

Letter ID	Comment ID	Entity	Comment (may be paraphrased or summarized)	USACE Response	PCCA Response
104	8	PC	<p>Regarding the WRDA 214 permit – agreement between the POCCA and USACE from September 2019 it is import to note the agreement was supposed to expire September 18, 2022, not September 18, 2024. The agreement required the POCCA to pay USACE \$200,000 per year for expedited review of certain POCCA applications. At the POCCA commissioners meeting on August 20, 2019, agenda item 10.I for the WRDA 214 agreement was presented at a 3-year agreement and that is what the commissioners approved, not a 5-year agreement.</p> <p>That means the last 2 years of payments totaling \$400,000 is a violation of Port policy and state law under Texas Water Codes. Also, I know and have documented that the PUBLIC money to have expedited review of POCCA applications was also used for USACE to review and modify the private entity application of Axis Midstream. So what else was that unapproved \$400,000 used on. For that matter how was the \$1,000,000 of public money spent?</p>	The CDP permit application is not included in the WRDA 214 agreement.	Thank you for your comment. This project was evaluated under FAST 41 Federal Permitting Infrastructure Steering Council and not the WRDA 214 Agreement between US Army Corps of Engineers and the Port of Corpus Christi Authority.
104	9	PC	Demand the USACE deny the permit or pick the LEDPA.	Thank you for your comment.	Thank you for your comment.
105	1	NGO	Requests an extension of the comment period.	<p>Following the comments received on the DEIS, revisions were made and included in the FEIS. Revisions to the DEIS included the addition of the following reports:</p> <ul style="list-style-type: none"> • PCCA Dredged Material Management Plan (Appendix C1) • PCCA Beneficial Use Monitoring Plan and Drawings (Appendix C2 and C3) • Cultural Resources Survey Reports (Appendix F2 and F3) • Inshore and Offshore Sediment Reports (Appendix J2 and J3) • PCCA 12-Step permittee Responsible Compensatory Mitigation Plan (Appendix K) <p>Based on the information provided in these reports, appropriate sections of the DEIS, EFH Assessment (Appendix E), Section 404(b)(1) Evaluation (Appendix O), Coastal Zone Management Program Consistency Determination (Appendix P), were revised to incorporate the findings of these reports.</p> <p>The USACE provided a 30-day comment period for the FEIS as a courtesy to the stakeholders and public. NEPA regulations do not require a comment period following the release of an FEIS.</p>	The Port of Corpus Christi Authority yields to the US Army Corps of Engineers to run its process for evaluation of this project in accordance with applicable rules and regulations, including development of the draft and final Environmental Impact Statement, scope of analysis, consultation with appropriate Federal and State agencies, conducting public meetings, providing opportunity for public comment, determining extensions of time for public comment, etc.
105	2	NGO	Request that your Record of Decision reflect that the applicant’s preferred alternative not be pursued. Several agencies (including TPWD, USFWS, and NMFS) agree that it is not the LEDPA.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and was prepared after the FEIS. The ROD had identified the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documented 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 also includes all mitigation measures, including avoidance and minimization, incorporated into the project.	The Port of Corpus Christi Authority (PCCA) prepared an Alternatives Analysis (AA) under the 404(b)(1) guidelines, associated with the Clean Water Act of 1972 and the Federal Register under 40 CFR Part 230. Four alternatives, including a no-action alternative, were reviewed and verified by USACE. The process requires a substantive USACE evaluation to determine the least environmentally damaging practicable alternative (LEDPA). USACE determined the PCCA's preferred alternative to be the LEDPA for the project's purpose and need.

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105	3	NGO	The newly-supplied mitigation plan is wholly inadequate.	Thank you for your comment.	A Permittee Responsible Compensatory Mitigation Plan (CMP; Appendix K of FEIS) was developed by the Port of Corpus Christi Authority (PCCA) in accordance with Title 33 Code of Federal Regulations (CFR) § 332.3 to compensate for 44.63-acres of direct impacts to special aquatic sites (SAS). This included 21.04-acres of palustrine wetlands, and 23.59-acres of Essential Fish Habitat (EFH) including 16.61-acres of estuarine wetlands, 6.88-acres of submerged aquatic vegetation (SAV) or seagrass, and 0.10-acres of oyster. The USACE final Compensatory Mitigation memo dated January 03, 2023, documented the direct permanent impacts to SAS in need of mitigation and was utilized by the PCCA in developing the CMP. The objective of the CMP is restoration through the reestablishment of 42.08-acres of palustrine wetlands, 32.94-acres of estuarine wetlands, 6.88-acres of SAV, and 0.10-acres of oyster. PCCA's Permittee Responsible CMP was coordinated, reviewed, and approved by the USACE.
