatening communities and the environment, will not be safe, efficient, or economical.	Thank you for your comment.
233	26	Does not believe the public or private petroleum companies need this project. To invest in infrastructure that enables the continued build-out of a planet-threatening dwindling industry (crude oil) in order to boost short-lived private profits, while also harming communities and the natural ecosystem (carbon sinks) that can help combat climate change, is a bad investment and injurious to the nation's (and world's) public interests.	Thank you for your comment.
233	27	The Port's stated project purpose "to construct a channel with the capability to accommodate transit of fully laden VLCCs from multiple locations on Harbor Island into the Gulf" is contrary to the public interest and needs to be removed from consideration altogether.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	28	Concerned that no other ports were considered as alternatives for achieving the project basic purpose. Any alternative to the applicant's preferred alternative of deepening the channel to 75 feet would be significantly less harmful.	Sites that lie substantially outside the geographic boundaries identified in the overall project purpose are not practicable, and therefore unreasonable, and can be eliminated with little information. Therefore, alternative locations, such as Houston and Brazos Island Harbor, which was scoped in by the public, are not being carried forward in the analysis.
233	29	**Public Interest Factor (a) wetlands:** No benefit. Benefits do not outweigh the damage to wetlands. See comment letter for information to support this statement. Concerned with the Port's argument for proposing no mitigation in Section 6, the Port justifies filling in 42.5 acres of wetlands on PA 4 as being of lower value since it was a former DMPA - thereby acknowledging that efforts at creating wetlands through dredged material placement have not been successful. The Port does not have a good track record of creating new wetlands and protecting seagrass. It is recommended that the District Engineer consult with others, including representatives from Mission Aransas NERR, RBSSA/ UTMSI, to discuss the cumulative effects, as described in 33 CFR 320.4(b)(3). It was concerning that USFWS cancelled their participation, according to the FAST-41 website. But more concerning is that I am unable to find that any local experts were consulted in the dredged material placement plan and destruction of wetlands in RBSSA; nor is anyone from UTMSI or Mission-Aransas NERR listed in Appendix P (Distribution list). These issues about wetlands destruction and lack of mitigation were brought up in original comments, and still seem to be unaddressed.	The EPA, USFWS, NMFS, and U.S. Coast Guard are Cooperating Agencies in the development of the EIS. In addition, USACE is in consultation with USFWS and NMFS pursuant to the Endangered Species Act and the Magnuson-Stephens Fisheries Act. The USFWS has been engaged in a review of the project since 2019 and there comments on the DEIS are included in this summary. Comments may also be submitted by any interested party such as those recommended by the commentor.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	30	**Public Interest Factor (b) fish and wildlife values:** No benefit. Claiming temporary and minor adverse impacts during dredging, but benthos recolonization is expected to occur after dredging operations cease. However, dredge and fill operations rarely cease and that is acknowledged in Section 9 stating they would continue to be disturbed during periodic maintenance dredging. It is unclear whether concerns brought up by TPWD and others during the earlier comment period have been adequately addressed.	Impacts to fish and wildlife associated with the Applicant's Proposed Action Alternative are addressed in Section 4.2 Ecological and Biological Resources, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter. CCSC is a federally authorized navigation channel that has been regularly dredged since 1874. Currently, USACE civil works program maintenance dredges at least a portion of the Federal channel annually. The CDP will also require maintenance dredging at similar intervals to the existing conditions.
233	31	**Public Interest Factor (c) water quality:** No Benefit. There will be ongoing increased turbidity, and salinity levels will increase – especially with the addition of desalination plants – two of which are being pursued by the Port. Desalination processes in ship channels, as proposed, will also require more energy for reverse osmosis to clean the turbid water. Waste discharge from ships and the potential for even bigger oil spills also impact water quality.	Impacts to water quality associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1.4. Impacts associated with desalination projects are addressed in Section 5.0 Cumulative Impacts. Based hydrodynamic and salinity modeling analysis, minor increases in salinity are anticipated because of Alternative 1 compared to the No-Action (Appendix I). Average salinity levels are anticipated to increase less than 1 ppt in the Corpus, Nueces, Redfish, and Aransas bays. Near the channel deepening, a salinity change of ±3 ppt can be expected.
233	32	**Public Interest Factor (d) historic properties:** No Benefit. Shipwrecks like the 1845 Steamship Dayton off the coast of IOB may be in danger, but it is unclear from limited info in the DEIS. The Texas Historical Commission keeps exact locations confidential.	Consultation with the Texas Historic Commission is ongoing. Discussion of ongoing consultation has been added to Section 4.3. Section 3.4.3 added which includes a summary of regulatory coordination, terrestrial and underwater field investigations, and regulatory determinations of effect. Detail of field surveys added to Section 4.3.2.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	33	**Public Interest Factor (e) recreation:** No Benefit. Increased VLCC traffic with potentially bigger wakes will impact boater safety and shorelines. Vessel traffic and congestion not considered. The ship simulation did not consider situations with other vessels, even though the load and unloading terminals will be directly adjacent to the Port Aransas Ferry and this channel is the sole means for pleasure and fishing crafts to access the Gulf of Mexico. Deepening of the channel will have a direct impact on access to the Gulf of Mexico by commercial and recreational fishing vessels and will increase wait times much longer than the 30 minutes estimated by the Ports. With 4 VLCCs in port at the same time, along with tugboats, and recreational boaters trying to also go in and out – often early in the morning before the sun comes up, just imagine the potential for catastrophe! Placing a deep water channel and crude oil terminal at access point to the Gulf, at the juncture of a ferry landing and right on the boundary of a special marine environment and national estuary reserve seems to be a very bad decision and taking risks to protected aquatic resource. Ocean dumping and DMPAs offshore from Mustang and San Jose Islands may attenuate desirable wave action for beachgoers (and sea turtles), thereby reducing desirability of Port Aransas for tourists. Ferry delays for tourists. Recreational fishing negatively impacted.	The comparative analysis of vessel wakes under Future Without Project and Future With Project channel scenarios captures both the change in magnitude of primary and secondary waves but also the change in frequency due to changes in vessel traffic as a result of the CDP. The analysis indicates that the CDP would have minimal impact when considering the additional impacts to the shorelines along the CCSC. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
233	34	**Public Interest Factor (f) shore erosion and accretion:** No Benefit. Increased large ship traffic of the CCSC and La Quinta Channels has already caused significant erosion at Ingleside on the Bay. It is expected to only get worse because of projected increased current speeds, storm surge, tropical storms, and relative sea level rise, with climate change exacerbated by continued use of fossil fuels, that approval of this project will promote.	Appendix H (Vessel Wake Analysis) showed the Applicant's Proposed Action Alternative would have minimal impact on the future evolution of natural shorelines along the CCSC. A general recession trend is observed in the analysis of historical shoreline positions and the annual shoreline change modeling, however no discernable increase in the recessional trend as a result of the project could be identified. In addition, both the vessel wake bed change and shoreline change modeling indicate that any change in vessel hydrodynamics due to the future project condition will not contribute to an increase in sedimentation within federal navigation channels.
233	35	**Public Interest Factor (g) considerations of property ownership:** No Benefit. Erosion of and beachfront property and damage to bulkheads has already occurred as a result of increased ship traffic facilitated by channel deepening.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	36	**Public Interest Factor (i) other Federal, state, or local requirements:** No Benefit. Ocean dumping and DMPAs B1-B9 and MI may not be in alignment with the 1995 City of Port Aransas Coastal Management Plan (https://cityofportaransas.org/wpcontent/uploads/2019/12/Coastal_Mgmt.pdf). It is unclear to what extent the City of Port A was consulted. Overriding issues of national importance do not appear to be applicable since current navigation is unhampered, and this oil EXPORT project does not serve energy needs for the U.S. No citations are given for how this project serves economic development or national needs at all.	Thank you for your comment.
233	37	**Public Interest Factor (j) floodplain values:** No Benefit. An essential part of this "channel to nowhere" is that it will connect to two oil terminals yet to be constructed on Harbor Island, which is located in a flood plain. Thus, not only does the project fail to avoid modification of floodplains, it directly supports floodplain development in contradiction to Executive Order 11988 – even though practicable alternatives exist. If the floodplain is developed, this removes another important protection for coastal communities and even puts them further in harm's way in the event of a storm that causes spills or explosions at the oil terminals or VLCCs harbored there.	The County Floodplain Administrator will make final determiation on floodplain impacts. USACE's review of the proposed CDP is compliant with EO 11988.
233	38	**Public Interest Factor (k) energy conservation and development:** No Benefit. Crude oil exports will increase consumption globally, further contributing to global warming.	Thank you for your comment.
233	39	**Public Interest Factor (l) navigation:** No Benefit. It is expected that, since this will be the only port in North America capable of handling fully-laden VLCCs, and the goal is to increase exports, navigation in the channel will only increase but with bigger, less maneuverable, ships. VLCCs will need to be accompanied by tugboats, which will also increase navigation hazards. This will increase hazards of navigation for recreational and commercial boaters.	The Port of Los Angeles can support fully laden VLCCs. A Ship Simulation Study was conducted for the CDP (Appendix L) which concluded the proposed project's channel configurations with the underlying environmental conditions would be acceptable to safely operate fully loaded VLCC originating from the Harbor Island terminal.
233	40	**Public Interest Factor (m) general environmental concerns:** No Benefit. Bigger ships means bigger accidents. Worsened air and water quality from increased ship traffic and ongoing dredging will impact habitat, fish, wildlife, and human environment.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	41	**Public Interest Factor (n) economics:** No Benefit except for private companies and the Port. In the absence of ANY economic information, it is possible that taxpayers will be expected to pay for all or part of this project without receiving any economic return.	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port ommission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, federal review of a navigation district's stated need for the project in the marketplace.
233	42	**Public Interest Factor (o) mitigation:** No Benefit. Communities will lose valuable diverse established wetlands and seagrasses, with no mitigation being offered.	Thank you for your comment.
233	43	**Public Interest Factor (p) aesthetics:** No Benefit. Port Aransas residents and tourists will have to put up with the sights, sounds, smells, and constant rumbling of dredgers. This was most unpleasant when we lived in IOB.	CCSC is a federally authorized navigation channel that has been regularly dredged since 1874. Currently, USACE civil works program maintenance dredges at least a portion of the Federal channel annually. The CDP will also require maintenance dredging at similar intervals to the existing conditions.
233	44	**Public Interest Factor (q) flood hazards:** No Benefit. Coastal communities will suffer from increased storm surge and flooding – potentially deadly.	Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with "planned future conditions" representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI's modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI's application of model parameters or inputs for the ADCIRC/SWAN models used in its study.
233	45	**Public Interest Factor (r) land use:** No Benefit. Flood insurance rates in coastal communities will likely increase even more than they already are based on sea level rise and subsidence.	The flood insurnace issues rasied are outside of the scope of analysis for the DA permit.
233	46	**Public Interest Factor (s) energy needs:** Foreign countries will have more access to dirty crude oil. Petroleum companies locating along the deepened channel are likely to have high energy requirements that further heat up the already hot atmosphere in Texas, further taxing the fragile Texas grid.	The global extraction, transportation, and consumption of crude oil is outside of the USACE's Scope of Anaylsis, as defined in 33 CFR 325 Appendix B, for the proposed CDP.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	47	**Public Interest Factor (t) safety:** An estimated 85 lightering events will be eliminated annually. Communities will be less safe because of direct and indirect effects of increased VLCC traffic to export crude oil - including risks of bigger spills and explosions; hazardous navigation; increased storm surge, tidal range, and flooding events; increased air emissions; loss of wetlands and flood plains; and impacts of global warming (rising see level, erosion, extreme weather events, power outages, etc.).	Thank you for your comment.
233	48	**Public Interest Factor (u) in general, needs and welfare of the people:** No Benefit. Quality of life in all Coastal Bend coastal communities is likely to suffer because of the ongoing dredging, the threats to coastal living from increased storm surge and tidal swings, the increased ship traffic, potential for larger spills and explosions, and the displacement of aquatic species and wildlife to places where their habitat is not so disturbed. In the event of a natural disaster or hazardous event, everyone's welfare will be jeopardized.	Several studies were conducted for the DEIS including Sediment Transport Modeling (Appendix G), Vessel Wake Analysis (Appendix H), Hydrodynamic and Salinity Modeling (Appendix I), Ship Simulation (Appendix L), Propeler Scour (Appendix M), and Underkeel Clearance (Apendix N) to assess the impacts of the Applicants Proposed Action Alternative. USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
233	49	There is no economic (or other) justification for this project. There is no cost information. There is no information about who plans to pay for it. The 2003 EIS contained a lot of information on justification and costs. Since the PCCA is a public navigation district, 33 Code of Federal Regulations (CFR) 320.4(q) referenced on p. 1-10 does not seem to apply: "…when private enterprise makes application for a permit, it will generally be assumed that appropriate economic evaluations have been completed, the proposal is economically viable, and is needed in the market place…Therefore, for the purpose of the permitting process, the economic need, as stated by the overall project purpose, is considered to be met."	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, federal review of a navigation district's stated need for the project in the marketplace.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	50	The Port's shift in the Application from imports (justified in 2003) to exports favors private interests over public interest. "As a result of PCCA's past investments in marine infrastructure and available capacity, PCCA has been capable of accommodating the recent historical shift in oil traffic from import to export; trend to continue "as long as the Port's infrastructure allows it" (Appendix A, p.29). Port infrastructure, paid for by taxpayers and labeled by the Port as "common and public", has not made available for open use. Instead, the Port either sells or leases the infrastructure to specific private companies, with no revenues coming back to local communities. Harbor Island terminals will be private lease agreements as well.	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, federal review of a navigation district's stated need for the project in the marketplace.
233	51	Channel Infrastructure not open, public, or common: Channel deepening from 54' to 75'+ may prop up private fossil fuel industry in the short-term, but it will certainly cause long-term (even permanent) and potentially devastating impacts on local coastal communities and the Corpus Christi Bay system (estuary of national significance) - under the absurd justifications that "beneficial use" of dredge is needed to save the bay system from climate change and that increasing oil exports is good for the U.S. and the world.	Thank you for your comment.
233	52	**Small impact:** There were only 130 lightering events in 2019, with this project expected at best to reduce this by half. How can the Port claim this will reduce air emissions, when they admit they're going to be increasing oil export ship traffic?	The Port did not perform the analysis of lightering evvent and emissions reduction. The USACE did. The Harbor Island terminals are separate facilities applying for separate permits and would be built with or without the proposed channel deepening project (CDP). Therefore, those terminal and vessel transit emissions would exist without the CDP. The reason the CDP would reduce air emissions is because it will allow VLCCs to fully load onshore vs having to fully load offshore which will do 2 key things: 1) eliminate the lightering vessel emissions from oil-shuttling ships sent out 15 or more miles into the Gulf to top off the VLCCs, and 2) swap offshore loading emplying much less vapor controls for onshore loading with 95% or greater recovery/destruction control for the loading to top off the VLCC. These impacts and comparison of emissions under the No Action and the Applicant-proposed Alternative 1 are described in Section 4.1.9.1 and 4.1.9.2.3, respectively, and Tables 4-14 and 4-15. A reference to Tables 4-14 and 4-15 has been added to 4.1.9.1 to better guide the reader to No Action results.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	53	Illegitimate Purpose. The “overall project purpose” focuses on decreasing costs & increasing safety for private companies and their employees, while ignoring increased size of catastrophes involving VLCCs closer to local communities and the environment, when spills, accidents, explosions, collisions, storms, and terrorist activity occurs inside the once-protected bay system.	Thank you for your comment.
233	54	LEDPA is anything BUT the proposed project (e.g., no action & offshore). Other alternatives, even for the proposed illegitimate purpose, were not considered, including other locations where residences and estuaries aren't as much at risk. If increasing oil exports by private companies thru fully-laden VLCCs coming into shore is truly a high national priority (which we doubt), then shouldn't that occur away from thriving estuaries of national significance and popular tourist destinations?	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the Final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE’s final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
233	55	Consequences for communities: Channelization worsens "sediment starvation" and erosion, increases storm surge and tidal range, increases salinity levels (without accounting for Harbor Island and other desal projects), increases hazards, will impact air quality, increase noise, smells, & visual esthetics thru dredgers.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
233	56	Ingleside on the Bay (IOB) was omitted in DEIS: IOB suffered worse storm surge in a century in Hurricane Celia 1971. Yet it is not singled out for discussion in the Section 3.0 of the DEIS. Mayor Ehmann has already been on the News about safety issues in canal from increasing ship traffic in Corpus Christi & La Quinta Ship Channels.	Ingleside on the Bay was included in the study area for the project. The study area encompasses an area that provides spatial boundaries for resources that could be indirectly impacted by the proposed CDP (Figure 3-1). The study area is defined to facilitate discussion of existing conditions in a general context as well as discussion of indirect and cumulative impacts. For some resources (e.g., air quality, noise, socioeconomics) the study area may be defined differently.
233	57	Worsens climate change impacts: Claims of "beneficial use" of dredged materials to combat climate change as main benefit doesn’t make sense, when its continued use of fossil fuels (the reason for deepening the channel) that is causing climate change.	Section 4.0 (Environmental Consequences) does not state that the main benefit of beneficial use of dredged material is to combat climate change.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	58	Focus on 14 "resources" (p. 5-2) is too limiting. PCCA says "cumulative impacts were discussed in further detail if the potential indirect and direct effects would have more than insubstantial temporary adverse or positive impacts to the resource. In addition, the health of the resource was taken into consideration." Per EPA guidance (1999): "While impacts can be differentiated by direct, indirect, and cumulative, the concept of cumulative impacts takes into account all disturbances since cumulative impacts result in the compounding of the effects of all actions over time. Thus, the cumulative impacts of an action can be viewed as the total effects on a resource, ecosystem, or human community of that action and all other activities affecting that resource no matter what entity (federal, non-federal, or private) is taking the actions." 42 projects didn't cover everything anticipated or going on currently. The Harbor Island desal plant is directly relevant and barely covered. No thoughtful consideration given to ecosystem or human community-level cumulative impacts over time.	Text regarding "more than insubstantial" effects has been removed. The 42 past, present, and reasonably foreseeable actions represent a good faith effort to identify projects that are known to or are part of plans by Federal and State agencies, or local governments; private organization's actions are included if they are documented in a plan or permit request, or economic trends indicate the project would be likely to occur. Harbor Island desal project description has been revised to reflect the latest project information. Potential cumulative impacts are described in Section 5.4 and 5.5.
233	59	Incorrect that no Mitigation is required due to PCCA portrayal that "beneficial use" of dredged placement outweighs impacts. PCCA provides 4 different excuses for not having to mitigate for destroying 200 acres of wetlands and 6 acres of seagrass: would erode anyway, restores to pre-Harvey conditions, was a DMPA originally, and was created by storm surge washout. The reason why there's a wetlands is immaterial. Mitigation is required when wetlands are destroyed - like for like type, in same area. To do otherwise is environmental destruction of Redfish Bay. It's hard to get a clear picture of acres impacted, when fuzzy math is used and verbiage changes throughout. There is no mention at all of breakwaters instead of flimsy spoil islands that are easily washed away to protect Redfish Bay or anyplace else alongside the ever deeper channel.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
233	60	Sections 7-9: Less than 1 page, not properly answered.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	61	LEDPA not identified.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the Final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
233	62	Believes that in the purpose the Port trying to play match maker between an over-abundance of undesirable cargo (dirty crude oil) and an unwieldy overbuilt carrier (VLCCs built too big for most ports) at the expense of the Coastal Bend. Commenter provides a bulleted list of the reasons for this statement (see comment letter).	Thank you for your comment.
233	63	"Partially loaded outbound VLCCs at Ingleside could top off at Harbor Island thereby reducing or eliminating reverse lightering." The Ingleside export terminals are owned by different companies and thus the product pipeline would be carrying product owned by different supplier. This is a big reach that they would partially fill up at one Company with one owner's product and top off at another company's terminal with a product owned by someone else. The Port is reaching for rationalization.	There are a wide range of possibile combinations off onshore and offshore that can be used to reach their objective. USACE describes the most likely operations, but understands that the economics may temproarily or permanently change the operations at any time and the DEIS does not speculate or document the entire range of possibilities.
233	64	Saint Joe Island is owned by the Bass family (petroleum dynasty) Should beneficial use of a federal project be used to benefit a private person or private company?	Thank you for your comment.
233	65	Most of the dredge will be dumped offshore in the Gulf, is not considered beneficial use, and is actually shown to have a detrimental impact on surrounding aquatic area. It should be investigated as to why the Port was given access to federal ocean dumping sites in the first place?	The use of the ODMDS is considered disposal and not beneficial use. The EPA's designation of the ODMDS allows any user authorized under Section 103 to use the site.
233	66	Any "real" beneficial use dredge material could be easily be provided by maintenance dredging of the newly dredged channel to 54' (CCSCIP) and the maintenance dredging of La Quinta Channel.	Thank you for your comment. The No-Action Alternative in the EIS considered the maintenance dredging that would take place with the –54 foot project.
233	67	While Cove Park (located at the entrance to IOB) is discussed at length, IOB is not discussed AT ALL - and it's located adjacent to La Quinta Channel, within feet of CCSC. No mention of Brass Turtle Lodge & boat ramp, Ingleside Beach Club & fishing pier, or Bahia Marina and boat ramp, or entire city of IOB.	Thank you for you comment. Section 3.5 has been revised to include Ingelside on the Bay, Brass Turtle Lodge and boat ramp, Ingleside Beach Club and fishing pier adn Bahia Marina. In addition, the discussion of impacts in Section 4 have been revised to include impacts that are relevant to IOB and the other locations mentioned in the comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	68	The Port brags that "Vessels using the channel system transport a wide variety of cargo. This includes crude oil and petrochemical products such as gasoline, liquefied natural gas, solvents, and ethylene." This doesn't sound like a "wide variety of cargo" to me! Perhaps diversification to something other than petroleum-related products would be another good alternative.	Thank you for your comment.
233	69	Major expansions of the major midstream industries [located on Live Oak Peninsula adjacent to IOB] is expected to increase vessel calls of the current tanker fleet used in the existing channel. Is all this big ship traffic, going to be able to be handled safely with just a single point of entry/exit to the Gulf of Mexico? Based on the simulation results, it doesn't bode well.	Operational limits and controls are typically imposed by ACC Pilots, USCG, and Harbor Master based on tug and ship capabilities ane environmental conditions.
233	70	What assurances are there that there won't be another near-collision with ferry traffic?	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	71	Section 4.1.3.1, first paragraph. This is lunacy, the stated purpose of the project creates climate change, but they state the effects of climate change are world wide and span over 50 years, so even though this project will DIRECTLY contribute to climate change, the impact on the Texas coast will happen regardless of the project alternatives, which one is to not build the project at all.	The global extraction, transportation, and consumption of crude oil is outside of the USACE's Scope of Anaylsis, as defined in 33 CFR 325 Appendix B, for the proposed CDP.
233	72	Section 4.1.1.1.2, page 4-3 and 4-4. “With proposed project, hurricane events could result in sedimentation volumes several times higher than the average annual sedimentation” (Baird, 2022a). This sounds bad - even worse sedimentation post-hurricane under proposed project.	According to Appendix G (Sediment Transport Modeling), individual hurricane events could result in sedimentation volumes in the outer channel that are several times higher than the average annual sedimentation. In contrast, the impact of hurricanes on the inner channel sedimentation is small.
233	73	Only the proposed Project "could result in localized shoreline change" (erosion, sea level rise, and subsidence). This sounds bad.	While regional rates of Gulf shoreline erosion would not change due to the alternatives, the Applicant’s Proposed Action Alternative could result in localized shoreline change. Severe weather events, such as coastal storms and hurricanes, can have potential impacts on shorelines, but these impacts would occur regardless of project alternative. None of the alternatives, including the No-Action Alternative, have an impact on other factors impacting shoreline change, including sea level rise and subsidence. Sediment transport modeling conducted for this project is included as Appendix G.
233	74	“[B]each nourishment would widen the shoreline and advance the beach seaward, causing the nourished beach to extend further into the active transport zone.” Even the beneficial use for beach nourishment sounds like it will be bad for the navigational purpose of the project, and therefore likely abandoned for safety reasons! So once again, how is the public going to benefit at all from this project?	The fate of sediment associated with beach nourishment was modeled and found to not significantly impact channel sedimentation.
233	75	There will be an increase in current speed in the CCSC from Port Aransas to Ingleside where the water depth remains unchanged. How will this combine with increased storm surge and tidal range? What are the impacts on Ingleside on the Bay – and cities further up, like Gregory, North Beach, Flour Bluff?	While the modeling of the CDP does indicate the greatest increase of tidal amplitudes (about 17%) in the Corpus Christi Channel near Humble Basin, the overall impact of the CDP on water level is insignificant. It is unlikely to increase the flood risk associated with changes in high tide or navigation risk associated with the changes in low tide and mean sea level in the Corpus Christi Bay. These results are addressed in Section 4.1.2.1.2 and Appendix I.
233	76	Deepening of navigation channels can alter circulation patterns and increase saltwater intrusion by allowing deeper, more saline water to move further into the estuary (USACE, 1987). Localized changes in salinity of less than ±3 ppt in the proposed dredge area and connected navigation channels may occur (Baird, 2022c). Yet, there is no discussion about additional salinity increases from desalination plants.	The potential for cumulative impacts due to desalination projects is discussed in Section 5.4.2.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	77	IPCC (2021) Impacts related to climate change are limited to increased carbon dioxide emissions due to an increase in the number of vessels and reverse lightering operations with all alternatives. What about increased loading activities by the expanding and additional oil terminals? And who knows what other companies will also be coming in and their impacts on climate change (e.g. energy use)?	Potential cumulative effects with other projects, including air impacts, are described in Section 5.4.5.
233	78	The list of 42 projects doesn't include any of the Port's MOUs for blue & green hydrogen, carbon capture and storage. It also doesn't include Enbridge's plans for $3 billion blue hydrogen facility next to IOB. Taft multi-use terminal "not considered connected action", but that's where 2 30" pipelines come from to supply Bluewater (offshore terminal). Ingleside Ethylene runs a 114.9 mile long, 8-inch diameter ethylene pipeline within a 75-foot-wide work corridor from their ethane cracker facility from Ingleside to Clemville (Matagorda Co), crossing 14 navigable waters & 85 wetlands. There are many other crisscrossing terrestrial pipelines from Taft to offshore. More terrestrial pipelines along coast are not mentioned as cumulative impacts with regard to safety. There's no cumulative look at risk, air and water quality degradation, loss of property value, and lack of job creation with pipelines.	The EIS has been revised with the latest reasonably foreseeable projects within the Study Area including PCCA's carbon capture and blue hydrogen projects. The two 30-inch pipelines, and the 114.9 mile-long pipeline are both mentioned in the respective project descriptions in Section 5.3.
233	79	With regard to dredging activities, there is no cumulative look at noise, aesthetics, air & water quality degradation, loss of property value, not job creators, impact on seagrass and misplacement of wildlife, killing sea turtles.	Cumulative effects that could result from dredging actions are described in Section 5.4

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	80	Provides a table showing the Port's calculations of no mitigation for wetlands destruction. They will destroy 197.83 acres of wetlands, but after discounting value of some wetlands using fuzzy math, they determine no mitigation is necessary. Is that really how mitigation works? Claim “beneficial use” and all is forgiven? I don’t think that aligns with wetlands policies. This plan goes totally against why Port/USACE got to do any previous dredging - the idea that DMPAs would be for BU. How can we believe that any of the new DMPAs proposed in this EIS will ever be useful for wildlife? Plus, we've seen it with our eyes. These will be used in perpetuity for dredge material, create eyesores, and sources of noise & construction - disrupting wildlife and communities like IOB.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
233	81	Section 7.0 Unavoidable Environmental Impacts. “While there are unavoidable impacts to EFH, they may be compensated for through the protection and creation of marshes and SAV via placement actions targeting BU, increasing the amount of nursery areas, protective habitat, and food sources within Corpus Christi Bay.” These are overly rosy projections of BU. EFH loss should always be compensated.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
233	82	Section 7.0 Unavoidable Environmental Impacts. “Inshore PAs would convert deep open water areas to protect adjacent shallow bathymetry that support or can establish tidal wetlands and SAV or would restore eroding shorelines that would protect larger extents of SAV.” Where is the evidence that inshore PAs (spearheaded by the Port) have worked elsewhere in the Coastal Bend?	BU for shoreline stabilization is a common practice nationwide.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	83	Section 7.0 Unavoidable Environmental Impacts. "Dredging may cause injury or mortality to sea turtle species, but any expected mortality should not be significant enough to affect long-term populations." Some of these sea turtles are endangered! How is this okay? What precautions are going to be taken in terms of warnings, times, seasons, etc.? Who will you be working on this? Has the Port reached out to UTMSI or Mission Aransas? I do not see them on distribution.	USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3). EFH consultation (EFH Assessment, Appendix E) with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
233	84	Section 7.0 Unavoidable Environmental Impacts. "Permit would ensure all cultural resource issues are addressed to meet regulatory requirements prior to construction of the proposed project." When will the public get to review this?	The terrestrial and marine cultural resource reports will be finalized and results incorporated into the Final EIS. Consultation is ongoing with the Texas Historical Commission. The marine and terrestrial archaeological reports were provided on June 6, 2023. Section 3.4.3 added information which includes a summary of regulatory coordination, terrestrial and underwater field investigations, and regulatory determinations of effect. Detail of the field surveys was added to Section 4.3.2.
233	85	Section 7.0 Unavoidable Environmental Impacts. "Dredging would result in temporary and minor noise and light level increases but will be compatible with other industrial activities in the project area." I do not believe the beaches at Port Aransas already have a lot of "industrial activities". Speaking from my experience at IOB, the dredging can last for months, with sights, smells, sounds, and a constant rumbling. I used to step outside in the middle of the night to look for a ship passing by. It wasn't until I started researching this turns out it was dredgers coming up the CSCC for Segment 2 causing the rumbling. Are citizens and tourists really going to be okay with this? This is likely to impact people's livelihoods.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	86	Section 8.0 Irreversible Commitments of Resources. "Irreversible commitments of resources are those resulting from impacts to resources so they cannot be completely restored to their original condition. Includes labor, capital, and material resources expended in the planning and construction of this project." I don't think this was what was meant. Wrong definition & wrong example. This refers to environmental resources.	Thank you for your comment. NEPA requires that an environmental analysis include identification of "any irreversible and irretrievable commitments of resources which would be involved in the Proposed Action should it be implemented" (40 CFR 1502.16). Irreversible and irretrievable resource commitments are related to the use of nonrenewable resources and the effects that this use could have on future generations. Irreversible effects result primarily from the use or destruction of a specific resource (e.g., energy and minerals) that cannot be replaced within a reasonable time frame. Irretrievable resource commitments involve the loss in value of an affected resource as a result of the action that cannot be restored (e.g., extinction of a Threatened or Endangered species or the disturbance of a cultural resource).
233	87	Section 8.0 Irreversible Commitments of Resources. "However, some proposed placement actions are intended as BU and would improve some tidal resources in the project area." Again, just label it as BU and unavoidable and irreversible impacts are forgiven?	Thank you for your comment.
233	88	Section 8.0 Irreversible Commitments of Resources. "Deepwater bay bottom would be irretrievably lost from channel deepening and bend easing." But won't benthic organisms recolonize there?	Yes, that is correct.
233	89	Section 8.0 Irreversible Commitments of Resources. "Energy resources used by the dredge equipment would be committed during dredging operation." I don't believe that is what is meant by resources.	Thank you for your comment.
233	90	Section 9.0 Short-Term Human vs. Long-Term Productivity This section did not address the "relationship between local short-term uses of man's environment and maintenance & enhancement of long-term productivity".	Thank you for your comment.
233	91	Section 10.0 Environmentally Preferred Alternative. LEDPA (least environmentally damaging project alternative) was not identified. The Port focused instead on how only channel deepening enables a fully loaded VLCC at Harbor Island, while also yielding 46.3 mcy of dredged material for inshore and offshore beneficial use.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the Final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	92	Section 10.0 Environmentally Preferred Alternative. “As these exports increase, the number of lightering vessels and product carriers will also increase, adding to shipping delays and congestion inside and outside of the Port. These delays and congestion will increase the cost of transportation, which in turn will increase the cost of crude oil with the ultimate consequence of making U.S. crude less competitive in the global market.” This sounds like a business problem that can be handled through better scheduling and slowing things down. The fact is, there is still only going to be one point of entry/exit for ships of all size and purposes – making Harbor Island a rather busy and dangerous location. Since channel deepening to increase oil exports does NOT economically benefit the public, and does cause substantial harm to the environment, channel deepening is the least “environmentally preferred alternative”.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE’s final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
233	93	Archaeological survey data (missing information). "It does not include findings and recommendations related to the presence/absence and present condition of archaeological cultural resources that could be affected by the Applicant’s Proposed Action Alternative. The discussion relied on available background information to interpret project-related effects to archaeological resources. This section will be updated once field data is available for review."	A marine archeological survey is being conducted for the CDP. That report was not available for incorporation onto the DEIS and therefore the DEIS relied on relied on available background information to interpret project-related effects to archaeological resources. The Final EIS will be updated with the results of that report and the text will be revised accordingly. Coordination is ongoing with the Texas Historical Commission. The marine archaeological report was provided on June 6, 2023. Section 3.4.3 added information which includes a summary of regulatory coordination, terrestrial and underwater field investigations, and regulatory determinations of effect. Detail of the field surveys was added to Section 4.3.2.
233	94	Cost-benefit analysis or economic evaluation (missing information). “In accordance with 33 Code of Federal Regulations (CFR) 320.4(q), “…when private enterprise makes application for a permit, it will generally be assumed that appropriate economic evaluations have been completed, the proposal is economically viable, and is needed in the market place…” Therefore, for the purpose of the permitting process, the economic need, as stated by the overall project purpose, is considered to be met.”	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, federal review of a navigation district’s stated need for the project in the marketplace.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	95	National Historic Preservation Act Section 106 Review (missing information). Extended to October 18, 2022.	Coordination is ongoing with the Texas Historical Commission.
233	96	Fish and Wildlife Conservation Act (FWCA) planning document (missing information). Due to staffing changes/limitations, FWS will not complete a separate FWCA planning document for the project. This action was cancelled.	Thank you for your comment.
233	97	The project violates: Section 9 and Section 10 of the Rivers and Harbors Act of 1899. The purpose of the Corpus Christi Ship Channel Improvement Project (CCSCIP) currently underway, as well as the proposed Corpus Christi Ship Channel Deepening Project (CDP), is to increase oil exports for private corporate profit. This deviates from plans from the CCSCIP's authorized socioeconomic purpose to increase oil imports to maximize national economic development and energy independence.	Thank you for your comment.
233	98	The project violates: Clean Water Act Section 404(b)(1) guidelines. Dredged material will have unacceptable adverse impacts both individually and in combination with known and/or probable impacts of other activities affecting the Coastal Bend Bays and Estuary system, which is one of 28 EPA designated estuaries of national significance (National Estuary Program). Increased salinity levels from dredging alone threaten aquatic species, but in combination with one or more desalination plants proposed (and nearing approval) by the applicant (Port of Corpus Christi) on Harbor Island and La Quinta Channel, the increased salinity levels will likely have a devastating impact. The filling in of nearly 200 acres of wetlands in the Redfish Bay State Scientific Area (including on a site previously created for beneficial use), represents an irreversible loss of valuable aquatic resources and offers evidence that new sites in the same rich estuarine location will not be of "beneficial use" as designed, according to the applicant. Berms are subject to washouts from frequent tropical storms and increased ship wake activity from the project, resulting in siltation over seagrasses and aquatic habitat.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
233	99	The project violates: Marine Protection Research & Sanctuaries Act of 1972, Section 102. The placement of dredged material in the New Work ODMDS will unreasonably degrade amenities and economic potentialities. Placement of huge quantities of dredged material just off the beaches will attenuate wave action desired by in the beach tourism industry, which form the economic base of Port Aransas. Dredged material will mix with sand on the beaches on Mustang and San Jose Islands, making the beaches less attractive to tourists, which includes, among many other activities, a renowned sand sculpture event.	EPA is responsible for establishing criteria for reviewing and evaluating permit applications. In the case of dredged material, the USACE is responsible for issuing ocean dumping permits, using EPA's environmental criteria. Permits for ocean dumping of dredged material are subject to EPA review and written concurrence. Beach noutrishment activities, if authorized, must comply with local and state requirments to comply with the DA permit.
233	100	The project violates: 33 CFR Part 320.4 Public Interest Review. This project is contrary to the public interest.	Thank you for your comment.
233	101	The project violates: 33 CFR Part 332 Mitigation. The Port of Corpus Christi offers no compensatory mitigation AT ALL in this project, despite the planned destruction of nearly 200 acres of wetlands in Redfish Bay State Scientific Area. With no known oversight, the Port itself serves as a mitigation bank, having industries that destroy wetlands and seagrasses in one place lease submerged land from the Port for the supposed reestablishment of aquatic resources. Appropriate mitigation should be required for this project, with federal oversight.	Thank you for your comment.
233	102	Recommend that the permit be denied as contrary to the public interest.	Thank you for your comment.
233	103	Request there be more time for the public to review and submit comments and that additional public meetings be held in the affected communities of Port Aransas and Aransas Pass, with the ability for individuals to participate remotely.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
234	1	Flood Plain Management EO11988. The property on Harbor Island is currently mapped Zone AE and VE. While the VLCC terminals that should be part of this permit are not included, the VLCC traffic to the terminals is modelled and preliminary project plans show these terminals to be constructed in the flood plain. It is clear that this project is going to directly induce growth in the floodplain as these terminals, if located on harbor island will be in the flood plain. Yet the DEIS states that the "The CDP is not expected to significantly affect floodplains." How can this be true?	The propsoed terminals at Harbor Island are not in the scope of this EIS. The impacts to floodplains resulting from the proposed projects will be evaluated in their individual DA permit applications.
234	2	Even with only two storms modelled, there will be a direct impact to the flood prone regions in the coastal bend by the deepening of the CCSC. On top of the storm surge, tidal variations in Port Aransas are projected to be up to 15% greater and 9% greater in Corpus Christi Bay. I have attached the FEMA flood maps for the area closest to the dredge. Most, if not all, of the shoreline and immediate inland areas are mapped as Zone AE and VE. I do not see how it can be claimed that the CDP will not significantly affect floodplains when the minimal storm surge modelling that was conducted shows a possibility of 12 inches additional storm surge in areas mapped VE and AE in Port Aransas. This 12-inches would be in addition to the 15% tidal increase.	Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with "planned future conditions" representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI's modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI's application of model parameters or inputs for the ADCIRC/SWAN models used in its study.
234	3	The USACE should run storm surge analyses for storms that make landfall to the North, South as well as a direct hit to the proposed channel with many variations in speed, intensity, pressure, and wind field. Foremost, the EIS needs to be revised to address this additional threat of flooding and property damage to the communities of Port Aransas, Aransas Pass, Ingleside, Ingleside on the Bay, Portland, and Corpus Christi.	The model scenarios identified by HRI represented moderately severe storm surge return periods as documented in the review report (HRI Storm Surge Modeling Review Memo, October 2021).
235	1	Concerned about a potential spill at the intersection and gateway to 3 major bay systems.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
235	2	Do not believe the depth is sustainable without continuous dredging.	Thank you for your comment. Maintenance dredging is expected.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
235	3	Concerned about the disastrous effect on local seagrass beds that many species of fish and invertebrates use for nurseries. The regular dredging would cloud waters going into these grass beds and reduce light necessary for photosynthesis.	Impacts associated with the Applicant's Proposed Action Alternative to estuarine fisheries and wetlands/SAV are described in detail Sections 4.2.1.2, 4.2.2.2.2, and Appendix E in the DEIS. EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
235	4	Concerned about the impacts to tourism and the local commercial fishing industry.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). Consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
235	5	The location of the associated turning basin for ships right next to the Ferry landing will disrupt the flow of tourists on and off the island. Could have a big impact on not only tourism in Port Aransas, but Aransas Pass, Ingleside, and Rockport as well.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
235	6	Concerned that dredge material dumped offshore will impact and change the composition of the local beaches which again would impact a big reason why most of our tourist come (the beach and fishing).	The evolution of the ODMDS Mound has been discussed in Section 6.2.3 of the Sediment Transport Modeling Report (Appendix G). The model did not indicate any significant movement of the dredge spoil mound towards the beaches.
235	7	The dredged material could resuspend buried toxins. Has core sampling down to 80ft been done in the proposed dredge site for composition, holding capacity, and toxicology?	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
235	7	The dredged material could resuspend buried toxins. Has core sampling down to 80ft been done in the proposed dredge site for composition, holding capacity, and toxicology?	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.
235	8	A platform in the Gulf offshore where ships and load and offload seems to make so much more sense.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
236	1	Asking for a receipt acknowledging the USACE received the previous email.	N/A
237	1	Concerned about neighbors on Bayshore Drive will continue to suffer the consequences of larger ships passing their properties.	The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) assessed the additional impact of the CDP by comparing Future Without Project and Future With Project channel scenarios. The analysis indicates that the CDP would have minimal additional impacts to the shorelines along the CCSC. The CDP will not increase vessel sizes, but increase the frequency of larger vessels by around 5%.
237	2	Request more public meetings in Port Aransas and Aransas Pass.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
238	1	Requesting extensions on all applications concerning Harbor Island in the city limits of Port Aransas.	These actions are being analyzed under separate aplication and are not part of the CDP.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
238	2	Request all meetings on this be held in person in either Port Aransas or Aransas Pass.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
238	3	Need extensions this, SWG-2019-00067; along with, Port of Corpus Christi application SWG-2019-00245 for ship berths on Harbor Island; and Axis Midstream's application SWG-0018-00789 for more ship berths and pipeline across Redfish Bay.	An extension for time to comment on the CDP DEIS was granted. The otheractions are being analyzed under separate applications and are not part of the CDP.
238	4	Support an offshore monobuoy known as SPM (single point mooring).	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
238	5	Concerned about the impacts to the fishery because Harbor Island is at the critical juncture of three channels "Ecological Hotspot".	Impacts to estuarine organisms associated with the Applicant's Proposed Action Alternative are addressed in Sections 4.2.2.2.2, 4.2.5.3.2, and Appendix E. EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
238	6	Concerned about the economy without a healthy fishery the town will die, area is based on tourism, lots of folks come for fishing tournaments.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term adverse impacts to recreational activities (e.g. boating, fishing, beach visitation) including those impacts likely to occur in Port Aransas and Mustang Island from the construction of the project, including impacts to small businesses. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). Consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
238	7	Concerned about the impact the project will have on the ferry operation. If the ferry system is shut down while VLCCs are turning this will be impossible to evacuate, accommodate emergency vehicles if there is an emergency.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
239	1	This EIS for a CDP is part of a three-prong project that must be evaluated as one action. Those three are this project (the deepening of the channel to -75'), the POCC dock/terminal facility at Harbor Island and the Axis Midstream dock/pipeline. The two dock/terminal projects are intended to have berths for VLCC size ships and a supply of oil from the mainland to fill them. They are listed in Table 5-1, Past, Present, and Reasonably Foreseeable Projects as numbers 41 and 38, respectively. At the top of page 2-5 the applicant states "The No-Action Alternative assumes that the Harbor Island and Axis Midstream marine terminal projects have been constructed." These projects absolutely have not BEEN CONSTRUCTED!! A few lines above, on page 2-4, the applicant states "Projects currently under way include building and operating a crude oil export terminal on land owned by the PCCA on Harbor Island and constructing facilities and pipelines for marine transport vessels by Axis Midstream (Port, 2019a; USACE, 2018, 2020)". There is no "building and operating" underway. *See comment letter. Commenter provides reasoning as to why the three project must be evaluated as one throughout the comment letter.*	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
239	2	In the Cumulative Impacts (5.3.2.9 pg 5-11) they state "PCCA is proposing to construct a terminal facility with vessel berths on Harbor Island that would accommodate up to two VLCCs deep-draft water borne vessels for the transportation of crude oil. Work in WOTUS would include: dredging two deep draft vessel berths at a slope of 3:1 to the CCSC authorized depth of –54 feet MLLW…". Here they accurately state that the POCC is actually proposing the project, not the totally unfactual statements about "built" or "under construction". At the end of the quote above, it can be seen that they even state, correctly for once, that the project is being proposed for only -54'. Even if it were permitted it would not be capable of filling a VLCC, as they misstate so consistently in this EIS.	VLCC's are currently being filled at the present channel depth of –48 foot and can do so at –54 foot depth, however, they cannot be completely filled to maintain operable draft.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
239	3	On page 4.1, at the beginning of section 4.0 they state "The No-Action Alternative condition considers those projects that have been completed (existing), are under construction, or have been authorized for construction. For the CDP, the No-Action Alternative includes the deepening and widening of the –54 foot CCSCIP from the Gulf to the Inner Harbor, building and operating a crude oil export terminal on land owned by the PCCA on Harbor Island, and constructing facilities and pipelines for marine transport vessels by Axis Midstream". This allows them to assume the construction and operation of these two absolutely essential components of the oil export project will have no impact relative to Alternative 1. That is patently deceptive and cannot be allowed. They must be required to at least assume those are future actions that have Cumulative impacts. In reality, the three actions are all one project and should be permitted together.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
239	4	As further obfuscation of the situation, the Applicant states on page 2-2 under the description of Alternate 1 "Under this alternative, only berths at Harbor Island would be capable of fully loading VLCCs. Partially loaded outbound VLCCs at Ingleside could top off at Harbor Island thereby reducing or eliminating reverse lightering." Not only is the dock/terminal project not built or under construction, but the existing permit application is only proposing a -54' berth. What the application for the CDP says about the utility of Alternative 1 is simply not feasible – it is simply false. How can the applicant give patently false information in the EIS and expect it to be approved?? These two projects are the subject of separate permits, permits that are at least 3-4 years old and may, or may not, even be under active evaluation. They certainly are not permitted and certainly not underway.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
239	5	In section 5.4.7 of the Cumulative Impacts assessment, the applicant states "Past, present, and reasonably foreseeable actions with dredging or construction activities, and resultant turbidity, can potentially impact nearby wetlands and SAV. Pipeline installation can also have direct impacts to wetlands and SAV; however, HDD can avoid and minimize potential impacts." However, in their detailed description of each potential project that might produce cumulative effects, in section 5.3.3.2, describing the Axis Midstream project they say "The installation of the proposed Midway to Aransas pipeline bundle would result in 13.94 acres of temporary trench and fill impacts in WOTUS, including wetlands." What happened to the HDD solution the PCCA says can avoid potential impacts and why did section 5.4.7 not assess the cumulative trench and fill impacts?	Section 5.4.7 indicates that cumulative effects to wetlands and SAV could result, particularly if there are direct impacts (such as those created by trench and fill methods), or if temporary impacts overlap with another project's temporary or permanent impacts. Text has been revised for increased clarity.
239	6	Throughout the text of the ESI there is extensive deceptive language which suggests that the proposed action would have a certain impact and the no-action alternative would have another impact. It is very important to recognize that the proposed project will extend into the bay system only to the Harbor Island area, terminating essentially in vicinity of the TEXDOT Ferry landings at Port Aransas, a distance of about 2 miles from the end of the jetties. The CCSC extends all the way into the Inner Harbor in the city of Corpus Christi, another 20 miles away. The applicant continuously refers to the CCSC as the project area or the impacted area. The applicant then implies that the CDP alternative would have certain effects that would negate of change the no-action alternative impacts. The reality is that the no-action scenario will continue for the 20 mile stretch from the ferry landing to the inner harbor regardless of whether the CDP is permitted or not.	The No-Action Alternative condition considers those projects that have been completed (existing), are under construction, or have been authorized for construction. For the CDP, the No-Action Alternative includes the deepening and widening of the –54 foot CCSCIP from the Gulf to the Inner Harbor, building and operating a crude oil export terminal on land owned by the PCCA on Harbor Island, and constructing facilities and pipelines for marine transport vessels by Axis Midstream. The project area provides spatial boundaries for evaluation of resources that may be more-directly impacted by the construction and operation of the proposed project, and is therefore a smaller area, more immediate to the proposed project features. Specifically, for purposes of analysis in this EIS, the project is defined as the footprint of the construction area within the channel plus a 1-mile buffer area and the beneficial use sites (Figure 3-2)