105	4	NGO	Commenter state that although the FEIS suggests that the CDP will end at Harbor Island, there is an abundance of evidence that proves the intent of the CDP is to go much further – all the way to Inner Harbor and up to the end of the La Quinta Channel. At the very least the CDP will reach the La Quinta Junction.	During the process of evaluating a permit, the Corps develops a scope of analysis. The Corps' scope describes the portions of an overall project the Corps will evaluate as the area subject to the federal action. The Corps uses four factors described in 33 CFR 325 Appendix B to determine the geographic limit of that federal action. Factors ii and iii are the most relevant the scope for this project and the decision is documented in Section 1.5.2 of the FEIS. The Corps' scope is generally limited to the specific activity impacting waters of the United States and any additional portions, such as uplands, over which there is sufficient Federal control and responsibility. In addition, when analyzing indirect impacts, the Corps must consider the strength and relationship between those impacts outside of the Corps federal control with those impacts from the regulated activity. For instance, would the impacts occur even if the permit is not issued? These recommendations are outside of the Corps Scope of Analysis for the proposed project.	Section 1.3 of the FEIS defines the extent of the project that the Port of Corpus Christi Authority (PCCA) is seeking authorization for and includes a 13.8-mile span from the southeast side of Harbor Island to the -80-ft MLLW bathymetric contour in the Gulf of Mexico. The US Army Corps of Engineers final decision will pertain only to this reach and not include areas outside of this defined footprint. Section 1.5 of the FEIS defines the purpose and need of the project, which is to accommodate fully loaded VLCCs. The number of VLCCs calling at PCCA has increased year over year since 2021 (91 in 2021, 170 in 2022, and 302 in 2023). Under current conditions, none of these vessels can be fully loaded, requiring accessory vessel trips and reverse lightering offshore. This partial loading translates into operational/economic inefficiency and unnecessary resource consumption and emissions. PCCA's website (https://portofcc.com/outbound-crude-oil/) provides an overview of the outbound crude oil export markets from 2016 through 2024.
105	5	NGO	States that the scope of the FEIS should extend to existing oil (and planned ammonia) terminals at La Quinta Junction. <i>Commenter provides figures and additional information in the comment letter to back up this comment. See comment letter for additional details.</i>	During the process of evaluating a permit, the Corps develops a scope of analysis. The Corps' scope describes the portions of an overall project the Corps will evaluate as the area subject to the federal action. The Corps uses four factors described in 33 CFR 325 Appendix B to determine the geographic limit of that federal action. Factors ii and iii are the most relevant the scope for this project and the decision is documented in Section 1.5.2 of the FEIS. The Corps' scope is generally limited to the specific activity impacting waters of the United States and any additional portions, such as uplands, over which there is sufficient Federal control and responsibility. In addition, when analyzing indirect impacts, the Corps must consider the strength and relationship between those impacts outside of the Corps federal control with those impacts from the regulated activity. For instance, would the impacts occur even if the permit is not issued? These recommendations are outside of the Corps Scope of Analysis for the proposed project.	Section 1.3 of the FEIS defines the extent of the project that the Port of Corpus Christi Authority (PCCA) is seeking authorization for and includes a 13.8-mile span from the southeast side of Harbor Island to the -80-ft MLLW bathymetric contour in the Gulf of Mexico. The US Army Corps of Engineers final decision will pertain only to this reach and not include areas outside of this defined footprint. Section 1.5 of the FEIS defines the purpose and need of the project, which is to accommodate fully loaded VLCCs. The number of VLCCs calling at PCCA has increased year over year since 2021 (91 in 2021, 170 in 2022, and 302 in 2023). Under current conditions, none of these vessels can be fully loaded, requiring accessory vessel trips and reverse lightering offshore. This partial loading translates into operational/economic inefficiency and unnecessary resource consumption and emissions. PCCA's website (https://portofcc.com/outbound-crude-oil/) provides an overview of the outbound crude oil export markets from 2016 through 2024.

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105	6	NGO	<p>States that the scope of the FEIS should extend to the Inner Harbor since the basic project purpose states that it includes inventories from the facilities at the Port. The true scope of this project is to extend all the way to the Inner Harbor, as it did in the 2003 EIS for the CCSCIP. However, the project was actually executed in segments, as shown in Figure 4.</p> <p><i>See comment letter for figure referenced.</i></p>	<p>During the process of evaluating a permit, the Corps develops a scope of analysis. The Corps' scope describes the portions of an overall project the Corps will evaluate as the area subject to the federal action. The Corps uses four factors described in 33 CFR 325 Appendix B to determine the geographic limit of that federal action. Factors ii and iii are the most relevant the scope for this project and the decision is documented in Section 1.5.2 of the FEIS.</p> <p>The Corps' scope is generally limited to the specific activity impacting waters of the United States and any additional portions, such as uplands, over which there is sufficient Federal control and responsibility. In addition, when analyzing indirect impacts, the Corps must consider the strength and relationship between those impacts outside of the Corps federal control with those impacts from the regulated activity. For instance, would the impacts occur even if the permit is not issued?</p> <p>These recommendations are outside of the Corps Scope of Analysis for the proposed project.