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
239	7	Page 5-41 "Beneficial use placement actions could potentially benefit Federally listed species such as Piping Plovers and Red Knots by nourishing or restoring habitats. Designated Piping Plover Critical Habitat can be found throughout the project area on Mustang Island, San José Island, Port Aransas, and along Corpus Christi Bay. Placement actions could potentially increase shoreline habitat within designated Critical Habitat on San José and Mustang Island. Whooping Crane habitat may benefit from placement actions targeting BU as well." This is just word salad, no description of how this benefit would occur, or how such potential benefit was determined. They might as well just say "the action could benefit these species, it might not benefit them, it might harm them – who knows!!" The applicant should not be allowed to use such hedge words as "could potentially increase … habitat" or "habitat may benefit from placement". They should either be required to declare the effect as in "it will benefit Whooping Cranes" or they should be required to just acknowledge that they really do not know the potential effect of their action.	The Applicant used a combination of Hydrogeomorphic Models and a ratio-approach to develop proposed Permittee Responsible Mitigation. Section 6.0 outlines the direct impacts versus the proposed mitigation.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
239	8	**Placement Site SS2.** Commenter points out this placement site is fraught with potential problems including it neglects to point out that it will impact some 57 acres of grasslands within the Port Aransas Nature Preserve. The design shows the fill area will be covered with dredged material up to 7 feet, destroying much of the grassland area. Grasslands are critical coastal habitat and an integral part of the nature preserve. The disposal area will be unusable for some period of time, possibly years, and will be very unattractive as a tourist draw in a town that almost solely relies on tourism, especially eco-tourism. Engineering plans do not show any berms or other mechanisms that will contain the material on the landward side of the area. The slurry will wash over sand flat areas, habitat that is used by Piping Plover, Whooping Crane, and other endangered birds. These sand flats are covered by a cyanobacteria mat that will be covered. A layer of slurry could eliminate this site for wildlife and tourists for years. The EIS should have provided a detailed assessment of the entire area affected, including the number of acres of mudflat affected, an estimate of the depth of slurry and estimate of the time for recovery, an estimate of production lost (both biological and economic, i.e. tourism) during that recovery period.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
239	9	Commenter says there are numerous misrepresentations of the literature throughout the document. Provides one example: In the section on effects of turbidity from the dredging process (pages 4-50 to 4-52) the applicant makes repeated use of publications by Clarke and Wilber, 2000 and Wilber and Clarke, 2001). The applicant references these papers to support their conclusion that “Notwithstanding the potential harm to some individual organisms, no long-term impacts to finfish or shellfish populations are anticipated from project construction, dredging, and placement activities associated with the Alternative 1 compared with the No-Action Alternative” (top of page 4-52).	Text has been revised to more species specific impacts.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
239	10	The description of the impacts and effects of Alternative 2: Offshore Single Point Mooring are clearly better than the other alternatives, even, in most cases, the No-Action Alternative. It accomplishes the purpose and need with much less environmental impact than Alternative 1.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
240	1	The GLO is responsible for managing state-owned submerged land dedicated to the Permanent School Fund. It has been identified that portions, both dredging and placement of material, of the Corpus Christi Ship Channel Deepening Project are proposed to be located on state-owned submerged land. These portions will require a lease authorized by the School Land Board under §61.116 of the Water Code. Attached is information about the lease application requirements and associated timelines for the authorization process. Although some preliminary coordination took place regarding this project in 2020, at this time, a completed application for the use of state land has not been received.	Dredging and placement of material, if authorized, must comply with state requirements to comply with the DA permit.
240	2	It has also been identified that placement of material on the beach or adjacent to the beach (nearshore water) is a component of this project. These actions are considered erosion response activities that require a Coastal Boundary Survey pursuant to Texas Natural Resources Code §33.136. Additionally, any placement of dredge material on Gulf facing beaches is considered a construction activity and requires a Beachfront Construction Certificate and Dune Protection Permit issued by the local government that will include GLO review for consistency with the Texas Administrative Code and state law. Furthermore, the GLO must ensure that the activities will not conflict with the Texas Dune Protection Act and the Texas Open Beaches Act, which includes GLO and local government approval of any temporary beach closures.	Beach noutrishment activities, if authorized, must comply with local and state requirements to comply with the DA permit.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
241	1	Does not feel that the USACE takes public participation seriously and does not follow protocol. Held the public meeting in Corpus Christi for dredging that will take place in another city.	The scheduling for the development of the EIS, including the Draft EIS comment period, was developed to comport with requirements of both NEPA and FAST-41. To ensure appropriate public engagement, the public has been encouraged to provide comments to USACE on the project during the August 2019 Public Notice, the EIS Scoping meeting in June 2020 that included 4 public meetings, and the Draft EIS in July 2022. During all three of these comment periods, the USACE has received a significant response from the public. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
241	2	Did not make the DIS available in a timely fashion.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website.
241	3	Do not appear to be following the Executive Orders concerning climate change or the secretary of defense or the Secretary of Army orders regarding the same.	There are several EO's that cover "climate change". Without specificlly stating which EO and how we failed to comply with it we cannot respond to the comment.
241	4	Did you not take the Strategic position of the nation in consideration because just dredging in particular will allow pastel Nations to use our valuable strategic materials to wage war against both economic and Military.	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port ommission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, federal review of a navigation district's stated need for the project in the marketplace.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
242	1	**Water and Sediment Quality.** Executive Summary states the new work material does not indicate potential for contaminants, however Appendix N states the opposite. The FEIS should resolve these incongruities.	This is incorrect in that Appendix N states that there is low potential for contaminants: "Although additional sediment sampling is pending, prior sampling for the –54 foot authorized depth did not indicate any concern for contaminants. A Sampling Analysis Plan for the Marine Protection, Research and Sanctuaries Act Section 103 evaluation of sediment was developed to determine if the new work material sediments proposed to be dredged are acceptable for disposal in the New Work ODMDS. Included in that plan is the biological testing of sediment, including sediment toxicity and bioaccumulation. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. Measurable impacts from chemical contaminants such as heavy metals, synthetic organic compounds, and nutrients are not expected to present in sediments. This conclusion is based on pre-dredging bulk analyses and toxicity and bioaccumulation assessments conducted from 1980 to 2002, whose results show that no extensive or severe contamination occurs in the sediments within the CCSC, and that dredged material was suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003). Most of the material to be dredged will be new work material, which is unlikely to have been exposed to contaminants or pollution.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
242	2	Metals and other chemicals were measured in site sediments in 2018 according to Appendix J, however whether further evaluation was conducted is not discussed and no results are presented. Silver concentrations measured in 2018 "exceeded the applicable screening criteria and as a result was evaluated in the STFATE model." The STFATE modeling results are also not discussed. These omissions are problematic—contaminant concentrations that exceed screening criteria warrant full discussion, as chemical concentrations in sediment may impact water quality during dredging and disposal. For a full discussion of the 2018 sampling event and other historical testing, Appendix J refers readers to the 2018 MPRSA Section 103 Report. However, this report is not widely available and was not provided to me upon request. The 2018 sampling report and all subsequent modeling and analyses should be appended to the EIS in full, instead of incorporated by reference. Chemical concentrations detected in sediments/ elutriates and data from toxicity and bioaccumulation tests must be provided to the public to support the agency's qualitative statements that no adverse environmental effects will result from dredging and disposal.	Updated sampling, chemical analysis, and bioassessment for offshore disposal of dredge material was completed for the inner and outer channel in January 2023 in accordance with MPRSA Section 103. MPRSA requires that testing follow protocols outlined in Chapter 8 of the Green Book (EPA and USACE, 1998) and the Ocean Dumping Regulations, guidance testing including the Regional Implementation Agreement (RIA) (EPA and USACE, 2003). The EPA must concur with the findings in accordance with 40 CFR 227 prior to USACE approval. For the inner channel, metals were not detected in concentrations above the criteria maximum concentrations (CMC) or Texas Surface Water Quality Standards (TWQS). Pesticide analytes, Total PCBs, and PAHs were not detected above the MDL in the site water and elutriate samples tested (Terracon Consultants, Inc., 2023a). For the outer channel, metals were not detected in concentrations above the criteria maximum concentrations (CMC) or Texas Surface Water Quality Standards (TWQS), with the single exception of copper in water sample CDP_01. Pesticide analytes were reported below the MDL in the site water and elutriate samples tested. Total PCBs, and PAHs were not detected above the MDL in the site water and elutriate samples tested (Terracon Consultants, Inc., 2023b). This information has been added to Section 4.1.4.
242	3	The Draft EIS states that additional sediment sampling is necessary to demonstrate the suitability of dredged material for ocean disposal, and is currently underway. However, the document also concludes that the dredged material is suitable for ocean disposal, before the sampling has been conducted. If existing data are not sufficient to demonstrate compliance with MPRSA §103 and CWA §404, then additional data must be collected and evaluated before a factual determination can be made. It is premature and arbitrary to conclude that the material is suitable for ocean disposal before sufficient data is available to make a factual determination.	Impacts to water and sediment quality associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1.4. A Sampling Analysis Plan for MPRSA Section 103 evaluation of sediment was developed to determine if the new work material sediments proposed to be dredged are acceptable for disposal in the New Work ODMDS. Included in that plan is the biological testing of sediment, including sediment toxicity and bioaccumulation. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. MPRSA requires that testing follow protocols outlined in Chapter 8 of the Green Book (EPA and USACE, 1998) and the Ocean Dumping Regulations, guidance testing including the Regional Implementation Agreement (RIA) (EPA and USACE, 2003). The EPA must concur with the findings in accordance with 40 CFR 227 prior to USACE approval.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
242	4	When comparing operating emissions from the No-Action Alternative and PCCA's Proposed Alternative, the DEIS counts reductions from reduced lightering demand, but fails to acknowledge the corresponding increase in onshore loading. The DEIS explains that loading vessels with crude oil at onshore terminals produces fewer emissions than lightering vessels and loading offshore, because vapors at port are routed to air pollution control devices (APCDs) that are not required offshore. While offshore emissions may be greater, emissions from loading crude onto vessels at onshore terminals are not zero and are not negligible. For example, the Enbridge/Moda Ingleside oil export terminal proposes to emit up to 305 tons of VOCs annually, with 96 tons from loading activities alone. Lightering will be replaced by increased loading and emissions at Harbor Island, which the DEIS fails to account for. The purpose of PCCA's Proposed Alternative is to facilitate onshore loading of VLCCs, therefore air emissions estimates should account for the additional onshore loading, in addition to the reduction in offshore loading.	Onshore loading would occur in more controlled conditions.
242	5	Air emissions estimates from onshore facilities should include the increase in throughput facilitated by the deepening project. The DEIS states that "Crude oil inventories exported at the Port have increased from 280,000 barrels per day in 2017 to 1,650,000 barrels per day in January 2020 with forecasts increasing to 4,500,000 barrels per day by 2030." The DEIS declines to estimate emissions from this increased throughput, based on a dubious assumption that that the same volume of oil will be exported with and without the proposed project.	The channel deepening will not alter any terminal facilities that determine the loading rate and numbers of VLCCs that can be processed through at a given time, which are the numbers and configuration of berths, the pump rate of loading arms, or enabling of two way traffic on the approaches to the berths. The channel deepening will enable a VLCC to fully load, which would increase the dwell time in the berth to load the vessel fully. Though it ties up a berth longer with a VLCC, this extra dwell time would be assumed to supplant the dwell time of a Suezmax that would have to load to revese lighter the vessel at sea. Though keeping the VLCC in berth to fully load would presumably eliminate the time needed to bring in and berth a Suezmax which is a few hours, it is anticipated market demand would practically drive annual increases in crude oil exported.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
242	6	Assuming that PCCA will export 4.5 million bpd with or without the deepening project minimizes the relative impacts between the no-action and action alternatives. (If true, this assumption undermines the Applicant's assertion that the channel deepening is needed to meet future demand). The EIS should independently evaluate whether the Applicant's forecast of 4.5 million bpd in oil exports under the No Action Alternative is accurate, taking into account the capacity of the Port's existing infrastructure, production growth, and pipeline capacity. With project impacts should account for growth in throughput that is facilitated or incentivized by a deepened channel.	The USACE has not identified a national interest that would compel an independent, federal review of a navigation district's stated need for the project in the marketplace.
242	7	The federal government has established that "Climate change is a fundamental environmental issue, and its effects fall squarely within NEPA's purview." The DEIS does not demonstrate that the Corps has satisfied its obligations under NEPA to assess and mitigate impacts from greenhouse gas emissions. Section 3.2.11.3 of the DEIS describes the greenhouse gas (GHG) emissions at the Port under current operations. However, the GHG emissions expected in the future, with and without the proposed action alternatives, are not addressed. GHG emissions are simply absent from the DEIS sections discussing environmental consequences and cumulative impacts of the project alternatives.	Greenhouse Gas emissions have been addressed in the Final EIS. Calculations and text of the GHG reductions due to reduction in lightering vessel activity of the alterenatives were added to 4.1.9.1, 4.1.9.2.3, 4.1.9.3.2, 4.1.9.4.2 and Table 4-15. Specific GHG impact text was added as a new Section 4.1.9.5 comparing the reductions to regional GHG estimates discussed in Section 3. The overall effect of the action alternatives is to reduce lightering activity (mainly transit & cargo transfer, where engines propel or loiter vessels), which is the main GHG generating activity that would be impacted by action alternatives with a small positive impact in GHG reduction.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
242	8	The applicant's stated need for the proposed channel deepening is to meet current and forecasted demand for U.S. produced crude oil, which they expect to increase from 1.65 million barrels per day in January 2020 to 4.5 million barrels per day by 2030. If this increased volume of oil is burned, it would generate hundreds of millions of tons of carbon dioxide emissions annually. This is unquestionably a significant impact that needs to be assessed in the EIS. The CEQ's 2016 GHG guidance encourages the use of widely available quantification tools to assess climate impacts and advises disclosure of reasonably foreseeable end uses of fossil fuels, including combustion.	The relevant tools such as OPGEE referenced in CEQ's 2016 and other guidance are life cycle production and dedicated transport mode comparison tools, and not for measuring change in demand due to terminal or channel improvement actions. The projected increase in demand for crude oil production and exports is not predicated on the channel deepening. Demand for crude oil is also not solely for fuel combustion purposes: crude oil is refined for numerous noncombustion products globally such as plastic, adhesives, solvents, insulation, coatings and medicines. Demand is driven by population growth and the need for those products previously described. Demand for US exports from Corpus and Texas in general has increased sharply with the existing channel and has occurred primarily due to the favorable price margin between WTI and Brent crude, pipelines constructed, and terminals built on the existing channel. These demands would otherwise be met by other oil producing regions catering to importing nations (e.g. Asia) that the US exports to. Nevertheless, Greenhouse Gas emissions has been addressed in the Final EIS. See response to Letter 242, Comment 7. GHG calculations and text were added to Sections 4.1.9.1, 4.1.9.2.3, 4.1.9.3.2, 4.1.9.4.2 and Table 4-15. Specific GHG impact text was added as a new Section 4.1.9.5.
242	9	The creation of new crude export infrastructure impacts the production and consumption of oil. The EIS should evaluate the extent to which channel deepening to accommodate VLCCs will induce greater production of crude in Texas and consumption of crude globally, due to greater availability or lower price.	The channel deepening will not create the actual new export infrastructure. Harbor Island terminals would be built and operated with the current 54' channel just as the current VLCC terminals at Ingleside are. Though more efficient shipping would reduce the price of crude, analysis and estimation of change in global consumption patterns solely attributable to this project would be speculative and beyond the scope of NEPA. Greenhouse Gas emissions has been addressed in the Final EIS. See response to Letter 242, Comment 7. GHG calculations and text were added to Sections 4.1.9.1, 4.1.9.2.3, 4.1.9.3.2, 4.1.9.4.2 and Table 4-15. Specific GHG impact text was added as a new Section 4.1.9.5.
242	10	Would like to be notified of denials, approvals, hearings and/ or changes to the Applicant's request for a Department of Army (DA) Permit.	You will be added to the stakeholder mailing list.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
243	1	The public comment deadline should be extended an additional 45 days to allow time to review the voluminous materials added and to allow for additional Public Meetings to be held in San Patricio, Nueces, and Aransas Counties.	USACE followed the required protocol of a 45-day review period. The review period was extended to August 9, 2022 to provide the public more time to review the additional baseline materials added to the USACE's Special Projects website. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
243	2	Provides reasoning why this project falls under the 1998 CEQ Regulations. Agencies were instructed to develop or revise proposed agency NEPA procedures, that instruction was short lived when the current administration indicated its intent to revise them again. The USACE did not propose, let alone adopt, any revised NEPA procedures in response to the now-superseded 2020 CEQ Revisions.	This evaluation is subject to the NEPA grandfathering clause because the process was initiated prior to the rulemaking.
243	3	The DEIS improperly relies on 33 C.F.R. § 320.4(q) to form the basis for its conclusion that the purpose and need, as stated by the overall project purpose, is considered met. As the DEIS acknowledges, this provision in the USACEs regulations asserts that "when private enterprise makes application for a permit, it will generally be assumed that appropriate economic evaluations have been completed, the proposal is economically viable, and is needed in the market place." However, the Port is not a private enterprise; the Port is a navigation district, and all navigation districts are political subdivisions of the State of Texas. Therefore, these assumptions were misplaced.	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port ommission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, federal review of a navigation district's stated need for the project in the marketplace.
243	4	The "project purpose" is explained by or justified by an assumption that there will be 4,500,000 barrels/day of crude oil exported each day at the Port. This projection may be realistic, but it also may not be. Though it is repeated dozens of times in the DEIS and its appendices, it is never supported by any analysis. The purported need to move that many barrels/day drives, among other costs, SPM costs, and, in turn, affects the considerations of at least Alternatives 2 and 3.	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The Applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port ommission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, federal review of a navigation district's stated need for the project in the marketplace.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
243	5	DEIS's failure to justify basic assumptions, is true for the estimated cubic yards of dredge spoils. Alternative 1 is repeatedly estimated to produce 46.3 million cubic yards of dredge material. However, the sources of that material are nowhere identified, and there is no even rough calculation presented of the contribution of each source to the 46.3 million cubic yards. The volume of dredge spoils and, likely, the sources of dredge spoils attributable to Alternative 1 drive almost all the environmental impacts of that alternative.	The exact determination of the volume of dredge material is based on variety of factors that affect shoaling rates of sediments. The estimate of the volume of material is based on simple geometric calculation of the volume in proposed dredge trapezoid.
243	6	The public — and, one would think, USACEs decisionmakers —cannot meaningfully analyze the alternatives or on the impacts of the alternatives without information about why there is thought to be the oft-repeated 4.5 million barrel/day "need" for the project and why 46.3 million cubic yards of spoil is thought to be a reasonable estimate. If a draft statement is so inadequate as to preclude meaningful analysis, the regulatory directive is that agency shall prepare and publish a supplemental draft of the appropriate portions of the DEIS. That is what should happen, here.	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The Applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port ommission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, federal review of a navigation district's stated need for the project in the marketplace.
243	7	Alternative 1 excludes Axis Midstream/Midway to Harbor Island Storage Terminal/Pipeline project and the Port of Corpus Christi/Harbor Island Terminal. These projects and the pipelines and upstream storage tanks that serve the terminals (at least, those pipelines and storage tanks within the geographic scope defined by this DEIS) are "connected actions." The terminals and their supporting infrastructure are actions that "will not proceed unless other actions [i.e., the channel and extension dredging] are taken previously or simultaneously or are interdependent parts of a larger action and depend on the larger action for their justification. 40 C.F.R. § 1501.9(e) provides that connected actions should be discussed in the same impact document, in this case, the same EIS. *See comment letter for additional information backing up this statement that these are "connected actions".*	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
243	8	The DEIS indicates (p. xiii) these terminal projects are among those for which impacts were only "described in general and qualitative terms" in the cumulative impacts analysis of the DEIS. That is generous, actually, insofar as the Port's Harbor Island terminal is concerned; this project is hardly described, at all. And, it is a large project, one for which air emissions on Harbor Island, alone and not including a co-located power generation plant, are permitted to allow 91.7 tons/year of CO2 equivalents. In any event, the Corps' position (DEIS, p. 2-5) is that "preliminary review of these applications indicated that an EIS is not required and, therefore, no NEPA documentation is available." Thus, very little information about the impacts of the two Harbor Island terminals is cumulated with those of the other the other 40 past, present, and reasonably foreseeable projects in the study area.	Information on how past, present, and reasonably foreseeable "Onshore Storage and Fabrication Terminals" may contribute cumulative effects with the CDP are covered in Section 5.4. This includes the proposed Harbor Island Terminal.
243	9	The DEIS fails to include a thorough Clean Water Act 404(b) evaluation. Although Appendix N purports to include such an evaluation, this evaluation is woefully deficient. It fails, for instance, to demonstrate, or even discuss, that the proposed action is the least environmentally damaging practicable alternative ("LEDPA"). (see comment for additional reasons for this comment). The presumption that a less damaging alternative is available can be rebutted only with particularized facts. That is, there must be specific information about the extent of the impacts expected from the proposed alternatives.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the Final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
243	10	The Corps may also consider specific information relating to cost concerns when evaluating an alternative's "practicability." As with availability, the applicant must provide specific information, and the Corps must independently evaluate it.	Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port Commission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, federal review of a navigation district's stated need for the project in the marketplace.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
243	11	The proposed project "does not require access or proximity to, or siting within, a special aquatic site in order to fulfill its basic purpose." Thus, there is a rebuttable presumption that alternatives that do not involve special aquatic sites are available and alternatives that do not involve special aquatic sites have less adverse impact on the aquatic environment. The DEIS acknowledges that special aquatic sites will be directly impacted by the disposal or placement of the dredged material. Yet, the DEIS fails to fully assess the potential impacts of the dredged material disposal on special aquatic sites. There is no specific information regarding the suitability of the dredged material for the intended purposes—such as whether the material is free from contaminants. Nor is there comprehensive information regarding the sites that are expected to be impacted—such as impacts on nearby seagrass beds. And there is no specific information provided so as to rebut the presumption that alternatives that do not involve special aquatic sites are available.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
243	12	Compensatory mitigation is required and necessary to maintain wetland function. *See comment later for specific rules/regulations regarding required mitigation [TCEQ, CFR, and USACE's own regulations)* The EIS takes the position that only inshore spoils placements are subject to this LEDPA analysis. Nowhere is this limitation on application of the LEDPA principle explained. The inshore placement areas are set out in Table 3 of DEIS Appendix N. They constitute roughly 4,663 acres. These acres will be covered with spoils for which the DEIS and its appendices provide absolutely no contaminant information. The Ports explanation for self mitigation does not qualify as mitigation under the USACE or TCEQ rules. Preservation is not allowed as compensatory mitigation unless the preserved site will be permanently protected through an appropriate real estate or other legal instrument (e.g., easement, title transfer to state resource agency or land trust). That is not what the Port is proposing to protect Redfish Bay.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
243	13	The alternatives analysis is deficient. The alternatives analysis in the DEIS is deficient in large part because the purpose and need analysis is inaccurate. Further, the DEIS fails to provide specific detail regarding the projected environmental impacts and other factors that led to the identification of the preferred alternative. And finally, the alternatives analysis fails to include the requisite wide range of alternatives, considering the degree of adverse environmental impacts that are expected as a result of the preferred alternative. The DEIS fails to properly define the Port's Preferred Alternative. The description excludes the Axis Midstream/Midway to Harbor Island Storage Terminal/Pipeline project and the Port of Corpus Christi/Harbor Island Terminal, even though these are connected actions. Having failed to accurately define the preferred alternative, the Corps cannot have, in good faith, objectively taken a hard look at the environmental consequences of the proposed action, including the environmental consequences of the connected actions. And without a rigorous analysis of the environmental consequences of the entire project, no meaningful alternatives analysis can be performed.	The preferred alternative is the Applicants preferred alternative. The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project. Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable. The applicant, the Port of Corpus Christi Authority, is a political subdivision of the State of Texas incorporated as a Navigation District in 1926 in accordance with the Texas Constitution and is governed by a Port ommission in accordance with the Texas Water Code. The USACE has not identified a national interest that would compel an independent, federal review of a navigation district's stated need for the project in the marketplace.and the standard scope comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
243	14	Consideration of climate change impacts is deficient. The DEIS erroneously limits its consideration of impacts related to climate change to "increased carbon dioxide emissions due to an increase in the number of vessels and reverse lightering operations with all alternatives." Not only does this fail to consider the potential for increase in vessels and total larger vessels should transportation become more "efficient" under the Preferred Alternative, it also wholly fails to consider the increase in total crude being transported and burned. The impact of GHG emissions on climate change is certainly a part of a NEPA cumulative impact analysis, but that analysis must include a quantification of the incremental impacts that the proposed project's emissions will have on climate change or on the environment more generally in light of other past, present, and reasonably foreseeable actions. Thus, it is not only the increased emissions due to the increased number of vessels (which the DEIS does not quantify in any way) that must be considered, but also, the downstream and upstream impacts of the fossil fuel being transported. It is reasonably foreseeable that an increase in the number of vessels and the size of the crude oil shipments will increase the total oil transported that will be burned and contribute to climate change. The DEIS does not consider the Project's contribution to transport and burning of crude oil and fossil fuels.	Quantification of incremental impact on climate change of this channel deepening is impractical and beyond the scope of this EIS and the intent of NEPA. Climate change models are not granular enough to discern or attribute individual project effects nor it practical. In actuality the project does not introduce new production or shipping of oil. Exploration and terminal projects introduce sources and capacity to export crude. This project only makes the transportation of crude more efficient. Not deepening would result in more long term greenhouse gas emissions due to perpetuating of the vessel traffic required for reverse lightering. Greenhouse Gas emissions have been addressed in the Final EIS. See response to Letter 242, Comment 7. GHG calculations and text were added to Sections 4.1.9.1, 4.1.9.2.3, 4.1.9.3.2, 4.1.9.4.2 and Table 4-15. Specific GHG impact text was added as a new Section 4.1.9.5.
243	15	Consideration of impacts on endangered and threatened species is deficient. This deficiency appears to be a result of a failure to initiate consultation with the USFWS and NMFS early in the process—well in advance of preparing the DEIS.	Impacts associated threatened and endangered species with the Applicant's Proposed Action Alternative are addressed in Section 4.2.5.2 and Appendix D. It is a standard practice to initiate formal consultation for ESA, EFH, and NHPA concurrent with the release of the DEIS. Consultation should be completed prior to the FEIS and the ROD will address the results of consultation. The EFH Assessment and ESA Biological Assessment are included in the Appendices of the DEIS for public comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
243	16	The biological assessment acknowledges the potential for adverse impacts to various sea turtles—both in-water impacts and nesting impacts. Yet, the assessment gives short shrift to any discussion of meaningful measures to avoid such impacts. For instance, the assessment notes that use of "hopper dredges" can increase the potential of mortality or injury for sea turtles. Yet, there is no commitment to avoid use of such hopper dredges. To the contrary, the DEIS states that the construction contractor may opt to employ hopper dredges, and if hopper dredges are used, additional (but unspecified) best management practices would be required. This promise to use unspecified best management practices does nothing to ensure the continued existence of sea turtles.	USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3).
243	17	Includes the unsupported conclusory statement that the channel deepening project is expected to "lower the risk of a collision between sea turtles and ships," because the project would decrease the volume of lightering vessel traffic. There is no discussion or estimate provided of collisions between sea turtles and lightering vessels in the Corpus Christi Ship Channel. Thus, this statement should be disregarded as it offers nothing meaningful to the biological assessment.	While it is true that lightering vessel traffic will decrease as a result of the project, it is only assumed that this reduction in traffic means reduced likelihood of collisions. The text has been revised for clarification.
243	18	The DEIS acknowledges that increased work boat traffic associated with construction activity could increase vessel collision, contaminant spills and debris and trash, which could adversely impact sea turtles. The DEIS suggests that the likelihood of these adverse impacts can be greatly reduced when avoidance, minimization, and conservation measures are performed, such as those described in the biological assessment. A review of those proposed measures, however, reveals that they are nothing more than a plan to look for turtles, their nests, and their eggs each day, and to get them out of the way, if observed. This is not a "conservation" plan. This plan does nothing to ensure that the channel deepening project will not jeopardize the continued existence of the sea turtles or destroy or adversely modify their critical habitat. The general plan proposed in the DEIS simply proposes to move turtles and their nests out of the way of the project and to use dim lighting.	NMFS and UFWS do not allow known sea turtle nests to remain in situ regardless if they are associated with a project's Biological Opinion. As per the BA, any sea turtle nest encountered will require notification to Padre Island National Seashore at 1-361-949-8173 X 226 or 1-866-TURTLE5 (1-866-887-8535) or the ARK at 361-749-6793, for relocation. USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3). A list of conservation measures routinely used for sea turtle avoidance and minimization is included in Section 4.0 of the BA. These avoidances include reasonable and prudent measures that have largely been incorporated in USACE regulatory and civil works projects throughout the Gulf for more than a decade.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
243	19	Regarding the various species that are considered likely to be affected, but not likely to be adversely affected, there is little basis for this determination. The DEIS simply presumes that once the project is complete, there will be less vessel traffic, and increased habitat and improved marshes. The DEIS concludes that the project would therefore not jeopardize the continued existence or the potential of recovery for the various affected species. But the DEIS provides no specifics—no data—to support these conclusory statements.	The conclusion in the BA and EIS regarding species that are considered likely to be affected, but not likely to be adversely affected is for construction of the project, not operations.
243	20	USFWS and NMFS have yet to weigh in with their biological opinions. This is likely a result of a failure to formally consult with these agencies early in the process. Consequently, the public has not had the benefit of these agencies' opinions. The comment period should be extended or reopened, once the agencies have completed their review and offered their opinions.	The EPA, USFWS, NMFS, and U.S. Coast Guard are Cooperating Agencies in the development of the EIS. In addition, USACE is in consultation with the USFWS and NMFS pursuant to the Endangered Species Act and the Magnuson-Stephens Fisheries Act. The FWS has been engaged in a review of the project since 2019. Coordination with the USFWS and NMFS on the Biological Assessment (Appendix D) has been ongoing throughout this process. The USFWS and NMFS provided comments and the report was revised accordingly. USFWS and NMFS are cooperating agencies on this project. The EIS and BA disclose the potential impacts to listed species. The BA provides conservation measures that will be implemented to avoid and minimize impacts to listed species. A Final Biological Assessment was prepared describing the study area, Federally listed threatened and endangered species of potential occurrence in the study area as identified by the NMFS and USFWS, and potential impacts of the preferred project on these protected species (Appendix D1). The preferred project was reviewed by the USFWS and the NMFS to determine compliance with the ESA. The NMFS issued Biological Opinion on the preferred action in December 2022 (Appendix D2). The USFWS issued a Conference and Biological Opinion on the preferred action in January 2023 (Appendix D3).
245	1	Discharges of return water from confined upland disposal areas should not exceed 300 mg/l total suspended solids (TSS).	The TCEQ is responsible for regulating the discharge of return water from confined upland disposal areas and will determine the appropriate TSS in the 401 WQC.
245	2	The DEIS should provide a list of Best Management Practices (BMPs) that will be used to protect and maintain water quality and seagrass habitat in and around the project area, including the adjacent Redfish Bay State Scientific Area, during and after the construction phase of the project.	Redfish Bay was designated a state scientific area by the TPWD in June 2000 to protect and study native seagrasses. The RBSSA contains the northernmost extensive stands of seagrass on the Texas coast. In May 2006, the "no-uprooting"/"no-Prop" regulation took effect in RBSSA. By September 2013, the "no-uprooting"/"no-Prop" regulation had been expanded statewide. While Redfish Bay remains a designated Scientific Area, all seagrass beds along the Texas coast have comparable protections laws. Seagrass beds are a special aquatic sites and will be evaluated in accordance with the 404(b)(1) Guidelines.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
246	1	Project documents do not quantify how habitat impacts (own water/bottom, beach nourishment, wetlands, SAV, oysters, and unconsolidated shorelines) would be offset by the Proposed Action.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
246	2	There is an overall concern that the DEIS does not consider or address the significance of the 32,000-acre Redfish Bay Scientific Area located between Harbor Island and the mainland.	The Redfish Bay State Scientific Area will be added to sections 3.3.5.1 and 4.2.5.1 for the Final EIS. Redfish Bay was designated a state scientific area by the TPWD in June 2000 to protect and study native seagrasses. The RBSSA contains the northernmost extensive stands of seagrass on the Texas coast. In May 2006, the “no-uprooting”/”no-Prop” regulation took effect in RBSSA. By September 2013, the “no-uprooting”/”no-Prop” regulation had been expanded statewide. While Redfish Bay remains a designated Scientific Area, all seagrass beds along the Texas coast have comparable protections laws. Seagrass beds are a special aquatic sites and will be evaluated in accordance with the 404(b)(1) Guidelines.
246	3	There is an overall concern that the DEIS does not consider or address the potential effects on state-listed threatened or endangered species that are likely to occur in the project area.	State-listed threatened or endangered species that can occur in the project area have been added to the EIS.
246	4	The creation of the RBSSA is firmly rooted in the muti-agency effort to develop a statewide conservation plan for seagrass. However due to a lack of quantitative analysis provided, the DEIS does not demonstrate that the Proposed Action is the least environmentally damaging preferred alternative.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE’s final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
246	5	As furnished in Appendix B, TPWD had previously provided comments and recommendations for the proposed project. However, the extent to which our recommendations will be incorporated during project implementation is not explicitly included in the DEIS. TPWD reiterates these previous comments and encourages the applicant to implement TPWD recommendations to avoidant minimize impacts to fish and wildlife resources.	USACE will address all comments relevant to the DEIS. The comments provided on other specific projects will be addressed in the evaluation of those projects.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
246	6	**2.2.3 Construction Page 2-10** states that light plants would be used in the late afternoon and evening time frames to provide additional lighting for the crew and to serve as safety beacons to surrounding waterborne traffic. Sky glow resulting from light pollution can have negative impacts on wildlife and ecosystems by disrupting natural day and night cycles inherent in managing behaviors such as migration, reproduction, nourishment, rest, and protection from predators. **Recommendation:** As protection measures for wildlife, TPWD recommends utilizing the minimum amount of night-time lighting fixtures needed for safety and security. TPWD recommends minimizing the project's contribution toward skyglow by focusing light downward, with full cutoff luminaries to avoid light emitting above the horizontal. TPWD also recommends using dark-sky friendly lighting that is only illuminated when necessary, minimizes brightness and blue light emissions, and is fully shielded. Appropriate lighting technologies, best management practices (BMP), and other dark sky resources can be found at the International Dark-Sky Association and McDonald Observatory websites.	Best management practices will be used as described in Appendix D (Biological Assessment) of the EIS and the NMFS Final Biological Opinion (2022). Sea Turtles: Contractors would use the minimum amount of light necessary through reduced wattage, shielding, lowering, and the use of low-pressure sodium lights during project construction to minimize the potential effects of artificial lighting on sea turtles. Dredge Lighting: From March 15 through October 1, sea turtle nesting and emergence season, all lighting aboard hopper dredges and support vessels operating within 3 nm of sea turtle nesting beaches would be limited to the minimal lighting necessary to comply with USCG and OSHA requirements. Non-essential lighting would be minimized through reduction, shielding, lowering, and appropriate placement.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
246	7	**3.3 Ecological and Biological Resources.** Considering the significant amount of aquatic habitat provided by the tidal flats within the vicinity of the project site, the DEIS includes an insufficient amount of information about their extent, function, and value. *See White et al. (2006) and comment letter for specific information on tidal flats in the area.* Although Section 3 .3 .3 .4 of the DEIS acknowledges extensive losses of tidal flats in the region over time, the degree to which those losses have occurred is not detailed. TPWD is not aware of any tidal flat or mud flat restoration projects with documented success in Texas and considers these habitats to be difficult to replace. **Recommendation:** Due to the ecological importance of tidal flat habitats, the FEIS should describe the location and extent of tidal flats within the project area and describe the functions and values they provide so that the environmental effects of the project alternatives can be fully assessed.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters. Added tidal flat info from TPWD letter citing White et al., 2006.
246	8	**3.3.3.2.6 Artificial Reefs** On Page 65, the DEIS misspells the Large Tomate (Haemulon aurolineatum) which is correctly spelled "Tomtate". **Recommendation**: Let the FEIS reflect the correct spelling of this important reef fish.	Text has been revised.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
246	9	**3.3.5.1 Protected Lands** Have previously provided information about the RBSSA and expressed concern for potential impacts to the fish and wildlife resources and outdoor recreational amenities that occur within the RBSSA. The DEIS does not provide a description of the RBSSA on Page 3-72 and does not identify the RBSSA on the associated map (Figure 3-17) on Page 3-73. Section 2.14 of the CZM Consistency Determination in Appendix O provides additional information about the RBSSA, but the policies for development in state parks, wildlife management areas, or preserves were not reviewed for compliance. State scientific areas are explicitly included in the definition of "coastal preserve" under Title 31, section 501.3(b)(3) of the Texas Administrative Code. *See comment letter for additional information provided on the RBSSA.*	Redfish Bay was designated a state scientific area by the TPWD in June 2000 to protect and study native seagrasses. The RBSSA contains the northernmost extensive stands of seagrass on the Texas coast. In May 2006, the "no-uprooting"/"no-Prop" regulation took effect in RBSSA. By September 2013, the "no-uprooting"/"no-Prop" regulation had been expanded statewide. While Redfish Bay remains a designated Scientific Area, all seagrass beds along the Texas coast have comparable protections laws. Seagrass beds are a special aquatic sites and will be evaluated in accordance with the 404(b)(1) Guidelines. The Redfish Bay State Scientific Area will be added to sections 3.3.5.1 and 4.2.5.1 for the Final EIS.
246	9	**Recommendation:** The FEIS should describe the RBSSA as protected land and evaluate the effects of the proposed project on the RBSSA in a manner consistent with all applicable definitions of special aquatic sites, including state designated areas and vegetated shallows, as described in 40 CFR 230.40(a) and 40 CFR 230.43(a). The FEIS should also review the policies for development in State Parks, Wildlife Management Areas, or Preserves as described at Title 31, section 501.29 of the Texas Administrative Code for consistency with the Texas Coastal Management Program. The FEIS should describe the RBSSA as protected land and evaluate the effects of the proposed project on the RBSSA in a manner consistent with all applicable definitions of special aquatic sites, including state designated areas and vegetated shallows, as described in 40 CFR 230.40(a) and 40 CFR 230.43(a). The FEIS should also review the policies for development in State Parks, Wildlife Management Areas, or Preserves as described at Title 31, section 501.29 of the Texas Administrative Code for consistency with the Texas Coastal Management Program.	Redfish Bay was designated a state scientific area by the TPWD in June 2000 to protect and study native seagrasses. The RBSSA contains the northernmost extensive stands of seagrass on the Texas coast. In May 2006, the "no-uprooting"/"no-Prop" regulation took effect in RBSSA. By September 2013, the "no-uprooting"/"no-Prop" regulation had been expanded statewide. While Redfish Bay remains a designated Scientific Area, all seagrass beds along the Texas coast have comparable protections laws. Seagrass beds are a special aquatic sites and will be evaluated in accordance with the 404(b)(1) Guidelines. The Redfish Bay State Scientific Area will be added to sections 3.3.5.1 and 4.2.5.1 for the Final EIS.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
246	10	3.3.5.2. Threatened and Endangered Species. A species list was included in the permit application submitted to the USACE as detailed in Appendix A of the DEIS. However, Section 3.3.5 of the DEIS does not identify state-listed threatened or endangered species that are not also on the federal threatened and endangered species list. In addition, Section 4.2 does not consider the effects that the Proposed Action and alternatives would have on state"listed species or detail BMP's that would be implemented to avoid and minimize those impacts. **Recommendation:** The FEIS should identify species listed on the TPWD Rare, Threatened, and Endangered Species of Texas by County online application (RTEST) that are not included in Table 3-19. The FEIS should evaluate potential effects to those species) and describe BMP that would be implemented to avoid and minimize those impacts.	State-listed threatened or endangered species that can occur in the project area have been added to the EIS.
246	11	**3.5.2.2. Recreational Resources.** This section of the DEIS describes numerous recreational resources throughout the project area. Lighthouse Lakes Park and Lighthouse Lakes Paddling Trail, which have close proximity to the proposed project site, are not described. In addition, this section does not describe the Great Texas Coastal Birding Trails comprised of the Aransas, Corpus Christi Bay, and Mustang Island Loops which detail publicly accessible birdwatching sites. **Recommendation:** Considering the proximity of the proposed project to Redfish Bay, this section of the FEIS should include Lighthouse Lakes Park, Lighthouse Lakes Paddling Trail, and the Aransas, Corpus Christi Bay, and Mustang Island Loops of the Great Texas Coastal Birding Trails.	Thank you for your comment. The project team will expand the discussion of recreational resources in the FEIS to include Lighthouse Lakes Park, Lighthouse Lakes Paddling Trail, and the Aransas, Corpus Christi Bay, and Mustang Island Loops of the Great Texas Coastal Birding Trails.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
246	12	**4.2 Ecological and Biological Resources.** In the summary table (Table 4-16, page 4-43) it is noted that the Flats category includes intertidal estuarine habitats comprised of aquatic beds, emergent vegetation, and unconsolidated shores as well as uplands which includes tidal flats located above high tide. Not only does the summary table not differentiate between aquatic and upland flats/beach, but the potential impacts to flats and oysters are not furtlter detailed in section 4.2 of the DEIS.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
246	13	**4.2 Ecological and Biological Resources.** Sections 4.2.2.2.2. (Estuarine Habitats and Fauna), 4,2.5.3.2 (Essential Fish Habitat), and 5.4.8 (Cumulative Effects on Aquatic Resources) of the DEIS state that direct impacts from inshore PA construction resulting from the Proposed Action include 84.85 acres of unconsolidated shorelines (tidal sand flats/algal flats/beach). The locations and extents of these or other impacts are not identified in the DEIS.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
246	14	Section 2.7 of Appendix O describes 3.17 acres of oysters mapped within a 500-foot construction buffer of an inshore PA. The DEIS does not indicate the location of this oyster reef relative to the project footprint, does not clearly describe how these oyster impacts would be avoided or minimized, and does not indicate if post-construction monitoring will be conducted to assess permanent impacts.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
246	15	Habitat survey reports prepared by Mott MacDonald and Triton Environmental Solutions for the Proposed Action are referenced but not provided in the DEIS for review by commenting agencies, such as TPWD, or the public. Efforts to survey non-wetland special aquatic sites, such as oysters and tidal flats, are not described. While limited bathymetric data is provided in the Dredged Material Management Plan (DMMP), other project documents do not show the locations, types, or extents of the various special aquatic sites and sensitive habitats surveyed in the project area relative to the project footprint.	The appenices in the DEIS included materials prepared in connection to the EIS that were used to substantiate the analysis. The Appendix is not intended to be an encyclopedic compendnium of all resources. Many of the resoucres cited in the reference section are already publically avaliable. The additonal resources that were not included in the appendices were added to the USACE's Special Project Website. The comment period was extended to August 9, 2022 to provide the public more time to review these additional materials. The USACE has verified delineation of Waters of the U.S. and does not need to coordinate it's conclusions with other Federal and State agencies.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
246	16	Recommendation (comment #'s 12-15): The applicant should provide the location and areal extent of each affected habitat type in tabular and spatial formats relative to the project footprint (including work corridors, staging areas, and access routes), tide lines, and water depths in either cross-section or plan views to inform environmental evaluations.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.
246	17	The potential beneficial environmental effects of the project are not quantitatively assessed by a Habitat Evaluation Procedure (HEP), or similar analysis, and results are not detailed in tabular or spatial formats for comparison with project impacts to demonstrate that the proposed project will not result in a net loss of aquatic resource functions. Furthermore, no post-construction monitoring is proposed to ensure that BU and PA site construction does not result in a net loss of aquatic resource function. **Recommendation:** The effects on aquatic resources "with" the project should be weighed against the effects on aquatic resources "without" the project using a quantitative assessment to demonstrate whether the Proposed Action would result in an overall net benefit to fish and wildlife resources.	The Habitat Evaluation Procedure is not a functional assessment. The USACE does not have an approved functional or conditional assessment for this region.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
246	18	The habitat and bathymetric survey prepared for the Axis Midstream project (SWG-2018-00789) identified 71.47 acres of unvegetated flats, the majority of which are located within the placement area described in the DEIS as SSL By letter dated September 13, 2019 (available on Page 125 of Appendix B), TPWD expressed concern for a conceptual mitigation project that would construct a 76-acre, 30-foot-tall shoreline stabilization project within the same area as SSL TPWD has similar concern for impacts to tidal flats and other special aquatic sites that would result from the construction of PA SS 1. It is not clear how the modeled increases in current speeds and tidal amplitudes within this section of the CCSC will react to the construction of this hardened vertical feature along the channel. The DEIS does not quantify any net effects of other project alternatives, even though similar projects within the vicinity of the Proposed Action (including inshore terminals and offshore deepwater ports) are currently undergoing environmental review and project information has been made publicly available. **Recommendation:** To the extent appropriate and practical, project documents associated with similarly situated crude oil export facilities should be used to inform the FEIS with respect to impacts associated with the "No Action", "Inshore/Offshore", and "Offshore" alternatives.	The USACE has used the best available information to model the impacts of the propoed project. The proposed SS1 uses typical construction methods for shoreline stablization and is located up to 700 feet from the Federal channel.
246	19	Baseline Report Part 19 (Mott MacDonald Wetland Delineation Report, Oct 2021) indicates that the Project Study Area (PSA) for proposed placement areas (PAs) SSl, SS2, PA4, HI-E, and MI included a 500-foot buffer around each PA. Except for PA SJI, wetland delineations did not extend onto private properties located within the 500-foot buffer.	The USACE requested the PCCA delienate special aquatic sites in a 500-buffer around placement areas to better determine the environmental baseline for the effect analysis.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
246	20	Table 5.1-1 on page 48 of 88 of Baseline Report Part 20 provides a summary of waters and wetlands delineated within five project study areas (PSAs). Table 5.1-1 on page 579 of 585 of Baseline Report Part 1 summarizes waters and wetlands delineated within the PSA identified as SJI (located along the Gulf shoreline of San Jose Island). It is unclear what percentage of the habitat acreages presented in Tables 5 .1 of Baseline Report Part 1 and Part 20 were within the project area as opposed to the 500-foot buffer. Therefore, TPWD is unable to verify how much direct and indirect impact is anticipated at each site based on the supplemental Baseline Reports. According to the DEIS, inshore placement would directly impact 16.61 acres of tidal wetlands, 122.46 acres of freshwater wetlands, 84.85 acres of unconsolidated shorelines (including tidal sand flats, algal flats, and beaches), 6.88 acres of seagrass, and 0.10 acre of oyster reef. Based on the information provided in the Baseline Report, it is still not clear how the applicant has avoided direct and indirect impacts to 141.415 acres of seagrass, 3.312 acres of oysters, 29.716 acres of non-tidal wetlands, and 79.701 acres of tidal wetlands including tidal flats.	The reports referenced are the wetland and special aquatic site delineations sumarized and cited in the DEIS. The DEIS, describes direct impacts to 16.61 acres of tidal wetlands, 122.46 acres of freshwater wetlands, 84.85 acres of unconsolidated shorelines (including tidal sand flats, algal flats, and beaches), 6.88 acres of seagrass, and 0.10 acre of oyster reef. A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
246	21	The 33 files provided on the project website include detailed wetland delineation and aquatic resource survey results and biological survey reports. The survey reports identify and describe each potentially affected aquatic resource in greater detail than the DEIS. In addition, the biological surveys demonstrate the importance of these special aquatic sites for migratory birds and threatened and endangered species. According to the Baseline Project Report, threatened and endangered species, including piping plover, red knot, and reddish egrets, were observed using these habitats during the project surveys. **Comment:** TPWD reiterates our previous comments concerning the need to quantify direct impacts and to provide a detailed explanation of how the project will result in a net benefit to aquatic resources. TPWD reiterates our previous comments concerning the need to provide a detailed description of BMPs used to avoid and minimize impact to state-listed rare, threatened, and endangered species.	A compensatory mitigation plan has been prepared by the PCCA and is included in the FEIS, Appendix K. The CDP will permanently impact 21.04 acres of palustrine wetlands, 16.61 acres of estuarine wetlands, 6.88 acres of SAV, and 0.1 acres live oysters. The PCCA will utilize SS1 to construct the mitigation site. The objective of mitigation is restoration through the reestablishment of 32.94 acres of estuarine wetlands, 42.08 acres of palustrine wetlands, 6.88 acres of SAV, and 0.1 acres oysters.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
246	22	Page 10 of 103 of Baseline Report - Part 10 (Mott MacDonald Wetland Delineation Report, April 2021) includes an email correspondence dated April 6, 2021, which states that grab samples of seagrass are not required for seagrass surveys. The rationale for this recommendation cites recent changes in state law regarding uprooting seagrasses and that "difficult permits will need to be secured". However, section 66.024 of Parks and Wildlife Code only prohibits uprooting seagrass "by means of a propeller". Thus, collecting grab samples of rooted seagrass for the purpose of surveying seagrass beds does not require a permit issued by TPWD. Oysters, however, are a regulated fishery species and may require one or more authorizations from TPWD to legally possess or transport oyster specimens collected for the purpose of conducting habitat surveys. TPWD does not object to visual and tactile seagrass surveys when timing and water conditions support the accuracy of those methods. However, TPWD strongly encourages grab samples to support presence/absence data collected outside the growing season when aboveground biomass (i.e., leaves) may have senesced or when water conditions are not conducive to visual or tactile survey methods (e.g., rough waters, low visibility, low water temperatures).	Seagrass survyes were conducted by PCCA's consultant and verified by USACE.
246	23	As the state's authority on fish and wildlife resources, TPWD appreciates coordination with U.S. Army Corps Engineers to review appropriate aquatic resource survey methodologies to inform permit decisions, and the associated TPWD authorization requirements for habitat sampling methods. To ensure regional consistency, TPWD recommends that future coordination on such matters be routed through the Ecosystem Resources Program Director, Emma Clarkson.	Points-of-Contact are indentifed in the SWG-2019-00067; Port of Corpus Christi Authority Channel Deepening Project (CDP) FAST-41 Coordinated Project Plan (CPP).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
246	24	Page 22 of 88 of Baseline Report - Part 20 (Mott MacDonald Wetland Delineation, October 2021) indicates that the oyster delineation results were for "live" oyster beds. TPWD would like to clarify that oyster habitat does not have to contain "live" oysters to meet the definition of a special aquatic site or to provide biological, chemical, or physical ecosystem functions. The presence of oyster shells (living or dead, including predominance of shell fragments greater than 25 mm) provides direct evidence that the area supports the recruitment and growth of live oysters when conditions are favorable. When conditions are unfavorable for the recruitment and growth of live oysters, these biogenic structures continue to provide food, substrate, and shelter to the oyster community of fish and invertebrates; continue to dampen wave action for shoreline stabilization; and continue to buffer the pH of the waterbody. **Recommendation:** Habitat surveys should not rely solely on the presence of "live" oysters to delineate oyster habitats, but also the predominance of dead shell material. Impacts to oyster habitat (dead or living) should be avoided and minimized to the extent practicable and compensatory mitigation should be provided for unavoidable impacts.	USACE uses standard survey methods for oysters but does not share the same definition of oyster reefs that TPWD uses for its fisheries management.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
246	25	TPWD provides correspondence with the USACE on the following: • Permit Application Number SWG-2019-00174 Bluewater Texas Terminal LLC, December 20, 2021 • Bluewater Texas Terminal, LLC DOT Docket No. MARAD-2019-0094, December 13, 2021 • Permit Application Number SWG-2019-00067 Port of Corpus Christi Authority Special Public Notice, July 2, 2020 • Permit Application Number SWG-2018-00789 Axis Midstream Holdings, LLC, September 13, 2019 • Axis Midstream Redfish to Hamor Island Pipelines, December 6, 2018 • Permit Application Number SW0-20L9-00245 Port of Corpus Christi Authority (PCCA), September 20, 2019 • Permit Application Number SWG-2019-00067 Port of Corpus Christi Authority (PCCA), August 28, 2019 • Permit Application Number SWG-1995-02221 Moda Ingleside Oil Terminal, LLC, March 9, 2020 • Permit Application Number SWG-2006-02562 South Texas Gateway Terminal, LLC, July 8, 2019 • Deepwater Port License Application: Bluewater Texas Terminal, LLC Notice of intent; notice of public meeting; request for comments. Docket No. MARAD-2019-0094, August 2, 2019	Thank you for providing this information.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
247	1	*Note: Comment received after comment period ended.* Concerned about a super tanker filling station and turn-around next to the ferry	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
247	2	*Note: Comment received after comment period ended.* Concerned about the possibility of accidents and shutting down the entire petroleum refining capacity.	The global extraction, transportation, and consumption of crude oil is outside of the USACE's Scope of Anaylsis, as defined in 33 CFR 325 Appendix B, for the proposed CDP.
248	1	*Note: Comment received after comment period ended.* The DEIS is incomplete regarding cultural resources, as stated within the document. The reports for the archeological investigations, terrestrial and underwater, have not been submitted to the Texas Historical Commission (THC) for review, as required by Section 106 of the National Historic Preservation Act and the Antiquities Code of Texas. The THC cannot review the DEIS until it is complete and it addresses the results of the archeological investigations and the potential impacts posed by the project. Please submit the DEIS to the THC for review once it is complete and includes this information.	The NEPA process and the NHPA process are separate. The terrestrial report received concurrence prior to the DEIS's NOA publish date.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
249	1	*Note: Comment received after comment period ended.* USACE has rightly pointed out that channel deepening is necessary for the construction of the Harbor Island Te1minal Facility (Terminal Facility), and that Axis Midstream Holdings LLC's proposed pipelines, planned to cross sensitive habitat, would serve the Terminal Facility (Pipelines). See Significance Determination for Pe1mit SWG-2019-00067 (Significance Determination), March 7, 2019, at p. 6. The Project and these two other projects taken together will share the same wate1ways, cause an increase in traffic, and the construction of each could contribute to spills negatively impacting the environn1ent. NEPA and federal case law require that the totality of impacts from these three proposed projects be reviewed as one whole project in the final EIS.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
249	2	*Note: Comment received after comment period ended.* In Section 3.3.3.2.3, the USACE makes the statement that "[m]ost oyster reefs in Corpus Christi Bay are dead." While this may be true, it is important to recognize the reasons why this has occurred. The average salinity of Corpus Christi Bay has increased dramatically over the past 50 years due to channel deepening and decreased freshwater inflows. Even the slightest increase in average salinities from current conditions will be the ultimate demise of remaining oyster reefs. Ultimately, compounding effects from this Project and other projects will result in Corpus Christi Bay becoming hyper-saline. Further, the USACE states that "[s]ome commercial harvesting of oysters occurs in Aransas Bay, but none in Corpus Christi Bay or the Upper Laguna Madre (pers. comm., D. Topping [TPWD], 2016)." This statement is false as there were reported commercial landings from Corpus Christi Bay in the late 1980s and the early 1990s. This Section fails to mention recreational oyster harvest in the impacted area or the role that oyster reefs play in carbon sequestration.	Some commercial harvesting occurred in Corpus Christi Bay in the late 1980s and early 1990s, however this statement is referring to the current state of commercial harvesting not the past. Text has been revised to "Currently some commercial harvesting...". Carbon sequestration is outside the USACEs scope of work.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
249	3	*Note: Comment received after comment period ended.* There is no explicit mention of the night-time fishing effort that occurs immediately within the Project area in Section 3.3.3.3.2. Southern Flounder are mostly a night-time fishing activity (gigging) and while TPWD lacks fishing effort data for this specific fishery, USACE must recognize the value of this fishery and the impact the Project will have on this activity.	Species included in the recreational fisheries data in Section 3.3.3.3.2 are Spotted Seatrout, Red Drum, Southern Flounder, Red Snapper, and King Mackerel.
249	4	*Note: Comment received after comment period ended.* The information presented in Section 4.1.2.2.2 is conflicting. On page 4-11, USACE states that "[s]hort-term modeling indicates that the construction of the Proposed Action could slightly decrease bay salinities, less than 1 part per thousand (ppt) on average in the Corpus Christi Bay system," and on page 4-12 USACE states that "[t]he results indicate that channel deepening would increase average salinity by less than 1 ppt in the Corpus Christi Bay system. This magnitude of change would appear negligible given the wide salinity tolerances of estuarine species. Therefore, it was concluded that channel deepening would not result in major changes to salinity in the Corpus Christi Bay system." USACE needs to clarify if the salinity in Corpus Christi Bay will increase or decrease. The blanket statement that the projected magnitude of change appears negligible given the wide salinity tolerances of estuarine species is a gross generalization of potential impacts, specifically for growth and production of vulnerable oyster reefs which are already at the upper end of their salinity tolerance. Any increase in salinity in the Corpus Christi Bay system will have significant detrimental impacts for live oyster reefs.	The statement about a decrease in salinity was an oversight and has been edited accordingly.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
249	5	*Note: Comment received after comment period ended.* On page 4-51, USACE claims that "finfish and shellfish are motile enough to avoid highly turbid areas." While this may be true for juvenile and adult stages of aquatic species, it is not the case for their larval stage. Larval fish and shellfish lack significant mobility and are generally at the mercy of tides, currents, and wave energy. As they pass through turbid waters, they can quickly become asphyxiated. This is a significant concern for red drum larvae that must recruit into the bay system through the proposed Project area.	Additional information has been added to sections 4.2.2.2, 4.2.5.3, and Appendix E (EFH Assessment) regarding larval fish. EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
249	6	*Note: Comment received after comment period ended.* CCA Texas partially disagrees with the following statement on page 4-53: "[a]s described in Section 3.3.3.2.3, oysters can tolerate relatively high salinities, temperatures, and increased water depths. However, some oyster predators (stone crabs [Menippe mercenaria] and oyster drills) and diseases (Dermo) may occur more frequently or in higher concentrations with higher temperatures and salinities (Cake, 1983; Murdock and Brenner, 2016; Soniat and Kortright, 1998). The slight increase in salinity that is expected resulting from Alternative 1 is not anticipated to cause any long-term impacts to oyster reefs in the project area." As mentioned in previous comments, any increase in salinity will further stress live oyster reefs in Corpus Christi Bay and will possibly be their ultimate demise.	Modeling by Baird (2022) (Appendix I) indicate minor increases in salinity (less than 1 ppt) are anticipated under Alternative 1 in the Redfish Bay State Scientific Area. The range of salinity change which is less than +/-3 ppt is within the proposed dredged channel. Most estuarine organisms occupying these environments are ubiquitous along the Texas coast and can tolerate a wide range of salinities (Pattillo et al., 1997). Average salinities in the study area range from 30 to 36 ppt, with dry years having salinity levels above 32 ppt and wet years around 25.5 ppt (Montagna et al., 2021). While oysters can survive in salinities ranging from 5 to 40+ ppt, they thrive within a range of 10 to 25 ppt. In areas where oysters are mapped, the salinity change was shown to be less than 1 ppt (see Appendix I) and are not anticipated to cause any long-term impacts as oysters have the ability to tolerate salinity ranges. Additional information regarding salnity tolerances and salinity maximums for common fish, shellfish, wetlands, and submerged aquatic vegetation within the study area has been added to Section 3.2.3.4 (Salinity).

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
249	7	*Note: Comment received after comment period ended.* The cumulative effects that are discussed in Section 5 are general and broad. As noted above, USACE must provide "some quantified or detailed information; ... [g]enteral statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided" when considering cumulative impacts. Ocean Advocates, 402 F.3d at 868. Further, the impacts to aquatic species as well as commercial and recreational fisheries were not addressed in Section Five.	Information on cumulative effects to commercial and recreational fishing has been added to Section 5.4.13.
249	8	*Note: Comment received after comment period ended.* The potential cumulative impacts discussed in Section 5.4.1 focus on sediment transport and shorelines. According to Table 5-2, the CEA Project Groups (defined below) "may contribute to adverse or beneficial cumulative effects in conjunction with the proposed action." CEA Project Groups include offshore oil and gas te1minals; onshore storage and fabrication te1minals; utility, gas, petroleum pipelines; maintenance and navigation dredging; bulkheads, breakwaters, boat ramps, and marinas; commercial and residential development; and ecosystem restoration. This cumulative effect analysis is vague and limited, and fails to meet the standard set forth in Fritiofton. The analysis should be expanded to consider other valuable resources which could be affected, while also considering a broader array of potential effects. For example, SAV will be negatively impacted by several of the proposed projects and loss of SAV results in diminished water quality and increased shoreline erosion. Increased sediment transport could also lead to the siltation of low-relief oyster reefs, which also negatively affects water quality. By expanding the assessment to consider SAV and oyster reef functions and their importance with a broader context, cumulative impacts could be more fully assessed. Important functions to focus on could include the economic value of seagrass and oysters and how they play a large role in preventing and slowing erosion.	Potential cumulative impacts to wetlands, SAV, and other aquatic resources such as oysters, are acknowledged in Section 5.4.7 and 5.4.8, including consideration of increased erosion and turbidity.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
249	9	*Note: Comment received after comment period ended.* States that dredging or hardening of shorelines from other projects could contribute to cumulative impacts through altered bathymetry, increased currents, associated impacts to the hydrosalinity gradients. Salinity modeling indicates that a change in the tidal prism associated with channel deepening increases the exchange of saltwater between Corpus Christi and Nueces bays. The results indicate that channel deepening would increase average salinity by less than 1 ppt in the Corpus Christi Bay system. Section 5.4.2 states that "this magnitude of change would appear negligible given the wide salinity tolerances of estuarine species" (Baird, 2022c). However, this Section does not address the cumulative impacts to salinity that will result when all of the desalination projects are taken into consideration. Further, it does not address how the increase in salinity will impact oyster habitat and fisheries in the impact zone. It is worth noting that CC Bay is a fringe bay system for oyster reefs. Of all the abiotic factors that can affect the biology on an estuarine organism such as Crassostrea virginica, the synergistic effects of temperature and salinity have the most profound effects and long-term exposure to high salinities can be detrimental. The projected increase in CC Bay salinities in model runs have the potential to further hinder the production of oyster reefs by providing a favorable environment for predators (oyster drills), putting the oysters in an environment outside their optimal salinity range (10-30ppt), or both.	The potential for cumulative impacts due to desalination projects is discussed in Section 5.4.2. Potential cumulative impacts to wetlands, SAV, and other aquatic resources such as oysters, are acknowledged in Section 5.4.7 and 5.4.8.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
249	10	*Note: Comment received after comment period ended.* Temporary and localized impacts to water quality (in the form of increased turbidity) may result during dredging and placement. There would be limited spatial (several hundred feet, approximately 1,000 feet) and temporal (several hours) ranges of turbidity effects and related sediment movement. Actions that require dredging or marine construction could increase turbidity temporarily and locally. Section 5.4.3 does not address the overall impact that can be expected if individual impacts are allowed to accumulate. For example, without any specificity, this Section states that "past, present, and reasonably foreseeable actions in the area could contribute similar temporary and localized impacts to water quality." However, Section 5.4.3 does not address the cumulative effect of increased turbidity and how this will affect different species of fish and wildlife in the area as well as how this will affect commercial and recreational fisheries. The Draft EIS also fails to address the adverse impacts to water quality that are certain to occur from any spills or leaks from any utility, gas, and petroleum pipelines in the area of the Project.	Additional text about water quality impacts also impacting aquatic resources have been added for clarity. The increased risk of spills as a cumulative effect is disclosed several times throughout Section 5.4.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
249	11	*Note: Comment received after comment period ended.* The Project would impact both tidal and non-tidal wetlands through placement activities. It is noted that dredging the channel is not expected to impact wetlands. However, Section 5.4.7 contains general statements about possible effects and some risk. It does not include any quantified or detailed info1mation. These approaches are too limited and should be expanded to consider other valuable resources which could be affected, while also considering a broader array of potential effects. By expanding the assessment to consider the full array of wetland functions and their importance with a broader context, cumulative impacts could be more fully assessed. For example, important functions to focus on could include the wetlands' role as a nursery for recreationally and/or commercially valuable aquatic species; its ability to minimize downstream flooding; and its ability to improve water quality.	Additional text regarding typical wetland functions and values has been added to Sections 3.3.2. Section 5.4.7 will also be edited to discuss potential losses of the typical wetland functions and values.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
249	12	*Note: Comment received after comment period ended.* States that "the CDP would directly affect the estuarine habitats and fauna in the study area ... impact 1,182 acres of open water/bottom habitat through excavation (NOAA, 2010)." Table 5-10 notes that impacts of other Maintenance and Navigation Dredging (CEA Project Group #4) projects "could contribute to aquatic resource impacts ... also contribute to turbidity and erosion which can impact aquatic resources." This potential cumulative impact analysis is vague and deficient. To better assess potential impacts, the final EIS must consider the dredging effects on migrating adult southern flounder and recruitment of southern flounder larvae. The timing of dredging is extremely important since flounder move along the bottom of the channel, spawn offshore and larvae go back into the channel in the springtime. Hydraulic entrainment, through the direct uptake of aquatic organisms by the suction field generated at the draghead or cutterhead during dredging operations, results in the localized by-catch of fish eggs, larvae, and mobile juveniles and adults. When entrainment occurs near large spawning aggregations, however, replenishment of fish populations could theoretically be suppressed via the removal of reproductive adults. Where sufficient ecological information exists, the risk of entraining larval fish and eggs can be minimized by restricting dredging during key reproductive and recruitment time periods and avoiding nurseries and spawning aggregations.	The potential for cumulative impacts due to desalination projects is discussed in Section 5.4.2. Potential cumulative impacts to wetlands, SAV, and other aquatic resources such as oysters, are acknowledged in Sections 5.4.7 and 5.4.8. Information on cumulative effects to commercial and recreational fishing has been added to Section 5.4 and 5.5.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
249	13	*Note: Comment received after comment period ended.* If it is found that the DEIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or new reasonably available alternatives that are within the spectrum of alternatives analyzed in the DEIS, which could reduce the environmental impacts of the proposal have been identified then the identified additional information, data, analyses, or discussion should be included in the FEIS. Further, if the DEIS does not adequately assess the potentially significant environmental impacts of the Project, the NEPA review will be found inadequate and thus should be formally revised and made available for public comment in a supplemental or revised DEIS.	Thank you for your comment.
250	1	*Note: Comment received after comment period ended.* Sent 2 DVD's to the USACE. One DVD shows a large ship wake at Charlie's pasture. The 2nd DVD is about contrary tidal currents. I observed this contrary current event for over 2 hours on December 21, 2021.	Thank you for providing this information.
250	2	*Note: Comment received after comment period ended.* Computer models are limited and are based on chosen inputs. What occurs in natural environments is not always predictable or uniform as shown in the short videos. We see the video occurrences often, but none of these events are reflected in the models conducted by Freese & Nicoles or Baird Engineering.	The limitations of numerical modelling are acknlowedged and benchmarking/ validation of the numerical methods employed has been undertaken where possible. The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) assessed the additional impact of the CDP by comparing Future Without Project and Future With Project channel scenarios (i.e. a comparative not absolute analysis). The analysis indicates that the CDP would have minimal additional impacts to the shorelines along the CCSC.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
251	1	*Note: Comment received after comment period ended.* Any deepening of the channel should not increase any storm surge impacts. If anything, this project should have the opposite mitigation to further protect our community. In addition, the project and outcomes should not expand any slope impacts to shoreline structures.	Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with "planned future conditions" representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI's modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI's application of model parameters or inputs for the ADCIRC/SWAN models used in its study.
251	2	*Note: Comment received after comment period ended.* Tourism is a multi-billion-dollar economy within the City of Port Aransas. Dredging, if allowed, would need to be stopped during our key seasons, including spring break and Texas Sandfest, summer (mid-May through mid-September), and holiday weeks in November and December.	USACE understands that port cities often have additional tourism economies. While the USACE does not condition permits to require demobilization during festivals, it does consider impacts to tourism as part of a larger evaluation in its public interest review.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
251	3	*Note: Comment received after comment period ended.* Any dredging impact should not impact any summer ferry operations, or other key visitation times to and from Port Aransas.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
251	4	*Note: Comment received after comment period ended.* Our fishing industry is a pillar of our tourism economy; therefore, any allowed dredging should not impact recreation boating, especially during our summer economy and key weeks of seasonal fishing and boating.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
251	5	*Note: Comment received after comment period ended.* The beaches of Port Aransas are the primary destination driver for our tourism economy. Any dredged sand mineralogy must match the current beach sand if placed on our beaches.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
251	5	*Note: Comment received after comment period ended.* The beaches of Port Aransas are the primary destination driver for our tourism economy. Any dredged sand mineralogy must match the current beach sand if placed on our beaches.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
251	6	*Note: Comment received after comment period ended.* The proposed turning basin is located within a primary intersection of our already busy waterways. Wherever the turning basin is located, it should have zero impacts to ferry operations and zero impacts to recreational boating. We cannot afford any additional negative impacts. Although unrelated to this project, even the current flow of VLCCs and Port of Corpus Christi water traffic should be restricted during peak times of daily ferry operations and busy use times of the ferry, especially on holidays and Sunday check-out times.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.
N/A	1	Good afternoon to everybody. Primarily today my comments will focus on what I am about to embark on which is to read the Draft EIS. I appreciate the presentation that was given so that I can have thorough analysis of what the Port's presentation is and also what the process will be for the EIS. My purpose in coming today is to assure my constituents not only do I intend to have data drive decisions but to promote the science should bring about the balancing act that is pretty pressing right now within the GO political circles. We all understand the global demand for energy. I am very familiar with the Port processes but I can tell you that since I left the Port, the Environmental team has been greatly enhanced. So I am prepared for both. I am prepared to read and to hear from my constituents, particularly my job is to protect those particularly that are highly effected which would be those for my constituency in Port Aransas.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	2	In addition, I also want to make reference to the fact that I think that there should be a real clear message that I am here on my own as the Nueces County Judge. I have not been sent by Nueces County Commissioners court nor have we taken any formal position nor do I expect there to be a formal position taken on it. However, I think the constituents can count me to be a repository for their concerns and their comments. If a permit were to be issued, my main focus would then be go right back to that Sediment Incident Management Plan that Nueces County already has with the Corps of Engineers to work on beneficial use, to make certain that shoreline protection particularly as it applies to some of the things you talked about, whether it is restoration seagrasses, living shorelines, erosion, beach nourishment. I will be deeply focused on that. So I am kind of prepared for both to make certain that my constituents understand that I am here to listen and to hopefully aid and guide in that very difficult balancing act between protecting this economy, making sure that these barrels do get to our western allies. But all the while, if the data and the science does not support the project that we are absolutely vocal about that too. So again, I thank you for the opportunity to learn here today. I will stay for a little bit in order to hear more. But as the Emergency Manager for this county, I think it is important that I consider any impact to the environment as a current emergency as is climate change as is so many other things. But I don't discount the GO political nature that a west Texas barrel of crude is still the best crude around. So I am here to make certain that you know that I am resource and that you can count on me as a partner as this process continues. Thank you.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	1	There are several things about the storm surge in the EIS but the consequences not fully explored. There is no mention of their interactions as part of the cumulative impacts in Chapter The 2022 EIS notes that channel deepening would allow more surge to propagate the channel, intensifying velocity and increasing water level. This includes a direct cumulative increase in tidal range, particularly in the inner channel near Port Aransas where it could be as high as 36 percent. The inundation area will increase up to 492 acres but it does not say where. Modeling data shows that the speed of the current Port Aransas to Ingleside will increase as a result of channel deepening since the water depth in that stretch will remain unchanged but it does not say by how much. Researchers have found that channel deepening is the main contributor to storm surge effects even though Ingleside on the Bay residents made numerous comments on the original EIS scoping, Ingleside on the Bay is not treated as a separate city in the EIS. IOB will be affected by normal and seasonal tidees, let alone tropical storms and hurricanes which already cause 4-foot storm surge	Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with “planned future conditions” representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI’s modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI’s application of model parameters or inputs for the ADCIRC/SWAN models used in its study.
N/A	2	Research which was brought up in scoping shows that hydrodynamic changes or channel deepening increase both intensity and extent of flooding and storm surge pushing the water further inland. Ingleside on the Bay experienced 4-foot storm surge during 2020 with every tropical storm in the Gulf, yet nowhere in the EIS are concerns about flood and storm surge impacts for communities like IOB or Gregory which could be catastrophic in the event of another major hurricane.	Hydrodynamic storm surge modeling using SWAN+ADCIRC was conducted by HRI using two synthetic Category 4 storms to evaluate storm surge impacts in and around Corpus Christi Bay with “planned future conditions” representing Alternative 1. Compared to the existing channel configuration, this alternative would allow more water to enter the bay. This increases the storm surge water levels, as well as slightly increases the inundation extent. There would be an increase in area inundated of between 447 to 492 acres in small areas throughout the study area. The maximum elevation gain of storm surge compared to existing conditions is 3.5 inches for this alternative. A hotspot of increased storm surge elevation of 4 to 12 inches was identified adjacent to Harbor Island for this alternative (Subedee and Gibeaut, 2021). Additional review of HRI’s modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any issues with HRI’s application of model parameters or inputs for the ADCIRC/SWAN models used in its study.
N/A	3	Conclusion: Update research talk about others about channel deepening and storm surge needs to be included in the EIS. Ingleside on the Bay should be specifically included in the EIS with more focus on impacts of channel deepening, on flooding tides, storm surge and coastal communities. The Corps should deny. Thank you guys	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	1	This is a colossal wrong to be done. Corps of Engineers has so many experience in doing many things. This is wrong. This is unprecedented. 80-foot deep channel? There is nothing like it in the Gulf Coast or even on the eastern seaboard. You all have no idea what your models are showing. Your models are showing nothing to do with relative sea level rise as it is today. I think they are older models. There is a Texas A&M study that shows 4- to 6 feet of erosion along the Gulf Coast. That's not included. We are not looking forward enough to what is happening. When you get a storm surge, the numbers that you are putting in there don't even measure with relative sea level rise over time. What does that mean to the property owners where Brian Gulley lives, when they fill in the Packery Channel and all those people that bought those beautiful lots with all those channels, what is going to happen? Who is paying for this? Oh, I guess the Port is in real estate, perhaps they can ensure it for us. But that's not really my point.	Thank you for your comment.
N/A	2	But that's not really my point. The other thing is Purpose 1, the forecast demand is wrong. In 2003, the forecast is for imports. Now they are not even on the books. They are exports. Okay. That's fine. If you want to make the national debt or international debt even, why don't we just export 10 percent and that way we can balance our debt. We don't need to have all these exports taking our oil away and given to somewhere else. This oil needs to stay in the United States. That's what we are paying international people to bring over here. That's not smart. It's inflationary. In fact, electric vehicle, just read today in Reuters, 33 percent of all global vehicles will be electric. So you are putting in a fossil fuel export terminal at the termination of the fossil life. This is it. We are running out. We also have climate change. I know the Corps believes in climate change. I know you believe in relative sea level rise. This will only promote more of that worldwide.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	3	I also want to say that -- I guess I already talked about the volumes. So storm surge as Mr. Daley was talking about is critical for our Bay. I think your numbers are wrong. Ingleside of the Bay is at the confluence of La Quinta, the ship channel -- Corpus Christi Ship Channel, intercoastal canal. We are seeing already the Corps made a determination within bridges permit. They took out all this seagrass. There is probably 30 percent of the seegrass loss in that immediate area. There is no response from the Corps on that. There is other issues the Corps has had. Let's look at Brazos. We diverted the channel and look what happened Sergeants Beach. We really need to think this thing through. I think this is not even a no action but a reverse action. Thanks.	Thank you for your comment.
N/A	1	First of all, what's the purpose of doing all of this. I've seen a lot of documentation that has a lot of very good comments about why the purposes is being propose to do the deepening. But if you look back in 2003, there was the last Environmental Impact Statement done on Corpus Christi Channel at least that I could find and the purpose at that time was to ensure that we could handle increase of oil and gas and also agricultural exports. But since then as we all know, in 2015 when we got rid of the oil export banned, things really took off. And we have seen a lot of changes with companies coming into the area with petrochemical plants, tank farms, oil export terminals. They came here for several reasons. One, financially, it's a great place to come to do business. We have some good working people and we've got some space. But what does that really mean to us? What happens is they get large tax incentives to do that. They get degradation of the seagrass.We can look at Google Earth for the last ten, 15 years. It's really going down.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	2	Then we've got water quality and the overall degradation of our environment. One of the things that I am concerned about is that with the environment, we are not Louisiana. We are not Port Arthur orange. We are not Houston, Texas City, come down to Freeport, even Point Comfort. We got good air here relatively speaking and what we are doing is getting companies to come down here and buy the ability to permit pollution in the air that is not exceeding the EPA limits because you can't do that in Houston. You build a product there, you got to take somebody else's emissions or get rid of yours. That's a whole different story. Anyway, the bottom line, we really have this deepening channel, I think it will adversely affect the air quality. It will affect the coastal bend air which is marginally monitored by TCEQ. If you look at all their monitoring stations and where the wind blows, the wind blows -- monitoring is here and the wind blowing over here. So, I think that's a problem. Anyway, to summarize, we have to look at the real need to affect the world experts. Okay. Thank you for your efforts.	Thank you for your comment.
N/A	1	I kind of want to help the Corps because y'all need some help. You are getting a bunch of B.S. from the Port here that this channel to nowhere. I've coined it "The Bridge to Nowhere." Why are we even evaluating an 80-foot dredge when it goes nowhere. There is no terminal. There is no pipeline to get the oil there and it's just a gigantic boondoggle. You have been down this road before. I think you guys have maybe done maybe 3 EISs on deep dredging, deep port, home port, safe port, whatever you call it. This is just another iteration of the same thing.	Thank you for your comment.
N/A	2	I appreciate the alternatives you are looking at. Maybe another alternative is to put all the money in retrofitting our refineries so we can use our own oil and not have to export our oil to other countries. There are lots of things I want to say here. The Essential Fish Habitat, I would highly encourage you guys to look at our local universities. They have a wonderful scientists here. This is Aransas Pass that we are dealing with here. This is not just some channel. It is a significant migration route of larvae, shrimp, crab and a life cycle between the Gulf and the Bays. It is like doing surgery on the aorta of a heart. It is significant.	Impacts to estuarine organisms associated with the Applicant's Proposed Action Alternative are addressed in Sections 4.2.2.2.2, 4.2.5.3.2, and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	3	And the map that I look at this, when I see all this dredge material going around, using these words "beneficial use", "nourishment", that's all PR terms. This is sludge. This is dredge material. Let's just call it what it is. Let's don't try to make these soft names like it's going to help us. Mother nature developed these barrier islands and this system. What do you think the Corps of Engineers and the Port of Corpus Christi can do better. So I think that this is going to take a lot of science. It's going to take a lot of evaluation. I think -- I have a house in Port Aransas. I am right on the ship channel. It's offensive to us that this meeting is here in Corpus Christi. If you look at this map, we are 30 miles away from where you are trying to do this. You should have this meeting in Port Aransas. That's the place that is going to affect it most. Forget industry, let's look at nature, tourism, outdoor, our families. That's what this is all about. Thank you.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
N/A	1	My pop, he's gone. He started this outfit, the Arc Animal Rehabilitation. He started counting plastic trash on the beach 40 years ago. He did it out of mortification. Look man, I am not making anybody the bad guy here. I am sure there is such a thing. I spoke to people before I stepped into this room who were super sincere, looks me straight in the eye, were fascinated upon the issues at hand. I don't need to doubt that. What I do need to doubt, however is the definition of National Energy Security and who's defining it. Okay. You have already heard people speak to this indirectly. Larger ships and fewer trips focuses on the how without examining the Why. The EIS contents, I don't get passed Chapter 1 and 2. You know. The Need and Purpose. That's National Energy Security. In the absence of looking at this one gentleman said, alternative energy and where we are going with that. We have to look at where we are right now and I appreciate that and I am sure you do too. We worked so hard and we made all this studies and gotten clear about all the facts about the how. But I don't think it is so clear why. We are on the verge of doing something irrevocable. I want to know that I was up here and I opposed it. That's my official position.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	2	I have to disagree with my representative Barbara Canales. The west Texas barrel of crude in the ground is the best barrel around. If we got that straight, all of this would be an intellectual endeavor. I am not putting anyone down. I am grateful for everybody's effort and best intentions. But if we don't get step one right, we have no prayer and that will be our legacy. Thank you.	Thank you for your comment.
N/A	1	My name is Craig Bennett, B-E-N-N-E-T-T. I am with the law firm of Jackson Walker. We have been following this and very interested in this process. First, I just want to make a request that there should be another public meeting in Port Aransas. The draft EIS statement was issued only 14 days ago. Most of the members of the public have not had an adequate opportunity to review that, to be able to prepare comments. I understand this is not a public hearing under 33CFR but even under that, those generally require minimum of 30-days notice. I think it's only reasonable to give the public a little more opportunity. I think it would build a lot of goodwill and it would actually be within the spirit of the purpose of giving notice to the public and having a public meeting. There is sufficient time to hold another public meeting in Port Aransas in the local area which is where most of the local citizens who have expressed an interest and who will be affected by this project are located. I think it would build a lot of goodwill and certainly would not delay the process or the project by holding another public meeting in Port Aransas.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	2	Now I want to turn to the Draft EIS. I would bring to your attention a number of things. One, it does not appear that the Draft EIS was prepared consistent with the new regulations, the new NEPA regulations that were adopted in May of 2022 that just went into effect. Those relate -- have new requirements related to the evaluation of the project's purpose and need. Specifically set out in 40CFR Sections 15.02, 15.07 and 15.08, there are requirements for the court to do certain things related to purpose and need that does not appear to have been done for the Draft EIS. The Corps needs to look at those regulations and correct certainly before the final EIS is issued. I also, as has been noted, Mr. King mentioned the phrase dredge to nowhere. He makes a very valid point that barring the Harbor Island terminal project and midstream pipeline project, both which are being considered by the Corps, the dredging makes no sense. Therefore, I would reurge the Corps to look at whether those three projects which the Corps is considering all of them, are part of a single and complete project. A Corps official earlier made that determination and then reversed course. I don't think there is any justification to change that earlier determination because clearly all of the projects are related to one another and dependent upon one another.	Thank you for your comment. As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
N/A	3	Also, I would note that the Corps determined that the proposed project is not water dependent which creates a rebuttable presumption and an alternative is available with less impact on the equatic environment. But the alternatives analysis does not address this rebuttable presumption at all. I would also note that the socioeconomic analysis does not address potential impacts for Aransas tourism, fishing or ferry operations post-dredging. These are significant impacts that must be considered as part of any sufficient socioeconomic analysis. Thank you.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project. Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. The section discusses the potential for short-term impacts to recreational activities (e.g. boating, fishing, beach visitation) from the construction of the project. Long-term adverse impacts to recreation and tourism are expected to be minor given that the vast majority of activities associated with the Port will continue in the future and will continue to co-exist with recreational activities and general tourism.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	1	Thank you for your time this evening. I-a-i-n, V-a-s-e-y. I am the president and CEO of Corpus Christi Regional Economic Development Corporation. We are the keepers and calculators of economic health and benefits for the region. In the last 11 years, we have seen the emergence of the Port of Corpus Christi as really the energy port of the Americas. We have seen 54 billion dollars worth of investments in this area, primarily in the energy sector. Actually, it will be more than that. Cheniere announced today another 7 billion dollar investment in the LNG facility. We have really become the hub of the energy sector that supplies energy to the western world, the democracies of the west. The Port will be handling upon within the next couple years, we anticipate between 3- and 4 percent of the global crude oil movement especially as the Russian oil is taken off the market. So it's increasingly important that all oil makes it to the western Europe and our allies around the world. From an economic's perspective, 70,000 jobs in this MSA are directly or indirectly supported by the Port operations. That's one in five jobs in this region. One in five families supported by this energy operations.	Thank you for your comment.
N/A	2	We are especially interested to hear and monitoring closely that this will remove the need for lightering and reverse lightering. So that's going to improve our air quality in the 20015 NAAQS standards which currently stand at 70 parts per billion. We test currently at about 71 parts per billion and pointed in the right direction in removing some of those emissions from the air. This will help us further improve the air quality for the entire region. The other things we are seeing is we are seeing the emergency of green and blue energy projects, more environmentally friendly energy, hydrogen type projects. We are starting to see those. This will help us make more -- more competitive as we pursue some of the those projects. Our calculations are without this project we could fail to see some of those projects and potentially see over a ten to 20,000 job loss over a ten year period. With that, I want to thank you for your time for allowing me to participate. Thank you.	Air quality impacts to Alternative 1 during construction are addressed in Section 4.1.9.2.2 Emissions From Construction Equipment and operation in Section 4.1.9.2.3 Operational Emissions.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	1	I am going to start talking from here to take advantage of my time. This thing about the quality air and all of that, you get infernal flares in your backyard. This is one in my backyard. To burn the gases that are expelled from those times which are going to have seals around it that never get fixed. Brother Patrick, they got the flares, I got mine. I am going to put this in here so you all can see it because I am going to cover about salinity. The flares come later and it's going to be ACES(sp.ph) and Lone Star behind this project. My name is Encarnacion Serna. It is too long and I don't want to use my three minutes spelling it out. I will write it for you.	Thank you for your comment.
N/A	2	I saw the Environmental Impact Statement, three volumes over 2000 pages. I read the introduction and I read pages 284 to 290 of Volume 1 and some pages of Volume 3. We are suppose to read all of that in less than a month. I can say this much, based on what I read so far, the Environmental Impact Statement is characterized with oversights on crucial issues, it has half truths, spins and it is saturated with factoids, bullshit and dances around the important issues but never digs, never digs like it needs to dig.	Thank you for your comment.
N/A	3	Because of the three-minute limitation, let me just talk about salinity. There are seven proposed gigantic, monster-size salinity projects. No cumulative effects on salinity were done because you left out four. You left out four. You can see that figure Table 5.1. The four desalination projects that you left out of the so-called cumulative effects was the Port of Corpus Christi La Quinta Channel was going to produce 30 million gallons a day in the permitting process. Then the City of Corpus Christi La Quinta Channel which will produce 40 in the permitting process. And then the Corpus Christi Polymers which went under the radar, it's build but has not been commissioned. It was left out. Then the City of Ingleside Poseidon is in the planning stages and not permitted yet. So you left those four out. I am going to leave this here so you guys can go back and do your study. I am also very very worried about the following very important issues; physical oceanography, salinity, climate setting, the assessment of water quality, air quality, cumulative effects and several more saturated with factoids and bullshit. Thank you.	The potential for cumulative impacts due to desalination projects is discussed in Section 5.4.2.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	1	My name is Chloe Torres. However, I am making this comment on behalf of Dorothy Pena. The Army Corps of Engineers mission as stated on their website is to deliver vital engineering solutions in collaboration with our partners to secure our nation, energize our economy and reduce disaster risk. You represent a system that engages in defensive tactics in order to achieve your mission. As an aside to not seem so defensive to the civilians you claim to serve and protect, you state that you also produce disaster risk. Disaster is what happens when complex systems are created without the proper investigations or foresight. Our community knows disasters. We are the ones who keep each other fed when the lights go off. We are the ones who keep each other safe, not the Port of Corpus Christi. What we are asking you to do today is just to avoid the disaster entirely by not moving forward with this dredging project. Do the proper investigation of the possible cumulative impact of this project and the climate crisis which are already affecting our coastal region.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	2	You were ordered on January 27 by executive order 14008 to take the climate crisis into consideration before making crucial decisions that could further exacerbate this particular eco region. Your agency is also responsible for upholding the regulations of the Clean Water Act which we have seen you violate in the past. It seems highly unlikely for your agency to properly serve the federal government, your partners and the taxpayers you claim to protect. Something has to give and usually it is the health and well-being of our communities. We pay. Not the corporations or industries. Our communities. Our environment pays. No more exploitation of our bay or our communities which are predominately of color. We understand your values change every time a new administration comes into power. New laws or regulations are written so you can quote, better collaborate with your partners. But our values don't change. It is not okay to destroy our bay to ensure national security, whatever that means. It is not okay to sacrifice the health and well-being of communities; Black, indigenous and other communities of color. Your government has done this, hallmark communities since it's inception and it needs to stop. No more violence on our bay or our community. I save the rest of my time.	Climate change is dicsussd in throughout Chapter 4 but is scpecially discussed in Section 4.1.3. Enviornmental Justice is discussed in detail Chapter 3 Section 3.5.4 and in multiple locations in Chapter 4.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	1	I strongly oppose this dredging project. I am especially concerned about the sediment quality from accumulation of pesticides and heavy metals. The public needs to see the details and data of what was tested and where. I believe they are available somewhere but it is too complicated and time consuming to find this crucial information for most people directly impacted. Also the sampling is not complete as of today which means there will be data in the final EIS which the public has no say in. Additionally, ACE is given two months during paid working hours to reviews the final EIS while the public has less than two months to prepare for public comment by reading hundreds of dense pages on their own time. I thank the good people involved on this project and ask all of you to not just hear our concerns but feel for us and see our perspectives as humans on a finite planet. Thank you.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
N/A	1	I strongly oppose this dredging project. I am especially concerned about the sediment quality from accumulation of pesticides and heavy metals. The public needs to see the details and data of what was tested and where. I believe they are available somewhere but it is too complicated and time consuming to find this crucial information for most people directly impacted. Also the sampling is not complete as of today which means there will be data in the final EIS which the public has no say in. Additionally, ACE is given two months during paid working hours to reviews the final EIS while the public has less than two months to prepare for public comment by reading hundreds of dense pages on their own time. I thank the good people involved on this project and ask all of you to not just hear our concerns but feel for us and see our perspectives as humans on a finite planet. Thank you.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	1	The science is clear that new fossil fuel infrastructure projects are contrary to public interest. This project should not be authorized according to Section 404(b) guidelines as it is not in the public interest. It involves impacts to special aquatic sites, namely Redfish Bay. The public interest is not served by approving a project that will directly hasten climate change, negatively impact estuaries and marine resources further congest transportation between Aransas Pass and Port Aransas, elevate the risk of oil spills in the bay and increase storm surge threatening coastal communities.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.
N/A	2	The purpose of this project to allow the safe and efficient loading of very large crude carriers will induce the development at additional crude export facilities on Harbor Island and pipelines that would cross Redfish Bay. This increase in crude oil production transport and processing will directly increase greenhouse gas emissions and hasten our heeded marsh to climate disaster. The overwhelming scientific consensus has conclusively determined that without significant rapid emission reductions the planet will result in catastrophic damage around the world. This project will directly and indirectly create additional warming that in turn threatens people's lives, health, safety and their livelihoods as well as threatening economy and national security for this generation and future generations.	The channel deepening would not be expected to induce development of additional crude facilities, because two terminals already have permit applications submitted on Hrabor Island without the channel deepening, and a 3rd property has had prospective midstream firms. The channel deepening would be expected to reduce vessel transits necessary to export from these facilities due to elimination of light loading. Nevertheless, Greenhouse Gas emissions have been addressed in the Final EIS. See response to Letter 242, Comment 7. GHG calculations and text were added to Sections 4.1.9.1, 4.1.9.2.3, 4.1.9.3.2, 4.1.9.4.2 and Table 4-15. Specific GHG impact text was added as a new Section 4.1.9.5.
N/A	3	If for some reason the Corps does not feel that addressing the cause of climate change is within their authority as it relates to this permit, the Corps is required by 404(b) guidelines to analyze less environmentally damaging alternatives to the proposed project to achieve it's purpose. The do nothing alternative should be preferred as it would leave 300 acres of seagrass in tact and not cover 5,000 acres of benthic habitat all while not producing the development of pollution causing and carbon industries. The offshore site alternative is definitely better than the Port's preferred project as while it does accomplish the ecological stated of the project, it does so with the least environmental impact similar to the do nothing option while also lowering the risks of accidents within the estuary bay system and lowering emissions caused by reverse lightering.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and is prepared after the final EIS. The ROD identifies the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documents the decision of all factors of the public interest review and the USACE's final decision on both the LEDPA and the preferred alternative. The ROD will also include all mitigation measures, including avoidance and minimization, incorporated into the project.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	4	The beneficial use argument that is stated in the EIS is flimsy at best. It does not come close to offsetting the destruction of habitat caused by construction. Beneficial use of dredge material proposed in this document could also be provided by the currently authorized dredging of the ship channel, maintenance dredging at La Quinta channel and the maintenance dredging that will be required to maintain the channel at it's current authorized depth of 54-feet. I request that the Army Corps of Engineers exercise its regulatory authority in a manner consistent with existing law, science and the President's Executive Order 14008 to respond to climate change at a time when we should all be coming together to deal with this problem, the Port of Corpus Christi is pursuing an infrastructure project that will provide a direct conduit to increase carbon production and further worsening the climate crisis. These climate implications are not addressed in this Environmental Impact Statement and we ask the court to provide a supplemental Environmental Impact Statement with the best available science regarding concerns raised at this meeting and submitted written comments. Thank you.	Climate change is dicsussd throughout Chapter 4 but is scpecially discussed in Section 4.1.3. Enviornmental Justice is discussed in detail Chapter 3 Section 3.5.4 and in multiple locations in Chapter 4.
N/A	1	My name is Brandon Marks. I am the Coastal Bend Regional Coordinator with the Texas Campaign for the Environment. I am a resident of Corpus Christi as is my family, including my dad, my grandmother and my cousins. I am here today because what is at stake is not a single dredging project. What is at stake is the heart and future of the Coastal Bend community. This project is just one piece in a larger plan to push an oil, gas and petrochemical industrial build-out on the Coastal Bend. This dredging project alone will lead to two new oil exports terminals on Harbor Island, increased traffic from very large crude carriers and new pipelines through the protected Redfish Bay state scientific area. This is not to mention what the rest of the industrial build-out will will bring like the plans for four desalination plants in Corpus Christi Bay that are designed to get water, to bring new petrochemical facilities to our community as well as an expansion of crude oil exports from Embridge and LNG from Cheniere.	The potential for cumulative impacts due to desalination projects is discussed in Section 5.4.2.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	2	Again, in addition to that, we have the Blue Water Offshore Oil Project. Our community is inundated with a fossil fuel industrial build-out. If allowed, this project and soon fossil fuel build-out will harm our collective health, our environment and our livelihoods. This may make our community profitable for a few corporations. But it will make it unlivable for the residents here. It's time to say no to the fossil fuel expansion. It is time to say no to any more toxic pollution that makes us sick at home and causes climate change around the world. We deserve better. We deserve elected and appointed officials that put the public interest above private profit. We deserve a future with breathable air, a livable climate and green jobs. But instead, we get false promises and greenwashing from the Port for projects like carbon capture and hydrogen that will just further the fossil fuel industry. To the elected and appointed officials in the room, if you are not willing to champion the people, our environment and our community, I urge you to step down and step aside. Let others with the courage and vision to take your place.	Thank you for your comment.
N/A	3	To the US Army Corps of Engineers, when our local, elected and appointed officials fail us, I urge you to step in to protect us. Hold a second public meeting in Port Aransas. Provide better outreach in Spanish to this community. Revise the DEIS, provide the supplementals that everyone is calling for with new information and reject the end of the day this harmful dredging proposal. Thank you.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	1	Hello and thank you for doing this meeting and though I am going to say like everybody else, we need one in Port Aransas because you've got us at a terrible time. It's freaking summer here. So we need it over there because a lot of people don't even try to leave the island at all during the summer and I am actually one of them. So I want to quote real quick on the dredge to nowhere based from one of your letters to the Port. "Based on this conclusion, it is clear that the deepening of the Corpus Christi ship channel and the construction of the Harbor Island terminal facility are interdependent --intaerdependent -- and should be considered a large, single and complete project." It goes onto state that "access midstream holdings to construct a series of pipeline and facilities that would supply that terminal, that that application also needs to be considered with this application." You guys said it. You guys first. Then every agency, the US Fish and Wildlife, The Texas Parks and Wildlife, the CCA, and I am forgetting one right now all said the same thing about we can't even look at this because we can't evaluate it without the other projects. So this is the biggest -- I don't want to say mistake -- wrongdoing that there is.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
N/A	2	i want to go onto state that the Port -- and I am going to be submitting a bunch of written comment. But the Port of Corpus Christi sent out an email on Friday. In that email, they indicated -- they sent it out to their friends, I guess -- they said they recently received funding approval for their long awaited ship channel improvement project under the Army Corps of Engineers Coastal Navigation construction category. It goes onto ask them to: Please come attend this meeting and say positive things about the Port and one of the things, Number 1, we all know that there has been no funding approved because the project hasn't been approved. Just for you guys to know, everybody is being misled one more time. It's another lie. Then they go onto make the statement that it's going to help with agricultural export. Really? At Harbor Island? How is that possible? But all right. And it's going to help the military. Really? The Naval base is going to benefit going to Harbor Island?	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	3	Let's be realistic about what we are talking about. Let's talk about reverse lightering real quick. I want everybody to understand this. Reverse lightering will not be reduced. It will not be reduced. Why? Because all the people upstream that are already doing this, they are not going to change their business model and stop again and, what, berth at Harbor Island and go through all of that just to top off and buy from another entity. That's not what they are going to do.	Thank you for your comment.
N/A	4	I also want to talk about salinity. Y'all are not looking at salinity. For Judge Canales, if she is still here, if you want to have your oyster rehabilitation be successful, do not support this project because the salinity rise is going to kill all the oyster beds not just what's already dead in Nueces Bay. Thank you.	Past, present, and reasonably foreseeable future actions in the study area are discussed in Section 5.0. Modeling by Baird (2022) (Appendix I) indicate minor increases in salinity (less than 1 ppt) are anticipated under Alternative 1. The range of salinity change which is less than +/-3 ppt is within the proposed dredged channel. Average salinities in the study area range from 30 to 36 ppt, with dry years having salinity levels above 32 ppt and wet years around 25.5 ppt (Montagna et al., 2021). While oysters can survive in salinities ranging from 5 to 40+ ppt, they thrive within a range of 10 to 25 ppt. In areas where oysters are mapped, the salinity change was shown to be less than 1 ppt (see Appendix I) and are not anticipated to cause any long-term impacts as oysters have the ability to tolerate salinity ranges.
N/A	1	Cathy is a very hard act to follow especially since I have not written anything down. I want to say thank you for the opportunity to be here. I do live in Port Aransas and I am here representing my neighborhood and my neighbors that were unable to attend today because it is a very busy season. We are all against the destruction of the Coastal Bend area. Period. The slide show was beautiful, lots of pretty words. But that seagrass is not going to make it with an 80-foot dredge.	Thank you for your comment.
N/A	2	Ms. Canales made a reference to our allies needing oil. Well, war is the number 1 cause of climate change. It displaces people. It causes death and, well -- I don't need to go into that. It's just the Number 1 cause of climate change. We need to be thinking about going forward into the future. The Port of Corpus Christi has the resources. They have the money. They need to invest in research instead of in drilling.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	3	The Army Corps of Engineers need to protect the people, all the people, everywhere. When you live near a project, you suffer from it. Not just the pollution but the noise, everything that can happen. I strongly recommend that all the projects, any projects in the Coastal Bend be looked at as a whole because they are all intertwined and for the Port of Corpus Christi, I suggest that you do your homework and look at what we can do for the future because actually there is only decades of crude oil left in the earth. And that's not going to last very long and you will leave a dystopia for the rest of this world. Thank you.	Thank you for your comment.
N/A	1	John Morris. Resident of Port Aransas. Port of Corpus Christi and other entities who continue to entertain a broad range of ever changing plan for our ride that can include berth, a desal plan, oil storage tanks and other infrastructures support both on and off terminals on an island that has been repeatedly characterized as the absolute worse location for these projects by respected members of the scientific community. Apparently, the Port does not believe in that community nor did they really believe in the community. The Corps of Engineers note that in 2019 that original deep dredge permit request was incomplete as it failed to recognize and consider the other permits associated with what should be characterized as a series of interdependent projects within the Harbor Island and complex. Each of these projects have notable impacts on their own. But the cumulative effects appear to be completely ignored and exponentially more damaging.	As currently proposed, the CDP will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two DA permit applications have been submitted for the construction of two terminals on Harbor Island with –54 feet MLLW basins; matching the current federally authorized channel depth. If the CDP is authorized, it is reasonable to foresee that any authorized facilities at Harbor Island, whether constructed or not, would request modification of their permit to dredge to the CDP depths. However, if the CDP is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their stated purpose and need at the currently authorized depths of –54-feet MLLW. Therefore, the USACE has concluded that the multiple locations and proposed facilities on Harbor Island are independent of the CDP. The fact that it is reasonable to foresee their construction and possible expansion requires there inclusion in the cumulative effects analysis but not in the permit's scope of analysis.
N/A	2	Additionally, this increase dredging exists solely to serve one entity, the Port of Corpus Christi. If and only if, it can find another willing or gullible investor to take such a gamble. As many can recall, this whole project began with the Carlisle Group commitment that was lost several years ago when they apparently made the determination it was a bad investment. What in the hell has changed since then.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	3	Meanwhile, upstream industry has invested and continues to invest in terminal capacity that is meeting demand. This proposed project has very little positive effect on reducing reverse lightering. That's just not going to stop. One little terminal right in front of a community is not going to stop reverse lightering. That's just another smoke and mirrors by the Port.	Thank you for your comment.
N/A	4	The subsequent number of ship movements, exhausts, fluid discharge from vessel, vapor release, ship wakes, all this crap is going to continue. Nothing is going to change but you are going to destroy a community. You are going to destroy a bay system. The very life blood of the entire area. And through all of that, they kind of forget that Blue Water terminal, among others, is trying to do offshore terminals. Nobody is building 80-foot deep holes in the dirt to try to do loading and unloading in VLCCs. They are all offshore. Why does the Port think they are so much smarter. I have not figured that one out. Obviously, three minutes is not enough time to adequately express what a bad idea this is. I implore you to listen to the science and heed the warnings of failure to find investors. This is a bad idea. An ego driven pipe dream of a Port Authority run amuck. Let's think about another meeting in Port A where the people are actually affected. It's two hours worth of drive time to get here. Thank you.	Thank you for your comment.
N/A	1	Today is a really special day for me personally because I lost my sister two years ago today. So instead of remembering her honor -- remembering her. I am here. And I am channeling her spirit because I thought about where she worked. She worked at Citgo 25 years. So we know what that industry can do. But the other thing is, we also know that we can't let one type of industry take over our entire region. That is -- another word -- stupid. It's just crazy. So I implore you to listen to the people here. I know that there is the show that the Port Authority has done. But when it comes to the people's part, all we have is our voices. All we have is our heart. But we breathe the air. We drink the water. We are from this area.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	2	I know -- just recently I did an ancestry and I am 56 percent indigenous and we never left this area. We were robbed. We were robbed of our language. We were robbed of our land. Yet still, it's never enough. It's never enough. So I just ask that you please rethink this. Think not just of the money because they are going to tell you what you want to hear which is jobs, jobs, jobs. That's what it's always been. That's what we have been sold on. But we are already know the history. We know that we are lied to and we will continue to be lied to until we stand up. So I ask you to please listen to the people that are here, the people that have traveled and the people that will continue to live here. I am here to represent my children's children because we are going to continue to live here and I want to be able to say that I stood up. I stood up for my grandchildren and my grandchildren's children. Thank you.	Thank you for your comment.
N/A	1	Good evening. My name is John Williams. I am a state Commission Harbor pilot here at the Port of Corpus Christi. I hold a US Coast Guard license, a master on oceans and gross tons. I have been piloting Port of Corpus Christi for over 17 years. Prior to entering the piloting profession, I spent 12 years at sea as a dec officer which two years were spent as a master oil tankers and other vessels. I am the current presiding officer of Aransas-Corpus Christi Pilots Associations. I represent 18 state commission pilots. Each with similar backgrounds as mine. We provide all the piling services at the Port of Corpus Christi. Tankers at Harbor Island is not new for the pilots. For decades up until the early 90s there were two tanker terminals located at Harbor Island. The vessels are not as large. However, over the last 30 years, technological improvements in both ship and harbor tech design vastly improved. Members of the pilots, we took part in all full mission -- excuse me, all full mission bridge simulations completed for this study and were consulted on other navigation questions. We brought the simulations, our combined years of experience of handling ships on the existing channel, that experience includes hundreds of actual VLCC transits.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	2	Politics, experience, participation of these simulation contributed to the conclusion that fully loaded VLCCs can be successfully accommodated within the boundaries of this deepening project. The rotor tugs and vision for use are highly maneuverable and powerful with capabilities suited for these expected environmentals. Any impact on other traffic would be minimal. The terminal's proximity to the open Gulf of Mexico allows for minimal transit times within the channel. Therefore, one-way restrictions imposed by these VLCCs to and from Harbor Island terminals would be negligible. Sea state effects 100 clearance would be minimal. Offshore waters tend to be rough. However, wake periods or short duration cause no effect on vessels of such length. Aransas-Corpus Christi Pilots delivery of a new ;arger size pilot vessel will help us accommodate working further offshore. In other words, we are already equipped to provide pilot service if and when it's needed. Thank you for your time.	Thank you for your comment.
N/A	1	Because of the time constraints here, I am going to focus my comments on one specific phenomenon that I believe would be negatively impacted if the Port is allowed to dredge to 80 feet. This phenomenon is quite simply the migration of marine life through the Aransas Pass. In other words, from the Gulf of Mexico into the estuary. A few years ago, I was for fortunate enough to attend the presentation of Dr. Ed Busky gave who is a professor at UTMSI. I will start by quoting Dr. Busky from a white paper he authored in 2018. This was a quote:"Several species of shell fish and fin fish of commercial and recreational importance in the Nueces and Mission Aransas estuaries possess live history patterns that are dependent upon estuaries whereby members of these species liveand mature in these estuary nurseries then migrate into the Gulf of Mexico as reproductive adults, releasing their eggs in platonic larvae in the open ocean."	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	2	Now looking specifically at how brown and white shrimp make their way through the pass into the estuaries to mature, Dr. Busky wrote, Quote:"When larval shrimp approach the passes between the Gulf and the estuary nursery grounds, they detect a decrease in salinity that indicates the presence of an estuary. This detection of estuary water triggers a process called selective title stream transport. This is where the small weak larvae swim up into the water column on flood tides. They carry them through the channel toward the estuary. When an ebb tide occurs that would carry them back into the Gulf, the larvae swim down toward the bottom of the channel where the current speeds are lower." During the presentation I asked Dr. Busky, what percentage total larvae make it from the depths of the channel into the much shallower waters of the estuaries to mature. He replied the number was below 20 percent. This was based on the channel depth of 47 feet. But here we are now and we stand 54 feet.	Impacts specific to socioeconomics associated with the Applicant's Proposed Action Alternative are addressed in Section 4.4.2. Impacts associated with marine resources are addressed in Section 4.2.2.2 and Appendix E (EFH Assessment). EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.
N/A	3	This Draft EIS is based on proposed channel depth of 75 feet. At this proposed depth, it stands to reason that the larvae will still have to swim toward the channel bottom where current speeds are slower. However, now the bottom is going to be 75-feet. Let's look at the entrance of the Lydia Ann Channel right off the ship channel and assume the depth of 14-feet in the intercoastal waterway. There is part of the Lydia Ann Channel. The swimming larvae must move from 75 feet to 14 feet in order to mature. That's a difference of 61 feet. If the channel -- if the survival percentage of larvae is less than 20 percent at 47, what does the Corps think it will be if the channel is dredged to 75 feet. It stands to reason that the chances of larval survival will be that much less. This is environmentally and frankly morally unacceptable. You need to come to Aransas for another meeting.	Additional information has been added to sections 4.2.2.2, 4.2.5.3, and Appendix E (EFH Assessment) regarding larval fish. EFH consultation with NMFS was initiated with the release of the DEIS. NMFS provided EFH Conservation Recommendations to the USACE in an August 9, 2022 letter.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	1	My name is Matt Garcia. I am the Regional Director for the Texas Oil and Gas Association a/k/a TXOGA. I reside with my family here in Corpus Christi. On behalf of TXOGA, I stand before you today to show our support for the channel deepening project which will allow for the safe transit of fully laden very large crude carriers at the Port of Corpus Christi, largest crude oil and second largest LNG gateway in the nation. Founded in 1919, the Texas Oil Gas Association or TXOGA is a statewide transit association with approximately 5000 member representing every facet of the Texas Oil and Ga industry including small independent and major producers. Collectively, TXOGA members account for almost 90 percent of all oil and natural gas produced in Texas, operate a vast majority of the state's refining milage and gas processing capacity and are responsible for the (inaudible) state's refining capacity.	Thank you for your comment.
N/A	2	TXOGA recognizes that projects like the channel deepening project are creating world class transportation infrastructure to help our communities and business reach markets across the globe and are essential for the continued success and growth of the Texas Energy Industry and therefore the Texas economy and vital to not only our nation's energy and national security but that of our allies abroad.	Thank you for your comment.
N/A	3	VLCC capable infrastructure currently exists at the port of Long Beach importing heavy (interruption) varieties required by many US refiners. Sound science and technology will ensure an environmentally responsible efficient maritime operations and according to provided models, the channel deepening project will positively effect the air quality in the Coastal Bend air shed through admissions reductions as a result of less reverse lightering. Nationwide, increased production and consumption of natural gas for electricity has allowed the US to lead the world in CO2 reductions.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	4	Investments that increased Texas wealth at the water energy export are critical for creating jobs and enhance economic development and ripple effects that resonate across locality across the region. They provide much needed property tax revenue that supports our first responders, our schools, hospitals and services across Texas. To secure the economic future of Texas, TXOGA supports new investments and infrastructure including imports, production, pipelines and processing such as refining capacity and petrochemical manufacturing along the Texas Gulf Coast.	Thank you for your comment.
N/A	5	We are generally supportive of ensuring these projects are of the up most consideration. The Channel Deepening Project and other projects that are in various phases of completion will ensure Texas produced energy from the Permian Eagle Ford will be able to meet the growing global energy needs and provide much needed market opportunities for Texas producers while creating local economic development, greater prosperity and new investment in the Coastal Bend. TXOGA appreciates your consideration.	Thank you for your comment.
N/A	1	My name is Marisa Perales. So three minutes to address the Draft EIS. I think I will focus my comments this evening on the public participation process. Because ultimately that is one of the goals of NEPA and the NEPA process. So to begin with, as we heard others encourage you to do, I too would encourage you to hold at least one more public meeting and this public meeting should be in Port Aransas. But I also want to encourage you to consider holding additional public meetings and to do so in a different way than you are doing here tonight.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	2	I would encourage you to hold public meetings in more vulnerable communities because we know that those vulnerable communities are already overburdened by polluting industries. Polluting industries that have been permitted or authorized to impact those communities by governmental entities. These very communities are going to be the ones that are most impacted by climate change. That climate change is going to be exacerbated by the decisions that are governmental entities make. These communities can help you understand the true costs of the decisions that you make when you undertake your cost analysis. I also encourage you to extend your comment period. If your purpose, as you mentioned earlier tonight, is truly to make an informed decision, then by providing an extended comment period by providing more robust public participation opportunities, this can only help you in achieving that objective. Because what has been made apparent tonight is that the local residence, the impacted community are the true experts here. You have acknowledged that the Draft EIS is lengthy, dense and technical. So allow the community to have the time, sufficient time that is necessary to truly digest this information and to provide you with informed comments.	The scheduling for the development of the EIS, including the Draft EIS comment period, was developed to comport with requirements of both NEPA and FAST-41. To ensure appropriate public engagement, the public has been encouraged to provide comments to USACE on the project during the August 2019 Public Notice, the EIS Scoping meeting in June 2020 that included 4 public meetings, and the Draft EIS in July 2022. During all three of these comment periods, the USACE has received a significant response from the public. The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.
N/A	3	Again, I encourage you to consider alternative ways of engaging the community of public participation processes including consider remote public participation in today's time of COVID, a lot of folks, especially those who are immunocompromised would benefit from having a remote option. I encourage you to put out more materials and have interpreters here to encourage Spanish speaking residence to provide comments. I encourage you to provide a more inviting atmosphere so that parents of small children will have a place to entertain their children while they listen to the various information that is being provided. Consider, I appreciate the drinks you have here, but consider having some food for children as well, some snacks. Once again ultimately, I encourage you to engage in more public participation, more alternative ways in engaging the public and extending the public comment period. This would not only benefit the impacted community but benefit you as well. Thank you.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.