</p>	<p>Section 1.3 of the FEIS defines the extent of the project that the Port of Corpus Christi Authority (PCCA) is seeking authorization for and includes a 13.8-mile span from the southeast side of Harbor Island to the -80-ft MLLW bathymetric contour in the Gulf of Mexico. The US Army Corps of Engineers final decision will pertain only to this reach and not include areas outside of this defined footprint.</p> <p>Section 1.5 of the FEIS defines the purpose and need of the project, which is to accommodate fully loaded VLCCs. The number of VLCCs calling at PCCA has increased year over year since 2021 (91 in 2021, 170 in 2022, and 302 in 2023). Under current conditions, none of these vessels can be fully loaded, requiring accessory vessel trips and reverse lightering offshore. This partial loading translates into operational/economic inefficiency and unnecessary resource consumption and emissions. PCCA's website (https://portofcc.com/outbound-crude-oil/) provides an overview of the outbound crude oil export markets from 2016 through 2024.</p>
105	7	NGO	<p>States that the scope of the FEIS should extend to the end of La Quinta Channel. The CDP should consider planned and evolving activities on the La Quinta Channel as "connected actions" as it did in the 2003 EIS, when it was expected to be a container port.</p> <p><i>Commenter provides figures and additional information in the comment letter to back up this comment. See comment letter for additional details.</i></p>	<p>During the process of evaluating a permit, the Corps develops a scope of analysis. The Corps' scope describes the portions of an overall project the Corps will evaluate as the area subject to the federal action. The Corps uses four factors described in 33 CFR 325 Appendix B to determine the geographic limit of that federal action. Factors ii and iii are the most relevant the scope for this project and the decision is documented in Section 1.5.2 of the FEIS.</p> <p>The Corps' scope is generally limited to the specific activity impacting waters of the United States and any additional portions, such as uplands, over which there is sufficient Federal control and responsibility. In addition, when analyzing indirect impacts, the Corps must consider the strength and relationship between those impacts outside of the Corps federal control with those impacts from the regulated activity. For instance, would the impacts occur even if the permit is not issued?</p> <p>These recommendations are outside of the Corps Scope of Analysis for the proposed project.</p>	<p>Section 1.3 of the FEIS defines the extent of the project that the Port of Corpus Christi Authority (PCCA) is seeking authorization for and includes a 13.8-mile span from the southeast side of Harbor Island to the -80-ft MLLW bathymetric contour in the Gulf of Mexico. The US Army Corps of Engineers final decision will pertain only to this reach and not include areas outside of this defined footprint.</p> <p>Section 1.5 of the FEIS defines the purpose and need of the project, which is to accommodate fully loaded VLCCs. The number of VLCCs calling at PCCA has increased year over year since 2021 (91 in 2021, 170 in 2022, and 302 in 2023). Under current conditions, none of these vessels can be fully loaded, requiring accessory vessel trips and reverse lightering offshore. This partial loading translates into operational/economic inefficiency and unnecessary resource consumption and emissions. PCCA's website (https://portofcc.com/outbound-crude-oil/) provides an overview of the outbound crude oil export markets from 2016 through 2024.</p>
105	8	NGO	<p>Commenter states that this is an opportunity for any agency to take a "hard look" at the direct, indirect, and cumulative impacts of further deepening the CCSC on IOB, the Coastal Bend, and the world. The last EIS for the CCSCIP was completed in 2003 in support of increasing "oil imports" and agricultural exports. In a form of "bait and switch", by the time the actual deepening occurred about 15 years later, the justification was for "oil exports," which spawned a rapid petrochemical build-out to which I had a front row seat at IOB. Once further deepened, this channel will be capable of supporting shipment of product other than crude, including ammonia, hydrogen, and other hazardous gases or materials – many of which require risky pipelines and infrastructure that jeopardize the safety of neighboring communities, the environment, and the global climate. While, from Corps's perspective, this may be an "unintended consequence" of the CDP, PCCA no doubt is aware and is, in fact, hiding part of its true purpose for the CDP – to expand into new, unproven, and/or harmful product lines like "scalable hydrogen production" being touted by PCCA's former CEO – while avoiding federal oversight.</p>	<p>During the process of evaluating a permit, the Corps develops a scope of analysis. The Corps' scope describes the portions of an overall project the Corps will evaluate as the area subject to the federal action. The Corps uses four factors described in 33 CFR 325 Appendix B to determine the geographic limit of that federal action. Factors ii and iii are the most relevant the scope for this project and the decision is documented in Section 1.5.2 of the FEIS.</p> <p>The Corps' scope is generally limited to the specific activity impacting waters of the United States and any additional portions, such as uplands, over which there is sufficient Federal control and responsibility. In addition, when analyzing indirect impacts, the Corps must consider the strength and relationship between those impacts outside of the Corps federal control with those impacts from the regulated activity. For instance, would the impacts occur even if the permit is not issued?</p> <p>These recommendations are outside of the Corps Scope of Analysis for the proposed project.</p>	<p>Section 5.0 of the FEIS discusses the potential cumulative effect of the project when combined with impacts that have already occurred, or are still occurring, in the project area due to past, present, and reasonable foreseeable projects or actions.</p>