PCCA CDP Draft EIS Comment/Response Matrix
December 2023

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	1	Good afternoon. My name is Lamont C. Taylor. A picture tells a thousand words. In this picture that you have here about the project features told me a lot. I did not even attempt to crack in 2, 3 and 4 of the EIS. However, I will provide additional input. What I would like to point out what is glaring to me is that someone said this is a project to nowhere. It's a project to somewhere. But you are not telling the people what else is tacked onto this particular project. Because I do not believe as an urban planner as an EUO officer, as a compliance officer that this is all that it is to this particular project because you are dredging 80 feet and then you just stopping at a terminal point. Something is happening upstream that you are not implying in this particular project.	Thank you for your comment.
N/A	2	So, what I guess am impressed that you are having the comment period. However, I would like to see another public hearing in Port Aransas. I would like to see something to the Spanish speaking population of this particular city. I would like to see also that you be concerned about what is really happening here and tell the people what is really going on in this project because this just -- then the other aspect of this picture. You are putting in these green spaces over here.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	3	You are going to put dredge material on a beach where people, tourists are coming in makes no sense. You are putting green area here. You are going to put the dredge material along the Gulf facing projects. So that's going to be Mustang Island. You are going to put the dredge material there and you have not told the people what is the sampling of the dredge material. But you are going to put it out there any way. There is a lot of questions that I have just by looking at the picture. So when I do start reading this particular project, I would definitely put in more public comment in the written section. I thank you very much for your time and God bless you.	Dredged material proposed for ocean disposal is evaluated and tested to ensure that the material will not adversely affect human health and the marine environment. Evaluation of dredged material for ocean disposal under the MPRSA relies on standardized testing using biological organisms (bioassays). Under section 103 of the MPRSA, any proposed dumping of dredged material into ocean waters must be evaluated through use of EPA's ocean dumping criteria (40 CFR 220-229). The Ocean Testing Manual (OTM), a national testing manual for the evaluation of dredged material proposed for ocean dumping, provides guidance for sampling, testing, and analysis of water, sediment, and tissue to evaluate the environmental acceptability of dredged material proposed for ocean disposal. In addition to the OTM, the USACE and EPA have cooperatively prepared the Reginal Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA. The RIA requires a project-specific Sampling Analysis Plan (SAP) for the evaluation of sediment. The SAP was approved by the USACE and EPA to determine if the new work material sediments proposed to be dredged are acceptable for disposal. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing. *Response continues on next row.*
N/A	3	You are going to put dredge material on a beach where people, tourists are coming in makes no sense. You are putting green area here. You are going to put the dredge material along the Gulf facing projects. So that's going to be Mustang Island. You are going to put the dredge material there and you have not told the people what is the sampling of the dredge material. But you are going to put it out there any way. There is a lot of questions that I have just by looking at the picture. So when I do start reading this particular project, I would definitely put in more public comment in the written section. I thank you very much for your time and God bless you.	Historical testing of the CCSC was included in the DEIS to demonstrates that no extensive or severe contamination has been identified in the sediments within the CCSC, and that dredged material has been historically suitable for offshore placement without special management conditions (EPA and USACE, 2008; USACE, 2003).The most recent sediment testing conducted by Montgomery and Bourne (2018) for the CCACIP also concluded that there was no potential for adverse bioaccumulation effects from the dredged project sediments. Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material is being tested to the more rigorous standards of MPRSA. Additional standards, including ecological and engineering, are applied to the inshore placement of dredge material to determine the appropriateness and/or suitability of the material for the specific activity such as beach nourishment or levee construction. The EPA will make the final determination that the dredge material is compliant with their ocean dumping criteria, including if the material is environmentally suitable. Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	1	Good evening. My name is Captain Michael Kershaw. I will direct my comments towards the navigational aspects of this project. All maritime projects are challenges which is why there are experts whose task is to help solve problems. In our case and locally, it is the Aransas County Corpus Christi Pilots who during the past year have done immense number of simulations that required new technologies, new trainings to ensure the safe navigation of the vessel using the proposed terminal. In my experience, which began here in 1963, I have watched the developmental of skills and equipment and tools and the planning that go into the development of terminals that are complex and futuristic as these are. It is my satisfaction of having viewed the simulation for this project that this project can be done safely navigationally speaking in all respects. Thank you.	Thank you for your comment.
N/A	1	My name is Charles Boone. I live in Ingleside on the Bay. Ingleside on the Bay is one of the coastal communities that are directly impacted by the project. You have already heard several people talking to you about the direct impact that it will have. The benefit of the project, obviously, is going to the oil and gas industry and to the Port Authority of Corpus Christi. The money is going there. The actual impact as I can see every day, I can sit at my house on Ingleside on the Bay and I look out into the La Quinta channel and if I move a little bit down the road, I can look into the Corpus Christi channel as well. The seagrass that we have had there is covered with just a current amount of traffic through there is covered with silt and it's brown and it used to be green. As other people have said too, this is not really a project that goes nowhere. It goes directly to the oil and gas industry. The cumulative project you can't build this and bring oil here and expect nothing else to happen. I would like to point out that doing this puts new crude oil facilities putting these in Harbor Island will induce development in the floodplains. There is going to be additional industrial facilities. Those are located in the flood plan. As far as I understand, the EIS does not address the requirements in executive order in 119(a)(a) related to analysis to be done on impact on the flood plain.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment). The potential cumulative effects of the Applicant's Proposed Action Alternative and reasonably foreseeable projects are discussed in Section 5.0. The County Floodplain Administrator will make final determiation on floodplain impacts. USACE's review of the proposed CDP is compliant with EO 11988.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	2	Also, the mayor of Ingleside on the Bay has already issued some sort of warning to the citizens there about the problem with displacement. Currently, the displacement of water in our area is large. People trying to fish there, kayak there use the water there are -- can be put in some kind of danger if they don't understand what is going on.	Not applicable to the CDP.
N/A	3	The amount of boat traffic or ship traffic that I have seen has gone up four or five times in the last -- I lived there seven years in the last couple of years. I am opposed to the project. The people who are here speaking in general are opposed to the project. They can't really match the money that you are going to get out of big oil or that big oil is putting in here. But that does not mean that they are not the ones that are directly going to have to live with the amount of traffic, the damage to the fisheries, the impact on the coastal oaks that are taken out and the communities themselves. Thank you.	Thank you for your comment.
N/A	1	Eduardo Canales. Member for the greater good and for the greater good. I oppose this dredging, this proposal. This proposal is a major project along with the other project's desal plants that only cater to the corporate interest that will span oil and gas and chemical heavy industry build out. It will continue to degrade our Coastal Bend. The absurdity of it all, justification of studies which are smoke and mirrors, dog and pony shows, voodoo signs and any environmental impacts study never, never takes a total picture, is never cumulative to the entire picture of this community. It's never a total assessment and never a total analysis of what impact it really will have in our environment.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	2	The other point I want to make, there is no accountability to the community. Time and time again, people, the community shows up to oppose these projects, overwhelmingly oppose these projects that will continue to destroy our bays, destroy our water, our air, our lands and harm our health. Examples: Permits, hearings that you go through proforma, perfunctory sessions like this and never, never take into account the majority of the community that is opposing this. Public officials like the City Council and the Port of Corpus Christi commissioners are unelected. It's an unbalanced entity. It does not represent all the interest in this community and this Coastal Bend. It just -- these are proposed because it is their rubber stamp by public entities that serve the corporate interest only. Example Texas Environmental Quality -- Texas Commission on the Environmental Quality. Port of Corpus Christi, we are asking you to seize, to reverse, to pause the expansion of continued fossil fuel industry in our community. Join us. Seek an agreed economy and act now for the greater good. Thank you.	An extensive independent study was conducted by USACE in compliance with Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) regulations. These studies utilized the best available scientific information and reached objective, scientifically-based conclusions. Results of the study are included in the DEIS. Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), Appendix E (EFH Assessment), Appendix G (Sediment Transport Modeling), Appendix H (Vessel Wake Analysis), Appendix I (Hydrodynamic and Salinity Modeling), Appendix L (Ship Simulation Report), Appendix M (Propeller Scour Study), and Appendix N (Underkeel Clearance Study).
N/A	1	Just to clarify too, I am not one of the nice guys. But I would like for everybody here who is opposed to raise your hands to make a visual concept for these guys. We are not for this. Okay. And as far as Barbara Canales is concerned, she does not represent the majority of her constituency. She represents the budget in her home. I would like to applaud Sean Strawbridge for remaining in this meeting to hear what the public has to say. I am emotional. I'm sorry. And also for warning me that I could get kicked out because of how vocal I am. So we don't agree with young oil gas guy. We don't agree with John and we don't agree with Barbara, just for the record.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	2	I also would like to clarify and let the people know that the Corps of Engineers is being paid by the Port of Corpus Christi Authority. Conflict of interest much? Little bit. If they are paying you, you are not going to represent us. You are going to listen to the people that are paying your salary so you can pay your light bill, right. To have it here, in the Port of Corpus Christi Center is a conflict of interest because people do not feel comfortable coming into the enemy land to fight for their rights. Why did you guys not provide any of the supporting studies that are not conclusive? Why are we not seeing those? As residents of this town, we don't want to see or hear that you have no concluded studies. We want them done before the trigger is pulled on this. We don't want like maybes, what ifs and ors. Okay. I also would like a study to be done on the human impact of this. You guys are spending all this money on engineering. Let's have a human impact portion of this. If you are the Corps of Engineers, you guys know everything, let's add the human aspect into this, yeah.	An extensive independent study was conducted by USACE in compliance with Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) regulations. These studies utilized the best available scientific information and reached objective, scientifically-based conclusions. Results of the study are included in the DEIS. Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), Appendix E (EFH Assessment), Appendix G (Sediment Transport Modeling), Appendix H (Vessel Wake Analysis), Appendix I (Hydrodynamic and Salinity Modeling), Appendix L (Ship Simulation Report), Appendix M (Propeller Scour Study), and Appendix N (Underkeel Clearance Study).
N/A	3	The next thing is I don't understand how it is not clear to Corps of Engineers that more volume causes more surges which causes more environmental impact. You don't have to be an engineer or part of the Port to understand this. This is common sense. The people behind all of this, all these studies, we live here. This is our city. This is our water. This is our land. And this is our community. Enough with these schematics, the logistics and all of that good stuff. We don't care about the global perspective. We don't care about the national perspective. We care about our water. We care about our land and we care about our community and our neighbors. So let's absorb that gentlemen. Yes.	Thank you for your comment.
N/A	1	Jo Krueger. I am from Port Aransas. I would like to request another meeting in Port Aransas. Because according to the map, that's who is being affected is Port Aransas.	The public meeting held in Corpus Christi in June 2022 provided an opportunity for individuals to meet and discuss the Draft EIS with USACE employees, and their contractors, as well as members of the applicant's team. The public meeting also included the ability to submit comments both orally and in writing. Corpus Christi was selected for the public meeting because it is the population center of the 4-county study area evaluated in the Draft EIS. Prior to the public meeting, USACE released a special public notice and several press releases to notify the public of the time and place of the public meeting. In addition, USACE continued to accept written comments throughout the 60-day comment period.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	2	So Texas Parks and Wildlife, they did studies and there are five zones to leave alone. This is one of them. There is a lot of reasons why. The fisheries, beaches, the larvae. But another thing is also, I sit every day, I managed a marina right across from Harbor Island for 20 years. I watched these VLCCs go in and out. I watch when they come in. I watch a foot of water go out and I watch it swirl back in. That happens all day long and you can't tell me that the sediment is not coming in and out of the Harbor. The VLCCs, they come around the corner and there is Harbor Island. So what are they going to do? Just stop right there? You got the Lydia Ann Channel. You got the Aransas channel. It all comes together there. It's three channels coming together. There is hundreds of boats in and out all day long.	Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), and Appendix E (EFH Assessment).
N/A	3	You have the Ferry landing right there. They are going to be right on top of the Ferry landing. What are they going to do with the Ferry landing. We have 5- to 6 million people come to Port Aransas every year. Our beaches are packed. Why do we have to destroy every inch of the Texas coast? We have plenty of oil gas. I am not against oil and gas. I was born and raised in South Texas. I am not against oil and gas. But there is a right places to put it and this is not the right place to put it. This is the one zone to leave alone. We have the VLCCs. They are going in and out. Nobody is stopping them and they moved the Port of Corpus Christi where it's at because of hurricanes. Harbor Island is a barrier island. So is Port Aransas. You can't -- they took everything off of Harbor Island because of hurricanes. I will tell you, Harvey came right across there. It's just not the right place to put it. So I wish we don't have to destroy every inch of the coast and leave this zone alone. Thank you.	The proposed Harbor Island (HI) Terminal and associated VLCC turning circle do not intrude into the ferry crossing lanes, therefore disruption to ferry operations or increases to ferry wait times are not expected to be induced by inbound/outbound HI VLCCs. Under the proposed CDP, the inbound/ outbound Ingleside VLCCs will continue to transit past the ferry crossing lanes at their current operational speeds, therefore, additional disruption to ferry operations or increases to ferry wait times are not expected. Under the No-Action Alternative, the Axis Terminal's inbound/outbound (partially-laden) VLCCs will transit past the ferry crossing landings at speeds approximately four times slower than current Ingleside VLCC operational speeds, therefore temporary disruption to ferry operations and increases to ferry wait times are expected to be induced by the inbound/outbound Axis VLCCs. Under the proposed project, it anticipated Axis Terminal's inbound/outbound (fully-laden) VLCCs will transit past the ferry landing crossings at the same speeds as under the No-Action Alternative. As a result of fully-laden VLCCs utilizing the proposed deepen channel, there will be a decrease in tanker vessel traffic, through a reduction in the number of Suezmax and/or Aframax class vessels required to carry out reverse lightering operations. Therefore, it is anticipated that there will be a net reduction of disruptions to ferry crossing operations. Vessel traffic is managed by a combination of USCG who enforces navigation rules, directs traffic routing measures, permits marine events, creates limited access areas, manages anchorages, and provides mariners information about hazards to navigation and the Harbormaster's office who coordinates and tracks ship and barge movements in the Port. USACE does not regulate vessel movements.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	1	Brian Gulley. G-u-l-l-e-y. I lived here all my life. I spent about 20 years living in Port Aransas. Now I live on Packery Channel. Born and raised here, trained as a marine biologist. Changed my mind and became a surgeon and now I am serving my second term as a voluntary Port commission. We are not elected. We are appointed by combination of 22 different elected politicians. We are not picked probably because we are not politicians. We are volunteers. I have been involved in this project and one thing I can say is the Corps of Engineers are a pretty tough group of guys to get any kind of projects through without vetting those things very seriously. We spent several million dollars, started before I was even on the Board, on this project, with the modeling and studies and the stuff. I encourage everyone to read the complete study before they make any comments on what is missioning in the study because there is a lot of that information in there.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	2	Sticking strictly to the science, I studied there at the UTMSI. I did graduate work in estuarian ecology and oceanography, population biology. I have a little bit of understanding on this and I approach this with my eyes wide open. I am proud of the Port because we spent about 22 million -- 22 percent of all of the operating budget on environmental-type studies like this, environmental projects. So I think we -- being on the inside, I see a different side of the Port than I think most of the people here see. There is a great deal of mistrust and that's unfortunate. I hope some day we can fix that. In the meantime, we have to understand that we are going to be stuck with fossil fuels for a few more decades. We are very proud of our projects that we have coming down the line with hydrogen and carbon-free projects. We worked very, very hard on those things. I am very proud of those things but they are going to take a long, long time. We are going to have to work together with combination of fossil fuels, some solar, some wind, some hydrogen and some ammonia. I've heard all kinds of scatter shots about this. But I think we need to get back to really what it is. This is a great big 'ol giant ditch that allows us to bring ships that are already coming here and allow us to clean up the air and do it a little bit cleaner and dock them no further than Harbor Island, same way we have been doing for decades and decades and decades there and avoid that reverse lightering and avoid the fact that we cannot capture that gas at sea. It can be be captured at Harbor Island and not get in the atmosphere. So it's a very good environmental project. No saline. No salt water. There is no health concerns. We need to get away from all of that and look at what the project is. It's not that difficult.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	1	Long time resident of Port Aransas. I have a statement. I wish I had some notes. I also have a question. What am I doing here today? Is this another thing where we are going to talk about all the environmental issues because really that's the biggest part of this thing is the environmental thing. And so am I going to be a winey, tree-hugging complainer, no. I am here today, they are fixing -- we are putting -- Port Aransas has been there a long time. It has survived three attempts to make a VLCC port out of it. Is has survived all the oil that went through there, all the ships, all that volume. We survived that. We did not get clobbered by oil spills and we have not had the ships at our tanks for a long time. It's still a nice place. We have challenges from -- we have challenges from industry. If you go to Aransas Pass, Ingleside, Rockport, Portland, I don't even like to drive thru Portland because it is such a mess. There is, it's happening right now. These are just the things that we know about; about the desal plants, about the plastics plants, about the natural gas. You get your natural gas shipped overseas and you also get your plastic made out of it in China, our good friend. Okay. So where does it stop? Can anybody say what the end is? Well, like I said, this is just the stuff we know about? So what is coming down the line. Now they want to put a -- stomp a mud hole in Harbor Island which definitely is -- that's ground zero. For one, all them fishies and larvaes, shrimp things, they all have to go through there. That does not seem to matter because we have to get that oil shipped overseas so they can ship some oil to us and it does not make sense. Yeah, it's a bad place to be. Well, okay, so we were talking about cumulative effects. What about that desal plant that might go through on Harbor Island? What about that? We just heard about that. So then we are going to have all that brine coming out. We got desal plants everywhere to feed those factories. That's the one reason they are building built. Now you want your terminal over	The potential for cumulative impacts due to desalination projects is discussed in Section 5.4.2.
N/A	1	Hello. My name is Melissa Zamora. So this project is not in the public's best interest. Prevention before mitigation. Think about that. Prevention before mitigation. We can prevent all of these horrible things that are being said if we just say when is enough enough? Marine life is important. People's lives are important. People and workers' lives is concerning as we should not forget the propone pipeline explosion that occurred by the ship channel back in 2020. That was caused by negligent dredging activities and cost four people their lives and many others injuries as a result.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	2	The best alternative is no action. There is tons of cumulative impacts that you have already heard. Coming from a younger person who is studying environmental science, is studying to be a science teacher because I am trying to teach the younger generations that they do have a say, that there is still hope, that we can change things. I have been born and raised here my whole life. I am a South Texan and I don't agree with the way things are going. I am not okay with oil and gas being so expansive to harm the communities that they are in, to harm the global community. Only in certain few, the people who are over here bullshitting about how great this is are the ones making the money from it. People like me, we are coming out here, we are spending time away from our families. We are being up here as voices for people who can't come here in person because of COVID or because other issues that they could not make it because of work. I am spending time away from my son who is why I am standing here today. I hope that he has a future and that his children do in a world that is not burning up, facing significant droughts like we are already in, exacerbated by greenhouse gas emissions where oil and gas plays a significant role but is not the only contributor. When we talk about carbon capture and all of those things, we need to think about prevention before mitigation and leaving the wetlands where they are to help as natural carbon as they are, to help with the old growth seagrass conservation and not just blow out all of the old growth that has been thriving and adapting to what we have already done and try to throw some new seedlings in and maybe they will make it, maybe they won't. We just need to really think about the impacts in the greater sense. Remember that we are a native land on stolen land and where is the indigenous people's perspective. Where is consent. We do not agree as part of a member for indigenous people of the Coastal Bend and for the greater good. We do not approve of this project.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	1	My name is Tammy King. We have a home on the ship channel in Port Aransas and have been part of a fight against the Corps of Engineers and-or the Port of Corpus Christi for the past seven years, probably helped raise and spent money on lawyers of over $7 million of private money to fight the over industrialization of our region. I have talked to many people, both political parties, and the most -- the biggest impact was made when I spoke to a CEO and a CFO of a major oil facility in Ingleside. There is Valero. There is Moda. There is South Texas Gateway, Flint Hills Resources. There is -- I can't think of the rest of the them in the inner harbor. They have been waiting with private money for their investments to come true for a 54-foot dredge. It may be coming in. Their tariff money is not being used to be pay for the dredging. We are asking the tax dollars, the federal government for $650,000,000 to do the 54-foot dredge. Now we want to go ahead and do an 80-foot dredge because, yes, it will be 80, not 75 foot at Harbor Island which will benefit just the Port of Corpus Christi which will be a direct competition with the stakeholders who are using private equity to fund their own deals, to give the Port of Corpus Christi 80 foot dredge is taking away from all the industries stakeholders. That same CEO and CFO told us that they have to go through rigorous permitting and if a private company tried to do this on Harbor Island, it would not happen. But because the Port of Corpus Christi has a way with the Corps of Engineers somehow, some way, this might get passed because they are doing it. They have more money to do it than the private of us who can fight it privately.	Thank you for your comment.
N/A	2	The book Texas Bays is a Jim Blackburn book that talks about how the bays and estuaries have been saved. He wrote this many years ago. The fight about deep port in the 70s was won because the Port realized that it was not going to do it. Basically, i just gives us, the next generation, a call to action. It was denied then. It was deactivated then. It should not be at Harbor Island. We fought it. We won it all these years. It should not happen now just because the Port has more money to do this, to out finance their stakeholders. Thank you.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	1	Hi, my name is Armon Alex. I will be pretty clear here and speak from the heart. I am a scientist by mind and passion, not by profit. And shame for any of the scientists that were here in attendance or saying that there was nothing wrong with the science. Shame on you. Your degree needs to be taken away if that is what you are claiming here today. Obviously, when you were in that room, there are very specific scientific points that were pointed out on how the ecology of that specific area will be impacted and for you to stand up here and say that this is not true, get a grip. I think that the rest of the parties and in play here need to get a grip.	An extensive independent study was conducted by USACE in compliance with Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) regulations. These studies utilized the best available scientific information and reached objective, scientifically-based conclusions. Results of the study are included in the DEIS. Impacts associated with the Applicant's Proposed Action Alternative are addressed in Section 4.1 Physical Resources, Section 4.2 Ecological and Biological Resources, Section 4.3 Cultural Resources, Section 4.4 Socioeconomics, Section 4.5 Navigation, Appendix D (Biological Assessment), Appendix E (EFH Assessment), Appendix G (Sediment Transport Modeling), Appendix H (Vessel Wake Analysis), Appendix I (Hydrodynamic and Salinity Modeling), Appendix L (Ship Simulation Report), Appendix M (Propeller Scour Study), and Appendix N (Underkeel Clearance Study).
N/A	2	I have been here my entire life, born and raised. I have fond memories of my father and I going along the Corpus Christi beach area picking up seashells. When I was little, we would spend some time counting the ships that would come in within about five to ten minutes. Since then, 22 years later, the amount of ships that comes in within five minutes is ridiculous and that's because of heavy industry in our area, specifically.	Thank you for your comment.

Letter ID	Comment ID	Comment (may be paraphrased or summarized)	Response
N/A	3	But let's get back to this specific project in terms of the dredging. As a scientist, I can tell you that what's going on in the area and the impacts, we have these individual little things going on in terms of salinity, whether we look at the ecology of benthic animals or whether we look at the water quality. They are all separate and you are saying they are temporary situations. But when you put all those together, the long term, the long term output of that is bad. This area depends on ecotourism, especially in the specific area of the Harbor Island Port A. I lived here for 22 years. We see the tourism in this area. Nobody wants to go to a beach where we've got sludge washing up, where you've got dirty water. What do you think that is going to do to the area? How much longer is the industry in this area going to take over where it's not even viable to live here any more. News flash! It's not viable to live here anymore when people are dying of asthma, people are being irritated in terms of eye and skin irritation. That stuff is real and tangible. I am asking you as a resident of this area is to look at the bigger picture here. When you approve this permit, if you do that, you are allowing space for this continuation of the industrial build out to be bigger than what it already is. We are already experiencing the problems. If you allow this to happen, it's only going to get worse. Worse is even more detrimental than what is going on right now. So get a grip. News flash. We are suffering right now and by letting this happen even further we are going to suffer more. Thank you.	Past, present, and reasonably foreseeable future actions in the study area are discussed in Section 5.0.

Appendix B8

Agency Correspondence

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

July 1, 2020

Regulatory Division

SUBJECT: Department of the Army Permit Application No. SWG-2019-00067

Mr. Robert Houston
Chief, Office of Planning and Coordination
USEPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Dear Mr. Houston:

The U.S. Army Corps of Engineers, as the lead Federal agency, is developing an Environmental Impact Statement (EIS), for which the Environmental Protection Agency is a cooperating agency. The EIS will analyze the potential impacts of issuing a Department of the Army permit for the Corpus Christi Ship Channel (CCSC) Channel Deepening Project (Project). The purpose of this letter is to coordinate an important milestone and ensure your agencies concurrence with the assumptions currently being evaluated by my office.

Fixing America's Surface Transportation Act (FAST-41).

On June 18, 2019, the Federal Permitting Improvement Steering Council (FPISC) added the proposed Project to the inventory of "covered projects" that are pending environmental review or authorization of the head of any Federal Agency pursuant to the requirements set forth in Title 41 of Fixing America's Surface Transportation Act (FAST-41). The CCSC Project has been placed on the FAST-41 Infrastructure Projects Permitting Dashboard (Permitting Dashboard) in accordance with the Joint Memorandum of the Office of Management and Budget/Council on Environmental Quality (OMB/CEQ) dated January 13, 2017 and entitled: "*Guidance to Federal Agencies Regarding the Environmental Review and Authorizations Process for Infrastructure Projects*".

Executive Order 13807 Concurrence Point 2

The CCSC Project is also subject to the "One Federal Decision" (OFD) Executive Order (EO) 13807: *Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure projects,* dated August 15, 2017. The subsequent Memorandum of Understanding Implementing One Federal Decision Under Executive Order 13807 (MOU), April 9, 2018 identifies three specific concurrence points in Section XI of the MOU, identified as milestones in the Permitting Timetable.

Concurrence points are opportunities for lead and cooperating agencies to assess mutual understanding and agreement on fundamental elements of the EIS. Concurrence among lead and cooperating agencies establishes that all involved agree to a given decision described in the concurrence point, and that all agree to abide by the decision as analyses and EIS preparation progresses. The Alternatives Analysis is Concurrence Point #2.

Corps Regulations for Alternatives Analysis

In its evaluation of permit applications to discharge dredged or fill material into waters of the U.S. (WOUS), including wetlands, the U.S. Army Corps of Engineers (Corps) is required to analyze alternatives to the proposed project that achieve its purpose. The Corps conducts this analysis pursuant to two main requirements – the 404(b)(1) Guidelines (Guidelines) found in 40 CFR 230 and the National Environmental Policy Act (NEPA) found in 33 CFR Part 325 Appendix B and 40 CFR 1508. The Corps also considers alternatives as part of its public interest review evaluation found in 33 CFR 320.4(a)(2)(ii).

The overall project purpose is used to evaluate less environmentally damaging practicable alternatives. The 404(b)(1) Guidelines state that an alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes. This evaluation applies to all waters of the United States, not just special aquatic sites such as wetlands and seagrasses.

The overall project purpose, as determined by the Corps after concurrence with the Cooperating Agencies is: *To safely, efficiently, and economically export current and forecasted crude oil inventories via Very Large Crude Carriers (VLCC), a common vessel in the world fleet. Crude oil is delivered via pipeline from the Eagle Ford and Permian Basins to multiple locations at the Port of Corpus Christi. Crude Oil inventories exported at the Port of Corpus Christi have increased from 280,000 barrels per day in 2017 to 1,650,000 barrels in January 2020 with forecasts increasing to 4,500,000 barrels per day by 2030. Current facilities require vessel lightering to fully load a VLCC which increases cost and effects safety.*

Based on evaluating information obtained from public input and meetings with federal and state agencies and data collection and analysis of environmental, socioeconomic, and engineering factors, development of Project alternatives prioritized minimization of impacts, both individually and cumulatively, to aquatic resources during both construction and operations. Using these concepts and considering avoidance and minimization to reduce impacts, the following six Project alternatives were identified.

1. No Action. Under the No Action Alternative, the CCSC would not be deepened to a -81MLLW, and would remain at -54 MLLW. VLCCs will continue to be partially loaded and reverse-lightered offshore. The No Action Alternative does not meet the Project purpose and need but is carried forward for detailed analysis in this EIS for comparison purposes.

2. Channel Deepening Alternative - This alternative consists of deepening the CCSC to -81 MLLW from the Gulf of Mexico to station 110+00 near Harbor Island, including the approximate 10 mile extension to the Entrance Channel necessary to reach sufficiently deep waters. Deepening would take place largely within the footprint of the currently authorized -54-foot MLLW channel. Dredging approximately 46.3 MCY would be required with inshore and offshore placement of the material. During our analysis, alternatives to dredge placement will be conducted on a case-by case basis. Under this alternative, only berths at Harbor Island would be capable of fully loading VLCCs. Partially loaded VLCCs at Ingleside could top off at Harbor Island thereby reducing or eliminating reverse-lightering.

3. Offshore Alternative - The CCSC would not be deepened to a -81 MLLW, and would remain at -54 MLLW. To meet the project purpose, multiple deep water port facilities capable of sustaining all projected oil exportation would be constructed. VLCCs would be fully loaded offshore eliminating the need to traverse the channel and reverse-lighter. This alternative would also eliminate dredging of the channel and the impacts associated with dredged material placement.

4. Combined Inshore/Offshore - The CCSC would not be deepened to a -81 MLLW, and would remain at -54 MLLW. To meet the project purpose, VLCC vessels would be partially loaded at inshore facilities in Ingleside and Harbor Island then traverse the channel to the offshore facility to be fully loaded. This alternative would eliminate the need to reverse-lighter and would also eliminate dredging of the channel and the impacts associated with dredged material placement.

5. Houston Alternative – This alternative consists of relocating the project to the Port of Houston. The Houston Ship Channel (HSC) is currently maintained at -45 MLLW. This alternative would either require the HSC be dredge to -81 MLLW or construct offshore facilities to eliminate reverse-lightering.

6. Brownsville Alterative – This alternative consists of relocating the project to the Port of Brownsville. The Brownsville Ship Channel (BSC) is maintained at -42 MLLW. This alternative would require either the BSC to be dredged to -81 MLLW or construct offshore facilities to eliminate reverse-lightering

The Corps used a multi-step process to screen the range of alternatives to determine which alternatives are reasonable, practicable, and meet the Project purpose. The Project alternatives were analyzed using the following screening criteria to identify a range of reasonable alternatives: satisfaction of the overall Project purpose; practicable based on Clean Water Act Section 404(b)(1) Guidelines (technology, logistics, cost); and consideration of potential aquatic resources impacts. The alternatives screening analysis is summarized in Table 1.

Table 1. Comparison Summary of Alternatives

Alternative	Carried Forward (Yes/No)			
	Purpose and Need	Practicability - Technology	Practicability - Logistics	Practicability - Cost*
No Action	Yes	Yes	Yes	Yes
Channel Deepening Corpus Christi	Yes	Yes	Yes	Yes
Offshore Corpus Christi	Yes	Yes	Yes	Yes
Inshore/Offshore Corpus Christi	Yes	Yes	Yes	Yes
Port of Brownsville	No	No	No	No
Port of Houston	No	No	No	No

* It is not a particular applicant's financial standing that is the primary consideration for determining practicability in regards to cost, but rather characteristics of the project and what constitutes a reasonable expense for these projects that are most relevant to practicability determinations.

Based on this analysis, the Corps has determined that the No Action Alternative and three action alternatives will be carried forward for detailed analysis in the EIS. Sites that lie substantially outside the geographic boundaries identified in the overall project purpose are not practicable, and therefore unreasonable, and can be eliminated with little information. Therefore, alternative locations, such as Houston and Brazos Island Harbor, which was scoped in by the public, are not being carried forward in the analysis.

Enclosed, you will find a copy of the applicant’s alternatives analysis for your reference. In accordance with the MOU, cooperating agencies will respond to the lead agency's request for concurrence within 10 business days. Failure to respond within 10 business days may be treated as concurrence, at the discretion of the lead agency.

If you have any questions, feel free to contact Mr. Jayson M Hudson, Regulatory Project Manager, from my staff at the letterhead address or by telephone at 409-766-3108 or by email at jayson.m.huidson@usace.army.mil.

Sincerely,

Joe McMahan
Chief, Regulatory Division

Enclosure

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

July 1, 2020

Regulatory Division

SUBJECT: Department of the Army Permit Application No. SWG-2019-00067

Mr. Rusty Swafford
NOAA-NMFS HCD
National Marine Fisheries Service
Galveston Laboratory
4700 Avenue U
Galveston, TX 77551

Dear Mr. Swafford:

The U.S. Army Corps of Engineers, as the lead Federal agency, is developing an Environmental Impact Statement (EIS), for which the National Marine Fisheries Service is a cooperating agency. The EIS will analyze the potential impacts of issuing a Department of the Army permit for the Corpus Christi Ship Channel (CCSC) Channel Deepening Project (Project). The purpose of this letter is to coordinate an important milestone and ensure your agencies concurrence with the assumptions currently being evaluated by my office.

Fixing America's Surface Transportation Act (FAST-41).

On June 18, 2019, the Federal Permitting Improvement Steering Council (FPISC) added the proposed Project to the inventory of "covered projects" that are pending environmental review or authorization of the head of any Federal Agency pursuant to the requirements set forth in Title 41 of Fixing America's Surface Transportation Act (FAST-41). The CCSC Project has been placed on the FAST-41 Infrastructure Projects Permitting Dashboard (Permitting Dashboard) in accordance with the Joint Memorandum of the Office of Management and Budget/Council on Environmental Quality (OMB/CEQ) dated January 13, 2017 and entitled: "*Guidance to Federal Agencies Regarding the Environmental Review and Authorizations Process for Infrastructure Projects*".

Executive Order 13807 Concurrence Point 2

The CCSC Project is also subject to the "One Federal Decision" (OFD) Executive Order (EO) 13807: *Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure projects,* dated August 15, 2017. The subsequent Memorandum of Understanding Implementing One Federal Decision Under Executive Order 13807 (MOU), April 9, 2018 identifies three specific concurrence points in Section XI of the MOU, identified as milestones in the Permitting Timetable.

Concurrence points are opportunities for lead and cooperating agencies to assess mutual understanding and agreement on fundamental elements of the EIS. Concurrence among lead and cooperating agencies establishes that all involved agree to a given decision described in the concurrence point, and that all agree to abide by the decision as analyses and EIS preparation progresses. The Alternatives Analysis is Concurrence Point #2.

Corps Regulations for Alternatives Analysis

In its evaluation of permit applications to discharge dredged or fill material into waters of the U.S. (WOUS), including wetlands, the U.S. Army Corps of Engineers (Corps) is required to analyze alternatives to the proposed project that achieve its purpose. The Corps conducts this analysis pursuant to two main requirements – the 404(b)(1) Guidelines (Guidelines) found in 40 CFR 230 and the National Environmental Policy Act (NEPA) found in 33 CFR Part 325 Appendix B and 40 CFR 1508. The Corps also considers alternatives as part of its public interest review evaluation found in 33 CFR 320.4(a)(2)(ii).

The overall project purpose is used to evaluate less environmentally damaging practicable alternatives. The 404(b)(1) Guidelines state that an alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes. This evaluation applies to all waters of the United States, not just special aquatic sites such as wetlands and seagrasses.

The overall project purpose, as determined by the Corps after concurrence with the Cooperating Agencies is: *To safely, efficiently, and economically export current and forecasted crude oil inventories via Very Large Crude Carriers (VLCC), a common vessel in the world fleet. Crude oil is delivered via pipeline from the Eagle Ford and Permian Basins to multiple locations at the Port of Corpus Christi. Crude Oil inventories exported at the Port of Corpus Christi have increased from 280,000 barrels per day in 2017 to 1,650,000 barrels in January 2020 with forecasts increasing to 4,500,000 barrels per day by 2030. Current facilities require vessel lightering to fully load a VLCC which increases cost and effects safety.*

Based on evaluating information obtained from public input and meetings with federal and state agencies and data collection and analysis of environmental, socioeconomic, and engineering factors, development of Project alternatives prioritized minimization of impacts, both individually and cumulatively, to aquatic resources during both construction and operations. Using these concepts and considering avoidance and minimization to reduce impacts, the following six Project alternatives were identified.

1. No Action. Under the No Action Alternative, the CCSC would not be deepened to a -81MLLW, and would remain at -54 MLLW. VLCCs will continue to be partially loaded and reverse-lightered offshore. The No Action Alternative does not meet the Project purpose and need but is carried forward for detailed analysis in this EIS for comparison purposes.

2. Channel Deepening Alternative - This alternative consists of deepening the CCSC to -81 MLLW from the Gulf of Mexico to station 110+00 near Harbor Island, including the approximate 10 mile extension to the Entrance Channel necessary to reach sufficiently deep waters. Deepening would take place largely within the footprint of the currently authorized -54-foot MLLW channel. Dredging approximately 46.3 MCY would be required with inshore and offshore placement of the material. During our analysis, alternatives to dredge placement will be conducted on a case-by case basis. Under this alternative, only berths at Harbor Island would be capable of fully loading VLCCs. Partially loaded VLCCs at Ingleside could top off at Harbor Island thereby reducing or eliminating reverse-lightering.

3. Offshore Alternative - The CCSC would not be deepened to a -81 MLLW, and would remain at -54 MLLW. To meet the project purpose, multiple deep water port facilities capable of sustaining all projected oil exportation would be constructed. VLCCs would be fully loaded offshore eliminating the need to traverse the channel and reverse-lighter. This alternative would also eliminate dredging of the channel and the impacts associated with dredged material placement.

4. Combined Inshore/Offshore - The CCSC would not be deepened to a -81 MLLW, and would remain at -54 MLLW. To meet the project purpose, VLCC vessels would be partially loaded at inshore facilities in Ingleside and Harbor Island then traverse the channel to the offshore facility to be fully loaded. This alternative would eliminate the need to reverse-lighter and would also eliminate dredging of the channel and the impacts associated with dredged material placement.

5. Houston Alternative – This alternative consists of relocating the project to the Port of Houston. The Houston Ship Channel (HSC) is currently maintained at -45 MLLW. This alternative would either require the HSC be dredge to -81 MLLW or construct offshore facilities to eliminate reverse-lightering.

6. Brownsville Alterative – This alternative consists of relocating the project to the Port of Brownsville. The Brownsville Ship Channel (BSC) is maintained at -42 MLLW. This alternative would require either the BSC to be dredged to -81 MLLW or construct offshore facilities to eliminate reverse-lightering

The Corps used a multi-step process to screen the range of alternatives to determine which alternatives are reasonable, practicable, and meet the Project purpose. The Project alternatives were analyzed using the following screening criteria to identify a range of reasonable alternatives: satisfaction of the overall Project purpose; practicable based on Clean Water Act Section 404(b)(1) Guidelines (technology, logistics, cost); and consideration of potential aquatic resources impacts. The alternatives screening analysis is summarized in Table 1.

Table 1. Comparison Summary of Alternatives

Alternative	Carried Forward (Yes/No)			
	Purpose and Need	Practicability - Technology	Practicability - Logistics	Practicability - Cost*
No Action	Yes	Yes	Yes	Yes
Channel Deepening Corpus Christi	Yes	Yes	Yes	Yes
Offshore Corpus Christi	Yes	Yes	Yes	Yes
Inshore/Offshore Corpus Christi	Yes	Yes	Yes	Yes
Port of Brownsville	No	No	No	No
Port of Houston	No	No	No	No

* It is not a particular applicant's financial standing that is the primary consideration for determining practicability in regards to cost, but rather characteristics of the project and what constitutes a reasonable expense for these projects that are most relevant to practicability determinations.

Based on this analysis, the Corps has determined that the No Action Alternative and three action alternatives will be carried forward for detailed analysis in the EIS. Sites that lie substantially outside the geographic boundaries identified in the overall project purpose are not practicable, and therefore unreasonable, and can be eliminated with little information. Therefore, alternative locations, such as Houston and Brazos Island Harbor, which was scoped in by the public, are not being carried forward in the analysis.

Enclosed, you will find a copy of the applicant’s alternatives analysis for your reference. In accordance with the MOU, cooperating agencies will respond to the lead agency's request for concurrence within 10 business days. Failure to respond within 10 business days may be treated as concurrence, at the discretion of the lead agency.

If you have any questions, feel free to contact Mr. Jayson M Hudson, Regulatory Project Manager, from my staff at the letterhead address or by telephone at 409-766-3108 or by email at jayson.m.huidson@usace.army.mil.

Sincerely,

Joe McMahan
Chief, Regulatory Division

Enclosure

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

July 1, 2020

Regulatory Division

SUBJECT: Department of the Army Permit Application No. SWG-2019-00067

LCDR Margaret Brown
U.S. Coast Guard
Sector Corpus Christi
Waterways Management
249 Glasson Drive
Corpus Christi, Texas 78406

Dear LCDR Brown:

The U.S. Army Corps of Engineers, as the lead Federal agency, is developing an Environmental Impact Statement (EIS), for which the U.S. Coast Guard is a cooperating agency. The EIS will analyze the potential impacts of issuing a Department of the Army permit for the Corpus Christi Ship Channel (CCSC) Channel Deepening Project (Project). The purpose of this letter is to coordinate an important milestone and ensure your agencies concurrence with the assumptions currently being evaluated by my office.

Fixing America's Surface Transportation Act (FAST-41).

On June 18, 2019, the Federal Permitting Improvement Steering Council (FPISC) added the proposed Project to the inventory of "covered projects" that are pending environmental review or authorization of the head of any Federal Agency pursuant to the requirements set forth in Title 41 of Fixing America's Surface Transportation Act (FAST-41). The CCSC Project has been placed on the FAST-41 Infrastructure Projects Permitting Dashboard (Permitting Dashboard) in accordance with the Joint Memorandum of the Office of Management and Budget/Council on Environmental Quality (OMB/CEQ) dated January 13, 2017 and entitled: "*Guidance to Federal Agencies Regarding the Environmental Review and Authorizations Process for Infrastructure Projects*".

Executive Order 13807 Concurrence Point 2

The CCSC Project is also subject to the "One Federal Decision" (OFD) Executive Order (EO) 13807: *Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure projects,* dated August 15, 2017. The subsequent Memorandum of Understanding Implementing One Federal Decision Under Executive Order 13807 (MOU), April 9, 2018 identifies three specific concurrence points in Section XI of the MOU, identified as milestones in the Permitting Timetable.

Concurrence points are opportunities for lead and cooperating agencies to assess mutual understanding and agreement on fundamental elements of the EIS. Concurrence among lead and cooperating agencies establishes that all involved agree to a given decision described in the concurrence point, and that all agree to abide by the decision as analyses and EIS preparation progresses. The Alternatives Analysis is Concurrence Point #2.

Corps Regulations for Alternatives Analysis

In its evaluation of permit applications to discharge dredged or fill material into waters of the U.S. (WOUS), including wetlands, the U.S. Army Corps of Engineers (Corps) is required to analyze alternatives to the proposed project that achieve its purpose. The Corps conducts this analysis pursuant to two main requirements – the 404(b)(1) Guidelines (Guidelines) found in 40 CFR 230 and the National Environmental Policy Act (NEPA) found in 33 CFR Part 325 Appendix B and 40 CFR 1508. The Corps also considers alternatives as part of its public interest review evaluation found in 33 CFR 320.4(a)(2)(ii).

The overall project purpose is used to evaluate less environmentally damaging practicable alternatives. The 404(b)(1) Guidelines state that an alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes. This evaluation applies to all waters of the United States, not just special aquatic sites such as wetlands and seagrasses.

The overall project purpose, as determined by the Corps after concurrence with the Cooperating Agencies is: *To safely, efficiently, and economically export current and forecasted crude oil inventories via Very Large Crude Carriers (VLCC), a common vessel in the world fleet. Crude oil is delivered via pipeline from the Eagle Ford and Permian Basins to multiple locations at the Port of Corpus Christi. Crude Oil inventories exported at the Port of Corpus Christi have increased from 280,000 barrels per day in 2017 to 1,650,000 barrels in January 2020 with forecasts increasing to 4,500,000 barrels per day by 2030. Current facilities require vessel lightering to fully load a VLCC which increases cost and effects safety.*

Based on evaluating information obtained from public input and meetings with federal and state agencies and data collection and analysis of environmental, socioeconomic, and engineering factors, development of Project alternatives prioritized minimization of impacts, both individually and cumulatively, to aquatic resources during both construction and operations. Using these concepts and considering avoidance and minimization to reduce impacts, the following six Project alternatives were identified.

1. No Action. Under the No Action Alternative, the CCSC would not be deepened to a -81MLLW, and would remain at -54 MLLW. VLCCs will continue to be partially loaded and reverse-lightered offshore. The No Action Alternative does not meet the Project purpose and need but is carried forward for detailed analysis in this EIS for comparison purposes.

2. Channel Deepening Alternative - This alternative consists of deepening the CCSC to -81 MLLW from the Gulf of Mexico to station 110+00 near Harbor Island, including the approximate 10 mile extension to the Entrance Channel necessary to reach sufficiently deep waters. Deepening would take place largely within the footprint of the currently authorized -54-foot MLLW channel. Dredging approximately 46.3 MCY would be required with inshore and offshore placement of the material. During our analysis, alternatives to dredge placement will be conducted on a case-by case basis. Under this alternative, only berths at Harbor Island would be capable of fully loading VLCCs. Partially loaded VLCCs at Ingleside could top off at Harbor Island thereby reducing or eliminating reverse-lightering.

3. Offshore Alternative - The CCSC would not be deepened to a -81 MLLW, and would remain at -54 MLLW. To meet the project purpose, multiple deep water port facilities capable of sustaining all projected oil exportation would be constructed. VLCCs would be fully loaded offshore eliminating the need to traverse the channel and reverse-lighter. This alternative would also eliminate dredging of the channel and the impacts associated with dredged material placement.

4. Combined Inshore/Offshore - The CCSC would not be deepened to a -81 MLLW, and would remain at -54 MLLW. To meet the project purpose, VLCC vessels would be partially loaded at inshore facilities in Ingleside and Harbor Island then traverse the channel to the offshore facility to be fully loaded. This alternative would eliminate the need to reverse-lighter and would also eliminate dredging of the channel and the impacts associated with dredged material placement.

5. Houston Alternative – This alternative consists of relocating the project to the Port of Houston. The Houston Ship Channel (HSC) is currently maintained at -45 MLLW. This alternative would either require the HSC be dredge to -81 MLLW or construct offshore facilities to eliminate reverse-lightering.

6. Brownsville Alterative – This alternative consists of relocating the project to the Port of Brownsville. The Brownsville Ship Channel (BSC) is maintained at -42 MLLW. This alternative would require either the BSC to be dredged to -81 MLLW or construct offshore facilities to eliminate reverse-lightering

The Corps used a multi-step process to screen the range of alternatives to determine which alternatives are reasonable, practicable, and meet the Project purpose. The Project alternatives were analyzed using the following screening criteria to identify a range of reasonable alternatives: satisfaction of the overall Project purpose; practicable based on Clean Water Act Section 404(b)(1) Guidelines (technology, logistics, cost); and consideration of potential aquatic resources impacts. The alternatives screening analysis is summarized in Table 1.

Table 1. Comparison Summary of Alternatives

Alternative	Carried Forward (Yes/No)			
	Purpose and Need	Practicability - Technology	Practicability - Logistics	Practicability - Cost*
No Action	Yes	Yes	Yes	Yes
Channel Deepening Corpus Christi	Yes	Yes	Yes	Yes
Offshore Corpus Christi	Yes	Yes	Yes	Yes
Inshore/Offshore Corpus Christi	Yes	Yes	Yes	Yes
Port of Brownsville	No	No	No	No
Port of Houston	No	No	No	No

* It is not a particular applicant's financial standing that is the primary consideration for determining practicability in regards to cost, but rather characteristics of the project and what constitutes a reasonable expense for these projects that are most relevant to practicability determinations.

Based on this analysis, the Corps has determined that the No Action Alternative and three action alternatives will be carried forward for detailed analysis in the EIS. Sites that lie substantially outside the geographic boundaries identified in the overall project purpose are not practicable, and therefore unreasonable, and can be eliminated with little information. Therefore, alternative locations, such as Houston and Brazos Island Harbor, which was scoped in by the public, are not being carried forward in the analysis.

Enclosed, you will find a copy of the applicant’s alternatives analysis for your reference. In accordance with the MOU, cooperating agencies will respond to the lead agency's request for concurrence within 10 business days. Failure to respond within 10 business days may be treated as concurrence, at the discretion of the lead agency.

If you have any questions, feel free to contact Mr. Jayson M Hudson, Regulatory Project Manager, from my staff at the letterhead address or by telephone at 409-766-3108 or by email at jayson.m.huidson@usace.army.mil.

Sincerely,

Joe McMahan
Chief, Regulatory Division

Enclosure

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

July 1, 2020

Regulatory Division

SUBJECT: Department of the Army Permit Application No. SWG-2019-00067

Mr. Chuck Ardizzone
Field Supervisor
U.S. Fish and Wildlife Service
17629 El Camino Real
Houston, TX 77058

Dear Mr. Ardizzone:

The U.S. Army Corps of Engineers, as the lead Federal agency, is developing an Environmental Impact Statement (EIS), for which the U.S. Fish and Wildlife Service is a cooperating agency. The EIS will analyze the potential impacts of issuing a Department of the Army permit for the Corpus Christi Ship Channel (CCSC) Channel Deepening Project (Project). The purpose of this letter is to coordinate an important milestone and ensure your agencies concurrence with the assumptions currently being evaluated by my office.

Fixing America's Surface Transportation Act (FAST-41).

On June 18, 2019, the Federal Permitting Improvement Steering Council (FPISC) added the proposed Project to the inventory of "covered projects" that are pending environmental review or authorization of the head of any Federal Agency pursuant to the requirements set forth in Title 41 of Fixing America's Surface Transportation Act (FAST-41). The CCSC Project has been placed on the FAST-41 Infrastructure Projects Permitting Dashboard (Permitting Dashboard) in accordance with the Joint Memorandum of the Office of Management and Budget/Council on Environmental Quality (OMB/CEQ) dated January 13, 2017 and entitled: "*Guidance to Federal Agencies Regarding the Environmental Review and Authorizations Process for Infrastructure Projects*".

Executive Order 13807 Concurrence Point 2

The CCSC Project is also subject to the "One Federal Decision" (OFD) Executive Order (EO) 13807: *Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure projects,* dated August 15, 2017. The subsequent Memorandum of Understanding Implementing One Federal Decision Under Executive Order 13807 (MOU), April 9, 2018 identifies three specific concurrence points in Section XI of the MOU, identified as milestones in the Permitting Timetable.

Concurrence points are opportunities for lead and cooperating agencies to assess mutual understanding and agreement on fundamental elements of the EIS. Concurrence among lead and cooperating agencies establishes that all involved agree to a given decision described in the concurrence point, and that all agree to abide by the decision as analyses and EIS preparation progresses. The Alternatives Analysis is Concurrence Point #2.

Corps Regulations for Alternatives Analysis

In its evaluation of permit applications to discharge dredged or fill material into waters of the U.S. (WOUS), including wetlands, the U.S. Army Corps of Engineers (Corps) is required to analyze alternatives to the proposed project that achieve its purpose. The Corps conducts this analysis pursuant to two main requirements – the 404(b)(1) Guidelines (Guidelines) found in 40 CFR 230 and the National Environmental Policy Act (NEPA) found in 33 CFR Part 325 Appendix B and 40 CFR 1508. The Corps also considers alternatives as part of its public interest review evaluation found in 33 CFR 320.4(a)(2)(ii).

The overall project purpose is used to evaluate less environmentally damaging practicable alternatives. The 404(b)(1) Guidelines state that an alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes. This evaluation applies to all waters of the United States, not just special aquatic sites such as wetlands and seagrasses.

The overall project purpose, as determined by the Corps after concurrence with the Cooperating Agencies is: *To safely, efficiently, and economically export current and forecasted crude oil inventories via Very Large Crude Carriers (VLCC), a common vessel in the world fleet. Crude oil is delivered via pipeline from the Eagle Ford and Permian Basins to multiple locations at the Port of Corpus Christi. Crude Oil inventories exported at the Port of Corpus Christi have increased from 280,000 barrels per day in 2017 to 1,650,000 barrels in January 2020 with forecasts increasing to 4,500,000 barrels per day by 2030. Current facilities require vessel lightering to fully load a VLCC which increases cost and effects safety.*

Based on evaluating information obtained from public input and meetings with federal and state agencies and data collection and analysis of environmental, socioeconomic, and engineering factors, development of Project alternatives prioritized minimization of impacts, both individually and cumulatively, to aquatic resources during both construction and operations. Using these concepts and considering avoidance and minimization to reduce impacts, the following six Project alternatives were identified.

1. No Action. Under the No Action Alternative, the CCSC would not be deepened to a -81MLLW, and would remain at -54 MLLW. VLCCs will continue to be partially loaded and reverse-lightered offshore. The No Action Alternative does not meet the Project purpose and need but is carried forward for detailed analysis in this EIS for comparison purposes.

2. Channel Deepening Alternative - This alternative consists of deepening the CCSC to -81 MLLW from the Gulf of Mexico to station 110+00 near Harbor Island, including the approximate 10 mile extension to the Entrance Channel necessary to reach sufficiently deep waters. Deepening would take place largely within the footprint of the currently authorized -54-foot MLLW channel. Dredging approximately 46.3 MCY would be required with inshore and offshore placement of the material. During our analysis, alternatives to dredge placement will be conducted on a case-by case basis. Under this alternative, only berths at Harbor Island would be capable of fully loading VLCCs. Partially loaded VLCCs at Ingleside could top off at Harbor Island thereby reducing or eliminating reverse-lightering.

3. Offshore Alternative - The CCSC would not be deepened to a -81 MLLW, and would remain at -54 MLLW. To meet the project purpose, multiple deep water port facilities capable of sustaining all projected oil exportation would be constructed. VLCCs would be fully loaded offshore eliminating the need to traverse the channel and reverse-lighter. This alternative would also eliminate dredging of the channel and the impacts associated with dredged material placement.

4. Combined Inshore/Offshore - The CCSC would not be deepened to a -81 MLLW, and would remain at -54 MLLW. To meet the project purpose, VLCC vessels would be partially loaded at inshore facilities in Ingleside and Harbor Island then traverse the channel to the offshore facility to be fully loaded. This alternative would eliminate the need to reverse-lighter and would also eliminate dredging of the channel and the impacts associated with dredged material placement.

5. Houston Alternative – This alternative consists of relocating the project to the Port of Houston. The Houston Ship Channel (HSC) is currently maintained at -45 MLLW. This alternative would either require the HSC be dredge to -81 MLLW or construct offshore facilities to eliminate reverse-lightering.

6. Brownsville Alterative – This alternative consists of relocating the project to the Port of Brownsville. The Brownsville Ship Channel (BSC) is maintained at -42 MLLW. This alternative would require either the BSC to be dredged to -81 MLLW or construct offshore facilities to eliminate reverse-lightering

The Corps used a multi-step process to screen the range of alternatives to determine which alternatives are reasonable, practicable, and meet the Project purpose. The Project alternatives were analyzed using the following screening criteria to identify a range of reasonable alternatives: satisfaction of the overall Project purpose; practicable based on Clean Water Act Section 404(b)(1) Guidelines (technology, logistics, cost); and consideration of potential aquatic resources impacts. The alternatives screening analysis is summarized in Table 1.

Table 1. Comparison Summary of Alternatives

Alternative	Carried Forward (Yes/No)			
	Purpose and Need	Practicability - Technology	Practicability - Logistics	Practicability - Cost*
No Action	Yes	Yes	Yes	Yes
Channel Deepening Corpus Christi	Yes	Yes	Yes	Yes
Offshore Corpus Christi	Yes	Yes	Yes	Yes
Inshore/Offshore Corpus Christi	Yes	Yes	Yes	Yes
Port of Brownsville	No	No	No	No
Port of Houston	No	No	No	No
* It is not a particular applicant's financial standing that is the primary consideration for determining practicability in regards to cost, but rather characteristics of the project and what constitutes a reasonable expense for these projects that are most relevant to practicability determinations.				

Based on this analysis, the Corps has determined that the No Action Alternative and three action alternatives will be carried forward for detailed analysis in the EIS. Sites that lie substantially outside the geographic boundaries identified in the overall project purpose are not practicable, and therefore unreasonable, and can be eliminated with little information. Therefore, alternative locations, such as Houston and Brazos Island Harbor, which was scoped in by the public, are not being carried forward in the analysis.

Enclosed, you will find a copy of the applicant’s alternatives analysis for your reference. In accordance with the MOU, cooperating agencies will respond to the lead agency's request for concurrence within 10 business days. Failure to respond within 10 business days may be treated as concurrence, at the discretion of the lead agency.

If you have any questions, feel free to contact Mr. Jayson M Hudson, Regulatory Project Manager, from my staff at the letterhead address or by telephone at 409-766-3108 or by email at jayson.m.huidson@usace.army.mil.

Sincerely,

Joe McMahan
Chief, Regulatory Division

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

September 21, 2021

Robert Heinly
Deputy Chief, Regulatory Division
Galveston District
U.S. Army Corps of Engineers
P.O. Box 1229
Galveston, TX 77533

Re: SWG-2019-00067- Port of Corpus Christi Authority Channel Deepening Project SAP

Dear Mr. Heinly:

This is in response to your August 9, 2021 request for concurrence on the Statement of Work and Sampling Analysis Plan MPRSA Section 103 Evaluation of Sediment from The Port of Corpus Christi Authority Channel Deepening Project, Corpus Christi, Texas (SAP) submitted by the Port of Corpus Christi Authority (PCCA). The sampling is done to determine the suitability of the material for ocean dumping. The Environmental Protection Agency (EPA) received the letter and included support documents via email on August 9, 2021, and a revised SAP on September 9, 2021.

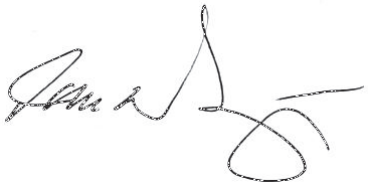
A review of the draft June 2021 SAP was completed by the U.S. Army Corps of Engineers (USACE) and EPA on July 15, 2021. EPA has since reviewed the revised SAP and agrees that all recommendations made by the agencies are included in the final document.

The SAP describes the collection of dredged material from 11 Dredged Material Management Units (DMMUs), nine in the new work improvement area, one at the Reference Area and one at the ODMDS. A total of 11 water and 30 sediment samples will be collected. Subsequent chemical and bioassay testing will be conducted in accordance with the procedures described in the Green Book (1991) and Regional Implementation Agreement (RIA) (2003).

Based on the information provided, we concur with your determination and conclude that the work described in your letter complies with the applicable subparts of 40 CFR Parts 220-229. This determination is provided in accordance with 40 CFR 225.2(d). Should events occur that may cause changes in these sampling procedures, please contact EPA immediately.

Should you have any questions regarding this determination or management of the Corpus Christi ODMDSs, please feel free to contact Wendy Jacques, Region 6 Ocean Dumping Coordinator at 214-665-7395 or by email at jacques.wendy@epa.gov.

Sincerely,



Charles W. Maguire
Director
Water Division

ecc: Jayson Hudson, Regulatory Project Manager

MPRSA SECTION 103 SAMPLING AND ANALYSIS PLAN

PCCA CHANNEL DEEPENING PROJECT

Project Management Title and Approval Sheet

Applicant: Port of Corpus Christi Authority

Point of Contact:

Title:

Signature:_____ Date: 8/4/2021

Regulatory Agency: U.S. Army Corps of Engineers (USACE), Galveston District

Point of Contact: Joseph A. McMahan

Title: Chief, Regulatory Division

Signature: Robert W. Heinly Date: 9 August 2021

Regulatory Agency: U.S. Environmental Protection Agency, Region 6

Point of Contact: Charles W. Maguire,

Title: Director, Water Quality Division

Signature: Charles Maguire Date: 09/22/2021

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, GALVESTON DISTRICT
2000 FORT POINT RD
GALVESTON, TEXAS 77553-1229

March 31, 2022

Policy Branch

SUBJECT: Department of the Army Permit Application SWG-2019-00067

Mr. Mark Wolfe
State Historic Preservation Officer
Texas Historical Commission
P.O. Box 12276
Austin, TX 78711-2276

Dear Mr. Wolfe:

The U.S. Army Corps of Engineers, Galveston District (Corps) Staff Archeologist has reviewed the draft report titled, *Cultural Resources Survey Report, Intensive Pedestrian Survey of Approximately 955-Acres along Mustang and San Jose Islands, Nueces and Aransas Counties, Texas*, prepared for Port of Corpus Christi Authority by Terracon Consultants, Inc., and dated March 2022. The draft report was prepared in response to our initial request for a cultural resource investigation of the permit area. A copy of the report is attached. Additionally, the applicant should have provided a copy of this report to you.

As documented in the report, no historic properties found in the permit area and further investigation is not justified. We request your review of the referenced report, your concurrence with our determination that no historic properties are present and that the proposed permit action is in compliance with Section 106 of the National Historic Preservation Act.

Thank you for your cooperation in this review process. If you have any questions concerning our review or if we can be of further assistance, please contact Mr. Jerry Androy at 409-766-3821.

Sincerely,

Jerry Androy
Regulatory Archeologist and
Tribal Liaison

From:	Hudson, Jayson M CIV USARMY CESWG (USA)
To:	Lisa Vitale; Tom Dixon; Anthony Risko
Subject:	FW: PCCA Channel Deepening Project - Administrative DEIS Cooperating Agency Review - Suspense: May 25, 2022.
Date:	Monday, May 23, 2022 1:40:56 PM
Attachments:	PCCA DEIS - EPA R6 - Reviewer Comment-Response Matrix.xlsx

Comments from EPA 103 program

Jayson M Hudson
Regulatory Project Manager
409.766.3108

Please tell me how I am doing by completing the survey found at:
https://regulatory.ops.usace.army.mil/customer-service-survey/

From: Jacques, Wendy <Jacques.Wendy@epa.gov>
Sent: Monday, May 23, 2022 1:20 PM
To: Hudson, Jayson M CIV USARMY CESWG (USA) <Jayson.M.Hudson@usace.army.mil>
Cc: Rickards, Lisa <Rickards.Lisa@epa.gov>; McCormick, Karen <mccormick.karen@epa.gov>; Hosch, Claudia <hosch.claudia@epa.gov>; Maguire, Charles <maguire.charles@epa.gov>; Jansky, Michael <Jansky.Michael@epa.gov>
Subject: [URL Verdict: Neutral][Non-DoD Source] RE: PCCA Channel Deepening Project - Administrative DEIS Cooperating Agency Review - Suspense: May 25, 2022.

Hello Jayson,

Thank you for the opportunity to review the Administrative DEIS for the Port of Corpus Christi Authority's Channel Deepening Project. Attached please find comments from the Ocean Dumping Program.

Regards,

Wendy Jacques
Ocean Dumping Program
Marine, Coastal and Nonpoint Source
US EPA Region 6 WD-AM
1201 Elm St., Suite 500
Dallas, TX 75270-2102
214.665.7395

From: Hudson, Jayson M CIV USARMY CESWG (USA) <Jayson.M.Hudson@usace.army.mil>
Sent: Monday, April 25, 2022 9:42 AM
Subject: PCCA Channel Deepening Project - Administrative DEIS Cooperating Agency Review - Suspense: May 25, 2022.

The Administrative DEIS and Appendices for the Port of Corpus Christi Authority's Channel Deepening Project, Department of the Army permit application SWG-2019-00067, are ready for Cooperating Agency review.

The DEIS is attached. A link to the full Admin DEIS, including Appendices, will be provided to you by the Corps DoD SAFE in a following email.

The Notice of Availability (NOA) for the DEIS is scheduled on the Permit Dashboard for June 10, 2022. To incorporate your comments by the scheduled NOA date, we are requesting comments in the attached Reviewer Comment Response Matrix by May 25, 2022.

Let me know if you have any problems accessing the files or any other general questions. We can schedule a call to assist you in your review.

Jayson M Hudson
Regulatory Project Manager
Policy Analysis Branch
Galveston District
409.766.3108

Please tell me how I am doing by completing the survey found at:
https://regulatory.ops.usace.army.mil/customer-service-survey/

From:	Hudson, Jayson M CIV USARMY CESWG (USA)
To:	Lisa Vitale; Tom Dixon; Anthony Risko
Subject:	FW: PCCA Channel Deepening Project - Administrative DEIS Cooperating Agency Review - Suspense: May 25, 2022.
Date:	Monday, May 23, 2022 2:54:07 PM

Comments from EPA's NEPA group.

Jayson M Hudson
Regulatory Project Manager
409.766.3108

Please tell me how I am doing by completing the survey found at:
https://regulatory.ops.usace.army.mil/customer-service-survey/

From: Jansky, Michael <Jansky.Michael@epa.gov>
Sent: Monday, May 23, 2022 2:39 PM
To: Hudson, Jayson M CIV USARMY CESWG (USA) <Jayson.M.Hudson@usace.army.mil>
Cc: Jansky, Michael <Jansky.Michael@epa.gov>; Jimenez, Jonathan <Jimenez.Jonathan@epa.gov>; Jacques, Wendy <Jacques.Wendy@epa.gov>; Houston, Robert <Houston.Robert@epa.gov>; Hayden, Keith <Hayden.Keith@epa.gov>
Subject: [URL Verdict: Neutral][Non-DoD Source] FW: PCCA Channel Deepening Project - Administrative DEIS Cooperating Agency Review - Suspense: May 25, 2022.

Hello Jayson:

Thank you for the opportunity to review and comment on the Administrative DEIS and Appendices for the Port of Corpus Christi Authority's Channel Deepening Project, Department of the Army permit application SWG-2019-00067. The Notice of Availability (NOA) for the DEIS is scheduled on the Permit Dashboard for June 10, 2022. To incorporate comments by the scheduled NOA date, the Corps is requesting comments May 25, 2022.

In response to your request, the following comments are now provided below. Commenters had problems with the Comment Spread Sheet and were not able to format as you suggested. I will defer to you expertise and request the Corps incorporate in to the desired format if necessary. The Ocean Dumping Program submitted comments to you directly on May 23, 2022. If you haven't received them please let me know.

Our narrative comments are provided as follows:

BACKGOUND

The Port of Corpus Christi Authority (PCCA or Applicant) applied to the U.S. Army Corps of

Engineers (USACE), Galveston District (SWG), for a Department of Army (DA) permit. The DA permit application is for deepening of the Corpus Christi Ship Channel (CCSC) at Port Aransas, Nueces County, Texas. The application was originally submitted on January 3, 2019. Based on comments provided by the USACE on May 23, 2019, the application was revised June 4, 2019. The DA determined the permitting constitutes a major Federal Action. The DA permit action is governed under the statutes of the Sections 10 and 14 of the Rivers and Harbors Act of 1899, Section 404 of the Clean Water Act, and Section 103 of the Marine Protection, Research, and Sanctuaries Act. Activities subject to the jurisdiction of the USACE would include dredging of navigable waters to extend the terminus of the authorized channel into the Gulf of Mexico (Gulf); deepening, expanding, and improving the existing CCSC; and beneficial use (BU) and placement of dredged material. The USACE published a Notice of Intent to prepare a Draft Environmental Impact Statement (EIS), which was published in the *Federal Register* on April 7, 2020. This project was determined to be a covered project under Title 41 of the Fixing America's Surface Transportation Act (FAST-41). As a result, the PCCA CDP was added to the Permitting Dashboard for Federal Infrastructure Projects which tracks covered projects publicly. FAST-41 is intended to improve the timeliness, predictability, and transparency of the Federal environmental review and authorization process

EPA Comments & Recommendation

Commentor: Jonathan Jimenez (EPA Region 6 WD)

1. Although the risk of oil spills may be low or reduced under certain alternatives, we ask that the Port of Corpus Christi (PCCA)
   describe the environmental remediation measures to be implemented ensuring minimal threat to water quality and native species in the event of a related emergency (Draft EIS, p. vii).

2. EPA requests that PCCA ensure that all oil transportation vessels have an approved Shipboard Oil Pollution Emergency Plan (SOPEP) (33 CFR 151.26) before entering the channel." (https://www.law.cornell.edu/cfr/text/33/151.26)

3. Disturbances of Hazardous, Toxic, and Radioactive Waste (HTRWs) from current or past facilities may be exacerbated by weather conditions that influence tide, flow, or circulation of the water column (e.g., after hurricanes or similar wind and precipitation events). EPA asks PCCA address what actions will be taken to mitigate the re-introduction of both new and old HTRWs into the water column (Draft EIS, p. vii; p. 3-35).

4. Although the proposed actions may only cause localized and temporary impacts to water quality and available habitat, they may prove disastrous for endangered species that are endemic to the region. EPA encourages PCCA to coordinate working with local conservation or sustainability groups to mitigate the effects of proposed action dredging and management activities on threatened or endangered marine mammals, fishes, or sea turtles. PCCA should explain efforts to protect the health of these species in the event of a maintenance emergency.

5. Please explain in the EIS how the dredging activities associated with the proposed action will result in lessened marine traffic in the shipping channel (Draft EIS, p. ix).

6. The EPA requests that PCCA follow Best Management Practices outlined in this dredging guidance document developed by the USACE and the EPA: https://semspub.epa.gov/work/HQ/175413.pdf

Thank you for allowing us the opportunity to comment. If you have questions, please let me know.

Respectfully,

Michael Jansky
Environmental Engineer/NEPA Specialist
Mail Code: ORACN
USEPA - Region 6
1201 Elm Street, Suite 500
Dallas, TX 75270
e: jansky.michael@epa.gov

From:	Hudson, Jayson M CIV USARMY CESWG (USA)
To:	Lisa Vitale; Tom Dixon; Anthony Risko
Subject:	FW: PCCA Channel Deepening Project - Administrative DEIS Cooperating Agency Review - Suspense: May 25, 2022.
Date:	Tuesday, May 24, 2022 9:13:11 AM
Attachments:	1_POCC CDP - ADEIS Reviewer Comment-Response Matrix (EPA R6 Wetlands 5-17-22).xlsx

Comments for EPA wetlands

Jayson M Hudson
Regulatory Project Manager
409.766.3108

Please tell me how I am doing by completing the survey found at:
https://regulatory.ops.usace.army.mil/customer-service-survey/

From: Kaspar, Paul <kaspar.paul@epa.gov>
Sent: Tuesday, May 24, 2022 8:50 AM
To: Hudson, Jayson M CIV USARMY CESWG (USA) <Jayson.M.Hudson@usace.army.mil>
Cc: Hayes, Mark <hayes.mark@epa.gov>; Jansky, Michael <Jansky.Michael@epa.gov>
Subject: [URL Verdict: Unknown][Non-DoD Source] RE: PCCA Channel Deepening Project - Administrative DEIS Cooperating Agency Review - Suspense: May 25, 2022.

Jayson,

Please find attached EPA R6 Wetlands Program comments on the ADEIS.

I hope all is well and feel free to reach out with any questions,

Paul Kaspar
Environmental Engineer
US. EPA - Region 6 (Houston Lab)
Water Division, NPDES/Wetlands Review Section (WDPN)
10625 Fallstone Road
Houston, TX 77099
Office: 214.665.7459
Fax: 281.983.2124
Email: kaspar.paul@epa.gov

From: Hudson, Jayson M CIV USARMY CESWG (USA) <Jayson.M.Hudson@usace.army.mil>

Sent: Monday, April 25, 2022 9:42 AM
To: Brian Rosegger <brian.rosegger@noaa.gov>; Ardizzone,Charles <chuck_ardizzone@fws.gov>; Brown Margaret <margaret.a.brown@uscg.mil>; charrish stevens - NOAA Federal <charrish.stevens@noaa.gov>; frankie_green@fws.gov; Gardiner, Dawn <dawn_gardiner@fws.gov>; Hayes, Mark <hayes.mark@epa.gov>; Houston, Robert <Houston.Robert@epa.gov>; Klemm, Dennis <dennis.klemm@noaa.gov>; Ledwin, Jane <jane_ledwin@fws.gov>; marty_tuegel@fws.gov; McCormick, Karen <McCormick.Karen@epa.gov>; noah.silverman <noah.silverman@noaa.gov>; Stacey Horstman - NOAA <stacey.horstman@noaa.gov>; Swafford, Rusty <rusty.swafford@noaa.gov>
Cc: Michael Barnette - NOAA Federal <Michael.Barnette@noaa.gov>; Kaspar, Paul <kaspar.paul@epa.gov>; HEINLY, Robert W CIV USARMY CESWG (USA) <Robert.W.Heinly@usace.army.mil>; Jacques, Wendy <Jacques.Wendy@epa.gov>; Rickards, Lisa <Rickards.Lisa@epa.gov>; Edwards, Aron S CIV USARMY CESWG (USA) <Aron.S.Edwards@usace.army.mil>; Hudson, Jayson M CIV USARMY CESWG (USA) <Jayson.M.Hudson@usace.army.mil>
Subject: PCCA Channel Deepening Project - Administrative DEIS Cooperating Agency Review - Suspense: May 25, 2022.

The Administrative DEIS and Appendices for the Port of Corpus Christi Authority's Channel Deepening Project, Department of the Army permit application SWG-2019-00067, are ready for Cooperating Agency review.

The DEIS is attached. A link to the full Admin DEIS, including Appendices, will be provided to you by the Corps DoD SAFE in a following email.

The Notice of Availability (NOA) for the DEIS is scheduled on the Permit Dashboard for June 10, 2022. To incorporate your comments by the scheduled NOA date, we are requesting comments in the attached Reviewer Comment Response Matrix by May 25, 2022.

Let me know if you have any problems accessing the files or any other general questions. We can schedule a call to assist you in your review.

Jayson M Hudson
Regulatory Project Manager
Policy Analysis Branch
Galveston District
409.766.3108

Please tell me how I am doing by completing the survey found at:
https://regulatory.ops.usace.army.mil/customer-service-survey/

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Texas Coastal Ecological Services Field Office
4444 Corona Drive, Suite 215
Corpus Christi, Texas 78411
361/994-9004 / (FAX) 361/994-8262

In Reply Refer To:
02ETTX00-2022-0045444

May 27, 2022

Jayson M. Hudson, Regulatory Project Manager
Regulatory Division, CESWG-RDP
U.S. Army Corps of Engineers Galveston District
2000 Fort Point Road
Galveston, Texas 77550

Dear Mr. Hudson:

The U.S. Fish and Wildlife Service (Service) is a Cooperating Agency under the National Environmental Policy Act in the FAST-41 planning process for the Port of Corpus Christi's Ship Channel Deepening Project (CDP). The Service received and reviewed an administrative draft Environmental Impact Statement (DEIS) dated April 2022, for the U.S. Army Corps of Engineers (Corps) permit number SWG-2019-00067. The Applicant, Port of Corpus Christi Authority (PCCA), proposes to deepen 13.8 miles of the Corpus Christi Ship Channel (CCSC) from the currently authorized depth of -54 feet to -77 feet. The dredging portion of the CDP would extend from Harbor Island in Port Aransas, Texas, to 10 miles beyond the current entrance of the CCSC in the Gulf of Mexico. Approximately 46.3 million cubic yards of material would be dredged, with inshore and offshore beneficial use placement. The proposed project is located at Port Aransas, Nueces County, Texas, with a DEIS study area to include portions of Nueces, San Patricio, Aransas, and Refugio counties.

The revised Department of the Interior Manual Instructions (503 DM 1), dated August 3, 1973, assigned responsibility for Department of the Interior coordination and review of Corps permit applications to the Service. Our comments are provided in accordance with these instructions, the Fish and Wildlife Coordination Act (16 U.S.C. 661-667(e)), the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq.), the Migratory Bird Treaty Act (16 U.S.C. 703 et seq.) and the National Environmental Policy Act (42 U.S.C. 4321-4347) (NEPA).

The Service provided preliminary review comments to a draft Endangered Species Act Biological Assessment, via an April 26, 2022, email. Therefore, no additional comments related to the Biological Assessment in Appendix D of the DEIS are included at this time. In addition to the general comments below, the enclosed Reviewer Comment Response Matrix contains comments related to specific sections of the DEIS.

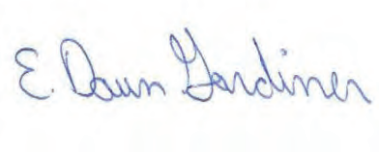
General Comments

- The DEIS needs to adequately demonstrate that the Applicant's preferred alternative (CDP) is the least environmentally damaging alternative to meet the stated purpose and need. The CDP is expected to result in increases in large vessel traffic, tidal amplitude, storm surge, salinity, turbidity, shoreline propeller scour, maintenance dredging, and inshore oil spill risk. These could negatively impact threatened and endangered species, migratory birds, wetlands, and seagrass. The Service agrees that the use of suitable dredged material to renourish beaches and restore eroded habitats is beneficial; however, these benefits may not outweigh irreversible damage that the CDP could potentially cause.
- The DEIS states that the presence of offshore ports in Alternatives 2 and 3 would reduce or eliminate the need for Very Large Crude Carriers (VLCC) to enter the CCSC and reverse-lighter offshore. However, crude oil exports are forecasted to more than double by 2030 with the PCCA becoming the leading crude oil exporter in the U.S. Construction of the new Harbor Bridge is scheduled to be completed in 2024, allowing VLCCs to enter the Inner Harbor. Given the increased market demand and accessibility to the Inner Harbor, large vessels could potentially still opt to enter the CCSC for partial loading. In addition, a VLCC can take 48 to 60 hours to fully load from a deepwater port. If there were long wait times for a single point mooring buoy offshore, some vessel operators might opt for partial loading from the CCSC and reverse lightering offshore. Would large vessels be restricted from entering the CCSC if multiple deepwater ports were in place? Please provide more details in the DEIS to provide realistic future scenarios about vessel traffic throughout the CCSC under each alternative.
- The DEIS includes model predictions for a cumulative salinity change range of +/- 4 Practical Salinity Units (PSU) with an error of +/- 5 PSU. The Service understands that salt storage in Nueces Delta is an uncertainty, and that salinity can fluctuate greatly depending on rainfall; however, freshwater inflow is limited in this semi-arid region, especially in the Nueces and Nueces-Rio Grande river basins. The Service is concerned that cumulative effects of increased salinity from the CDP, periods of drought, climate change, and effluent from multiple proposed desalination plants, could result in a significant change in the distribution and species composition of seagrass and lower trophic level organisms in Redfish, Corpus Christi, Aransas, and Nueces bays. This

change would impact threatened and endangered species and migratory birds that feed, breed, nest, and roost in these estuaries. The cumulative impacts analysis of the DEIS should be expanded to better examine potential increases in salinity.

The Service appreciates the opportunity to review the administrative DEIS for CDP. If you have questions regarding these comments, please contact Mary Kay Skoruppa at 361-225-7314 or mary_kay_skoruppa@fws.gov.

Sincerely,



Dawn Gardiner for
Charles Ardizzone
Field Supervisor

cc:
Environmental Protection Agency, Region 6, Dallas, TX
National Marine Fisheries Service, Galveston, TX

Enclosure:
Reviewer Comment Response Matrix - USFWS

From:	Hudson, Jayson M CIV USARMY CESWG (USA)
To:	Lisa Vitale; Tom Dixon; Anthony Risko
Subject:	FW: [URL Verdict: Neutral][Non-DoD Source] PCCA CDP BA
Date:	Monday, May 9, 2022 2:03:44 PM
Attachments:	Draft Biological Assessment - Mar 28 2022 - MCB review.docx

From NMFS

Jayson M Hudson
Regulatory Project Manager
409.766.3108

Please tell me how I am doing by completing the survey found at:
https://regulatory.ops.usace.army.mil/customer-service-survey/

From: Michael Barnette - NOAA Federal <michael.barnette@noaa.gov>
Sent: Monday, May 9, 2022 1:30 PM
To: Hudson, Jayson M CIV USARMY CESWG (USA) <Jayson.M.Hudson@usace.army.mil>
Cc: Brian Rosegger - NOAA Affiliate <brian.rosegger@noaa.gov>; Klemm, Dennis <dennis.klemm@noaa.gov>
Subject: [URL Verdict: Neutral][Non-DoD Source] PCCA CDP BA

Hi Jayson-

Attached is the draft BA with initial comments in track changes. I focused my review on ESA-listed species under NOAA purview; we defer to USFWS for any land-based effects on ESA-listed sea turtles.

I would recommend that additional information be added to the BA/DEIS that provides better detail on dredging activities under the preferred alternative. A good source document on dredging project effects can be found in the 2020 South Atlantic Regional Biological Opinion for Dredging and Material Placement Activities in the Southeast United States (2020 SARBO), available online here: https://media.fisheries.noaa.gov/dam-migration/sarbo_acoustic_revision_6-2020-opinion_final.pdf

As noted in your DEIS, 2-9: "It is assumed that the deepening of the channel would be constructed with a cutterhead suction hydraulic or single large-capacity hopper dredge. However, the construction contractor may opt to employ two or more mid-capacity hopper dredges, or a cutterhead hydraulic pipeline dredged, or a mix of hopper and cutterhead dredges."

The draft BA also includes language regarding different dredge types, seasonal windows, etc., though the language is a bit ambiguous and unclear. As you likely know, these different dredge types can have significantly different effects on ESA-listed sea turtles in particular. Without knowing the extent the various dredge types would be contributing to material removal, it will be difficult to calculate anticipated take of sea turtles. At the very least, based on the potential dredge windows

presented in the draft BA, if estimates could be provided for the contributions hopper dredges and cutterhead dredges account for of the total anticipated 46.3 MCY of dredged material, we may have a path to estimate potential CPUE for sea turtle take (by hopper dredges). We appreciate any effort you can make to reduce the ambiguity of the proposed action (preferred alternative) so we can ensure a swift ESA consultation.

I also started my review of the DEIS and noticed some slight divergence in some sections. For instance, for loggerhead sea turtles presence/absence in the action area, the draft BA noted on 2-17: "The likelihood of encountering a Loggerhead Sea Turtle within the study area is uncommon but possible." While the DEIS on page 3-80 states: "Due to their habitat preference, it is unlikely that the Loggerhead Sea Turtle would occur in the study area."

Also, given that loggerheads represent the second most documented TX dredge takes as noted in the draft BA, available information seems to contradict the DEIS conclusion about this species absence in the action area.

In any case, I wanted to get some of these preliminary review comments to you ASAP. Please let me know if you would like to discuss in further detail. I am in most of this week, but I will be out extensively from May 13-June 8.

Cheers,
Mike
--
MICHAEL C. BARNETTE
Fishery Biologist, Southeast Regional Office
NOAA Fisheries | U.S. Department of Commerce
Office: (727) 551-5794
www.fisheries.noaa.gov

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

August 10, 2022

Policy Analysis Branch

SUBJECT: Section 7 Formal Consultation for Department of the Army Permit SWG-2019-00067, Port of Corpus Christi Authority

Michael C. Barnette
Fishery Biologist
National Marine Fisheries Service
Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701

Dear Mr. Barnette:

The U.S. Army Corps of Engineers (USACE), as the lead Federal agency for SWG-2029-00067 is developing an Environmental Impact Statement (EIS), for which the NMFS is a cooperating agency. The EIS will analyze the potential impacts of issuing a Department of the Army permit for the Corpus Christi Ship Channel (CCSC) Channel Deepening Project (Project). In addition, the Federal Permitting Improvement Steering Council (FPISC) added the proposed Project to the inventory of "covered projects" pursuant to the requirements set forth in Title 41 of Fixing America's Surface Transportation Act (FAST-41).

The proposed Port of Corpus Christi Authority (PCCA) Project (CDP) is located in Port Aransas, Nueces County, Texas within the existing channel bottom of the CCSC near the southeast side of Harbor Island, and traversing easterly through Aransas Pass and extending an additional 5.5 miles beyond the existing terminus of the channel. Dredging approximately 46.3 million cubic yards would be required with inshore and offshore placement of the material.

Our responsibility under Section 7(c) of the Endangered Species Act (ESA) of 1973 as amended, requires the United States Army Corps of Engineers to ensure that any action it authorizes, funds, or carries out, is not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of critical habitat.

Based upon our discussions, we have determined that this project may affect 12 listed species, onshore and in the water, and we are requesting formal consultation pursuant to Section 7 of the ESA. To assist in your review, we provided the *Biological Assessment for the Proposed Corpus Christi Ship Channel Deepening Project* dated June 2022. In response to comments received on July 28, 2022, we provided the *Final Biological Assessment for the Proposed Corpus Christi Ship Channel Deepening*

Project (BA) dated August 2022 on August 5th. In an email dated August 10, 2022, you indicated that additional information about trawling relocation is still required and you raised a new concern about the Environmental Protection Agency's (EPA) expansion of the Corpus Christi New Work Ocean Dredge Material Disposal Site (ODMDS).

In regards to the ODMDS, the EPA is incorrect in their preliminary conclusion that the proposed PCCA project is dependent on the expansion of the ODMDS. The designation of the ODMDS is proposed for the disposal from a range of projects, both private and federal, in the Corpus Christi Texas area. Because this site is utilized for a range of projects beyond those covered by this biological assessment, and therefore would continue to be designated and used regardless of the proposed action, the USACE does not consider the re-designation of the ODMDS to be a consequence of the proposed project.

The USACE has not been able to locate the requested relocation trawling data for sea turtles along the Texas coast. We are able to provide information for the years 2003-2016 for the Action Area in Corpus Christi, Texas. (Enclosed)

The USACE has provided the best available scientific and commercial data concerning the impact of the proposed project in Corpus Christi. Absent the additional relocation trawling data, USACE requests that you develop the biological opinion with the available information giving benefit of doubt to the species.

Sincerely,

Jayson M Hudson

Jayson M Hudson
Regulatory Project Manager
Policy Analysis Branch

Corpus Christi Ship Channel: Entrance/Jetty Channel

Trawling for Dredge	Trawler	Year	Start	End	Surface Temp Range (º C)	Tows	Trawler Days	Turtle Captures	Comments
Atchafalaya	*Miss Anna, Jana Lin*	2003	4/15/2003	7/4/2003	16 - 30	2239	84	1 Dc, 15 Lk, 55 Cc	3 turtles recaptured; 3 turtles injured-transported to rehab; 1 bottlenose dolphin caught/died
Atchafalaya	*Miss Vanessa, Woody*	2006	7/20/2006	8/11/2006	29.9 - 31.5	1011	22	10 Cc, 2 Lk	Trawlers at anchor part of 7/25 - 7/27 due to weather.
Columbia	*Two Didos*	2007	3/19/2007	5/23/2007	19-26	1515	66	12 Cc, 24 Lk, 1 Cm	
Wheeler	*Lucky JJ*	2015	1/3/2015	1/20/2015	10.55-16.66	243	17	1 Cm	
Styvesant	*King Julian*	2016	8/17/2016	9/3/2016	27.9-28.2	359	18	7 Cc	

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

June 9, 2022

REPLY TO ATTENTION OF:

Policy Analysis Branch

SUBJECT: SWG-2019-00067; Essential Fish Habitat Recommendations

Mr. Rusty Swafford
National Marine Fisheries Service
Habitat Conservation Division
4700 Avenue U
Galveston, Texas 77551-5933

Dear Mr. Swafford:

The U.S. Army Corps of Engineers (USACE), as the lead Federal agency for SWG-2019-0067, is developing an Environmental Impact Statement (EIS), for which the NMFS is a cooperating agency. The EIS will analyze the potential impacts of issuing a Department of the Army permit for the Corpus Christi Ship Channel (CCSC) Channel Deepening Project (Project). In addition, the Federal Permitting Improvement Steering Council (FPISC) added the proposed Project to the inventory of "covered projects" pursuant to the requirements set forth in Title 41 of Fixing America's Surface Transportation Act (FAST-41).

The proposed Port of Corpus Christi Authority (PCCA) Project (CDP) is located in Port Aransas, Nueces County, Texas within the existing channel bottom of the CCSC near the southeast side of Harbor Island, and traversing easterly through Aransas Pass and extending an additional 5.5 miles beyond the existing terminus of the existing channel. Dredging approximately 46.3 million cubic yards would be required with inshore and offshore placement of the material.

In the August 2019 initial public notice, the USACE concluded that our initial determination was that the proposed action would have a substantial adverse impact on Essential Fish Habitat or federally managed fisheries in the Gulf of Mexico. After further evaluation of the proposed project, documented in the *Draft Environmental Impact Statement for the Proposed Corpus Christi Ship Channel Deepening Project* (DEIS), we have reached a determination relative to project impacts and the need for mitigation measures and documented them in the enclosed *Essential Fish Habitat Assessment for the Proposed Corpus Christi Ship Channel Deepening Project*. The DIES is available on our website at: https://www.swg.usace.army.mil/Missions/Regulatory/Special-Projects-Environmental-Impact-Statements/,

The FPISC Permitting Dashboard for Federal Infrastructure Projects has your next milestone, *NOAA Determines the EFH Assessment is complete and Initiates consultation*, scheduled for August 10, 2022. We are ready to assist you in whatever way possible and can arrange a meeting to discuss any additional information necessary. If you have any questions, please contact me at the letterhead address or by telephone at 409-766-3108. You may also e-mail me at jayson.m.hudson@usace.army.mil if you prefer.

Sincerely,

Jayson M Hudson

Jayson M Hudson
Regulatory Project Manager

Cc w/Encl.

Mr. Charrish Stevens
National Marine Fisheries Service
Habitat Conservation Division
4700 Avenue U
Galveston, Texas 77551-5933

Sarah Garza
Port of Corpus Christi Authority
400 Harbor Dr
Corpus Christi, TX 78401

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

June 9, 2022

Policy Analysis Branch

SUBJECT: Section 7 Formal Consultation for Department of the Army Permit SWG-2019-00067, Port of Corpus Christi Authority

E. Dawn Gardiner
Assistant Field Supervisor
Texas Coastal Ecological Services
U.S. Fish & Wildlife Service (USFWS)
P.O. Box 81468
Corpus Christi, TX 78468-1468

The U.S. Army Corps of Engineers, as the lead Federal agency for SWG-2019-00067 is developing an Environmental Impact Statement (EIS), for which the USFWS is a cooperating agency. The EIS will analyze the potential impacts of issuing a Department of the Army permit for the Corpus Christi Ship Channel (CCSC) Channel Deepening Project (Project). In addition, the Federal Permitting Improvement Steering Council (FPISC) added the proposed Project to the inventory of "covered projects" pursuant to the requirements set forth in Title 41 of Fixing America's Surface Transportation Act (FAST-41).

The proposed Port of Corpus Christi Authority (PCCA) Project (CDP) is located in Port Aransas, Nueces County, Texas within the existing channel bottom of the CCSC near the southeast side of Harbor Island, and traversing easterly through Aransas Pass and extending an additional 5.5 miles beyond the existing terminus of the channel. Dredging approximately 46.3 million cubic yards would be required with inshore and offshore placement of the material.