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105	9	NGO	<p>Storm Surge and Sea Level Rise: Even USACE acknowledges that this deepening project will increase tidal amplitudes and storm surge levels and will permanently inundate hundreds of acres. This poses an existential threat to IOB, since the city is already experiencing sea level rise due to climate change, which will also be exacerbated by this project.</p>	<p>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 however reviewers believe this is likely a localized model error (Subedee and Gibeaut, 2021).</p> <p>Additional review of HRI’s modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any major issues with HRI’s application of model parameters or inputs for the ADCIRC/SWAN models used in its study.</p>	<p>The Port of Corpus Christi Authority (PCCA), in 2019, contracted with Texas A&M-Corpus Christi Harte Research Institute (HRI) to assess the potential impacts of storm surge, tidal hydraulics, and salinity from the various Corpus Christi Ship Channel dredging projects (proposed and ongoing). The study was completed in April 2021. As part of the development of the FEIS, PCCA provided the study to the Corps of Engineers to provide relevant information to the Channel Deepening Project. Prior to relying on the information, the Corps of Engineers independently reviewed the methodology and findings using a third-party contractor. Section 4.1.3.4.2 provides details on the hydrodynamic storm surge modeling conducted by HRI.</p> <p>Additional modeling and studies can be found in the FEIS:</p> <ul style="list-style-type: none"> • Appendix G - Sediment Transport Modeling Study • Appendix H -Vessel Wake Analysis • Appendix I -Hydrodynamic and Salinity Modeling Study • Appendix L -Ship Simulation Report • Appendix M -Propeller Scour Study • Appendix N -Underkeel Clearance Study <p>The proposed beneficial use sites when constructed will restore barrier islands that provide protections to the region in the event of storms, as well as for impacts from sea level rise, and improve and bolster the natural environment, which also provides additional protections.</p>
105	10	NGO	<p>Indirect and Cumulative Impacts: The FEIS fails to give sufficient attention to indirect impacts of deepening the channel, including climate change impacts worsened by more oil export facilities. POCCA has reported that another 80 companies, mostly related to hydrogen and ammonia facilities, hope to locate in the Coastal Bend as soon as desalination plants, planned inside the Corpus Christi Bay, become a reality. Enbridge itself has proposed a new ammonia plant next to IOB in partnership with Yara. This “Ingleside Clean Ammonia Project” (ICAP) is not listed in the EIS. In fact, the Cumulative Impacts section should probably add a 10th category for Hydrogen and Ammonia Projects, since those projects, touted as green, blue, and/or clean threaten to change the character of the region even further.</p>	<p>Direct and indirect impacts to climate change from construction of the proposed Alternative 1 are discussed in Section 4.1.3.1.</p> <p>The cumulative effects of greenhouse gasses resulting from projects not in the federal control and responsibility of the Corps are not included in our analysis since they are no within thee scope of the channel deepening project.</p>	<p>Section 5.0 of the FEIS discusses the potential cumulative effect of the project when combined with impacts that have already occurred, or are still occurring, in the project area due to past, present, and reasonable foreseeable projects or actions.</p>

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105	11	NGO	<p>Public Interest Review: Wetlands - detrimental Comments from EPA, USFWS, NMFS, TPWD, other organizations all agree that significant acreage of wetlands will be negatively and permanently impacted and the Port's preferred alternative is not the LEDPA.</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of wetlands was found to be neutral (mitigated), see Section 4.2.1 of the FEIS, BU Plan, CMP. Impacts would occur to approximately 139 acres of wetlands. However, the BU Plan would create approximately 290 acres of marsh and the CMP would create an additional 75 acres of marsh. Beneficial use placement would also impact approximately 6.88 acres of seagrass and 0.10 acre of live oyster. However, mitigation efforts would re-establish these resources via transplanting of live seagrasses and oysters from the impacted area to the mitigation area. Overall, the BU Plan included sites that were designed to protect approximately 2,400 acres of seagrass in Redfish Bay and Charlies Pasture.</p> <p>The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and was prepared after the FEIS. The ROD had identified the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documented 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 also includes all mitigation measures, including avoidance and minimization, incorporated into the project.</p>	<p>The Port of Corpus Christi Authority (PCCA) prepared a Permittee Responsible Compensatory Mitigation Plan (CMP; Appendix K of FEIS) in accordance with Title 33 Code of Federal Regulations (CFR) § 332.3 to compensate for 44.63-acres of direct impacts to special aquatic sites (SAS). This included 21.04-acres of palustrine wetlands, 23.59-acres of Essential Fish Habitat (EFH), including 16.61-acres of estuarine wetlands, 6.88-acres of submerged aquatic vegetation (SAV) or seagrass, and 0.10-acres of oyster. The USACE final Compensatory Mitigation memo dated January 03, 2023, documented the direct permanent impacts to SAS in need of mitigation and was utilized by the PCCA in developing the CMP. The objective of the CMP is restoration through the reestablishment of 42.08-acres of palustrine wetlands, 32.94-acres of estuarine wetlands, 6.88-acres of SAV, and 0.10-acres of oyster.</p> <p>Additionally, one of the primary objectives contained in PCCA's Beneficial Use Monitoring Plan (BUMP), located in Appendix C of the FEIS, is to restore substantially eroded and washed-out shorelines at several beneficial use sites including SS1, SS2, PA4, and HI-E.</p> <p>Habitat restoration/creation and habitat protection are very important objectives of PCCAs BUMP. At SS1, this involves construction of an armored levee to restore the severely eroded shoreline and highly fragmented wetland complex that has developed over time. These actions will also limit the future loss of existing SAS at SS1 (which continues to degrade and erode at an accelerated rate) but notably also protect vast acres of additional SAS including approximately 2,400-acres of seagrass within the project watershed located directly adjacent in Redfish Bay. Without armoring and protection at SS1, the erosion and loss of SAS habitats (i.e., SAV, wetlands, tidal flat) will continue indiscriminately. In addition to the PCCAs CMP, beneficial use (BU) placement will establish an additional 181.80-acres of estuarine wetlands and 34.30-acres of palustrine wetlands at SS1. Similarly, dredge material will be utilized beneficially at SS2 to restore the shoreline washouts and erosion caused by Hurricane Harvey, thereby protecting considerable critical Piping Plover and Red Knot tidal flat habitats. Further, beach nourishment will result in approximately 803.4-acres of beneficial forebeach</p>