Our responsibility under Section 7(c) of the Endangered Species Act (ESA) of 1973 as amended, requires the United States Army Corps of Engineers to ensure that any action it authorizes, funds, or carries out, is not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of critical habitat.

Based upon our discussions, we have determined that this project may affect 12 listed species, onshore and in the water, and we are requesting formal consultation pursuant to Section 7 of the ESA. To assist in your review, we have enclosed the

Biological Assessment for the Proposed Corpus Christi Ship Channel Deepening Project dated June 2022. A summary of effects determinations for all 26 federally listed species is included in Table 1.

In addition, the Draft Environmental Impact Statement for the Proposed Corpus Christi Ship Channel Deepening Project is available on our website at: https://www.swg.usace.army.mil/Missions/Regulatory/Special-Projects-Environmental-Impact-Statements/

Table 1: Summary of effects determination for the Federally threatened and endangered species

Common Name	Scientific Name	Effects Determination
MAMMALS		
Ocelot	*Leopardus pardalis*	No Effect
Blue Whale	*Balaenoptera musculus*	No Effect
Fin Whale	*Balaenoptera physalus*	No Effect
Humpback Whale	*Megaptera novaeangliae*	No Effect
Sei Whale	*Balaenoptera borealis*	No Effect
Sperm Whale	*Physeter macrocephalus*	May affect, but not likely to adversely affect
West Indian Manatee	*Trichechus manatus*	May affect, but not likely to adversely affect
FISH		
Giant Manta Ray	*Manta birostris*	May affect, but not likely to adversely affect
BIRDS		
Northern Aplomado Falcon	*Falco femoralis septentrionalis*	No Effect
Piping Plover	*Charadrius melodus*	May affect, but not likely to adversely affect
Red Knot (Rufa)	*Calidris canutus rufa*	May affect, but not likely to adversely affect
Whooping Crane	*Grus americana*	May affect, but not likely to adversely affect
Eastern Black Rail	*Laterallus jamaicensis jamaicensis*	May affect, but not likely to adversely affect
Attwater's Greater Prairie Chicken	*Tympanuchus cupido attwateri*	No Effect
REPTILES		
Green Sea Turtle	*Chelonia mydas*	Likely to adversely affect
Hawksbill Sea Turtle	*Eretmochelys imbricata*	Likely to adversely affect (FWS)/ may affect, but not likely to adversely affect(NMFS)
Kemp's Ridley Sea Turtle	*Lepidochelys kempii*	Likely to adversely affect
Leatherback Sea Turtle	*Dermochelys coriacea*	May affect, but not likely to adversely affect

Loggerhead Sea Turtle	*Caretta caretta*	Likely to adversely affect
CLAMS		
False Spike	*Fusconaia mitchelli*	No Effect
Guadalupe Orb	*Cyclonaias necki*	No Effect
INSECT		
Monarch Butterfly	*Danaus plexippus*	No Effect
PLANTS		
Slender rush-pea	*Hoffmannseggia tenella*	No Effect
South Texas ambrosia	*Ambrosia cheiranthifolia*	No Effect
Black lace cactus	*Echinocereus reichenbachii albertii*	No Effect

The FPISC Permitting Dashboard for Federal Infrastructure Projects has your next milestone, *Consultation Package Deemed Complete – Formal*, scheduled August 10, 2022. We are ready to assist you in whatever way possible and can arrange a meeting to discuss any additional information necessary. If you have any questions, please contact me at the letterhead address or by telephone at 409-766-3108. You may also e-mail me at jayson.m.hudson@usace.army.mil if you prefer.

Sincerely,

Jayson M Hudson

Jayson M Hudson
Regulatory Project Manager
Policy Analysis Branch

cc w/Encl.

Sarah Garza
Port of Corpus Christi Authority
400 Harbor Dr
Corpus Christi, TX 78401

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

June 9, 2022

Policy Analysis Branch

SUBJECT: Section 7 Formal Consultation for Department of the Army Permit SWG-2019-00067, Port of Corpus Christi Authority

Mr. David Bernhart
Assistant Regional Administrator
Protected Resources Division
National Marine Fisheries Service (NMFS)
Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701

Dear Mr. Bernhart:

The U.S. Army Corps of Engineers, as the lead Federal agency for SWG-2029-00067 is developing an Environmental Impact Statement (EIS), for which the NMFS is a cooperating agency. The EIS will analyze the potential impacts of issuing a Department of the Army permit for the Corpus Christi Ship Channel (CCSC) Channel Deepening Project (Project). In addition, the Federal Permitting Improvement Steering Council (FPISC) added the proposed Project to the inventory of "covered projects" pursuant to the requirements set forth in Title 41 of Fixing America's Surface Transportation Act (FAST-41).

The proposed Port of Corpus Christi Authority (PCCA) Project (CDP) is located in Port Aransas, Nueces County, Texas within the existing channel bottom of the CCSC near the southeast side of Harbor Island, and traversing easterly through Aransas Pass and extending an additional 5.5 miles beyond the existing terminus of the channel. Dredging approximately 46.3 million cubic yards would be required with inshore and offshore placement of the material.

Our responsibility under Section 7(c) of the Endangered Species Act (ESA) of 1973 as amended, requires the United States Army Corps of Engineers to ensure that any action it authorizes, funds, or carries out, is not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of critical habitat.

Based upon our discussions, we have determined that this project may affect 12 listed species, onshore and in the water, and we are requesting formal consultation pursuant to Section 7 of the ESA. To assist in your review, we have enclosed the

Biological Assessment for the Proposed Corpus Christi Ship Channel Deepening Project dated June 2022. A summary of effects determinations for all 26 federally listed species is included in Table 1.

In addition, the Draft Environmental Impact Statement for the Proposed Corpus Christi Ship Channel Deepening Project is available on our website at: https://www.swg.usace.army.mil/Missions/Regulatory/Special-Projects-Environmental-Impact-Statements/

Table 1: Summary of effects determination for the Federally threatened and endangered species

Common Name	Scientific Name	Effects Determination
MAMMALS		
Ocelot	*Leopardus pardalis*	No Effect
Blue Whale	*Balaenoptera musculus*	No Effect
Fin Whale	*Balaenoptera physalus*	No Effect
Humpback Whale	*Megaptera novaeangliae*	No Effect
Sei Whale	*Balaenoptera borealis*	No Effect
Sperm Whale	*Physeter macrocephalus*	May affect, but not likely to adversely affect
West Indian Manatee	*Trichechus manatus*	May affect, but not likely to adversely affect
FISH		
Giant Manta Ray	*Manta birostris*	May affect, but not likely to adversely affect
BIRDS		
Northern Aplomado Falcon	*Falco femoralis septentrionalis*	No Effect
Piping Plover	*Charadrius melodus*	May affect, but not likely to adversely affect
Red Knot (Rufa)	*Calidris canutus rufa*	May affect, but not likely to adversely affect
Whooping Crane	*Grus americana*	May affect, but not likely to adversely affect
Eastern Black Rail	*Laterallus jamaicensis jamaicensis*	May affect, but not likely to adversely affect
Attwater's Greater Prairie Chicken	*Tympanuchus cupido attwateri*	No Effect
REPTILES		
Green Sea Turtle	*Chelonia mydas*	Likely to adversely affect
Hawksbill Sea Turtle	*Eretmochelys imbricata*	Likely to adversely affect (FWS)/ may affect, but not likely to adversely affect(NMFS)
Kemp's Ridley Sea Turtle	*Lepidochelys kempii*	Likely to adversely affect
Leatherback Sea Turtle	*Dermochelys coriacea*	May affect, but not likely to adversely affect

Loggerhead Sea Turtle	*Caretta caretta*	Likely to adversely affect
CLAMS		
False Spike	*Fusconaia mitchelli*	No Effect
Guadalupe Orb	*Cyclonaias necki*	No Effect
INSECT		
Monarch Butterfly	*Danaus plexippus*	No Effect
PLANTS		
Slender rush-pea	*Hoffmannseggia tenella*	No Effect
South Texas ambrosia	*Ambrosia cheiranthifolia*	No Effect
Black lace cactus	*Echinocereus reichenbachii albertii*	No Effect

The FPISC Permitting Dashboard for Federal Infrastructure Projects has your next milestone, *Consultation Package Deemed Complete – Formal*, scheduled August 10, 2022. We are ready to assist you in whatever way possible and can arrange a meeting to discuss any additional information necessary. If you have any questions, please contact me at the letterhead address or by telephone at 409-766-3108. You may also e-mail me at jayson.m.hudson@usace.army.mil if you prefer.

Sincerely,

Jayson M Hudson
Regulatory Project Manager
Policy Analysis Branch

cc w/Encl.

Sarah Garza
Port of Corpus Christi Authority
400 Harbor Dr
Corpus Christi, TX 78401

Port of Corpus Christi Authority
Corpus Christi Channel Deepening Project
Preliminary Draft EIS Comment/Response Matrix
Cooperating Agencies
April 2022

Category:

Significant	Deficiency or incomplete
Incorrect	Incorrect and/or errors noted during review.
Insignificant	Comment is minor or otherwise editorial in nature.

Response Code:

Incorporate	Comment will be incorporated into document. Provide explanation of how.
Investigate	Additional investigation is required. Define actions to be taken.
Not Recommended	Comment is not recommended for inclusion. Explain justification for not doing so.
Other	Other - Explain

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
3/24/22	ADEIS		Throughout	Wetlands	Paul Kaspar (EPA Region 6 - Wetlands)		For consistency throughout the document and to simplify comparing impacts to aquatic resources within the various ADEIS sections, it is recommended a common metric be utilized to consistently identify resources by type and impact. Various sections reference impacts as 150 acres of SAV, 205 acres of estuarine/tidal wetlands, 413 acres palustrine/non-tidal wetlands, while the mitigation section offers different impact quantities. Consider including a concise table that clearly articulates impacts by aquatic resource type (e.g., PEM, EEM, SAV, Seagrasses), by impact type (e.g., direct, indirect, permanent, temporary) for each placement site (e.g., SS1, SS2) contemplated in the preferred alternative. Additionally, include the associated project benefits anticipated from the beneficial use component for the identified placement sites.	Incorporate	The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant.	open
3/24/22	ADEIS		Throughout	Wetlands	Paul Kaspar (EPA Region 6 - Wetlands)		At this time, it is unclear whether complete compensatory mitigation will be provided to offset aquatic impacts as described. No compensatory mitigation is proposed as the applicant estimates beneficial use activities will create more wetland habitat and provide greater indirect benefit than aquatic resources impacted. Rationale to support and quantify the value of beneficial use for the various placement areas is frequently limited to general qualitative statements such as: “beneficial use is expected to have a long-term positive benefit”; “BU actions may help protect SAV that could be exposed”; “may protect larger areas of SAV once constructed”; and “may increase contribution to the long-term productivity.” As existing aquatic resources will be directly impacted by the proposed beneficial use placement sites, there are concerns with this no mitigation approach without further evaluation to quantify the benefits from the proposed beneficial use activities. To support the proposed approach, it is recommended the applicant attempt to quantify future without project versus future with project estimates of aquatic resource functions using available habitat evaluation procedures or other applicable analysis. Additionally, it is recommended the proposed beneficial use areas be monitored for ecological success to ensure anticipated benefits are achieved.	Other	All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
3/24/22	ADEIS		2.2.4, pg 2-10	Wetlands	Paul Kaspar (EPA Region 6 - Wetlands)		This section references maintenance material may possibly be used on nearshore berms B1 through B9 if applicable for use. Applicability should be determined based upon monitoring of ecological success of the placement sites as beneficial use.	Other	The effectiveness of nearshore berms were evaluated via coastal modeling. USACE will determine if a Special Condition to monitor success of nearshore berms is necessary.	open

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
3/24/22	ADEIS		4.0, pg 4-1	Wetlands	Paul Kaspar (EPA Region 6 - Wetlands)		In addition to the emphasis on contributions to channel sedimentation as part of the nearshore berm sediment transport modeling, it is recommended the modeling project sediment utilization by the ecosystem to further support the merits of beneficial use as it is stated the nearshore berm has little influence on beach stability. The magnitude of salinity and tidal amplitude changes are modeled; however, no conclusions are drawn as to the impacts of these changes upon aquatic resources.	Other	No edits were made to the EIS based on this comment. Sediment transport modeling was performed to consider accretion or erosion impacts but ecological considerations were not primary; however, locations for BU are certainly subject to erosion and sediment loss. Salinity modeling indicated a minor change that was not expected to result in impacts. Tidal amplitude may increase substantially near Harbor Island and that may be ecologically significant for that specific area (although most of the area is residential and industrial land use).	closed
3/24/22	ADEIS		4.2, pg 4-46	Wetlands	Paul Kaspar (EPA Region 6 - Wetlands)		It is unclear as to how the quantity of delineated aquatic resources within the project area relate to the quantity of impacted aquatic resources. Additionally, for the description of the benefits associated with the placement areas, further analysis is recommended to quantify potential benefits given the direct impacts to aquatic resources as a result of placement area construction.	Other	The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
3/24/22	ADEIS		4.6, Table 4-20	Wetlands	Paul Kaspar (EPA Region 6 - Wetlands)		As alternatives are identified that result in fewer direct impacts to aquatic resources, it is unclear how the applicant's preferred alternative will be reconciled with the requirement to identify a least environmentally damaging practical alternative as part of the CWA 404 permitting process which is referenced in the ADEIS and in Appendix N - 404(b)(1) Guidelines Evaluation.	Other	Noted and will be evaluated further by USACE	open
3/24/22	ADEIS		5.4, pg 5-23; 7.0, pg 7-1; 8.0, pg 8-1; 9.0, pg 9-1; 10.0, pg 10-1	Wetlands	Paul Kaspar (EPA Region 6 - Wetlands)		To support the statements regarding the cumulative effects of potential beneficial use activities, further analysis is recommended to quantify potential benefits given the direct impacts to aquatic resources as a result of placement area construction.	Other	Other BU projects are discussed in the Cumulative Effects section. Any quantification of mitigation efforts were provided by the Applicant. The Applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
3/24/22	ADEIS		6.0, pg 6-1	Wetlands	Paul Kaspar (EPA Region 6 - Wetlands)		As presented, there is concern that insufficient evidence has been provided to support the lack of compensatory mitigation for impacts associated with the proposed dredged material placement sites proposed in the applicant's preferred alternatives. The action of creating suitable elevations for marsh coastal prairie habitat, or the restoration of eroded shoreline landmasses with the intent of protecting SAV and seagrasses, does not necessarily equate to full compensatory mitigation to offset project impacts. The design of the placement sites appears to be driven by the purpose of disposal capacity with beneficial use as an ancillary product. The quantification of benefits derived from the proposed beneficial use placement sites should be demonstrated along with requirements to ensure the likelihood of success and long-term sustainability. As proposed, it would be anticipated that temporal losses of aquatic resource function would occur. Finally, the position that other project alternatives utilizing newly created dredged material placement areas would result in significantly more impacts is noted. However, it is also noted that other alternatives exist that would impact significantly fewer aquatic resources and limit the need for mitigation and/or beneficial use to offset those impacts.	Other	Noted and will be evaluated further by USACE	open

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
5/23/22	ADEIS		General Comment	ODMDS	EPA Region 6 - 103 Ocean Dumping	Incorrect	Maps show pre-expansion sites, should include proposed expansion boundaries	Other	SWG & EPA to discuss discrepancy between EPA's EA expanded ODMDS geometry and SWG CDP expanded ODMDS geometry.	
5/23/22	ADEIS		pg. vii	ODMDS	EPA Region 6 - 103 Ocean Dumping	Incorrect	References "existing maintenance ODMDS". In the expansion EAs we reference the "existing" sites as what is out there currently (pre-expansion). Suggest changing language in document to reference that the newly expanded ODMDS will be utilized.	Incorporate	Revision made. Used the terminology "planned" instead of "newly", since the expansion has not been formalized yet.	closed
5/23/22	ADEIS		pg. 1-5 - Last Bullet	ODMDS	EPA Region 6 - 103 Ocean Dumping	Incorrect	"Corpus Christi Expanded New Work ODMDS"- site should be referenced as such throughout the document	Other	On hold per EPA direction to the USACE.	open
5/23/22	ADEIS		pg. 4-18 - Paragraph 3	ODMDS	EPA Region 6 - 103 Ocean Dumping	Incorrect	Edits in Blue: "Site management plans must be developed for the Corpus Christi Expanded Maintenance and New Work ODMDSs designated pursuant to Section 102(c) of the MPRSA of 1972. An existing ODMDS Management Plan exists for the CCSC (EPA and USACE, 2018). A new Site Management Plan will be developed for the expansion of the CCSC ~~routine maintenance ODMDS~~ ODMDSs."	Incorporate	On hold per EPA direction to the USACE: re: CC Expanded Maintenance.	open
5/23/22	ADEIS		pg. 11-4	ODMDS	EPA Region 6 - 103 Ocean Dumping	Incorrect	"A Sampling and Analysis Plan for MPRSA" - References "July 2021 Sampling and Analysis Plan", do we need to reference the Errata/Addendum?	Other	On hold per EPA direction to the USACE.	open
5/23/22	ADEIS		p. vii	HTRW for remediation measures, but implications to other sections of the EIS	Jonathan Jimenez - EPA Region 6 NEPA		Although the risk of oil spills may be low or reduced under certain alternatives, we ask that the Port of Corpus Christi (PCCA) describe the environmental remediation measures to be implemented ensuring minimal threat to water quality and native species in the event of a related emergency.	Other	HTRW addressed during resuspension from maintenance or project related dredged activities as applicable in each section of 4.1.8. PCCA should provide a statement on emergency response measures as it relates to all Port activities regardless of the alternative selected.	open
5/23/22	ADEIS			HTRW	Jonathan Jimenez - EPA Region 6 NEPA		EPA requests that PCCA ensure that all oil transportation vessels have an approved Shipboard Oil Pollution Emergency Plan (SOPEP) (33 CFR 151.26) before entering the channel." (https://www.law.cornell.edu/cfr/text/33/151.26)	Other	PCCA should provide a statement on emergency response requirements as it relates to all Port activities regardless of the alternative selected.	open
5/23/22	ADEIS		p. vii; p. 3-35	HTRW	Jonathan Jimenez - EPA Region 6 NEPA		Disturbances of Hazardous, Toxic, and Radioactive Waste (HTRWs) from current or past facilities may be exacerbated by weather conditions that influence tide, flow, or circulation of the water column (e.g., after hurricanes or similar wind and precipitation events). EPA asks PCCA address what actions will be taken to mitigate the reintroduction of both new and old HTRWs into the water column.	Incorporate	Addressed HTRW concerns from adverse weather conditions as it relates to the project and alternatives in 4.1.8.	closed
5/23/22	ADEIS	Threatened and Endangered Species		Threatened and Endangered Species	Jonathan Jimenez - EPA Region 6 NEPA		Although the proposed actions may only cause localized and temporary impacts to water quality and available habitat, they may prove disastrous for endangered species that are endemic to the region. EPA encourages PCCA to coordinate working with local conservation or sustainability groups to mitigate the effects of proposed action dredging and management activities on threatened or endangered marine mammals, fishes, or sea turtles. PCCA should explain efforts to protect the health of these species in the event of a maintenance emergency.	Incorporate	Text has been revised: Best management practices may be used to reduce impacts to the water column during ongoing maintenance dredging or construction dredging activities (USACE, 2008).	closed
5/23/22	ADEIS	Navigation	p. ix	Navigation - implications to other sections of the EIS	Jonathan Jimenez - EPA Region 6 NEPA		Please explain in the EIS how the dredging activities associated with the proposed action will result in lessened marine traffic in the shipping channel.	Incorporate	Revisions made by noting a reduction of Suezmax and Aframax class vessels to carry out reverse lightering operations. Further explanation is provided in Section 4.5.2.	closed
5/23/22	ADEIS				Jonathan Jimenez - EPA Region 6 NEPA		The EPA requests that PCCA follow Best Management Practices outlined in this dredging guidance document developed by the USACE and the EPA: https://semspub.epa.gov/work/HQ/175413.pdf	Incorporate	Incorporated by reference in 4.1.8. Also added to references in back. Full copy attached for the record.	closed

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
4/26/22	EIS	Executive Summary Coastal Processes	v	NEPA	Brian Rosegger (NOAA)		***"dredged material would be placed in existing upland placement areas or used beneficially to offfset shoreline and habitat loss along beach and bay shorelines."*** There needs to be a discussion of how beneficial placement is to offset impacts associated with habitat loss along beach and bay shorelines (quantities).	Incorporate	Text revised. The discussion requested by the commenter is provided in detail later in the document.	closed
4/26/22	EIS	Executive Summary Wetlands/SAV	viii	NEPA	Brian Rosegger (NOAA)		***"Beneficial use of dredged material would result in direct impacts to wetlands and SAV; 106.3 acres of SAV within SS1, 18.7 acres within HI-E, and 25.3 acres within PA4."*** This sentence is unclear. The first part of the sentence indicates direct impacts to wetlands and SAV but the totals reported here (106.3 + 18.7 + 25.3 = 105.3 acres) are only given for SAV. What are the total direct impacts to wetlands?	Other	The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant.	closed
4/27/22	EIS	Executive Summary Wetlands/SAV	viii	NEPA	Brian Rosegger (NOAA)		**"there would be no major impacts to existing wetlands or SAV."** This confuses the reader, as it implies that the project would have no major impacts. Though not derived from dredging, impacts to existing wetlands and SAV during dredge material placement would result in impacts.	Incorporate	The statement has been edited to clearly indicated channel impacts vs PA impacts.The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant.	closed
4/27/22	EIS	Executive Summary Wetlands/SAV	viii	NEPA	Brian Rosegger (NOAA)		***"However, those impacts are expected to be temporary with the long-term objective of protecting and expanding these habitats."*** NMFS disagrees. Placement of dredged material in SAV or wetlands is a permanent impact.	Other	Noted and will be evaluated further by USACE	open
4/27/22	EIS	Executive Summary Aquatic Resources	ix	NEPA	Brian Rosegger (NOAA)		***"1182 acres dredged = 175 acres inshore placement, 1,841 acres Gulf side placement and 1,182 acres fr the New Work ODMS"*** It seems odd that the 1,182 acres dredged equal the 1,182 acres for the New Work ODMDS. Is this a coincidence or an error?	Incorporate	Correct acres for the New Work ODMDS is 1,180. Text has been revised.	closed
4/27/22	EIS	Executive Summary Aquatic Resources	ix	NEPA	Brian Rosegger (NOAA)		***"Beneficial use of dredged material is expected to have long-term positive benefit by improving and protecting habitat and building resistance to rising sea levels."*** How? USACE needs to identify all habitat present within each BU PAs, enumerate proposed impacts to each of those identified habitats, discuss how those habitats will be restored or created to offset direct/indirect impacts to each EFH.	Incorporate	Habitats present in each BU placement area are described in detail in Section 4.2, tables 4-11, 4-12, and 4-13. Additional general statements regarding how placement of BU will build resistance to rising sea levels added.	closed
4/27/22	EIS	Executive Summary Mitigation	xii-xiii	NEPA	Brian Rosegger (NOAA)		***"Impacts would occur to approximately 198 acres of wetlands. However, beneficial use placement would create approximately 287 acres of marsh and protect other wetland and marsh habitat from erosion. Beneficial use placement would also impact 6.2 acres of seagrass."*** This contradicts what was stated on pg viii in which it is stated that beneficial use of dredged material will directly impact 150.3 acres of seagrass/SAV.	Investigate	The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
4/27/22	EIS	4.2.1.2 Wetlands/SAV	4-42	NEPA	Brian Rosegger (NOAA)		***"therefore impacts to wetlands would be avoided during construction of Alternative 1. No other special aquatic sites (e.g., SAV, coral reef, oysters, mud flats) would be impacted by the channel deepening."*** This is a misleading statement as it makes it seem like there will be no impacts associated with the project. Although impacts are expected to occur during the placement of the materials, not the dredging, this sentence makes it seem like the project will not have impacts to SAV, oysters, mud flats, etc. If it is the writer's intent to state impacts are not expected during "construction" care should be made to differentiate "construction" from "material placement."	Incorporate	The statement has been edited for clarity.	closed

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
5/4/22	Biological Assessment (Appendix D)	Appendix D - 2.1	2-18	NEPA	Brian Rosegger (NOAA)		Beginning at "Guadalupe Orb" the numbering conventions for the sections are off. Continues for 2.2 Monarch Butterfly, 2.3 Slender Rush-Pea, etc.	Incorporate	Good catch!! Revised.	closed
4/11/22	EFH Assessment	3.3	3-7	Habitat Conservation Division	Charrish Stevens (NMFS)		150.36 acress of SAV contradicts acreage of impacts in section 4.2.1	Incorporate	Agree. Acreages will be checked and consistent throughout. The EIS was updated to more accurately describe impacts to wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant.	closed
4/11/22	EFH Assessment	4.2.1	4-3	Habitat Conservation Division	Charrish Stevens (NMFS)		105.4 acres of total SAV impacts stated, contradictory with what is stated in section 3.3 where acres are 150.36 acres. This looks like it may have been a typo.	Incorporate	Text has been revised. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant.	closed
4/11/22	EFH Assessment	4.2.1	4-3	Habitat Conservation Division	Charrish Stevens (NMFS)		The applicant needs to enumerate estimated acreage of created seagrass habitat to express how the conversion of deep open water habitat will offset the 150.36 acres (3:1 mitigation ration required).	Incorporate	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
4/11/22	EFH Assessment	4.2.1	4-3	Habitat Conservation Division	Charrish Stevens (NMFS)		Considering USACE is acknowledging impacts by way of sedimentation/ turbidity, how are these impacts going to be offset? Enumerating these impacts and iterating how those impacts will be off-set will help NMFS understand how impacts to EFH will be offset by BU PAs. If this project moves forward with Alternative 1, then the applicant needs to take into consideration the secondary and cumulative impacts it will be having on EFH and associated fisheries, thus mitigating for those secondary losses.	Incorporate	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
4/11/22	EFH Assessment	4.2.1	4-4	Habitat Conservation Division	Charrish Stevens (NMFS)		NMFS recommends USACE enumerate the acreage of EFH being converted and acreage being restored to show there will be an overall net benefit to EFH. In addition, it needs to be the same kind of EFH being restored. Simply stating deep open water habitat will be converted to shallow water habitat is not enough. Also, monitoring of restoration activities should be no less than five years to ensure those restored resources have met the percent cover for mitigation requirements.	Incorporate	The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat." USACE will determine if any Special Conditions to monitor would be necessary.	open
4/11/22	EFH Assessment	4.2.1	4-4	Habitat Conservation Division	Charrish Stevens (NMFS)		***"Alternative 1 may positively impact tidal wetlands and SAV."*** NMFS would like to see the amount of acreage created to ensure the appropriate ratio of mitigation for seagrasses (3:1) and wetlands are accounted for, and that there will be indeed a net benefit.	Incorporate	The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
4/11/22	EFH Assessment	4.2.2	4-6	Habitat Conservation Division	Charrish Stevens (NMFS)		***"unlikely event a petroleum spill should occur..."*** However, EFH affected by these incidences would be impacted.	Incorporate	Text has been revised.	closed
4/11/22	EFH Assessment	4.2.2	4-6	Habitat Conservation Division	Charrish Stevens (NMFS)		***"long-term impacts would not be expected"*** Would like to see more recent scientific data that includes long-term monitoring. How long would it be expected to recover? Years most likely?	Incorporate	A more recent citation has been added.	closed
4/11/22	EFH Assessment	4.2.2	4-6	Habitat Conservation Division	Charrish Stevens (NMFS)		(Appendix C - Dredged Material Management Plan) Again, would like to see this DMMP now so, I can reference this document while reading the EFH assessment. Also, enumerating the amount of acreage per habitat that is being restored is necessary to show that direct impacts associated with BU placement are being replaced with like habitat and there is a net benefit. Additionally, these sites would need to have some kind of monitoring plan to ensure habitat that is being created is successful and continues to be a net benefit.	Other	DMMP is included as Appendix C.	closed
4/11/22	EFH Assessment	4.2.3	4-6	Habitat Conservation Division	Charrish Stevens (NMFS)		***"First paragraph"*** How are these impacts being offset? There are almost 7,000 acres of open bay/benthic habitat being impacted and nowhere in this section does it say how these impacts are being offset.	Other	Port to address.	open
4/11/22	EFH Assessment	4.2.3	4-7	Habitat Conservation Division	Charrish Stevens (NMFS)		***"dredged material placement from alternative 1 may result ina shift in community structure rather than a decrease in production"*** How will this shift in community structure impact overall productivity of the organisms that depend on the food availability that once occurred prior to dredging/placement and now no longer occurs or may not for many months to many years?	Incorporate	Text has been revised.	closed

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
4/11/22	EFH Assessment	4.2.4	4-7	Habitat Conservation Division	Charrish Stevens (NMFS)		***"2.45 acres of live oyster reef to be directly impacted, 32 acres indirectly impacted"*** How will this be mitigated for? At what ratios and total proposed acreage to be restored?	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
4/11/22	EFH Assessment	4.2.4	4-7	Habitat Conservation Division	Charrish Stevens (NMFS)		***"Turbidity increases from construction of Alternative 1 would be temporary and local."*** This statement is contradictory to what has been stated previously and what is stated below. Increase salinity will have long term effects on oysters as in makes the oyster more susceptible to disease and predation. In addition to turbidity having indirect impacts to 32 acres. How will these impacts or potential impacts be mitigated for or monitored to ensure the proposed impacts are only temporary and no additional mitigation is necessary for loss of oyster reefs?	Incorporate	Text has been revised.	closed
4/6/22	EFH Assessment	4.2.4	4-7	Habitat Conservation Division	Charrish Stevens (NMFS)		***"slight increase in salinty that is expected resulting from Alternative 1 is not anticipated to cause any long-term impacts to oyster reefs in the project area."*** Don't agree with this statement. What is the current salinity value these oyster reefs are already subjected to? Will this additional salinity increase push the reefs past their threshold of being resilient to diseases and keeping away predators that thrive in more saline environments? Increased salinity to a species that regularly requires fresher water influxes to stay healthy, will have long term impacts on the resiliency of the oyster community. Not only will increased salinity be an additional stressor to oysters, excess nutrients inducing algal blooms will also impact oyster health further reducing the fit level of oyster populations surrounding the project area therefore impacting the overall resiliency of oyster populations in the Corpus Christi Bay. How does USACE propose to offset those cumulative impacts to the oyster population that resides near the project and placement areas? Other popoulations in the Gulf on on a steep decline or have already collasped due to various issues. It is imperative the oyster populations along the west Gulf coast maintain resiliency in order to withstand ongoing threats from various man-made and natural events.	Incorporate	Text has been revised. The results of the salinity modeling were previously discussed in Section 4.2.2.	closed

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
4/6/22	EFH Assessment	4.3.1	4-8	Habitat Conservation Division	Charrish Stevens		***"Estuarine wetland SAV habitat occur within the proposed project area of the Applicant's Proposed Action Alternative would be directly impacted by the proposed project"*** At the beginning of this assessment USACE stated that there will be no direct estuarine wetland or SAV impacts by the proposed project; however, this sentence says the opposite. Does this mean to say from BU PAs? How much is being impacted? What habitat types and how much is being restored and/or created to offset those exact impacts? This is the section where you would want to enumerate you total impacts per habitat type and discuss how those impacts will be offset and at what acreage, because the Table below that shows impacts from BU placement completely confuses the reader.	Other	Yes. Sections 4.2.1.2 and 5.4.7 state placement activities would impact wetlands. The same section states 205 acres of estuarine and 413 acres of palustrine wetlands will be impacted. The portion of the text the commenter is referring to is difficult to identify. It is identified as Section/Figure 4.3.1. Section 4.3.1 addresses Cultural Resource considerations for the No-Action Alternative in the draft EIS pdf and the Word version being edited. p. 4-8 in the Word version being edited deals with model results on tidal amplitude. p. 4-8 in the draft EIS deals wth current speeds. The text in quotation marks, "Estuarine wetland SAV" did not occur in either document. The quoted text could not be found in the EFH section. Table 4-16, p. 4-44, summarizes impacts to each type of wetland in each placement area. On p. viii of the Word version being edited in the Wetlands and Submerged Aquatic Vegetation paragraphs, the second sentence states, "No direct impacts to wetlands or submerged aquatic vegetation (SAV) would occur under the No-Action Alternative."	open
									The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	
4/6/22	EFH Assessment	4.3.1	4-8	Habitat Conservation Division	Charrish Stevens (NMFS)		***"Placement actions targeting BU in Corpus Christi and Redfish bays would create estuarine/aquatic hatibat that may potentially be more prdoductive than the open-water habitat that would be lost because of the Applicant's Proposed Action Alternatvie."*** NMFS needs to see enumerated created/restored acres of in-kind mitigations for same habitat being displaced.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
4/6/22	EFH Assessment	4.3.1	4-8	Habitat Conservation Division	Charrish Stevens (NMFS)		***"This would create a postive benefit to the bay system throughout the life of the project when compared to the No-Action Alternative"*** USACE would need to ensure that the amount and kinds of habitat impacts are adequately mitigated for to offset those impacts thus having a net benefit (i.e., higher than a 1:1 mitigation ration (SAV 3:1; Oyster Reef 1:1; and wetland 1.5:1)	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
4/11/22	EFH Assessment	4.4	4-10	Habitat Conservation Division	Charrish Stevens (NMFS)		***"The CDP would directly affect the estuarine habitats and fauna in the study area by the loss of bay bottom habitat due to dredging and placemnet activities."*** How does USACE propose to offset these impacts per habitat type and at what acreage per habitat type?	Other	Section 4.4 is Cumulative and Synergistic Impacts. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
4/11/22	EFH Assessment	4.4	4-10	Habitat Conservation Division	Charrish Stevens (NMFS)		***"Various infrastructure can convert potential EFH, and any EFH conversions associated with placement actions may contribute to cumulative impacts of habitat loss."*** While NMFS does not disagree with this statement, USACE still needs to enumerate all EFH impacts associated with CDP and PAs and iterate how those impacts will be offset and at what acreage.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
4/6/22	EFH Assessment	4.4	4-11	Habitat Conservation Division	Charrish Stevens (NMFS)		***"beneficial cumulative impacts may be expected when considering the Applicant's Proposed Action Alternative PAs in combination with restoration actions that are planned within the study area."*** Yes, but it cannot be at the expense of other EFH, the beneficial cumulative impacts must be enumerated and of the same EFH being displaced. Depending on type of EFH the greater the mitigation ratio.		Port to address. The text this comment addresses appears to be in Section 5.5 on p. 5-52. Potential cumulative impacts on habitats and wildlife are summarized in Tables 5-9 to 5-13. This comment appear focused on quantifying impacts in order to identify the amount of mitigation to be done. Section 6.0 states there will be no mitigation for impacts. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
4/11/22	EFH Assessment	5.0	5-1	Habitat Conservation Division	Charrish Stevens (NMFS)		***"wind tidal flats"*** There was no discussion about proposed impacts to tidal flats that NMFS could see until now. This EFH needs to be considered in the assessment.	Incorporate	Algal flats and "unconsolidated shorelines" were mapped within the PAs. Impacts to these areas have been included in the EIS and EFH, as provided by the Applicant.	closed
4/6/22	EFH Assessment	5.0	5-1	Habitat Conservation Division	Charrish Stevens (NMFS)		***"the Applicant does not propose direct mitigation for the project"*** The applicant will need to demonstrate how the impacts from the PAs will be offset adequately. The acreage needs to be enumerated.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
4/11/22	EFH Assessment	5.0 - Table 4	5-1	Habitat Conservation Division	Charrish Stevens (NMFS)		***"Table 4"*** This is not the same proposed impacts as stated earlier. Section 3.3 states there will be a total of 150.36 acres of SAV impacts. The same goes for oyster reefs, wetland, open bay bottom, and tidal flats impacts; there needs to be consistency in representation of impacts to all EFH, and it needs to be clearly stated. This table makes it look like there is little impact compared to what was stated earlier in body of the assessment.	Incorporate	The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant.	closed
4/12/22	EFH Assessment	5.1	5-2	Habitat Conservation Division	Charrish Stevens (NMFS)		***"Since the project would create more wetland habitat that it would impact, the Applicant does not propose to mitigate for wetland impacts."*** NMFS agrees that there will be an overall net benefit to the natural resources as a whole in the area; however, the placement of BU cannot be at the expense of other EFH. USACE needs to identify all habitat present within each BU PAs, enumerate proposed impacts to each of those identified habitats, discuss how those habitats will be restored or created to offset direct/indirect impacts to each EFH. Right now this section does not do that. It just states in general terms and looks like some EFH being impacted will be displaced and not restored or created.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
4/12/22	EFH Assessment	5.2	5-2	Habitat Conservation Division	Charrish Stevens (NMFS)		***"BU placement across the six sites, the Applicant estimates the project would impact 6.22 acres of seagrass."*** In section 3.3 it states there will be 150.4 acres of seagrass impacts associated with BU placement. Why is it now only 6.22 acres? What happened? There needs to be some kind of discussion and/or justification in this section and others that iterate the actual SAV impacts and how those are being off-set by the creation/restoration of xxxx amount of acres.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
4/12/22	EFH Assessment	5.2	5-2	Habitat Conservation Division	Charrish Stevens		***"since the Applicant designed SS1 and PA4 to protect the Redfish Bay, approximately 2,000 acres of seagrass, the project benefits to regional seagrass, outweigh the impacts."*** While preservation is nice, USACE will still need to discuss how this preservation of 2,000 acres of seagrass will benefit from this BU placement. Ex, if the percent coverage of SAV is low and by creating/restoring DMPA SS1 and PA4, the meadow would then be allowed to recruit additional SAV and grow denser thus making the habitat more resilient and healthy, then USACE needs to iterate and discuss that.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
4/6/22	EFH Assessment	6.0	6-1	Habitat Conservation Division	Charrish Stevens (NMFS)		***"Applicant's Proposed Action Alternative would have negative impacts, both directly and indirectly, to EFH in the project area. However, BU of dredged material also has the potential to enhance EFH."*** Still need USACE to enumerate total impacts and how those impacts will be offset by BU by way of actual acreage of restoration of inkind	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
4/6/22	EFH Assessment	6.0	6-1	Habitat Conservation Division	Charrish Stevens (NMFS)		***"Because the Applicant's Proposed Action Alternative would create more wetland and seagrass habitat than it would impact, the Applicant does not propose any mitigation for wetlands or seagrass impacts. Any indirect benefits of the BU placements are greater than the estimated impacts."*** This may be the case; however, USACE needs to elaborate more throughout the direct/indirect/cumulative impact sections, which enumerate the actual proposed impacts to each identified EFH, then needs to state how those impacts will be offset per impacted EFH. It is not discussed very well and leaves the reader confused throughout the entire document as to what the actual impacts are because the estimated impacts are inconsistent in each section. The information is most likely available; it is just not discussed clearly or concise enough to have a clean and clear argument that indicates the chosen alternative will result in a net benefit to EFH.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
5/4/22	EIS Vol I	Executive Summary Coastal Processes	v	Habitat Conservation Division	Charrish Stevens (NMFS)		**"Placement and beneficial use of dredge material would continue as planned."** This statement contradicts what has been stated in the sections that discuss alternatives analysis. It states no placement of BU would take place in Alternatives 2, 3, or No Action. However, according to this statement there will be BU placement associated with channel maintenance in all of the alternatives, just not as much up front when compared to the preferred alternative 1. However, there will be significantly less impacts to EFH resources with Alternative 2 and 3. NMFS would like clarification on this statement becuase is there is BU taking place no matter the alternitive due to scheduled maintenance dredging, then the applicant needs to state so.	Other	The sentence referred to by the commenter refers only to the No-Action alternative. Sentence modified for clarification.	closed
5/4/22	EIS Vol I	Executive Summary Wetlands and SAV	viii	Habitat Conservation Division	Charrish Stevens (NMFS)		**"Beneficial use of dredged material would result in direct impacts to wetlands and SAV; 106.3 acres SAV within SS1, 18.7 acres within HI-E, and 25.3 acres within PA4. However, those impacts are expected to be temporary with the long-term objective of protecting and expanding these habitats."** How much of each habitat is being impacted? Is it a total of 106.3 acres of imapcts to SAV or is this some kind of combination of SAV and Wetland impacts? This needs to be portioned out per habitat type. If there will be specific types of wetland habitat impacts, then those need to be identified and enumerated. This confuses the reader and leads them to believe that there are more impacts to a particular habitat then maybe there really is.	Other	The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant.	closed

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
5/4/22	EIS Vol I	Executive Summary EFH	x	Habitat Conservation Division	Charrish Stevens (NMFS)		**"The Applicant's Proposed Action Alternative would result in permanent loss of 175 acres of bay bottom habitat to construct inshore placement and permanent loss of 2.5 acres of oyster reef habitat for inshore placement."** This does not capture all EFH impacts. Throughout the document it iterates different total numbers of impacts in delineated/identified EFH; however, it is not clear how these impacts are being offset through placement of BU and how much per EFH being impacted is being offset. This needs to be worked out in the EFH and then summarized in the EIS.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
5/4/22	EIS Vol I	Executive Summary Mitigation	xiii	Habitat Conservation Division	Charrish Stevens (NMFS)		**"However, beneficial use placement would create approximately 287 acres of marsh and protect other wetland and marsh habitat from erosion. Beneficial use placement would also impact approximately 6.2 acres of seagrass. However, these placement areas were designed to protect approximately 2,000 acres of seagrass in Redfish Bay. Provided the benefits of dredged material placement, mitigation is not proposed by the Applicant."** These are different numbers being presented. In other sections it states 106.3 to 150 plus acres of impacts to SAV. There needs to be more explanation as to what the different numbers mean and how applicant went from 150 to 106 to 6.2 acres of SAV impacts. With that said, preservation of SAV does not constitute as mitigation for direct impacts to SAV. The applicant needs to enumerate the actual proposed impacts to EFH per habitat type then state how much habitat is going to be created/restored through placement of BU and how these efforts will end up with a net benefits. This needs to be done per habitat type to show how BU will result in a no net loss but a net benefit for those resources being impacted.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
5/4/22	EIS Vol I	1.3 Introduction	1-5	Habitat Conservation Division	Charrish Stevens (NMFS)		The applicant mentions in executive summary that BU placement would include creation of shallow water habitat in efforts to restore SAV habitat and to offset impacts associated with BU PAs; however, this section makes no mention of those restoration/creation efforts.	Other	Those statements have been revised to indicate that BU placement would protect adjacent existing wetlands and SAV.	closed
5/4/22	EIS Vol I	2.2.2 Alternatives Analysis	2-6	Habitat Conservation Division	Charrish Stevens (NMFS)		**"Placement of new work dredged material at the following BU and PA sites (Table 2-3, and see Figure 2-1)"** This section does not talk about any type of creation/restoration of shallow water habitat for SAV; however, there will be direct loss of SAV due to placement of BU. Why is there no mention of creation/restoration of shallow water habitat when it is mentioned throughout the EIS?	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
5/4/22	EIS Vol I	2.2.2, Table 2-3 Alternatives Analysis	2-8	Habitat Conservation Division	Charrish Stevens (NMFS)		This table does not talk about any type of creation/restoration of shallow water habitat for SAV; however, there will be direct loss of SAV due to placement of BU. Why is there no mention of creation/restoration of shallow water habitat when it is mentioned throughout the EIS?	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
5/4/22	EIS Vol I	2.2.3 Alternatives Analysis	2-9 to 2-10	Habitat Conservation Division	Charrish Stevens (NMFS)		**"SS1 Extension would repair an eroded shoreline....South Texas seasonal rainfall."** How does any of this offset direct and secondary impacts associated with BU DM placement? Preservation alone is not enough. The applicant has to enhance/restore same habitat being impacted.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
5/4/22	EIS Vol I	4.2.1.2 Wetlands/SAV	4-45	Habitat Conservation Division	Charrish Stevens (NMFS)		**"The proposed placement sites for BU include areas where SAV has been mapped...BU sites HI-E, SS1, and PA4 contained SAV, with SS1 having the highest total acreage and species diversity....150.4 acres of mapped SAV, 106.3 acres occur within the SS1 footprint plus the buffer."** What are the estimated impacts to SAV per placement area? It is not stated or clearly so in the document.	Other	The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant.	closed
5/4/22	EIS Vol I	4.2.1.2 Wetlands/SAV	4-46	Habitat Conservation Division	Charrish Stevens (NMFS)		**"Wetland and SAV impacts would occur at proposed placement sites. However, it should be noted that dredged material would be used at all PAs to either: 1) convert deep open water areas to shallow bathymetry to support either establishment of tidal wetlands or SAV, or 2) restore eroding shorelines that would protect larger extents of SAV."** Wetlands were not discussed in Table 4-18 it only discusses SAV acreage. This section still does not tell the reader how many impacts are proposed from BU Placement per habitat type in each placement area.	Other	Those statements have been revised to indicate that BU placement would protect adjacent existing wetlands and SAV. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant.	closed

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
5/4/22	EIS Vol I	4.2.1.2 Wetlands/SAV	4-46	Habitat Conservation Division	Charrish Stevens (NMFS)		**"This action may help protect SAV that could be exposed if the shoreline is breached with the continued erosion expected under the No-Action Alternative."** Yes it would most likely protect; however, mitigation for EFH impacts does not allow for just preservation, the applicant must also consider restoration and/or creation of same EFH (i.e., SAV, high/low marsh, tidal flats, algal mats, and mangroves) that was directly impacted. Making an area of the bay shallow water habitat does not constitute as mitigation for direct loss of EFH. It has to be in-kind mitigation through BU placement followed by planting to restore/create lost habitat.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
5/4/22	EIS Vol I	4.2.1.2 Wetlands/SAV	4-46	Habitat Conservation Division	Charrish Stevens (NMFS)		**"Considering the beneficial use nature and objective of these PAs to protect or provide more area conducive to tidal wetlands or SAV establishment, Alternative 1 may positively impact tidal wetlands and SAV. During construction and operations there is some chance of spills which may also impact wetlands or SAV."** There needs to be more information provided here. Simply stating that converting deep open water to shallow bathymetry to support one or the other habitat will not suffice. The applicant needs to demonstrate by enumerating the amount of acreage per habitat will be offset by enumerated habitat created by BU placement per placement area.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
5/4/22	EIS Vol I	4.2.1.3 Wetlands/SAV	4-47	Habitat Conservation Division	Charrish Stevens (NMFS)		States no BU projects to repair vital beach and island habitats would not take place; however, in the Executive summary, it states in the No Action alternative that BU would continue with the maintenance dredge material from the maintenance dredging that continues to take place to maintain current depths. Based on what has been said, this alternative would be the best option as it both serves the project purpose and avoides/minimizes the most EFH impacts. So NMFS is confused as to why Alternative 2 is not being considered.	Other	No edits were made based on this comment. USACE will evaluate this further.	open
5/5/22	EIS Vol I	4.2.2.2.2 Estuarine Habitats and Fauna	4-50	Habitat Conservation Division	Charrish Stevens (NMFS)		**FIRST PARAGRAPH:** This whole paragraph is confusing to the reader. It seems like the numbers of acres are not correct. The applicant needs to double check these numbers to ensure they are reporting the exact number of impacts and iterate this clearly and concisely to the reader as possible. In addition, preservation is not considered mitigation; the applicant has to restore/create habitat along with preservation of in-kind mitigation to have a no net loss of EFH resources.	Other	Paragraph revised in attempt to clarify for the reader. The commenter's point about mitigation may be addressed in Section 6.0 which states the applicant "...does not propose direct mitigation for the project." because of the net benefit provided by the BU sites. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
5/5/22	EIS Vol I	4.2.2.2.2 Estuarine Habitats and Fauna	4-53	Habitat Conservation Division	Charrish Stevens (NMFS)		**"Thirty-two acres of mapped oyster reef habitat occur in the remainder of the project area and could be indirectly impacted by increased turbidity during construction of placement site SS1."** Will these impacts be monitored to ensure adequate mitigation for these resources takes place?	Not Recommended	Section 4.4.2. addresses in part the commenters question. Under the subsection on Community and Recreational Resources, it states the Port would implement best management practices including turbidity curtains during dredging and construction, and biological monitors to minimize impacts. Specific monitoring of this area is not proposed. As stated in Section 6.0, the applicant does not propose mitigation. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	closed
5/5/22	EIS Vol I	4.2.2.2.2 Estuarine Habitats and Fauna Cumulative	4-53	Habitat Conservation Division	Charrish Stevens (NMFS)		**"slight increase in salinity that is expected resulting from Alternative 1 is not anticipated to cause any long-term impacts to oyster reefs in the project area. Increased nutrients from dredging activities could cause algal blooms that could impact oysters."** These cumulative impacts associated with the project will have long lasting impacts to oyster fitness level and will impact the younger cohorts of oysters thus impacting new and future successful recruiting to sustain the current population. The applicant needs to take into consideration that oysters of the west coast of the GoM are one of the last self-sustaining population that is quickly disappearing due to on-going cumulative impacts from various projects and environmental factors.	Incorporate	Section 3.3.3.2.3 acknowledges the substantial declines that have occurred in oyster populations along this region of the Texas coast. Added text repeating historic declines in oysters in the area and the need to avoid and minimize impacts to oysters.	closed
5/5/22	EIS Vol I	4.2.2.2.3 Estuarine Habitats and Fauna	4-54	Habitat Conservation Division	Charrish Stevens (NMFS)		**"Alternative 2"** The applicant has not enumerated impacts associated with Alternative 2 or 3 as of yet. So saying this alternative would result in similar impacts to estuarine and fauna is not accurate. There would be deep water impacts away from more sensitive resources. In addition, the applicant has not considered utilizing or teaming up with other existing DWP .	Not Recommended	The statement is specifically referring to water column turbidity caused during construction (pipeline and SPM placement) of Alternative 2 being similar as described for Alternative 1.	closed
5/5/22	EIS Vol I	4.2.5.3.2 Essential Fish Habitat	4-63	Habitat Conservation Division	Charrish Stevens (NMFS)		It does not state anywhere in this section the kinds and amount of impacts that will take place in all aspects of the project (dredging and placement). It discusses permanent loss of bay bottom habitat and oysters but does not discuss other habitats that will be impacted by placement of BU such as tidal marsh, tidal flats, algal mats, SAV, and mangroves nor does it discuss at what acreage per habitat type will be impacted and how those impacts per habitat will be offset by BU. This all needs to be discussed in detail within the EFH section.	Incorporate	The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	closed