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105	12	NGO	<p>Public Interest Review: Fish and Wildlife Values - detrimental Appendix D and Appendix E show that fish and wildlife will be negatively and permanently impacted. Comments from USFWS, NMFS, and TPWD all agree that the Port's preferred alternative is not the LEDPA. This project nearly doubles the depth of the channel from its pre-2020 depth of 45'. The deeper the channel gets, the more frequent and long-lasting maintenance dredging will be, yet the actual schedule and impacts are not addressed in the FEIS. Ingleside on the Bay, located on La Quinta Channel, already experiences near-constant dredging which causes turbidity and sediments snuffing out seagrasses and benthic organisms, impacting fishing and quality of life.</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of fish and wildlife values was found to be neutral (mitigated), see Section 4.2.2.2.2 and 4.2.5.3.2 in the FEIS.</p> <p>Estuarine habitats and fauna would be directly affected due to dredging and placement activities. Dredging and placement of sediments for BU would have temporary impacts associated with burial of nearby benthic communities and increase turbidity near those sites. Beneficial use of dredged material is expected to have a long-term positive benefit by improving and protecting habitat and building resistance to rising sea levels. Beneficial use would also create protective barriers along the Gulf shorelines and the eroding shores of Harbor Island and Dagger Island.</p> <p>Section 4.2.2.2.2 of the FEIS acknowledges that Aransas Pass is the main route for larval transport of estuarine dependent species from the Gulf to local estuaries and that changes in hydrology due to the deepening of the channel could impact the recruitment of estuarine dependent species. A study was published in the Journal of Marine Science and Engineering in 2021 (Valseth et al., 2021) that assessed the potential impact that deepening the CCSC could have on the transport of Red Drum larvae through Aransas Pass. Their passive particle modeling indicated a slight reduction of the maximum velocity due to channel deepening. The Corps modeling also found that under the proposed project the current speeds are expected to decrease an average of 0.23 feet per second with the deeper entrance channel. The study concluded that changes in channel bathymetry (i.e. deepening) had little effect on recruitment of Red Drum larvae, with the model predicting a slight increase in the number of larvae entering the estuary with the decreased velocities. The slight decrease in velocity with the proposed project is not anticipated to have an impact on recruitment of estuarine dependent species and the impacts of channel deepening to overall larval transport at Aransas Pass should be minimal.</p>	<p>Section 5.0 of the FEIS discusses the potential cumulative effect of the project when combined with impacts that have already occurred, or are still occurring, in the project area due to past, present, and reasonable foreseeable projects or actions.</p>
105	13	NGO	<p>Public Interest Review: Water Quality - detrimental The FEIS predicts increases in salinity caused by CDP that will be quite detrimental to the already hypersaline Corpus Christi Bay, as described in the "Vulnerability Assessment of Coastal Bend Bays" (Montanga et al, 2021)1. Appendix I predicts that "Average salinity levels are anticipated to increase less than 1 ppt in the Corpus, Nueces, Redfish, and Aransas bays" and ±3 ppt near the channel deepening. Section 5.4.2 admits that "During extreme drought conditions, there is a possibility that brine discharges could contribute to hydrosalinity gradient impacts in conjunction with channel deepening." The FEIS fails to assess cumulative impacts of "multiple proposed desalination plants" (USFWS, 5/27/22 letter).</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of this interest factor was found to be negligible, see Section 4.1.4.1.2 in the FEIS.</p>	<p>Section 3.2.3.4 of the FEIS addresses potential impacts to salinity in the bay system in detail. Salinity modeling indicates that a change in the tidal prism associated with channel deepening increases the exchange of saltwater between Corpus Christi and Nueces Bay. Attachment I of the FEIS provides the hydrodynamic and salinity modeling study. The results indicate that the increase would be less than 1 ppt in the Corpus Christi Bay system. According to the FEIS reference, Baird, 2022c, this magnitude of change is negligible given the natural range of salinities in the bay and the wide salinity tolerances of endemic estuarine species. Section 5.0 of the FEIS provides a summary of the cumulative impacts of salinity.</p> <p>The Port of Corpus Christi Authority (PCCA) has also completed additional far field, three-dimensional modeling of the Corpus Christi Bay system to evaluate the potential impacts from the discharges of the proposed desalination plants on PCCA property at Harbor Island and La Quinta. The modeling report documenting the results was produced during the contested case hearing for the Texas Commission on Environmental Quality (TCEQ) discharge permit and was evaluated as part of the ultimate record of decision and issuance (by TCEQ) of the discharge permit for up to 50 million gallons per day desalination facility at Harbor Island on December 22, 2022. The US Environmental Protection Agency withdrew objections to the permit in September 2023.</p> <p>PCCA is in the process of making all data and studies related to a potential desalination facility at Harbor Island available through the PCCA web page at https://portofcc.com/</p>