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
5/5/22	EIS Vol I	4.2.5.3.3 Essential Fish Habitat	4-65	Habitat Conservation Division	Charrish Stevens (NMFS)		The last period discusses how Alt 2 has less impacts to EFH than Alt 1 due to lack of dredging and placement of BU. However, if no deepening takes place then no BU will take place, thus continued loss of EFH. NMFS agrees Alternative 2 is less impactful to EFH, but NMFS does not agree that there will be no dredge material placement for future BU placement. The document stated that maintenance dredge will continue in the ship channel no matter what to maintain current depths, so why would there not be any BU placement of that material to protect vulnerable areas? The document seems to contradict itself alot and there needs to be clarity.	Incorporate	Text has been revised.	closed
5/5/22	EIS Vol I	4.6, Table 4-20 Wetlands/SAV	4-94	Habitat Conservation Division	Charrish Stevens (NMFS)		**"Ecological and Bilogical Resources, Wetlands and SAV, Alternative 1:"**The impacts to these resources have not been offset. The way the EIS written, the applicant is not mitigating for any of the imapcts becuase the placement of dredge material for BU will convert openwater habitat to shallow water habitat, thus make a more productive habitat. This paragraph does not describe how placement of BU will create the habitat that is being displaced. It only states it will preserve SAV which is not enough alone. The applicant has to demonstrate they have offset those impacts with creation/restoration of like habitats.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
5/5/22	EIS Vol I	4.6, Table 4-20	4-95	Habitat Conservation Division	Charrish Stevens (NMFS)		**"Ecological and Bilogical Resources, Estuarine Habitats and Fauna, Alternative 1:"** How are these being mitigated for and at what ratios?	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
5/5/22	EIS Vol I	4.6, Table 4-20	4-96	Habitat Conservation Division	Charrish Stevens (NMFS)		**"Ecological and Bilogical Resources, EFH, Alternative 1:" S**ame as last comment regarding direct impacts and applicant stating BU placement creates net benefit without even stating how they come up with that determination or providing total acreage being restored/created by way of BU placement.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
5/5/22	EIS Vol I	6.1 Mitigation	6-2	Habitat Conservation Division	Charrish Stevens (NMFS)		**"Since these wetlands are in the confines of a former DMPA, they are considered of lower value than naturally occurring wetlands."** Yes, but they are still wetlands and serve as a natural resource area for wildlife and aquatics.	Other	Noted and will be evaluated further by USACE	open
5/5/22	EIS Vol I	6.0, Table 6-1 Mitigation	6-1	Habitat Conservation Division	Charrish Stevens (NMFS)		This table does not reflect the acreage of impacts discussed in previous sections of the EIS. For example, SAV impacts from SS1 was estimated to be 106.3 acres alone; a total of 2.45 acres of oyster reef will be impacted with and additional 35 plus acres of potential impact. This chart needs more explanation as to why the proposed impacts expressed throughout this document is not reflected in the same manner of the Table. This completely confuses the reader and would indicate the impacts are being minimized.	Other	The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant.	closed
5/5/22	EIS Vol I	6.1 Mitigation	6-2	Habitat Conservation Division	Charrish Stevens (NMFS)		Last paragraph: The applicant needs to break down the kinds of wetland creation/restoration by habitat and enumerate those benefits and compare them with delineated habitat impacts to show the full picture in this concluding paragraph of how the impacts are being offset and there will be a net benefits to those impacted habitats. . There needs to be more than just a generict wetland verbage and then a number thrown beside it.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
5/5/22	EIS Vol I	6.2 Mitigation	6-2	Habitat Conservation Division	Charrish Stevens (NMFS)		**"Through the BU placement across the six sites, the Applicant estimates the project would impact 6.22 acres of seagrass."** This is not the same as what was stated in the EFH Assessment or in the body of EIS where it talks about impacts. It was iterated there would be 106.3 acres of SAV impact within SS1, 18.7 acres of SAV impact within HI-E, and 25.3 acres of SAV impact within PA-4 discussed under the Wetlands and Submerged Aquatic Vegetation Section. If this is not accurate or is a combination of impacts, then the applicant needs to provide more clarification and be concise with how the present their impacts.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
5/5/22	EIS Vol I	7.0	7-1	Habitat Conservation Division	Charrish Stevens (NMFS)		**"Approximately 2.45 acres of oyster reef habitat, 205.64 acres tidal wetlands, 413.12 acres non-tidal wetlands, and 150.40 acres of SAV would be lost as a direct result of placement of dredged material at the proposed placement sites" S**o, now this section is talking about impacts to EFH, which iterates total impacts minus open water and bay bottom, but in section 6.0 it does not acknowledge the total of impacts to SAV as mentioned here. The applicant needs to ensure the text is clear and concise. The impacts are not being fully discussed as to how they will be offset by BU placement.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
5/5/22	EIS Vol I	8.0	8-1	Habitat Conservation Division	Charrish Stevens (NMFS)		**"The loss of approximately 205.64 acres tidal wetlands, 413.12 acres non-tidal wetlands, 150.40 acres of SAV, and 2.45 acres of oyster reef during construction is irreversible;"** This section is acknowledging the permanent loss of EFH; however, in the document does not go into any detail as to how these impacts will be offset by way of BU placement. More details are needed which enumerate the total acreage of habitat being created/restored per habitat type. This would show the reader the amount of proposed impacts per habitat type as well as the amount of restored/created habitat by BU placement area per habitat type, which then presents a better picture of net benefits.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
5/5/22	EIS Vol I	9.0	9-1	Habitat Conservation Division	Charrish Stevens (NMFS)		**"Construction would result in the loss of approximately 205.64 acres tidal wetlands, 413.12 acres non-tidal wetlands, 150.40 acres of SAV, and 2.45 acres of oyster reef; however, proposed PAs that would support the establishment of tidal wetlands or SAV and restore eroding shorelines (and may protect larger areas of SAV once constructed). These actions may increase contribution to the long-term productivity of the Corpus Christi Bay system by providing nursery and juvenile habitat for finfish and shellfish species."** This needs to be discussed in more detail in the EFH Assessment as well as the body of this document. How will BU PAs benefit EFH and fisheries? Hom much EFH is being created/restored per habitat type? Preservation does not constitute mitigation for impacts to EFH alone. All of these questions needs to be addressed in EFH Assessment and the body of the EIS.	Other	Port to address. The EIS was updated to more accurately describe impacts to aquatic resources including wetlands and SAV. All information on impacts and mitigation was provided by the Applicant. Within the EIS, any instance where impact acreages were mentioned, the text was edited to capture all impacts as provided by the Applicant. All information regarding mitigation was provided by the Applicant and has been included. The applicant indicates that PA sites would result in the creation of 252.75 acres of "marsh coastal prairie habitat" and 34.28 acres of "marsh habitat."	open
5/5/22	EIS Vol II	3.1, Table 3.2	A-11	Habitat Conservation Division	Charrish Stevens (NMFS)		The table is supposed to be a summary of potential impacts of the placement plan to WOUS including wetlands and other special aquatic sites. However, the reader is left confused as it appears the acreage totals per site don't add up to mapped habbitat or Open water. It is unclear how much and what is being created/restored etc. The needs to be a colunm in this table that shows impacts per habitat at each site and then another that shows how much is being created/restored per habitat per site, which then equates to the total acreage per site to better show the reader what exactly is happening at each site. It looks like the Sum of Estimate section of table attempted this but it would be better placed alonside each site as an additional column.	Other	N/A. This is the Port's Permit Application.	closed
5/5/22	EIS Vol II	4.4, Table 4.1	A-27	Habitat Conservation Division	Charrish Stevens (NMFS)		Alternative C and D: This statement is not accurate; there will be continued maintenance dredging to maintain existing channel depth, thus the opportunity for BU placement from the dredged material is still available just not at the levels that would be present initially if project were to deepen channel.	Other	N/A. This is the Port's Permit Application.	closed
5/5/22	EIS Vol II	5.1.2.1	A-30	Habitat Conservation Division	Charrish Stevens (NMFS)		**"M3 would convert featureless bay bottom to approximately 330 acres of estuarine/aquatic habitat behind Pelican Island. M9 and M10 would convert featureless bay bottom to approximately 329 and 770 acres of estuarine/aquatic habitat behind PA9 and PA10, respectively."** What is the acreage of habitat creation/restoration per habitat type (i.e., SAV, tidal marsh)?	Other	N/A. This is the Port's Permit Application. Additionally, the Port removed placement alternatives M3, M9, M10, PA9. There was never a placement area PA10. See the DMMP, Appendix C1.	closed

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
5/5/22	EIS Vol II	6.0	A-37	Habitat Conservation Division	Charrish Stevens (NMFS)		This section discusses how impacted EFH (seagrasses, marsh/wetlands, tidal flats, etc) involves mostly preservation. However, the remaining impacts would be offset by reconfiguring sites to host impacted habitat. What does this mean? Raise elevations only? Will there also be planting of seagrasses and marsh? Non of this is mentioned in enough detail to answer the readers questions. The applicant needs to make sure the restration/creation of EFH is done at appropriate mitigation rations for those resources being lost.	Other	N/A. This is the Port's Permit Application. Migitaion proposed by the Port is described in Section 6.0 of the EIS.	closed
5/5/22	EIS Vol II	6.0, Table 6.1	A-44	Habitat Conservation Division	Charrish Stevens (NMFS)		First, Table should be moved into appropriate section. Right now it is falling after Section 7.0 which is not the right section. Secondly, the proposed restoration of seagrass or marsh needs to be separated out into two habitat categories which shows amount of habitat created/restored per PA. Just a reminder it needs to be discussed in detail how impacts associated with placement are mitigated for adequately per habitat that is being displaced. Placement of BU should not be at the expense of other EFH. Also, preservation results in a net loss of EFH function. Therefore, it can not serve as mitigation alone. There needs to be restoration and/or creation of in kind habitat that is being dispaced from placement of BU. Finally, these proposed impacts to SAV are not consistently mentioned throughout the EIS. There needs to be consistency to keep from confusing the reader to make sure it is clear how much is EFH per habitat type is being impacted and how much is being restored/created per habitat type inorder to show there will be a net benefit to EFH resources.	Other	N/A. This is the Port's Permit Application.	closed
5/26/22	ADEIS	2.0 Proposed Action and Alternatives	2-1 and 2-2	Alternatives Analysis	Mary Kay Skoruppa, USFWS	Insignificant	The Alternatives are listed as Alternatives #1-4, including the No Action Alternative, to be carried forward. However, the DEIS subsequently renumbers the alternatives without the No Action Alternative as #1-3, which is confusing to the reader when referring back to the original list of alternatives that have different numbers. For example, the CDP changes from Alternative #2 to Alternative #1.	Incorporate	The initial list of alternatives were not provided numbers, they were just listed numerically. To avoid any confusion, this list has been been changed to bullets.	closed
5/26/22	ADEIS	3.5 Socioeconomic Conditions		Socioeconomics	Mary Kay Skoruppa, USFWS	Significant	This section states that the Region of Influence (ROI) for socioeconomic analysis includes the three counties of Nueces, Aransas, and San Patricio. However, Section 3.5.4, Environmental Justice, considers only block census tracts within a project area much smaller than the ROI or the DEIS' study area. The Service understands that the project area represents an area of resources more directly impacted; however, the Service recommends also analyzing indirect and cumulative impacts throughout the study area. For example, if seagrass and low trophic level organisms are affected from turbidity, salinity changes, tidal amplitude, or other CDP effects, then fishing and viewshed resources would likely be affected beyond just the project area.	Investigate	To be addressed for the FEIS	open
5/26/22	ADEIS	5.4.2 Physical Oceanography	Table 5-4,		Mary Kay Skoruppa, USFWS	Insignificant	Table has missing rows at the page break.	Not Recommended	Table is not missing a row, it is split between two pages.	closed
5/26/22	ADEIS	5.4.10 Threatened and Endangered Species	5-41	Cumulative Impacts	Mary Kay Skoruppa, USFWS	Significant	This section only mentions impacts to sea turtles and shorebirds; however, there are several other listed species that should be considered.	Incorporate	Included additional information on noise and oil spill impacts to marine mammals, sea turtles and fish.	Closed
5/26/22	ADEIS	Appendix J. MPRSA Section 103 Sampling Analysis Plan.		MPRSA Section 103	Mary Kay Skoruppa, USFWS	Significant	Sampling was conducted in 2021 but the results are not included. When will the report be available for review?	Other	Need Port or Jayson to answer. Per the SAP, draft report is to finished at 217 days after NTP.	open

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
5/26/22	ADEIS	Appendix K. Ship Simulation Report		Navigation / Ship Simulation	Mary Kay Skoruppa, USFWS	Significant	This report recommended that when VLCCs are present in the CCSC, traffic be restricted to one-way only. How would periods of one-way traffic affect shipping needs of other Port customers and the wait times for residents and tourists at the Port Aransas Ferry?	Other	Partially laden VLCCs currently transit the CCSC, and will continue under the No Action alternative. One-way traffic is currently imposed for these existing VLCC transits and pending No Action transits. Therefore, wait times for other vessels are not expected to be adversely affected by improving the navigation channel to accomodate fully laden VLCCs. With respect to ferry operations, the proposed action does not deviate from the VLCC docking and egress times of the No Action alternative. Therefore, there should not be impacts to the ferry operations when comparing the No Action to the Proposed Action. See Section 4.5.2.	Closed
5/26/22	ADEIS	Appendix N. Clean Water Act Section 404(b)(1) Evaluation	Section 2.3 Physical Effects on Benthos. Pages 2-2 and 2-8	CWA Section 404(b)(1)	Mary Kay Skoruppa, USFWS	Significant	Page 2-2 states that benthic organisms in deep water can take up to eight years to recover; however, on page 2-8, it is stated that benthic organisms are expected to quickly rebound after construction. What is the basis for this conclusion?	Incorporate	Text has been revised with citations to be more clear.	closed
5/26/22	ADEIS			Mitigation??	Mary Kay Skoruppa, USFWS		The DEIS needs to adequately demonstrate that the Applicant's preferred alternative (CDP) is the least environmentally damaging alternative to meet the stated purpose and need. The CDP is expected to result in increases in large vessel traffic, tidal amplitude, storm surge, salinity, turbidity, shoreline propeller scour, maintenance dredging, and inshore oil spill risk. These could negatively impact threatened and endangered species, migratory birds, wetlands, and seagrass. The Service agrees that the use of suitable dredged material to renourish beaches and restore eroded habitats is beneficial; however, these benefits may not outweigh irreversible damage that the CDP could potentially cause.	Other	Noted and will be evaluated further by USACE	open
5/26/22	ADEIS			Navigation	Mary Kay Skoruppa, USFWS		The DEIS states that the presence of offshore ports in Alternatives 2 and 3 would reduce or eliminate the need for Very Large Crude Carriers (VLCC) to enter the CCSC and reverse-lighter offshore. However, crude oil exports are forecasted to more than double by 2030 with the PCCA becoming the leading crude oil exporter in the U.S. Construction of the new Harbor Bridge is scheduled to be completed in 2024, allowing VLCCs to enter the Inner Harbor. Given the increased market demand and accessibility to the Inner Harbor, large vessels could potentially still opt to enter the CCSC for partial loading. In addition, a VLCC can take 48 to 60 hours to fully load from a deepwater port. If there were long wait times for a single point mooring buoy offshore, some vessel operators might opt for partial loading from the CCSC and reverse lightering offshore. **Would large vessels be restricted from entering the CCSC if multiple deepwater ports were in place? Please provide more details in the DEIS to provide realistic future scenarios about vessel traffic throughout the CCSC under each alternative.**		Alternative 2 was conceived to be able to provide the total projected throughput of 4.5 MBPD. Although it is recognized that the scenario of all loading from Corpus Christi taking place offshore is unlikely due to existing and already-planned VLCC terminals and the number of SPMs would be greater than the largest current offshore SPM complex, the alternative was analyzed solely for completeness of impact analysis and consideration. Text in Section 4.5.3 recognizes this scenario is unlikely, stating "However, it is highly unlikely that the terminal operators would abandon the No-Action Alternative's Harbor Island terminals and facilities after substantial investment to construct." This would also be true of facilities at VLCC Ingleside. That said, VLCC's would be expected to continue using VLCC purpose built-facilities at Harbor Island and Ingleside, and a more likely scenario would be that a smaller number of SPMs would add future supplemental loading throughput. With regard to VLCCs using Inner Harbor facilities, this would not be expected to prevail because 1) there are no facilities currently planned with VLCC-sized berths that the study team could find, and 2) the Harbor Bridge vertical clearance will be 205 feet while the largest VLCC's can have lightship air drafts of 222 feet (67.8 m).	

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
									Although some portion of the world VLCC fleet has an air draft less than 205 feet, the larger, more modern version trends towards the higher end. Also, the available turning basins are barely longer than the VLCC length overall of 1,080 feet, and would be too tight for efficient turnaround. It is more likely that if SPMs had excessive wait times in a future scenario, that VLCCs would use already existing Harbor Island or Ingleside facilities, mainly due to no air draft limitation, space, purpose-built docks and loading arms, and transit distance versus Inner Harbor facilities. Again, Alternative 2 was conceived to meet all throughput demand. Alternative 2 was conceived to provide fewer SPMs that would be primarily used to top off VLCCs partially loaded at Ingleside or Harbor Island, which would eliminate the lightering. If multiple SPMs are put into place, large vessels would not be restricted from entering the VLCC, because the shippers would be free to select VLCC terminals for storage and loading according to arrangement and agreements they set in place, and investment decisions made. There would not be a statutory prohibition against vessel operations using onshore VLCC facilities.	
5/26/22	ADEIS			Cumulative Impacts	Mary Kay Skoruppa, USFWS		The DEIS includes model predictions for a cumulative salinity change range of +/- 4 Practical Salinity Units (PSU) with an error of +/- 5 PSU. The Service understands that salt storage in Nueces Delta is an uncertainty, and that salinity can fluctuate greatly depending on rainfall; however, freshwater inflow is limited in this semi-arid region, especially in the Nueces and Nueces-Rio Grande river basins. The Service is concerned that cumulative effects of increased salinity from the CDP, periods of drought, climate change, and effluent from multiple proposed desalination plants, could result in a significant change in the distribution and species composition of seagrass and lower trophic level organisms in Redfish, Corpus Christi, Aransas, and Nueces bays. This change would impact threatened and endangered species and migratory birds that feed, breed, nest, and roost in these estuaries. The cumulative impacts analysis of the DEIS should be expanded to better examine potential increases in salinity.	Other	The Cumulative Effects section addresses past, present, and reasonably foreseeable projects and considers their potential impacts in conjunction with this proposed project. We list several desalination projects that may be constructed in the region and indicate potential cumulative impacts, particularly during drought conditions, since this project will have a minor increase in salinity. In particular, we indicate that desalination projects, during drought and in combo with this project, could impact wetlands, SAV, listed species, aquatic fauna, terrestrial wildlife, etc. This is located in Section 5.4, and particular mention of cumulative impacts with desalination facilities is embedded the tables within 5.4.	closed
5/9/22	BA	2.17.3	2-15		Michael Barnett (NMFS)		"…turtles may benefit from having improved beach nesting habitat…." Questionable…should be supported at some point (i.e., documented eroded nesting beaches, etc.	Incorporate	Included reference to Gallaher, 2009 supporting the use of nourished vs unnourished beaches by sea turtles.	closed
5/9/22	BA	2.18.3	2-16		Michael Barnett (NMFS)		"…turtles may benefit from having improved beach nesting habitat…." Questionable…should be supported at some point (i.e., documented eroded nesting beaches, etc.	Incorporate	Included reference to Gallaher, 2009 supporting the use of nourished beaches vs unnourished beaches by sea turtles.	closed
5/9/22	BA	2.19.3	2-17		Michael Barnett (NMFS)		"…turtles may benefit from having improved beach nesting habitat…." Questionable…should be supported at some point (i.e., documented eroded nesting beaches, etc.	Incorporate	Included reference to Gallaher, 2009 supporting the use of nourished vs unnourished beaches by sea turtles.	closed
5/9/22	BA	2.20.2	2-17		Michael Barnett (NMFS)		"…turtles may benefit from having improved beach nesting habitat…." Questionable…should be supported at some point (i.e., documented eroded nesting beaches, etc.	Incorporate	Included reference to Gallaher, 2009 supporting the use of nourished beaches by sea turtles.	closed
5/9/22	BA	4.4	4-3		Michael Barnett (NMFS)		"…decreased water quality from dredging, and habitat modifications." Relocation trawlers	Incorporate	Included trawling to potential impacts to giant manta rays.	closed
5/9/22	BA	4.4	4-3		Michael Barnett (NMFS)		"….would not jeopardize the continued existence or potential recovery of the species." Unsupported – there is no discussion on difference between lethal and non-lethal take, or potential scale of take. Best to delete this sentence.	Incorporate	Sentence was deleted.	closed
5/9/22	BA	4.1	4-5		Michael Barnett (NMFS)		"…. expected to be local and temporary." Mortality of sea turtles is not temporary per se, and if mortality occurs prior to a nesting female, the impact is more than just one turtle due to loss of eggs and progeny.	Incorporate	Clarified to suggest that the duration of construction impacts are temporary.	closed
5/9/22	BA	4.1	4-5		Michael Barnett (NMFS)		"…will be utilized to widen…." Earlier the document stated anticipated work was not predicted to widen channel, only deepen.	Incorporate	Sentence has been removed.	closed

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
5/9/22	BA	4.1	4-5		Michael Barnett (NMFS)		Second paragraph, second and third sentences. Three different dredge types are listed, and the use of the word "if" makes effect analysis difficult. Ideally, we will need to know the expected dredge type to be used for the work and amount of material per dredge type estimated to be excavated. Or, based on amount of work (3 years) and dredge windows for hopper dredges, and amount of material removed per day on average by	Other	Information on the types of dredge vessel used and dredge quantities for each dredge vessel type are unknown at this time.	open
5/9/22	BA	4.1	4-5		Michael Barnett (NMFS)		"…would be required to avoid impacts (Ramirez et al., 2017)." What are the triggers for relocation trawls: during all work, after certain threshold of turtle take occurs, etc.? EDIT: noted in section 5.	Incorporate	The triggers for relocation trawling can be foundin Section 4.1 Channel Dredging Conservation Measures.	closed
5/9/22	BA	4.1	4-6		Michael Barnett (NMFS)		"(Operations and Dredging Endangered Species System, 2021)" A more detailed examination of this data should be presented. Such as average number of turtle take per 100K cy of dredged material, etc. Also, a map with recent nesting on Mustang and other adjacent beaches would be useful for analysis (compared to other areas like Padre) so significance of the area to nesting could be assessed. And if you expect this	Other	Information on the types of dredge vessel used and dredge quantities for each dredge vessel type are unknown at this time. FNI was unable to find geospatial information with sea turtle nest locations.	open
5/9/22	BA	4.1	4-6		Michael Barnett (NMFS)		"Other types of impacts…" Lighting of dredging vessels, particularly during nesting season, resuspension of heavy metals and other contaminants in sediments, etc.	Incorporate	Listed potential impacts have been included.	closed
5/9/22	BA	4.1	4-6		Michael Barnett (NMFS)		"…relocation trawling…" Would this just be used during triggered hopper dredge activities? An estimate of relocation trawling take based on duration of the work, amount of material to be dredged via hopper dredge, and historical comparisons to other dredge projects off TX would be very, very useful	Incorporate	Specific triggers for relocation trawling has been included in Section 4.1.	closed
5/9/22	BA	4.1	4-6		Michael Barnett (NMFS)		…other conservation measures." Specify? Seasonal dredging windows? What measures?	Incorporate	Information on other conservation measures have been included in Section 4.1.	closed
5/9/22	BA	4.1	4-6		Michael Barnett (NMFS)		"…can be greatly reduced if avoidance…." This reads very speculatively. It should read more definitively, so we know conservation measures are mandatory and not voluntary, sporadic, etc.	Not Recommended	The comment has been acknowledged.	closed
5/9/22	BA	4.1	4-6		Michael Barnett (NMFS)		"The CDP is expected to decrease the volume of vessel traffic traversing the CCSC." Perhaps related to lightering traffic associated with VLCCs, but perhaps not overall shipping traffic, particularly higher speed recreational vessel traffic.	Not Recommended	The comment has been acknowledged.	closed
5/9/22	BA	4.1	4-6		Michael Barnett (NMFS)		"Beneficial placement of dredge material can lead to sediment transport of material to the shoreline and an accretion of beachfront habitat." Consistency of dredged material should be discussed, particularly given the depth of dredging that will occur…depending on type of sediments, placement could have a negative effect as well.	Incorporate	Sand characteristics has been discussed in section 4.1.	closed
5/9/22	BA	5.1	5-1		Michael Barnett (NMFS)		4th bullet - "…whenever possible…" Does not seem definitive. Would hopper dredging potentially occur during other times of the year? Discuss potential interactions with lethargic, cold stunned turtles.	Incorporate	Included additional information about cold-stunned sea turtles in section 5.11.1 In-water Impacts to sea turtles.	closed
5/9/22	BA	5.1	5-1		Michael Barnett (NMFS)		5th bullet - "…when the dragheads are not firmly on the bottom…" Based on what – telemetry on the draghead? Should be discussed.	Incorporate	Added "as indicated by sensors" to the sentence.	closed
5/9/22	BA	5.1	5-1		Michael Barnett (NMFS)		6th bullet - "…whenever possible…" Same as above. Is this a hard rule, or more flexible?	Incorporate	Information on the types of dredge vessel used and the dredging time frames are unknown at this time.	closed
5/9/22	BA	5.1	5-2		Michael Barnett (NMFS)		2nd bullet - "…bedleveling…" Is bedleveling part of the proposed action…it's not mentioned in the DEIS volume 1?	Other	Bedleveling is not part of the proposed action. The statement has been revised.	closed
5/9/22	BA	5.1	5-2		Michael Barnett (NMFS)		3rd bullet - Relocation Trawling. Note previous comment regarding needed estimates of relocation trawl activities – take via relocation trawler is still take that has to be accounted for in the opinion. And effort data will be essential in calculating take estimates…	Other	It is difficult to determine relocation trawling effort if the project has not begun since relocation trawling is based off turtle take.	closed
8/5/22	BA	1.1	1-1		Mary Kay Skoruppa, USFWS		Second paragraph. Recommend mentioning proposed critical habitat for red knot in this paragraph too.	Incorporate	Revised to included mention of Red Knot Critical Habitat in following sentence.	closed
8/5/22	BA	Table 1	1-3		Mary Kay Skoruppa, USFWS		Suggest changing PE - Potentially Endangered to Proposed Endangered	Incorporate	Revised to Proposed.	closed

REVIEWER								RESPONDER / BACKCHECK		
Date	Document (EIS, BA, EFH, etc.)	Section/Figure	Page Number	Discipline	Reviewer Name	Category	Reviewer Comment	Response Code	Response/Proposed Resolution	Status (open/closed)
8/5/22	BA	3.1	3-1		Mary Kay Skoruppa, USFWS		Second Paragraph. According to the following reference, manatees are estimated to have a behavioral shift threshold of 175 decibels. Recommend including this information. NMFS. 2018. 2018 Revisions to: Technical Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing (Version 2.0): Underwater Thresholds for Onset of Permanent and Temporary Threshold Shifts. U.S. Dept. of Commer., NOAA. NOAA Technical Memorandum USFWS-OPR-59, 167 p	Incorporate	Decibel level has been added.	closed
8/5/22	BA	5.6	5-4		Mary Kay Skoruppa, USFWS		Change this to NOT likely to adversely modify. The Critical Habitat effects determination is applied to the species' whole range so even if the part located within the CDP project area were to be modified, it would not reach the level of a Likely determination because the total critical habitat is large and widely distributed in the U.S.	Incorporate	Text has been revised.	closed
8/5/22	BA	5.6	5-4		Mary Kay Skoruppa, USFWS		Change this to not likely to adversely modify. The Critical Habitat effects determination is applied to the species' whole range so even if the part located within the CDP project area were to be modified, it would not reach the level of a Likely determination because the total critical habitat is large and widely distributed in the U.S.	Incorporate	Text has been revised.	closed
8/5/22	BA	Table 5	6-1		Mary Kay Skoruppa, USFWS		Recommend adding rows for whooping crane critical habitat and piping plover critical habit with determinations (not likely to adversely modify).	Incorporate	Text has been revised.	closed
8/5/22	BA	Table 5	6-1		Mary Kay Skoruppa, USFWS		Suggest being consistent on terminology throughout table. Either "may affect, likely to adversely affect" or "likely to adversely affect"	Incorporate	Text has been revised.	closed
8/5/22	BA	Table 5	6-2		Mary Kay Skoruppa, USFWS		Monarch Butterfly. Change to "not likely to jeopardize continued existence"	Incorporate	Text has been revised.	closed
8/5/22	BA	7.0	7-6		Mary Kay Skoruppa, USFWS		I believe this date is an error. I sent review comments via email on 4/26, 5/9, and 7/11 but this reference is most likely for my email on 7/11/22 email.	Incorporate	Text has been revised.	closed

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701-5505
https://www.fisheries.noaa.gov/region/southeast

August 9, 2022 F/SER46: CS/RS

Mr. Jayson Hudson
Regulatory Division,
Policy Analysis Branch
U.S. Army Corps of Engineers
2000 Fort Point Road
Galveston, Texas 77550

Dear Mr. Hudson:

NOAA's National Marine Fisheries Service (NMFS) Habitat Conservation Division received your response letter dated August 5, 2022, regarding our recommendations to improve the U.S. Army Corps of Engineers' (USACE) essential fish habitat (EFH) assessment provided to you by our letter of August 1, 2022. The NFMS has reviewed the following additional information provided with your response letter: (1) Waters and Wetlands Delineation Report for the San Jose Island Beneficial Use (BU) Site dated January 2022, (2) Waters and Wetlands Delineation Report for Five BU Sites dated June 2021, and (3) the aquatic survey report for San Jose Island BU Site dated January 14, 2022. Your August 5, 2022, letter states the USACE has provided the best scientific information available regarding the effects of the action on EFH and disclosed all of the measures the applicant has proposed to take to avoid, minimize, or offset such effects in the EFH Assessment. Based upon this information, NMFS will provide initial conservation recommendations in accordance with the EFH provisions of the Magnuson-Stevens Fishery Conservation and Management Act (MSA) (Section 600.920; P.L. 104-297).

As stated in our previous comment letter, the Applicant's Proposed Action Alternative will have direct impacts to EFH resulting in approximately 4,605.47 acres of open water/bay bottom, 6.88 acres of seagrass, 0.10 acre of oyster reef, 407.97 acres of sand flat/beach, 16.61 acres of estuarine tidal wetland, and 181.22 acres of palustrine wetland habitats. The Applicant, Port of Corpus Christi Authority (PCCA), has stated the BU plan will mitigate for the proposed EFH impacts. However, neither the BU plan or the draft Environmental Impact Statement (EIS) adequately describe how direct impacts to the various categories of EFH will be adequately offset. In addition, the PCCA has not demonstrated how their Proposed Action Alternative has avoided and/or minimized EFH impacts as required by the USACE's mitigation rules. Based on the information provided in the draft EIS, we believe Alternative 2 appears to be the environmentally preferable alternative. In addition, the draft EIS does not quantify any net effects of other project alternatives. The NMFS requests the methodology used for the alternatives analysis and for the selection of the preferred alternative be further refined in the final EIS.

While the NMFS generally supports the BU of dredged material for beach nourishment and marsh creation, or to restore eroded shorelines and dunes of barrier islands along the Gulf of Mexico, unavoidable direct impacts to EFH such as seagrass, tidal sand/mud flats, algal mats, and oyster reefs from the BU construction should be adequately mitigated for. According to the USACE's 2008 Mitigation Rule, applicants must compensate for unavoidable impacts by way of restoration, establishment, enhancement, and/or preservation of aquatic resources for the purpose of offsetting unavoidable adverse impacts which remain after all appropriate practicable avoidance and minimization has been achieved. The applicant has not demonstrated how they will offset direct impacts to seagrass and oyster reefs through restoration, establishment, and/or enhancement of shallow water habitat within the same watershed the impacts are taking place. The PCCA states in the draft EIS no mitigation for direct impacts to seagrass will take place because the restoration of "SS"1 and "PA4" shorelines would protect Redfish Bay and its 2,000+ acres of existing seagrass meadow. The PCCA is not proposing to mitigate for the direct loss of 6.88 acres of seagrass because they argue the protection of the bay far outweighs the direct impacts to seagrasses. The NMFS does not support this reasoning and continues to be concerned there will be a net loss of EFH resources if no mitigation of direct impacts to seagrass is provided. The recommended mitigation ratio for seagrass in Texas is 3:1; therefore, we recommend the applicant should be required to provide a total of 20.64 acres of seagrass compensation for those direct impacts. The applicant also states there will be direct impacts to 0.10 acre of oyster reef, but there is no discussion of compensation for the loss of oyster resources. We also recommend the applicant be required to mitigate for the loss of oyster resources or demonstrate how restoration, creation, and enhancement activities associated with BU placement will offset impacts to oysters and/or oyster reef habitat at a mitigation ration of 2:1, totaling 0.20 acres of oyster reef.

The NMFS is concerned the project as currently proposed would result in a net loss of EFH from the conversion of habitat and would adversely impact EFH and associated marine fishery resources in Corpus Christi Bay system. Therefore, the NMFS recommends the Department of the Army authorization for this project not be authorized as currently proposed in the Applicant's Proposed Action Alternative. Should new information become available, NMFS reserves the right to provide additional conservation recommendations in response to the final EIS. Section 305(b)(4)(A) of the MSA requires NMFS to provide EFH conservation recommendations for any federal action or permit which may result in adverse impacts to EFH. Therefore, NMFS Habitat Conservation Division recommends the following to ensure the conservation of EFH and associated marine fishery resources:

EFH Conservation Recommendations

1. The NMFS encourages the USACE to consider selecting Alternative 2 as the preferred alternative. In addition, the applicant should provide a complete alternative analysis which demonstrates the preferred alternative selected will be resolved with the requirement to identify the least environmentally damaging practical alternative. If PCCA continues to pursue the Applicant's Proposed Action Alternative, additional documentation should be required to demonstrate their efforts to avoid and minimize impacts to EFH.

2. It is unclear whether adequate benefits to EFH will be provided to offset aquatic impacts as described in the dredged material management plan. Therefore, the PCAA should also be required to quantify a future without project versus a future with project estimate of aquatic resource functions and values using available habitat evaluation procedures or other applicable analyses to quantify placement site impact and benefits.

3. The preliminary mitigation analysis and approximate total acres of impacts to EFH provided in the draft EIS should be refined to verify: (1) the final assessment of acres of impacts to each EFH category, (2) description of the ecological assessment methodologies used and results of the impact and mitigation calculations, (3) the types of mitigation required, and (4) the final mitigation project design. Fill in estuarine water column and estuarine mud/sand/shell bottoms EFH that convert healthy bay habitats to uplands should also be included among the habitat types assessed and requiring mitigation. Estimates of all direct and indirect project related impacts to tidally influenced EFH should be refined for inclusion in the project's final EIS.

4. Should the Department of the Army authorization permit unavoidable impacts to EFH, then a mitigation plan and monitoring plan should be developed which fully compensates for all EFH impacts. We also request the EFH mitigation plan be coordinated with NMFS prior to issuance of a USACE permit. To avoid additional mitigation for temporal impacts, NMFS also recommends the authorization include special conditions requiring the implementation of the mitigation plan concurrent with the deepening of the channel and placement of BU dredged material.

5. The USACE should implement in-kind compensatory mitigation for direct and secondary EFH impacts (seagrass and oyster reef habitat) resulting from the proposed BU placement activities. The amount of mitigation should be based upon a functional assessment and a mitigation compensatory ratio of 3:1 for seagrasses and 2:1 for oyster reef habitats. To avoid additional mitigation for temporal impacts, the NMFS also recommends implementation of the mitigation plan concurrent with the construction of the development.

6. If after three years of post-construction seagrass and oyster reef monitoring of BU placement areas reveal additional EFH impacts have occurred, then the applicant should develop a compensatory mitigation, monitoring, and contingency plan designed to offset those observed ecological losses.

Consistent with Section 305(b)(4)(B) of the MSA and NMFS' implementing regulation at 50 CFR 600.920(k), your office is required to provide a written response to our EFH conservation recommendations within 30 days of receipt. Your response must include a description of measures to be required to avoid, mitigate, or offset the adverse impacts of the proposed activity. If your response is inconsistent with our EFH conservation recommendations, you must provide a substantive discussion justifying the reasons for not implementing the recommendations. If it is not possible to provide a substantive response within 30 days, the USACE Galveston District should provide an interim response to NMFS, to be followed by the detailed response. The

detailed response should be provided in a manner to ensure that it is received by NMFS at least 10 days prior to the final approval of the action.

We appreciate your consideration of our comments. If you wish to discuss this project further or have questions concerning our recommendations, please contact Charrish Stevens at (713) 715-9613, or by email at charrish.stevens@noaa.gov.

Sincerely,

Virginia M. Fay
Assistant Regional Administrator
Habitat Conservation Division

cc:
NOAA: NOAA NEPA
F/SER: Silverman, Rosegger
F/SER4: Dale, Scarpa
F/SER46: Swafford
File

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, GALVESTON DISTRICT
2000 FORT POINT RD
GALVESTON, TEXAS 77553-1229

November 22, 2022

SUBJECT: Department of the Army Permit Application SWG-2019-00067
Corpus Christi Ship Channel 75' Deepening Project

Mr. Mark Wolfe
State Historic Preservation Officer
Texas Historical Commission
P.O. Box 12276
Austin, TX 78711-2276

Dear Mr. Wolfe:

The U.S. Army Corps of Engineers, Galveston District (Corps) Staff Archeologist has reviewed the draft reports titled, *Marine Archaeological Investigations Port of Corpus Christi's (PCCA's) Ship Channel 75' Channel Project, Aransas Count, Texas*, dated August 2022 and *Addendum: Marine Archaeological Investigations Port of Corpus Christi's (PCCA's) Ship Channel 75' Channel Deepening Project Beneficial Use (BU) Nearshore Berms, Aransas and Nueces Counties ,Texas* both reports prepared for Port of Corpus Christi Authority by RECON Offshore. The draft reports were prepared in response to our request for a cultural resource investigation of the permit area. A copy of the report is attached. Additionally, the applicant should have provided copies of these reports to you pursuant to TAP #30317.

As documented in the report, no historic properties found in the permit area and further investigation is not justified. Two documented sites 41NU252 (the SS Mary) and 41NU264/41NU292 (the Utina) were identified and discussed, but both are located over 50-meters away from the project and will not be impacted. We request your review of the referenced report, your concurrence with our determination that no historic properties are present and that the proposed permit action is in compliance with Section 106 of the National Historic Preservation Act.

Thank you for your cooperation in this review process. If you have any questions concerning our review or if we can be of further assistance, please contact Mr. Jerry Androy at 409-766-3821.

Sincerely,

Jerry Androy
Regulatory Archeologist and
Tribal Liaison

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, GALVESTON DISTRICT
2000 FORT POINT RD
GALVESTON, TEXAS 77550

January 3, 2023

Policy Analysis Branch

SUBJECT: Permit Application: SWG-2019-00067

Ms. Sarah Garza
Director of Environmental Planning and Compliance
Port of Corpus Christi Authority
400 Harbor Drive
Corpus Christi, Texas 78401

Dear Ms. Garza:

This is in reference to your Department of the Army Permit Application for the Channel Deepening Project. The PCCA's proposed dredge material placement plan (DMMP) was included in the Draft Environmental Impact Statement published on June 10, 2022. The U.S. Army Corps of Engineers (Corps), Environmental Protection Agency (EPA), National Marine Fisheries Service (NMFS), and the U.S. Fish and Wildlife Service (FWS) objected to the plan.

In response to the comments, PCCA eliminated 58.76 acres of proposed impact to high quality, palustrine dune swale wetlands on San Jose Island and has expanded their wetland creation project features to include both SS1 and SS2. However, PCCA has declined the request from the Corps and Cooperating Agencies to commit to the wetland creation in a compensatory mitigation plan compliant with 33 CFR 332 Compensatory Mitigation for Losses of Aquatic Resources.

The Corps has concluded that the current proposal has not taken the necessary steps to ensure this wetland creation design feature will be implemented. In order for the Corps to consider the wetland creation at SS1 and SS2 as mitigation, the creation and success of the mitigation measures must be committed to, monitored, and enforced. This is a requirement of NEPA, the Guidelines, and the Corps implementing regulations (33 CFR 320-332.)

In order to demonstrate compliance with these requirements, PCCA must propose a compensatory mitigation plan compliant with 33 CFR 332 Compensatory Mitigation for Losses of Aquatic Resources. The plan may include the development of SS1 and SS2 to 33 CFR 332 standards or PCCA may propose other locations and concepts.

We are prepared to assist you in the development of a compensatory mitigation plan. Please contact Jayson Hudson at 409-766-3108 or by email at jayson.m.hudson@usace.army.mil.

Sincerely,

Nicholas A. Laskowski
Chief, Regulatory Division
Galveston District

TEXAS HISTORICAL COMMISSION
REAL PLACES TELLING REAL STORIES

P.O. Box 12276
Austin, Texas 78711-2276
512-463-6100
thc.texas.gov

January 10, 2023

Jason Burns
RECON Offshore
P.O. Box 30210
Pensacola, FL 32503

Re: Project review under Section 106 of the National Historic Preservation Act of 1996 and the Antiquities Code of Texas

Draft Report Review, Marine Archaeological Investigations Port of Corpus Christi's (PCCCA's) Ship Channel 75' Channel Deepening Project and Addendum: Marine Archeological Investigation Port of Corpus Christi's (PCCCA's) Ship Channel 75' Channel Deepening Project Beneficial Use (BU) Nearshore Berms
Antiquities Permit No. 30317, THC Tracking No. 202303250
COE-VD

Dear Mr. Burns,

This letter serves as comment on the proposed federal undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC). As the state agency responsible for administering the Antiquities Code of Texas, these comments also provide recommendations on compliance with state antiquities laws and regulations.

The review staff, led by State Marine Archeologist Amy A. Borgens, has reviewed the August 2022 draft report *Marine Archaeological Investigations Port of Corpus Christi's (PCCCA's) Ship Channel 75' Channel Deepening Project* and the November 2022 *Addendum: Marine Archeological Investigation Port of Corpus Christi's (PCCCA's) Ship Channel 75' Channel Deepening Project Beneficial Use (BU) Nearshore Berms.* The THC cannot assess the full investigative results and complete the review due to abnormalities and inconsistencies in the data processing and presentation. There are additionally errors in how archeological site avoidance buffers have been applied. These circumstances may affect the results and recommendations presented in the draft report. New data is required so that the THC can complete its review. Revisions for the draft report are presented as Appendix A. Please submit to the THC a revised draft report for review that addresses these comments. The THC looks forward to receipt of the revised report.

Thank you for your cooperation in this federal and state review process, and for your efforts to preserve the irreplaceable heritage of Texas. **If you have any questions concerning our review or if we can be of further assistance, please contact Amy Borgens at 512-463-9505/Amy.Borgens@thc.texas.gov.**

Sincerely,

for
Mark Wolfe
State Historic Preservation Officer
MW/ab

Cc: Jerry Androy, U.S. Army Corps of Engineers, Galveston District

Appendix A

Many of these comments will affect both reports, please make changes accordingly.

I) Title page is missing the principal investigator.
II) Table of Contents. Include Appendices and their titles.
III) Abstract
   a. Add acreage.
   b. Add statement regarding curation of records
   c. Add site 41AS119 to list of sites to avoid.
   d. Add clarification for avoidance buffer recommendations so that the 50-m commences from the perimeter of the outer magnetic contours for each site.
   e. Change "Texas State Code" to "Texas Administrative Code." It Is recommended it is referred to in full as Texas Administrative Code, Title 13, Part 2, Chapter 28, Rule §28.6.
IV) 1.0 Introduction
   a. 1.1. The introduction is missing a detailed discussion of the proposed work and its impacts. Please quantity number of feeder berms and describe the nature of the modifications. What are the current and proposed new channel depths? What are the dimensions of the channel extension, etc.
   b. The buffer referenced in the bulleted lists is the THC survey buffer correct? The buffer is 100 m within the 3-mile delineation and 200 m outside of the 3-mile line? This could be stated more succinctly, and it may also be worth mentioning that these boundaries exceed the requirements in Texas Administrative Code, Title 13, Part 2, Chapter 28, Rule §28.6 of 50 and 150 m.
   c. Please include professional affiliations for all staff since there are many partners. Are Matt Thompson and Erick Huchzermayer also of RECON Offshore? Include which staff performed magnetometer editing and processing, in addition to the analysis/interpretation—was this more than one individual? Which staff were involved in the field survey? Did the BIO-WEST r/v vessels *Ms. Kendle* and MREC include their own survey staff – include these individuals in the report? Since a non-archeological subcontractor was used for the field survey, please include and clarify if an archeologist participated in the duration of the on-field survey as required in the Texas Administrative Code.
V) 3.0 Overview of Known Cultural Resources
   a. There is an error in the THC database that has been inherited in the report. It is the reference to Antiquities Permit No. 6 which was erroneously issued twice in 1970 to the Institute of Underwater Research (1554 survey) and again in 1976 to Jack Hudson. The THC is evaluating if this clerical error can be corrected and will provide an update.
   b. Please refer to Permit No. 6 consistently on page 33 as No. 6 and not Permit No. 0006.
   c. Page 36. The investigations conducted under Antiquities Permit No. 1261 consisted of survey and minimal collection of exposed artifacts. No excavations or test excavations were conducted, see Pearson and Simmons (1995:110–126). Please revise.
   d. Summary of Permit No. 1457. File information and reports for projects not in The Texas Archeological Sites Atlas are available upon request. This investigation is important to include in the draft report as it is germane to the current project. An abstract has been created (THC Abstract No. 800022864) and a pdf file of the report will be uploaded to Atlas shortly. Please create a summary for this project.

e. Please alter formatting for the section on recorded shipwrecks pgs. 37–39: all the paragraph text in these pages should be indented to match the bulleted format.
f. On pg. 38, J. Barto Arnold and other individuals in this role are the State Marine Archeologist (no a) at/of the Texas Historical Commission and not the Texas State Marine Archaeologist.
g. On pgs. 38–39, update section on 41NU264 to include recommendations from the report for permit no 1457. Please mention which EFC vessel type this is (Ferris) and its original dimensions (270 ft.) as a reference for understanding the much smaller site size. The historic information for *Utina* should be using and citing some of the original report research (Hoyt and Schmidt 1995, etc.).

VI) 5.0 Research Design and Methods

a. Project personnel. Specify which staff participated in the field survey and which staff were involved in magnetic data editing, processing, and interpretation, see IVc above. Please make this section very specific for each task. Was the individual tasked with processing and editing magnetic data a marine archeologist with sufficient expertise in editing and processing such data for cultural resource projects? There is a concern about the qualifications of the staff involved in this process based on issues recounted below.
b. The methods section is missing the survey speed, towfish distance and depths (20 ft. from seafloor?) and recording interval for the magnetometer. Please include size of r/v *Ms. Kendle* and MREC.
c. Data Processing
    i. Diurnal correction? The magnetic data does not appear to be diurnally corrected as required by Texas Administrative Code, Title 13, Part 2, Chapter 28, Rule §28.9. Can you please confirm this has occurred? The method described on page 56, appears to try to achieve this goal by using average field strength for each line but this appears to have failed to diurnally correct the data as a whole and has produced a large quantity of 10+ gamma ambient "noise" consistent throughout all the magnetic data. The occurrence of contour lines consistently running parallel to the vessel run lines throughout all the data is consistent with data that has not been corrected. Can RECON make diurnal corrections using more traditional algorithms or mathematical computations to better clean the data for review purposes?
    ii. The contouring is problematic as known/recorded wreck anomalies contoured as north-oriented negative dipoles in earlier reports (Enright et al. 2001; Gearhart 2011) are not presenting as such in the current study. Is this related to diurnal correction (above) or other issues with the processing? The magnetic target in Figure 10 of the addendum should not constitute hard zig-zag patterns across adjacent lines. It almost appears as though different contouring methods are be applied to different figures and that there are errors in how the data was gridded. The data processing overall, looks to be in error.
d. Data Presentation: The data figures are difficult to interpret. This will affect the figures in the body of the report and appendices.
    i. Remove all overlying or underlying semi-transparent or opaque polygon fills from the magnetic maps and sonar contours. This should not be on top of the data and obscures the ability to review this information. Avoidance buffers can be indicated simply by polygon outlines.

ii. Do not include survey track lines on the sonar mosaics. Run lines are only needed for the magnetic contour sheets as these are part of interpretation criteria.

iii. The sonar images, both mosaics, detail imagery, and contact report needs to refrain from using any symbols or data that covers it. Do not use solid fill polygons for the magnetic targets that cover the data. Label lines should also not cover magnetic and sonar targets. Do not include the crosshair contact labels in the detailed images of the sonar targets.

iv. The report is missing the required image that shows both planned and actual survey lines presented concurrently in the same figure.

v. There is an issue in this report with unnecessary and redundant image duplication. The APE, Survey Buffers, AWOIS/ENC wrecks/obstructions, THC MAP wrecks, etc., are presented in Appendix B and then the same information is duplicated in Appendix G sonar mosaics (pdf pages 7-24) and Appendix H contoured magnetic data (pgs. 46–63). Is Appendix B necessary?

vi. There are images in the body of the report that are 100% duplicated in the appendices such as Figures 30, 31, 33, 34, etc. It is highly recommended these duplicate images be removed from the report body for the final copy if they are already featured in the appendix—especially because some contain sensitive information. The appendix figures also need figure or sheet numbers so they can be referenced in the report. The duplication creates unnecessary report length and additional content for review.

vii. Since Appendix I is solely detailed images of SS *Mary* and *Utina* and the sonar and magnetic data is already captured in Appendix G and H, please reproduce these at a larger scale and eliminate all the repetitive information regarding survey buffers, reported/recorded AWOIS/ENC., wrecks, and etc. These images need to focus on presenting high resolution, clear images of these sites devoid of repetitive labeling already included elsewhere in the report. Please add a similar larger scale image of site 41AS119 to this appendix.

viii. Avoidance buffers have been created for every ENC/AWOIS Obstruction, THC reported shipwrecks, and TARL/THC archeological sites. As per Texas Administrative Code requirements, avoidance buffers are only to be illustrated in the report for archeological sites and confirmed remote-sensing targets that are significant and have the potential to represent submerged cultural resources or are sites. All other avoidance buffers need to be removed if these represent unconfirmed reports not validated by the data collection. The avoidance buffers should only be presented for remote-sensing targets or sites recommended in the report results and conclusions as requiring avoidance and/or additional investigation.

e. Pg. 57 and 58. The Enright et al. interpretation study is Bob Gearhart's model and should be discussed in tandem with his publication from 2011 and new reporting available in Atlas as a larger number of targets have now been included and his model has been updated. As this is one of the main models being applied to magnetometer data interpretation in Gulf underwater CRM reports (and is the criteria being applied by the authors), please revise this discussion, and include updated information. This section is more than 15 yrs. out of date.

f. Pg. 57. Pearson's change to a smaller magnetic target occurs in an earlier report than referenced – it should be Pearson 2010 and not Linden and Pearson 2014. It is recommended that for this

discussion, the quote from a second-hand source be substituted with information from the 2010 report.

g. 41NU264 (north) and 41NU292 (south) interpretations, pgs. 113–118 . In Table 2, include the sizes of both the 41NU264 (north) and 41NU292 (south) targets depicted in Figure 58. More information is needed for this site discussions, especially as the new imagery for 41NU292 does give it a very barge-like appearance which is highly dissimilar to the more than 30 similar sonar examples of Texas EFC vessels in the Sabine and Neches Rivers. There has been confusion in the past about the identities of these tow sites. Does new data confirm for support these previous arguments?