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105	14	NGO	<p>Public Interest Review: Historic Properties - detrimental Shipwrecks like the 1845 Steamship Dayton off the coast of IOB may be in danger. The Texas Historical Commission keeps exact locations confidential. The SS Mary and the Utina are admittedly within the CDP area. How does the public have assurance that the 164-foot avoidance buffers mentioned in Section 3.4.3.2 will be respected and are sufficient to protect these shipwrecks? What is the penalty if these shipwrecks are disturbed, damaged, or destroyed?</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of this interest factor was found to be negligible, see Section 4.3.2 in the FEIS.</p> <p>The USACE, in consultation with the Texas State Historic Preservation Officer (SHPO) has determined that sites 41AS119, SS Mary (41NU252), Utina (41NU264, 41NU292), M275/M277, and M97/M102/M112/M126 are present within the permit area. In addition, the USACE, in consultation with the SHPO, have determined that the magnetic anomalies and sonar targets associated with the SS Mary and with the Utina are located outside the area being dredged and will be avoided by project activities. However, the permittee shall establish a 50-meter avoidance buffer surrounding these locations. The buffer shall stop at the top of the cut for the existing CCSC. No ground disturbing project activities shall occur within the buffered zones.</p>	<p>The Port of Corpus Christi Authority's (PCCA) proposed CDP is subject to Federal and State regulations concerning cultural resources. Section 3.4 of the FEIS describes the regulations in detail and Section 3.4.1 provides a cultural history overview. Appendix F provides the project's studies and surveys for cultural resources.</p> <p>As a result of the surveys and studies, archaeologists, in consultation with the Texas Historical Commission (THC), USACE, and PCCA, developed 164-foot avoidance buffers around resources identified through side scan sonar and magnetic surveys. The USACE concluded that the CDP would have no adverse effect on underwater historic properties, and the THC concurred with those findings on May 12, 2023 (Tracking Number: 202307362); furthermore, if any unexpected discoveries occur during construction for any site other than 41NU252, PCCA will halt work or move until consultation with PCCA and THC is conducted.</p> <p>The Aransas Pass Light Station District stands just outside the CDP's area of potential effect. Though the CDP corridor is near the District's boundaries, no dredging is proposed that would likely alter the site or the bayou that gives access to the station structures.</p>
105	15	NGO	<p>Public Interest Review: Recreation - detrimental USACE may not "regulate vessel movements", but this FEIS should at least provide detailed information about how much vessel traffic there is projected to be. I see no clear projections – even based on current volumes – included in this FEIS. USACE states that the USCG and Harbormaster have responsibility for managing vessel traffic. Yet I did not find any documentation that either entity agreed that the vessel traffic changes will be safe – particularly to recreational boaters. Isn't this creating a problem and then passing the buck for solving it? The ship simulation study (Appendix L) did not consider situations with other vessels, even though the Harbor Island terminals will be immediately adjacent to the Ferry, which is the only way for Port Aransas residents to get to work in or via San Patricio County and for tourists heading to Port A from San Pat County. A "near accident" at the Ferry in August 20192 was one of the motivators for the formation of IOBCWA – and that was almost five years ago! This channel is the sole means for pleasure and fishing crafts to access the Gulf. Each VLCC will need to be accompanied by 5 tugboats (all loudly spewing emissions). Tourists heading to Port Aransas are likely to experience longer delays for the ferry, with more frequent larger, slower, harder-to-manuever ships in the Pass. Fishing is likely to be negatively affected – especially since there will be impacts to spawning and larvae in Redfish Bay State Scientific Area due to increased salinities, sedimentation, turbidity, dredging noises, etc. Marine mammals like dolphins and manatees are likely to relocate.</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of this interest factor was found to be negligible, see Section 4.4.2 in the FEIS.</p> <p>Vessel traffic during operations of these facilities are 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.</p>	<p>The existing channel is a deep draft navigation channel constructed and maintained for commercial vessel traffic. Vessels move at slow speeds in the channel, and are unable to turn sharply; therefore, tugs are needed to provide safe navigation and to avoid the risk of collision. Dredging operations will include provisions to lessen disruption of ferry use, such as planning dredging for off-peak or after-hours of typical high traffic ferry operations. VLCCs will continue transiting with one-way traffic restrictions, the same as they do under the No-Action Alternative.</p> <p>Compared to the No-Action Alternative, the proposed project would eliminate the need for reverse lightering traffic and thereby:</p> <ul style="list-style-type: none"> • Reduce vessel transits by 140 and 230 transits for Suezmax vessels • Increase channel availability • Reduce ferry operating time impacts compared to a no-action alternative <p>Section 4.5 of the FEIS describes the impacts of navigation on existing commercial and recreational navigation uses. A vessel wake analysis included in Appendix H of the FEIS indicates that vessel induced wakes associated with the project would minimally impact future evolution of shoreline along the ship channel. Ship simulations included in Appendix L of the FEIS concluded that the project's channel configurations and underlying environmental conditions would be acceptable for safely operating fully loaded VLCCs.</p>

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105	16	NGO	<p>Public Interest Review: Shore Erosion and Accretion - detrimental As can be seen in Figures 3.2, 5.1-5.4, and 6.2, IOB shorelines are excluded from both FUNWAVE and XBEACH modeling in the Vessel Wake Analysis. Modeling only goes to Enbridge (formerly Moda), based on the premise (which I believe to be false) that channel deepening will end at Harbor Island (as opposed to extending the scope for this EIS all the way to La Quinta Junction, as described earlier). Many IOB residents have already lost their beaches due to ship wake impacts. Impacts to IOB shorelines can foreseeably be expected to worsen because of projected increased current speeds, storm surge, tropical storms, relative sea level rise, and other climate change impacts exacerbated as an indirect effects of the CDP, which supports expanded consumption worldwide of fossil fuels. Yet “no wind, waves or currents have been applied in the FUNWAVE or XBEACH modeling” (p. 10). Isn’t USACE required to analyze climate change impacts of its efforts? When the scope of this project is extended to La Quinta Channel, as I believe it should be, real and immediate impacts to global warming, directly occurring due to the CDP, could be readily assessed, based on current shipping levels from these three prolific oil export terminals.</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of shoreline erosion and accretion was found to be neutral (mitigated), see Section 4.1.1.2.2 of the FEIS. The beach nourishment can result in a wider and higher beach that can attenuate wave energy, provide storm protection, create new habitat, and enhance beach recreation. The BU placement along the Inner Channel is designed to address erosion, primarily from vessel wake, protecting wetlands and seagrasses behind it.</p>	<p>Section 5.0 of the FEIS discusses the potential cumulative effect of the project when combined with impacts that have already occurred, or are still occurring, in the project area due to past, present, and reasonable foreseeable projects or actions.</p>
105	17	NGO	<p>Public Interest Review: Consideration of Property Ownership - detrimental The CDP will accelerate the current proliferation of new and expanding oil terminals and refineries along the ship channels, as well as scary new ammonia, hydrogen, and carbon capture projects. All of this harms property values for Texas’s beautiful coastal communities (that have been here for decades) with expensive waterfront homes, like IOB and Port Aransas. Erosion of and beachfront property and damage to bulkheads has already occurred, but will worsen, as a result of increased ship traffic facilitated by channel deepening. The proposed new spoil islands in front of Port Aransas and those already in front of IOB also impact people’s enjoyment of their property as well as resale. Would YOU want your city skyline view obstructed by backhoes? Would YOU want to live next to an ammonia plant with CO2 pipelines running to it? The FEIS fails to consider this criterion at all!</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. Consideration of Property Ownership is not applicable to the CDP.</p>	<p>Section 5.0 of the FEIS discusses the potential cumulative effect of the project when combined with impacts that have already occurred, or are still occurring, in the project area due to past, present, and reasonable foreseeable projects or actions.</p>
105	18	NGO	<p>Public Interest Review: Coastal Zones - detrimental I have serious doubts that a proper assessment of coastal zone factors was done.</p>	<p>A Coastal Zone Management Act consistency concurrence is required. Based on an evaluation of the CDPs compliance with Federal goals and policies (see FEIS Appendix P), the project is consistent with the Federal goals and objectives of the Coastal Zone Management Program. Any concerns expressed by the GLO will be addressed before the permit is granted. Coordination with the GLO regarding consistency with the goals and policies of the TCMP is ongoing.</p>	<p>The FEIS and supporting documents cite numerous assessments of coastal zone factors. Appendix P (Coastal Zone Management Consistency Determination) assessed 13 Coastal Natural Resource Areas (CNRAs) as defined in the Texas Natural Resources Code, §33.203(1) for their relevance to the proposed project. The 13 CNRAs evaluated in the determination are: waters of the open Gulf, waters under tidal influence, submerged lands, coastal wetlands, submerged aquatic vegetation, tidal sand and mud flats, oyster reefs, coastal barriers, coastal shore areas, Gulf beaches, special hazard areas, critical erosion areas, and coastal preserves. The Determination identifies the significance the project will have on each of these areas.</p>

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105	19	NGO	<p>Public Interest Review: Other Federal, State, or Local Requirements - detrimental 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/wp-content/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.</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of energy needs was found to be not applicable to the CDP. In accordance with 33 CFR 320.4, energy conservation and development are major national objectives, and this evaluation received the appropriate priority during permit processing. This priority does not impact impartial decision-making with respect to application review and any final permit decision, either substantively or procedurally.</p>	<p>The Port of Corpus Christi Authority (PCCA) will comply with Texas General Land Office requirements (31 TAC 15) for beach nourishment, including permitting, sand sourcing, and construction. Additionally, PCCA will comply with applicable site-specific Coastal Management Plans. Placement of material will occur only after appropriate permits and approval of material meeting "beach quality sand" requirements designs are obtained. Further, beach nourishment will require an agreement with the landowner prior to placement, and such agreement will stipulate any additional site-specific details that PCCA will be required to comply with when placing material and regarding the quality of the material to be placed. A full design of the placement of material at any beneficial use site will also be required prior to placement and approved by the landowner prior to placement.</p> <p>Appendix C of the FEIS provides the studies related to the placement of dredge materials, the beneficial use monitoring plan, the dredge material placement matrix, and the summary of near-shore berm modeling. Refer to Appendix C for additional details on the material required for each beneficial use site.</p> <p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all</p>