VII) Recommendations

a. The introduction and conclusion recommend avoidance of 41NU252, 41NU264, and 41NU292. Site 41AS119 is also presented in the report as it occurs in the data collected for the project—it needs to also be added to the recommendations. The recommendations also need to clarify the avoidance recommendations for sites within the project area and avoidance for sites/targets that are not but were detected during the investigation.

b. The avoidance boundaries for the sites are inaccurately illustrated. In all the relevant report figures, the boundaries have been drawn from the radius of the site centroid. These buffers are therefore not taking into consideration the visible sonar targets or buried features. Because of the potential for buried wreck remains, avoidance buffers for underwater archeological sites are to be from their outer magnetic contours. Avoidance buffers need to be created for the entire site and its related attributes and not as separate polygons for each feature or part.

VIII) Miscellaneous

a. Editorial/formatting suggestions. Paragraph break missing on page 10. Figure and text formatting issues on pgs. 18–19 and 21–24, 27. Figure 6 caption is cut off at the bottom of the page. Boundary contour for Figure 10 is cropped. There are issues with figure/figure text formatting in this report.

b. The current survey has demonstrated that positional data presented in Atlas for 41NU264 is incorrect. Please submit site revisit forms for this archeological site with revised coordinates and any new information learned during this archeological investigation. If this is also the case for any of the other sites resurveyed in the report, please submit a site revisit form. Mention in the report that a revisit form(s) was created.

c. Please ensure that none of the target coordinates presented in the body of the report on page 140 are included in the redacted versions. Typically, these are not presented in the report itself but instead in a non-disclosure appendix.

TEXAS HISTORICAL COMMISSION
REAL PLACES TELLING REAL STORIES

P.O. Box 12276
Austin, Texas 78711-2276
512-463-6100
thc.texas.gov

February 9, 2023

Jason Burns
RECON Offshore
P.O. Box 30210
Pensacola, FL 32503

Re: Project review under Section 106 of the National Historic Preservation Act of 1996 and the Antiquities Code of Texas

Draft Report Review, Marine Archaeological Investigations Port of Corpus Christi's (PCCCA's) Ship Channel 75' Channel Deepening Project and Addendum: Marine Archeological Investigation Port of Corpus Christi's (PCCCA's) Ship Channel 75' Channel Deepening Project Beneficial Use (BU) Nearshore Berms
Antiquities Permit No. 30317, THC Tracking No. 202304526
COE-VD

Dear Mr. Burns,

This letter serves as comment on the proposed federal undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC). As the state agency responsible for administering the Antiquities Code of Texas, these comments also provide recommendations on compliance with state antiquities laws and regulations.

The review staff, led by State Marine Archeologist Amy A. Borgens, has reviewed the January 2023 revised draft report *Marine Archaeological Investigations Port of Corpus Christi's (PCCCA's) Ship Channel 75' Channel Deepening Project* and the January 2023 revised *Addendum: Marine Archeological Investigation Port of Corpus Christi's (PCCCA's) Ship Channel 75' Channel Deepening Project Beneficial Use (BU) Nearshore Berms.*

The THC concurs with the recommendations for avoidance of 41AS119, SS *Mary* (41NU252) and the sites associated with the wrecked vessel *Utina* (41NU264, 41NU292). It is recognized that SS *Mary* and *Utina* cannot be avoided by 50 m. The proposed project may proceed on the condition that construction activities that occur within the channel do not come near or impinge upon the nearby archeological sites. Additional coordination may be required.

There have been consistent issues with the processing and presentation of the contoured magnetic data in the original and revised draft reports submitted to the THC in December 2022 and January 2023. These irregularities affect how specific interpretative models are applied for identifying potential shipwreck targets. The THC is working with the authors to rectify these issues for the final report, however, as an extra precaution, the THC is recommending two additional magnetic targets for avoidance.

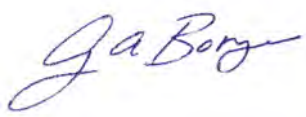
A cluster of anomalies in Berm 3 (M97, M102, M112, M126) is described by the authors as consistent with a well head—though no oil features are mapped in the very immediate area. Contoured data for well heads and capped oil wells consistently produces magnetic signatures similar to data collected over recorded

shipwreck sites. In addition, the dipole anomaly M275/M277 is also of sufficient amplitude and duration to be consistent with data collected over recorded archeological sites. Both M275/M277 and the anomaly cluster formed by M97, M102, M112, M126 fulfill the traditional criteria used to select significant magnetic targets consistent with submerged cultural resources. Both are recommended for avoidance by the THC, by a distance of 50 m from their outer magnetic contours.

In summary, three archeological sites and two buried remote-sensing anomaly clusters are recommended for avoidance: 41AS119, SS *Mary* (41NU252), *Utina* (41NU264, 41NU292), M275/M277, and M97/M102/ M112/M126. The revised data requested by the THC for the final report may present other significant magnetic targets that have the potential to represent historic shipwreck sites. In the case that this occurs, additional avoidance measures will be required and will be coordinated with the U.S. Army Corps of Engineers. Additional revisions for the final report are included as Appendix A.

Thank you for your cooperation in this federal and state review process, and for your efforts to preserve the irreplaceable heritage of Texas. **If you have any questions concerning our review or if we can be of further assistance, please contact Amy Borgens at 512-463-9505/Amy.Borgens@thc.texas.gov.**

Sincerely,



for
Mark Wolfe
State Historic Preservation Officer
MW/ab

Cc: Jerry Androy, U.S. Army Corps of Engineers, Galveston District

Appendix A. Recommended Revisions for the Final Report

I) Abstract (and Introduction) for main report and addendum: The report is missing the preamble that discusses that the federal and state statutory requirements for the work. It is recommended that the abstract and introduction be revised to state something similar to the following:

> The Port of Corpus Christi Authority (PCCA) sponsored marine and terrestrial cultural resources surveys in support of the development of a Draft Environmental Impact Statement (DEIS) for the PCCA's 75-foot Channel Deepening Project. The work was conducted in compliance with Section 106 of the National Historic Preservation Act and the Antiquities Code of Texas (Texas Natural Resource Code, Title 9, Chapter 191). Conduct of fieldwork, report preparation, and records curation adhered to the minimum requirements presented in the Texas Administrative Code, Title 13, Part 2, Chapters 26 and 28.

II) 1.0 Introduction
   a. Page 1, paragraph 2. The last sentence is missing its beginning. On page 2 there is an extra parenthesis in the first sentence. On page 40 there is a mistake in (SA)L. In general, additional copy-editing is recommended for this report prior to submission as a final.
   b. See I above.

III) 3.0 Overview of Known Cultural Resources
   a. The THC has determined that Jack Hudson was not issued an antiquities permit for the 1976 pipeline survey and he falsely assumed the No. 6 permit, already issued in 1970, was applied to his project. Please remove the association of permit no. 6 to this 1976 project. The THC will add a disclaimer to the letter report hosted in Atlas.

IV) 5.0 Research Design
   a. Page 54, paragraph 1. The authors may have conflated the state law, the Antiquities Code of Texas (ACT) with the state rules, the Texas Administrative Code (TAC). The primary goal of the ACT is to protect antiquities on state public land, including archeological sites and pre-twentieth century shipwrecks. The TAC provides supplemental rules in support of the law including minimum reporting and curation standards, professional qualifications, antiquities permit requirements, additional protections for historic shipwrecks, and the associated requirements for underwater survey and data presentation. These are presented in Title 13, Part 2, Chapters 26 and 28. In sentence 2 of paragraph 1, the authors mention the ACT but use a direct quote and citation from the TAC.
   b. Page 58. Describe what a contour "bust" is and how do these affect the data presentation in the contour maps?
   c. Page 60, last paragraph. The study was first published in 2003 and not 2006; see Gearhart's orientation model discussed in Watts et al 2003 (permit no. 2920) and also several in 2005 including reports for permit nos. 3061, 3377, 3406, 3488, 3524, and 3682. Enright et al 2006 is not the correct report to be citing for the earliest mention of Gearhart's anomaly database and orientation model. Please correct.
   d. Pgs. 60–61. The discussion of Bob Gearhart's model was not updated to include refinements to his study made since the 2011 publication. This was requested in the THC review letter dated January 10, 2023. The authors have misunderstood his model to suggest that the 26° declination off north is a specific factor of Gearhart's selection criteria, when it is not. The target simply needs to be predominantly north oriented. He does mention that the anomaly for *Denbigh* is 26° and the earlier reports actually mention 35° as suggestive of shipwrecks. When he discusses his selection criteria in recent reports, he states this: "…a) it must have at least one dipole, oriented with its negative pole north of its positive pole." See Gearhart 2021:28 (TAP 9610). Though Enright et al. is a great

reference for understanding the orientation model in 2006, it is not accurate for representing when the study was introduced or for discussing current criteria developed from that model. Update this section.

e. Page 69, Figure 17. All wells and pipelines need to be illustrated in the contour maps. Without a scale and the project area boundary, it is difficult to determine the distance of the wells from the anomaly and project area.

V) 6.0 Remote-Sensing Results

a. Permit authorization from the USACE initiates compliance with Section 106 of the National Historic Preservation Act. See I and IIb above. Section 106 is not mentioned in this report.

b. Enright et al. 2006 (pgs. 134–141, 143–145) does not stipulate the 26° delineation as a selection criterion, only that it should be predominantly north oriented. See IVd above. Since the authors are using Gearhart's model towards their own selection criteria, cite the most recent published form of his model—not the 2006 or 2011 works. The information for this model is frequently updated in Gearhart's work.

VI) 7.0 Recommendations

a. Page 94. Last paragraph, last sentence. "Per Texas State Code these anomalies need to be avoided by all project activities by a margin of 50 meters (see Appendix H)." Change "Texas State Code" to "the Texas Administrative Code, Title 13, Part 2, Chapter 28." Clarify that the archeological sites of 41NU252, 41NU264/41NU292 are to avoided by 50 m from their outer magnetic contours.

b. Page 96 –The citation of the USS *Westfield* report , volumes 1-2 (Gearhart 2015) is inaccurate. Revise the intext citation to (Borgens et al 2015) and the reference to the following:

Borgens, Amy; Justin Parkoff, Robert Gearhart, Sara Laurence, Doug Jones, Jessica Stika
2015 Investigation and Recovery of USS Westfield (Site 41GV151) Galveston Bay, Galveston County, Texas Volume 1-2. Prepared for the U.S. Army Corps of Engineers, Galveston District. Prepared by Atkins North America, Inc., Austin, Texas.

c. The avoidance buffers for SS *Mary* and *Utina*/41NU264 extend into the channel and will themselves not be able to be avoided. The report needs to acknowledge that the proposed project activities cannot avoid these archeological sites by 50 m and that the THC and USACE have coordinated to reduce this buffer on the condition the sites themselves are not impacted by the proposed work.

d. Add to the recommendations that the THC has recommended the two additional magnetic targets. Make sure avoidance buffers are added to the contour maps.

VII) Appendices

a. The revised magnetic contour maps are an improvement over the version submitted in the original draft report. Please continue to improve the legibility of the significant magnetic targets by reducing the line weight of the triangle symbols that are on top of the data. It is preferred that the triangles be removed altogether and that only the directional lines and labels for the magnetic targets be retained, similar to how the utilities are labeled. Remove as much overlying symbols and labels from the contours as possible. This labeling in these revised figures still makes the contours difficult to interpret, especially at SS *Mary* and *Utina*.

b. Addendum Appendices magnetic contour maps. Do not present the "average" magnetic contours, just the positive and negative contours. Please include the revised contours submitted on February 9, 2023 (without the average) in the final version of the report.

c. Move all the labels that are on top of the sonar mosaics.

d. Please ensure that all the targets labeled in the magnetic contour maps are included in the magnetometer tables, 275 and 277, for example, are not included.

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, GALVESTON DISTRICT
2000 FORT POINT RD
GALVESTON, TEXAS 77553-1229

April 19, 2023

Policy Branch

SUBJECT: Department of the Army Permit Application SWG-2019-00067

Mr. Mark Wolfe
State Historic Preservation Officer
Texas Historical Commission
P.O. Box 12276
Austin, TX 78711-2276

Dear Mr. Wolfe:

The U.S. Army Corps of Engineers, Galveston District (Corps) Staff Archeologist has reviewed the draft reports titled, *Marine Archaeological Investigations Port of Corpus Christi's (PCCA's) Ship Channel 75' Channel Deepening Project, Aransas County, Texas*, dated April 2023 and *Addendum: Marine Archaeological Investigations Port of Corpus Christi's (PCCA's) Ship Channel 75' Channel Deepening Project Beneficial Use (BU) Nearshore Berms, Aransas and Nueces Counties, Texas* dated April 2023, both reports prepared for The Port of Corpus Christi Authority by RECON Offshore. The draft reports were revised in response to comments from both the Corps and the Texas State Historic Preservation Officers (SHPO). Copies of both reports are enclosed. Additionally, the applicant should have provided copies of both reports to your office pursuant to the Texas Antiquities Permit.

As documented in the reports, the investigations resulted in the identification of magnetic anomalies and sonar targets associated with the SS *Mary* and with the *Utina*, as well as sonar target 0008 which is associated with 41AS119. The SS *Mary* and the *Utina* are located outside the area being dredged and will be avoided by project activities; however, the standard 50-meter avoidance buffer would extend within the existing Corpus Christi Ship channel. The Corps proposes placing the following special condition on the permit to ensure the project will not result in adverse effects to either site.

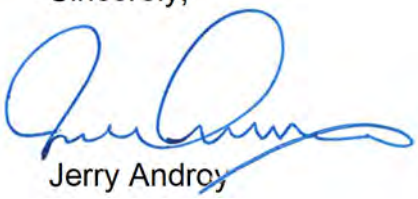
> The permittee shall establish a 50-meter buffer surrounding the magnetic anomalies and sonar targets associated with the SS *Mary* and the *Utina* shipwrecks. The buffer shall stop at the top of cut for the existing Corpus Christi Ship Channel as shown on the attached figures. No ground disturbing project activities shall occur within the buffered zones.

The project was redesigned, and the location of the feeder berms was moved. Site 41AS119 (sonar target 0008) is no longer within the area of potential effect and will not

be affected by the project. We request your review of the attached reports and your concurrence with our determinations and that the proposed permit action is in compliance with Section 106 of the National Historic Preservation Act.

Thank you for your cooperation in this review process. If you have any questions concerning our review or if we can be of further assistance, please contact Mr. Jerry Androy at 409-766-3821.

Sincerely,



Jerry Androy
Regulatory Archeologist and
Tribal Liaison

** Attached reports contain sensitive site location information that is not for public distribution. This information will be included in the PCCA CDP Project Administrative Record.

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, GALVESTON DISTRICT
2000 FORT POINT RD
GALVESTON, TEXAS 77550

November 27, 2023

Policy Analysis Branch

SUBJECT: Permit Application: SWG-2019-00067

Ms. Karen McCormick
Marine and Coastal Section Chief
Environmental Protection Agency Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Dear Ms. McCormick:

The Port of Corpus Christi Authority (PCCA) have requested a Department of the Army permit for new work dredging of the Corpus Christi Ship Channel (CCSC) to for the proposed channel deepening project (CDP). Dredging will be conducted via hopper dredge, a hydraulic cutter head dredge, and/or mechanical clamshell dredge to excavate the material that will be directly loaded to a dump scow barge. The hopper dredge or scow barge will be transported to the Corpus Christi New Work Ocean Dredged Material Disposal Site (ODMDS) where the material will be dumped.

The CDP will deepen an approximate 13.8-mile section of the CCSC. The purpose of the CDP is to deepen the CCSC to accommodate the transit of fully laden Very Large Crude Carriers (VLCCs). The project area begins at the southern end of Harbor Island near Port Aransas, Nueces County, Texas and extends into the Gulf of Mexico. The existing channel will be deepened from the current authorized depth of -54 feet and -56 feet mean lower low water (MLLW) to a maximum depth of -79 feet and -81 feet MLLW, respectively. Further, the proposed project includes a 29,000-foot extension of the CCSC to a maximum depth of -81 feet MLLW to reach the -80-foot MLLW bathymetric contour in the Gulf of Mexico.

Part 225

The following information is provided to fulfill the requirements of Title 40 CFR 225.2(a)(1-8) of the Ocean Dumping Regulations.

Proposed Disposal Site

The New Work ODMDS, designated by the EPA for new work dredging activities within the Corpus Christi Ship Channel in 1988, is located approximately 3 miles offshore, and about 1,000 feet southwest of the centerline of the Outer Bar Channel. The site was originally designated for the U.S. Navy's Homeport Project at Corpus Christi/Ingleside for placement of new work and maintenance dredged material. The site is rectangular in shape; corner coordinates located may be found in Table 1:

Table 1: Corner locations of the Corpus Christi New Work ODMDS NAD 83

Latitude	Longitude
27° 47' 43"N	97° 00' 12"W
27° 47' 16"N	96° 59' 26" W
27° 46' 18" N	97° 01' 12" W
27° 45' 50" N	97° 00' 25" W

Historical Use of the Disposal Site

Since 1988, the New Work ODMDS has been utilized for one dredge event by the Corps for the Federal project. Approximately 3,309,482 cubic yards of material were disposed by hopper dredge between April 4, 2019 and March 15, 2020. Detailed information on the historical use of the site may be found at the ODMDS Database located at: https://odd.el.erdc.dren.mil/index.cfm

Authorized Disposal Effects

Dredged material deposited at the New Work ODMDS disperse and erode quickly. There are no significant environmental resources delineated within or immediately outside of the designated New Work ODMDS. Since this site is dispersive in nature, the primary concern of the use of the site is the potential short-term buildup of dredged material, such that a hazard to navigation is presented. Another concern is whether there is significant short-term transport of the dredged material beyond the New Work ODMDS boundaries; specifically, the benthic community can be impacted if significant rapid movement of material off the site occurs, resulting in burial of benthic populations outside the site.

Length of Disposal Site Use

Dredging will be conducted via a hopper dredge, hydraulic cutter head dredge and/or mechanical clamshell dredge to excavate the material that will be directly loaded to a dump scow barge. Deepening of the channel from -56 feet MLLW to a maximum of-81 feet MLLW would generate approximately 46 million cubic yards (MCY) of dredge material over 3-5 years. Placement would occur in a mix of Beneficial Use (BU) sites and the Corpus Christi New Work ODMDS. Of the 46 MCY, PCCA is requesting to dispose of up to 38,888,600 MCY in the New Work ODMDS.

Characteristics and Composition of the Dredged Material

The portion of the proposed CDP reach was previously tested for offshore disposal under MPRSA Section 103 as part of the Corpus Christi Ship Channel Improvement Project (CCSCIP). The site is dominated by sands from 58-84% with the remainder of particles silt and clay. Based on the results of the sampling, testing, and evaluation of the sediment, the CCSCIP analysis concluded that no adverse environmental effects would be expected from dredging or placement of the sediment from the project area into the New Work ODMDS.

Need for Environmental Impact Statement

The primary Federal involvement associated with the proposed action is the discharge of dredged or fill material into waters of the United States (U.S.), the construction of structures and/or work that may affect navigable waters, and ocean disposal of dredged material. Federal authorizations for the proposed project would constitute a "major federal action." Based on the potential impacts, both individually and cumulatively, the Corps prepared an Environmental Impact Statement (EIS) in compliance with the National Environmental Policy Act (NEPA) to render a final decision on the permit application. The Corps' decision will be to issue, issue with modification, or deny DA permits for the proposed action. The EIS assesses the potential social, economic, and environmental impacts of the proposed project and is intended to be sufficient in scope to address Federal, State, and local requirements, environmental and socioeconomic issues concerning the proposed action, and permit reviews. The Notice of Availability for the Final EIS is schedule to be published April 10, 2024. The Draft EIS is located at: https://www.swg.usace.army.mil/Missions/Regulatory/Special-Projects-Environmental-Impact-Statements/

Part 227

The following information is provided to fulfill the requirements of Title 40 CFR 227.1-6, 227.9-10, and 227.13-22 of the Ocean Dumping Regulations.

Subpart A

The Corps has reviewed the information provided by PCCA and concludes that the proposed project complies with the criteria published by EPA in Title 40 of the Code of Federal Regulations (CFR), Parts 220–228 subparts C, D, E, and G and sections 227.4, 227.5, 227.6227.9, 227.10 and 227.13 of subpart B.

Specific testing methods are described in the *Evaluation of Dredged Material Proposed for Ocean Disposal - Testing Manual* (USEPA and USACE 1991, referred to here as the 'Green Book') and the *Regional Implementation Agreement for Testing and Reporting Requirements for Ocean Disposal of Dredged Material off the Louisiana and Texas Coasts under Section 103 of the Marine Protection, Research and Sanctuaries Act* (USEPA and USACE 2003, referred to hereinafter as the 'RIA').

Based on the findings provided in the enclosed October 23, 2023 Report and the November 6, 2023 Report, the applicant has also demonstrated that the material proposed for disposal in the New Work ODMDS satisfies the environmental impact criteria set forth in Subpart B.

Subpart B

Due to the composition, the material did not meet the Section 227.13(b) criteria and further testing of the liquid, suspended, particulate and solid phases was required.

Based on the analysis provided in the enclosed October 23, 2023 Report and the November 6, 2023 Report, all major constituents of the liquid phase are in compliance with the marine water quality criteria or have had bioassays on the liquid phase to assure it does not exceed limiting permissible concentrations. In addition, bioassay on the suspended particulate and solid phases show that a discharge will not exceed limiting permissible concentrations. The dredge material does not contain prohibited constituents and meets the criteria set forth in 227.13(c).

Subpart C

The material dredged from the Corpus Christi Ship Channel (CCSP) is a mixture of dominated by sands with the remainder of particles silt and clay that do not require treatment and is not a manufacturing waste. Therefore, it is compliant with factors 227.15(a) and (b). A more detailed analysis of alternatives to ocean dumping, in fulfilment with factor (c), is in the DEIS and the enclosed Beneficial Use Monitoring Plan (BU Plan)

The PCCA's BU plan identifies six sites categorized into one of the following three categories: habitat restoration and development, beach nourishment, and construction/industrial development. The overall objective of the BU sites is to restore shorelines so they efficiently address ongoing and historical impacts to seagrass, wetland, aquatic, and critical coastal habitats. BU site selection considered proximity to the CDP and the need for restoration. All BU sites are adjacent to the CDP and within a reasonable distance to hydraulically place dredge material effectively. Without the strategically placed dredged material, continued erosion of these shorelines will threaten substantial acreages of valuable habitat. Port Corpus Christi identified six sites to restore habitat, nourish beaches, and support industrial (DMPA) development.

The Corps has evaluated PCCA's dredge material placement plan in accordance with the factors listed in 227.15 and concluded that PCCA has maximized the beneficial use of the dredge material and that there are no practicable alternative locations and methods of placing the remaining dredge material which have less adverse environmental impact or potential risk to other parts of the environment than the proposed methods of ocean disposal.

Subpart D

The Corps DEIS evaluated the impact of PCCA's proposed project on esthetic, recreational, and economic values and concluded that there may be minor, temporary impacts to recreational and commercial enterprises as a result of the disposal activity. The location of the approved New Work ODMDS is outside of the fairways and anchorages used by commercial shipping. The site may, at times, be used by both

recreational and commercial fishermen. The material proposed for disposal does not contain toxic chemical constituents, pathogenic organisms, or chemical constituents known to bioaccumulate. The composition and color of the material is comparable to both the New Work ODMDS and the reference sites. Minor impacts to fisherman may occur during disposal of the material. However, no notable loss of dollars or reduction in recreational areas is anticipated to occur.

Subpart E

The Corps has evaluated the impact of PCCA's proposed project to other uses of the ocean and has concluded that the proposed project will not result in an irreversible or irretrievable commitment of resources if authorized. The proposed project may have a temporary impact on commercial and recreational fishing in the open ocean area where the New Work ODMDS is located resulting from the dredge disposal events. However, as discussed above, we concluded that there is no indication that deposited material will have unacceptable adverse effects on navigation of shallow draft vessels, such as commercial and recreational vessels, or living marine resources within or beyond the current New Work ODMDS boundary.

Part 228

To satisfy legal requirements associated with MPRSA, the permit, if authorized, will be conditioned to require PCCA to comply with the following special conditions:

1. The permittee understands and agrees that, if future operations by the United States require the removal, relocation, or other alteration, of the structure or work herein authorized, or if, in the opinion of the Secretary of the Army or his authorized representative, said structure or work shall cause unreasonable obstruction to the free navigation of the navigable waters, the permittee will be required, upon due notice from the Corps of Engineers, to remove, relocate, or alter the structural work or obstructions caused thereby, without expense to the United States. No claim shall be made against the United States on account of any such removal or alteration.

2. Dredging, dredged sediment discharge/placement, and monitoring of the dredging projects using the Dredging Quality Management (DQM) system shall be implemented for this permit when the project activity is using dredging equipment. The permittee 's DQM system must have been certified by the National DQM Support Center (DQM Center) within one calendar year prior to the initiation of the dredging/discharge/placement of sediments. The permittee is responsible for ensuring that the DQM system is operational throughout the dredging and discharge/placement of sediments, and that the project data is submitted to the DQM Center in accordance with the specifications provided at the DQM website. Questions regarding codification and/or additional information about DQM program should be addressed to the DQM Center at (877) 840-8024 and/or https://dqm.usace.army.mill

3. The permittee will comply with the terms, conditions, and reporting requirement of the 2018 Corpus Christi, Nueces County, Texas Maintenance and New Work Ocean Dredged Material Disposal Sites Site Management and Monitoring Plan as Required by Section 102 of the Marine Protection, Research, And Sanctuaries Act (SMMP) or any subsequent revisions.

a) In accordance with Section 2.7.5 Disposal Technique, the permittee will develop for Corps and EPA a placement strategy that will spread the material uniformly throughout the disposal zone.
b) In accordance with Section 3.2.1(i) Routine Bathymetric Survey – Navigational Safety, bathymetric surveys shall be obtained and supplied to the Corps and EPA before the start of the disposal operations, and monthly (30 days) thereafter until operations are complete. Bathymetry Survey Reports will be provided to the Corps and EPA monthly.
c) If the monthly surveys indicate deposited dredged material is mounding to heights greater than the threshold elevation above the existing bottom elevation and/or there is movement of material outside of the designated limits, then the disposal operation will be paused to allow review by the Corps and EPA to determine if the disposal sequence is being properly followed.

4. The enclosed Biological Opinions contain mandatory terms and conditions to implement the reasonable and prudent measures that are associated with the "incidental take" that is specified in your BOs. Your authorization under this Corps permit is conditional upon your compliance with all the mandatory terms and conditions associated with incidental take in the Section 7 action areas identified in the BOs, which terms and conditions are incorporated by reference in this permit. Failure to comply with the terms and conditions associated with the incidental take in the Section 7 action areas identified in the BOs, where a take of the listed species occurs, would constitute an unauthorized take, and it would also constitute non-compliance with your permit. The USFWS and NMFS are the appropriate authority to determine compliance with the terms and conditions of their BO's, and with the ESA .

5. The permittee will provide weekly reports during dredge events utilizing the Corpus Christi New Work Ocean Dredged Material Disposal Site by close of business Friday. Reports will include individual details for each load. Details shall include: 1) Load Number; 2) Transit start and end times and date(s); 3) Bin volume at start of transit; 4) Initial draft (aft & fore); 5) Vessel and tow tug names; 6) Material source; 7) Placement start and placement end details including Latitude and Longitude, start and end times as well as start and end draft; 8) Graphic representation of the vessel route demarcating where in the route placement starts and ends.

6. With the exemption of emergencies, Barge Scow and/or Hopper dredge doors will only be opened when the vessel(s) is within the Offshore Dredge Material Disposal Site's "Actual Disposal Area".

Conclusion

The Corps has reviewed the information provided by PCCA and concludes that the appropriate criteria for evaluating the disposal of the maintenance dredged material into the New Work ODMDS was utilized and the material is suitable or ocean disposal.

We look forward to working with you to develop sound, enforceable permit conditions. We can arrange a meeting to discuss the requested information if that is your desire. If you have any questions, please call me at 409-766-3168. You may also email me at nicholas.a.laskowski@usace.army.mil if you prefer.

Sincerely,

Nicholas A. Laskowski
Chief, Regulatory Division
Galveston District

Enclosure(s)

CC (Electronic Mail):
Ms. Sarah Garza, PCCA

United States Department of the Interior
FISH AND WILDLIFE SERVICE
Texas Coastal and Central Plains Ecological Services Office
Corpus Christi Sub-Office
4444 Corona Drive, Suite 215
Corpus Christi, Texas 78411
PHONE: 361/994-9004

In Reply Refer To:
2022-0045444

January 22, 2024

Mr. Jayson M. Hudson
Regulatory Project Manager
Regulatory Division, CESWG-RDP
U.S. Army Corps of Engineers
Galveston District
2000 Fort Point Road
Galveston, Texas 77550

Dear Mr. Hudson:

The U.S. Fish and Wildlife Service (Service) is a Cooperating Agency under the National Environmental Policy Act in the FAST-41 planning process for the Port of Corpus Christi Authority's Ship Channel Deepening Project (CDP). The Service received and reviewed an administrative final Environmental Impact Statement (EIS) dated January 2024, for the U.S. Army Corps of Engineers (Corps). The Port of Corpus Christi Authority proposes to deepen 13.8 miles of the Corpus Christi Ship Channel (CCSC) from the currently authorized depth of -54 feet to -77 feet. The dredging portion of the CDP would extend from Harbor Island in Port Aransas, Texas, to 10 miles beyond the current entrance of the CCSC in the Gulf of Mexico. Approximately 46.3 million cubic yards of material would be dredged, with inshore and offshore placement. The proposed project's location is Port Aransas, Nueces County, Texas, with the EIS study area including portions of Nueces, San Patricio, Aransas, and Refugio counties.

The revised Department of the Interior Manual Instructions (Department; 503 DM 1), dated August 3, 1973, assign responsibility for Department coordination and review of Corps permit applications to the Service. Our comments are provided in accordance with these instructions, the Fish and Wildlife Coordination Act (16 U.S.C. 661-667(e)), the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq.), the Migratory Bird Treaty Act (16 U.S.C. 703 et seq.) and the National Environmental Policy Act (42 U.S.C. 4321-4347).

The Service provided review comments for the draft EIS in a letter to the Corps dated May 27, 2022, and the Department provided comments, including Service comments, in a letter dated July 21, 2022. The Service also consulted with the Corps under Section 7 of the Endangered Species Act and provided a Final Conference and Biological Opinion dated January 13, 2023.

The Service offers the following comments and recommendations after a review of the administrative final EIS.

Section 11.8 of the EIS provides results of the National Marine Fisheries Service's Biological Opinion and Incidental Take Statement; however, does not adequately report the results of the Service's consultation. The EIS states that the Service concurs with the Corps' determination for the whooping crane and leatherback but fails to include the Incidental Take Statement from pages 42-50 of the Service's January 13, 2023, Biological Opinion. To be consistent, please add reference to the Service's Incidental Take Statement to Section 11.8 of the EIS, as found in Appendix D3, for the Kemp's ridley sea turtle, green sea turtle, loggerhead sea turtle, hawksbill sea turtle, piping plover, piping plover critical habitat, red knot, proposed red knot critical habitat, eastern black rail, and West Indian manatee.

The proposed Permittee Responsible Compensatory Mitigation Plan (Appendix K of the EIS) does not include mitigation for the loss of tidal and algal flats in Site SS1, which have developed over time in this eroded dredged material placement area. The habitat impacted would include approximately 85 acres of tidal flats below the high tide line and another approximately 139 acres of habitat presumably above the high tide line. Site SS1 is known to be used by piping plovers and red knots; therefore, dredged material placed within these habitats would bury foraging grounds and benthic organisms important to these listed shorebirds and convert the area to an upland protected by armored levees. Due to the importance of tidal and algal flat habitats to ESA-listed species and their classification as aquatic resources of national importance, the Service recommends avoidance of tidal and algal flats. If avoidance is not possible, off-site restoration of tidal flat habitats within the project's watershed should be included in the proposed mitigation.

The Service appreciates the opportunity to review the administration final EIS for CDP. If you have questions regarding these comments, please contact Mary Kay Skoruppa at 361-225-7314 or mary_kay_skoruppa@fws.gov.

Sincerely,

Charles Ardizzone
Field Supervisor

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701-5505
https://www.fisheries.noaa.gov/region/southeast

02/02/2024

F:SER/BR

Mr. Jayson Hudson
Regulatory Division
Policy Analysis Branch
U.S. Army Corps of Engineers
2000 Fort Point Road
Galveston, Texas 77550

Attention: Lisa Vitale, Tom Dixon

Re: Port of Corpus Christi Channel Deepening Project - Administrative FEIS Comments

Dear Mr. Hudson:

NOAA's National Marine Fisheries Service (NOAA Fisheries) received your January 3, 2024 correspondence, requesting review of the Administrative Final Environmental Impact Statement (FEIS) for the proposed Port of Corpus Christi Ship Channel (CCSC) Channel Deepening Project (CDP). We conducted our review from a unique perspective, given our multiple review roles as a cooperating agency with special expertise and jurisdiction by law over marine resources in the Gulf of Mexico, and as a consulting agency under the Magnuson-Stevens Fishery Conservation and Management Act (MSA), Fish and Wildlife Coordination Act (FWCA), and Endangered Species Act (ESA). We have reviewed the FEIS for the proposed CCSC CPD dated January 2024, and offer the following comments.

Project Description

The proposed CDP is located in Port Aransas, Nueces County, Texas within the existing channel bottom of the CCSC near the southeast side of Harbor Island and traversing easterly through Aransas Pass and extending 5.5 miles beyond the existing terminus of the existing channel in the Gulf of Mexico. The proposed project would deepen the CCSC from its current authorized channel depth of -54 feet and -56 feet mean low low water (MLLW) to a maximum depth of -75 feet and -77 feet MLLW to accommodate transit of fully loaded Very Large Crude Carriers with vertical distances between the waterline and bottom of hull or drafts, of approximately 68 feet. The proposed project also includes a 29,000-foot (5.5 mile) extension of the CCSC from the existing terminus into the Gulf of Mexico and deepened to -77 feet MLLW. Two feet of advanced maintenance and two feet of allowable over dredge would be applied to each CDP channel segment. An estimated 46.3 million cubic yards of new work material would be generated from the channel deepening and would require inshore and offshore placement of dredge material in a mix of Placement Areas (PAs), beneficial use (BU) sites, and/or the new work openwater dredged material disposal sites. Under the Applicant's Proposed Action Alternative, also known as Alternative 1, dredging will only take place within the existing channel footprint except for the proposed 5.5 mile extension into the Gulf of Mexico.

Magnuson-Stevens Fishery Conservation and Management Act

The following is provided in accordance with the essential fish habitat (EFH) provisions of the MSA (Section 600.920; P.L. 104-297) and the FWCA (16 U.S.C. 661 et seq.).

Since July 3, 2019, NOAA Fisheries has served as a Cooperating Agency and has participated in several interagency coordination meetings with U. S. Army Corps of Engineers (USACE) Galveston District staff regarding the proposed project to assist in the development of the Environmental Impact Statement and EFH assessment for the proposed project. As stated in our previous comment letter dated August 9, 2022, the Applicant's Proposed Action Alternative will have direct impacts to EFH, resulting in approximately 4,605 acres of open water/bay bottom, 6.88 acres of submerged aquatic vegetation (SAV), 0.10 acre of oyster reef, 408 acres of unconsolidated shorelines (tidal sand flats/algal flats//beach), 16.61 acres of estuarine tidal wetlands, and 122.46 acres of palustrine wetland habitat impacts. The local sponsor, Port of Corpus Christi Authority (PCCA), has stated their mitigation plan (Appendix K of the administrative FEIS) will offset the proposed EFH impacts by relocating 6.88 acres of SAV and 0.10 acre of live oysters from PA-4, H1-E, and SS1 PAs. However, neither the mitigation plan, beneficial use (BU) plan, or the administrative FEIS addresses how direct impacts to tidal sand/mud flat, algal mat habitats will be adequately offset, and mitigation for SAV and oysters is still lacking. Based on the information provided in the administrative FEIS, we continue to believe Alternative 2 is the environmentally preferable alternative, as it will not have direct impacts on EFH found in the Applicant's preferred alternative.

The USACE has provided an EFH assessment, which can be found in Appendix E of the administrative FEIS. Based on requirements in the NOAA Fisheries implementing regulations, an EFH assessment for these activities should clearly characterize, delineate, and quantify impacts to all EFH by habitat type, including a description of measures to avoid, minimize, mitigate, or offset the adverse impacts of the proposed activities on EFH. The EFH assessment should include updated details delineating and quantifying impacts to EFH by habitat type. To date, the applicant has not identified or quantified all impacts to EFH by habitat type. For example, in Section 2.1 of the EFH assessment, habitat types were all lumped into either tidal wetlands or SAV. There was no mention of tidal sand/mud flat, algal mat habitats within either of those identified habitat types in the EFH assessment. However, in Section 4.1.2 of the EFH assessment, impacts to tidal sand/mud flat, algal mat habitats are identified in Table 4, which summarizes all aquatic resource impacts. Also, section 4.2 of the EFH assessment does not identify impacts to tidal flat/algal mat habitat either even though the BU management plan and the administrative FEIS state these habitats will be directly impacted by placement of dredged material. The USACE needs to identify and delineate all habitats in the EFH assessment as tidal sand/mud flats and algal mats are considered EFH. In addition, these impacts need to be quantified per habitat type to ensure there is no net loss of each type of EFH to be impacted by the PCCA's Preferred Alternative.

The administrative FEIS and the Beneficial Use Monitoring Plan state the dredged material from CDP would be used in all PAs to restore shorelines in a manner to efficiently address ongoing and historical impacts to SAV, wetland, aquatic, and critical coastal habitats. However, this plan

would actually have direct impacts on existing EFH within the proposed placement areas. While NOAA Fisheries generally supports the BU of dredged material for the above mentioned purposes, unavoidable direct impacts to EFH, such as estuarine wetlands, SAVs, tidal sand/mud flats, algal mats, and oyster reefs from the BU construction should be avoided or adequately mitigated for to ensure there is a no net loss of EFH. According to the USACE's 2008 Mitigation Rule, applicants must compensate for unavoidable impacts by way of restoration, establishment, enhancement, and/or preservation of aquatic resources for the purpose of offsetting unavoidable adverse impacts which remain after all appropriate practicable avoidance and minimization has been achieved. The PCCA has not demonstrated how they will offset direct impacts to tidal sand/mud flats or algal mats through restoration, establishment, and/or enhancement of the PAs. If the proposed BU sites are restoring, enhancing, and/or creating additional tidal sand/mud flats, algal mats to offset these direct losses, then the PCCA needs to provide clarification in the BU Monitoring Plan, the administrative FEIS, the EFH assessment, and the Compensatory Mitigation plan. In addition the PCCA's planned mitigation does not adequately compensate for the direct impacts to SAV and oyster reefs.

The PCCA continues to state the BU placement on SS1 and PA4, which are designed to protect Redfish Bay, far outweigh the impacts to other EFH. NOAA Fisheries mostly agrees with this statement; however, providing protection to Redfish Bay does not offset the resources being affected by the placement of BU and will result in a net loss of EFH resources. The PCCA is currently proposing to construct BU SS1, where 75 acres of the BU site will be used for wetland mitigation for all project related impacts. This would include restoration through reestablishment of 32.94 acres of estuarine wetlands and 42.08 acres of palustrine wetlands, and the relocation of 6.88 acres of SAV, and 0.10 acres of oyster reef. NOAA Fisheries continues to recommend the mitigation ratio be 3:1 for SAV and 2:1 for oyster reefs to adequately address the loss of resource functions and values provided by the existing EFH. Therefore, the PCCA should be required to provide a total of 20.64 acres of seagrass and 0.20-acre of oyster reef compensation for direct impacts.

NOAA Fisheries continues to be concerned the project as currently proposed would result in a net loss of EFH from the conversion of habitat and would adversely impact EFH and associated marine fishery resources in the Corpus Christi Bay system. Therefore, NOAA Fisheries recommends the Department of the Army not seek Congressional authorization for this project as currently proposed. Section 305(b)(4)(A) of the MSA requires NOAA Fisheries to provide EFH conservation recommendations for any federal action which may result in adverse impacts to EFH. Therefore, NOAA Fisheries Habitat Conservation Division recommends the following to ensure the conservation of EFH and associated marine fishery resources:

EFH Conservation Recommendations

1. The USACE should provide a revised EFH assessment to NOAA Fisheries to include the delineation and quantification of tidal sand/mud flat, algal mat habitats, as they are identified EFH by the Gulf of Mexico Fishery Management Council, at each of the proposed PAs.

2. It is unclear whether adequate benefits to EFH will be provided to offset aquatic impacts as described in the Beneficial Use Management Plan (i.e., tidal sand/mud flat, algal mat habitats). The PCCA needs to demonstrate how the displacement of tidal sand/mud flat and algal mat habitats will be offset (e.g., restored, created, enhanced) by the placement of BU dredge material.

3. The preliminary mitigation analysis and approximate total acres of impacts to EFH provided in the administrative FEIS should be refined to verify: (1) the final assessment of acres of impacts to each EFH category (including tidal sand/mud flat, algal mat habitats); (2) description of the ecological assessment methodologies used and results of the impact and mitigation calculations; (3) the types of mitigation required; and (4) the final mitigation project design. Fill in estuarine water column and estuarine mud/sand/shell bottoms EFH that convert healthy bay habitats to uplands should also be included among the habitat types assessed and requiring mitigation. Estimates of all direct and indirect project related impacts to tidally influenced EFH should be refined for inclusion in the project's final EIS.

4. A mitigation plan which fully compensates for all EFH impacts and a monitoring plan should be developed. We also request the EFH mitigation plan be coordinated with NOAA Fisheries prior to issuance of the final EIS. To avoid additional mitigation for temporal impacts, NOAA Fisheries also recommends the implementation of the mitigation plan concurrent with the deepening of the channel and placement of BU dredged material.

5. The USACE should require the PCCA to implement in-kind compensatory mitigation for direct and secondary EFH impacts (SAV, oyster reef, tidal sand/mud flat, and algal mat habitats) resulting from the proposed BU placement activities. The amount of mitigation should be based upon a functional assessment or a mitigation compensatory ratio of 3:1 for SAV and 2:1 for oyster reef habitats.

6. If after three years of post-construction seagrass and oyster reef monitoring of BU placement areas reveal additional EFH impacts have occurred, then the PCCA should develop a compensatory mitigation, monitoring, and contingency plan designed to offset those observed EFH losses.

Due to the inadequacies in the current EFH assessment, we are unable to evaluate the full scope of the project. Should new information become available, NOAA Fisheries reserves the right to provide additional conservation recommendations in response to the final EIS.

Endangered Species Act

We completed the required ESA Section 7 consultation on December 9, 2023, and forwarded the biological opinion (SERO-2022-02122) to you on December 12, 2023, via email. Note the biological opinion contains two conservations recommendations, which are discretionary measures that should be carried out by the USACE:

1. We recommend the USACE upload historical dredging reports to Operations and Dredging Endangered Species System and maintain the repository to aid future Section 7 consultations on dredging projects.

2. We recommend the USACE require all personnel to report giant manta ray sightings to the giant manta ray recovery coordinator (calusa.horn@noaa.gov) at SERO PRD. Giant manta ray observations should be photographed and include the latitude/longitude, date, and environmental conditions at the time of the sighting.

Conclusion

We appreciate your continued coordination with our office on this project. If you have any additional questions regarding the comments provided above, please do not hesitate to contact us. For questions pertaining to EFH and/or the MSA, please contact Ms. Charrish Stevens at (713) 715-9613, or by email at charrish.stevens@noaa.gov. For questions pertaining to protected species and/or the ESA, please contact Mr. Michael Barnette at (727) 551-5794, or by email at michael.barnette@noaa.gov.

Sincerely,

for Andrew J. Strelcheck
Regional Administrator

cc:
F, Chabot, Youngkin
F/SER, Strelcheck, Amendola, Blough, Silverman, Rosegger
F/SER3, Bernhart, Shotts, Reece, Klemm, Barnette, Horn
F/SER4, Croom, Swafford, Stevens

REGION 6
DALLAS, TX 75270

February 7, 2024

Mr. Nicholas A. Laskowski
Chief, Regulatory Division
Galveston District
United States Army Corps of Engineers
Post Office Box 1229
Galveston, Texas 77553

Re: New Work Dredging of the Corpus Christi Ship Channel, Channel Deepening Project in Nueces County, Texas

Dear Mr. Laskowski:

This letter is written in response to your November 2023 request for concurrence on the suitability for ocean disposal of new material from the federal navigation channel, Corpus Christi Ship Channel for the Channel Deepening Project in Port Aransas, Texas. The EPA received the letter and the included support documents via email on November 27, 2023.

The work will deepen an approximate 13.8-mile section of the CCSC be performed. The project area begins at the southern end of Harbor Island near Port Aransas, Nueces County, Texas. Approximately 46 million cubic yards of dredged material will be disposed into the Corpus Christi New Work ODMDS over 3 to 5 years.

Your evaluation is based in part on the results from samples collected in October and November 2023. The determination for ocean placement showed that data taken from those reports relative to water and sediment quality in the channel had no adverse effects to the environment.

Accordingly, you have determined that the proposed ocean disposal plan for dredging of the Corpus Christi Ship Channel, Channel Deepening Project complies with the Regional Implementation Agreement and all applicable subpart of 40 CFR Parts 225-228. Based on the characterizations and evaluations performed (2023), you have determined that the dredged material proposed for removal during this maintenance event is suitable for ocean disposal.

In accordance with the Water Resources Development Act of 1992 amendments to MPRSA, disposal activities must be conducted in accordance with the Corpus Christi New Work ODMDS Site Management and Monitoring Plan. Accordingly, we acknowledge that hydrographic surveys of the placement areas will be conducted before and after the dredging project and that DQM data will be submitted weekly for the duration of this project.

Therefore, based on the information described above, we concur with your determination and conclude that the work described in your letter complies with the applicable subparts of 40 CFR Parts 225-228. This determination is provided in accordance with 40 CFR 225.2(d).

Regarding concurrence on the suitability for ocean disposal of maintenance material from the federal navigation channel, Corpus Christi Ship Channel, Channel Deepening Project, new physical, chemical and biological testing is needed on a five-year period. The period starts from the suitability determination request date. Therefore, new testing will be required for Corpus Christi prior to maintenance dredging planned for fiscal year 2028.

If you have any questions regarding this request, please contact Wendy Jacques, Region 6 Ocean Dumping Coordinator at (214) 665-7395 or by email at jacques.wendy@epa.gov.

Sincerely,

Dzung Kim Ngo Kidd
Acting Director
Water Division

ecc: Jayson Hudson, USACE Galveston District

Appendix B9

General Correspondence

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, GALVESTON DISTRICT
2000 FORT POINT RD
GALVESTON, TEXAS 77550

January 3, 2023

Policy Analysis Branch

SUBJECT: Permit Application: SWG-2019-00067

Ms. Sarah Garza
Director of Environmental Planning and Compliance
Port of Corpus Christi Authority
400 Harbor Drive
Corpus Christi, Texas 78401

Dear Ms. Garza:

This is in reference to your Department of the Army Permit Application for the Channel Deepening Project. The PCCA's proposed dredge material placement plan (DMMP) was included in the Draft Environmental Impact Statement published on June 10, 2022. The U.S. Army Corps of Engineers (Corps), Environmental Protection Agency (EPA), National Marine Fisheries Service (NMFS), and the U.S. Fish and Wildlife Service (FWS) objected to the plan.

In response to the comments, PCCA eliminated 58.76 acres of proposed impact to high quality, palustrine dune swale wetlands on San Jose Island and has expanded their wetland creation project features to include both SS1 and SS2. However, PCCA has declined the request from the Corps and Cooperating Agencies to commit to the wetland creation in a compensatory mitigation plan compliant with 33 CFR 332 Compensatory Mitigation for Losses of Aquatic Resources.

The Corps has concluded that the current proposal has not taken the necessary steps to ensure this wetland creation design feature will be implemented. In order for the Corps to consider the wetland creation at SS1 and SS2 as mitigation, the creation and success of the mitigation measures must be committed to, monitored, and enforced. This is a requirement of NEPA, the Guidelines, and the Corps implementing regulations (33 CFR 320-332.)

In order to demonstrate compliance with these requirements, PCCA must propose a compensatory mitigation plan compliant with 33 CFR 332 Compensatory Mitigation for Losses of Aquatic Resources. The plan may include the development of SS1 and SS2 to 33 CFR 332 standards or PCCA may propose other locations and concepts.

We are prepared to assist you in the development of a compensatory mitigation plan. Please contact Jayson Hudson at 409-766-3108 or by email at jayson.m.hudson@usace.army.mil.

Sincerely,

Nicholas A. Laskowski
Chief, Regulatory Division
Galveston District