105	20	NGO	<p>Public Interest Review: Floodplain Values - detrimental 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. USACE's deferral to the "County Floodplain Administrator" to "make final determination of floodplain impacts" is not "compliant with EO 11988."</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of this interest factor was found to be negligible, see Section 7.19 in the FEIS.</p>	<p>The Port of Corpus Christi Authority (PCCA), in 2019, contracted with Texas A&M-Corpus Christi Harte Research Institute (HRI) to assess the potential impacts of storm surge, tidal hydraulics, and salinity from the various Corpus Christi Ship Channel dredging projects (proposed and ongoing). The study was completed in April 2021. As part of the development of the FEIS, PCCA provided the study to the Corps of Engineers to provide relevant information to the Channel Deepening Project. Prior to relying on the information, the Corps of Engineers independently reviewed the methodology and findings using a third-party contractor. Section 4.1.3.4.2 provides details on the hydrodynamic storm surge modeling conducted by HRI.</p> <p>Additional modeling and studies can be found in the FEIS:</p> <ul style="list-style-type: none"> • Appendix G - Sediment Transport Modeling Study • Appendix H -Vessel Wake Analysis • Appendix I -Hydrodynamic and Salinity Modeling Study • Appendix L -Ship Simulation Report • Appendix M -Propeller Scour Study • Appendix N -Underkeel Clearance Study <p>The proposed beneficial use sites when constructed will restore barrier islands that provide protections to the region in the event of storms, as well as for impacts from sea level rise, and improve and bolster the natural environment, which also provides additional protections.</p>

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105	21	NGO	<p>Public Interest Review: Energy conservation and Development - detrimental Deepening the Corpus Christi Ship Channel for the purpose of “safely, efficiently, and economically” handling exports undermines both conservation and development efforts. Making the fossil fuel export business more economical (especially at taxpayer expense) will subsidize a known harmful product, slow development of competing clean and/or renewable energy sources, increase fossil fuel consumption and dependence globally, exacerbate global warming, and sabotage the necessary transition away from fossil fuel energy sources.</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of energy needs was found to be not applicable to the CDP. In accordance with 33 CFR 320.4, energy conservation and development are major national objectives, and this evaluation received the appropriate priority during permit processing. This priority does not impact impartial decision-making with respect to application review and any final permit decision, either substantively or procedurally.</p>	<p>Section 1.3 of the FEIS defines the extent of the project that the Port of Corpus Christi Authority (PCCA) is seeking authorization for and includes a 13.8-mile span from the southeast side of Harbor Island to the -80-ft MLLW bathymetric contour in the Gulf of Mexico. The US Army Corps of Engineers final decision will pertain only to this reach and not include areas outside of this defined footprint.</p> <p>Section 1.5 of the FEIS defines the purpose and need of the project, which is to accommodate fully loaded VLCCs. The number of VLCCs calling at PCCA has increased year over year since 2021 (91 in 2021, 170 in 2022, and 302 in 2023). Under current conditions, none of these vessels can be fully loaded, requiring accessory vessel trips and reverse lightering offshore. This partial loading translates into operational/economic inefficiency and unnecessary resource consumption and emissions. PCCA's website (https://portofcc.com/outbound-crude-oil/) provides an overview of the outbound crude oil export markets from 2016 through 2024.</p>
105	22	NGO	<p>Public Interest Review: Navigation - detrimental Since POCCA’s real goal in deepening the channel is to increase export volumes, navigation hazards in the channel will only increase 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. Baird’s Vessel Wake Analysis (Appendix H) concludes that: “growth in the reverse lightering operations between the MODA [now Enbridge] terminal at Ingleside and the Harbor Island terminals would be more VLCC vessel utilize the Corpus Christi Ship Channel.” (p. 27) This contrasts with USACE’s contention on p.4-43 of the EIS that “traffic volume of crude carriers is anticipated to decrease since, for the same production volume of crude oil, fewer ships would need to be loaded in the channel”. Of course, there is no intention to keep “the same production volume”, so vessel traffic will, in fact, increase. See Figure 2. It’s not just Enbridge (#1 oil terminal in North America), but also Gibson Energy’s South Texas Gateway (#2 oil terminal), and Koch Brothers’ Flint Hills that are already operational. These additional VLCCs, plus their tugs, will all head out to Harbor Island, causing further hazardous congestion impacting the ferry crossing. Baird’s Vessel Wake Analysis also claims that “pilots endorsed the assumptions made by Baird”, yet I found no proof of this in the FEIS.</p> <p><i>Comment continues on next row.</i></p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of navigation was found to be neutral (mitigated), see Section 4.5.2 of the FEIS. Temporary impacts to commercial and recreational navigation during dredge and disposal events. Temporary impacts will be similar to other dredge events that occur in the region. Long-term effects of operations were evaluated in and documented in the FEIS. A vessel wake analysis was performed to assess bed and shoreline change induced by vessel transits resulting from the CDP (see FEIS Appendix H). Results indicated the CDP would have minimal impacts to the shorelines along the CCSC. Ship simulations were performed on the CDPs laden VLCC vessel (see FEIS Appendix L) which concluded five 120 metric ton bollard pull rotor tugs would provide higher margins of safety. In addition, the use of these tugs would allow for operating fully loaded VLCCs for most environmental conditions. Therefore, it was concluded the CDP channel configurations with the underlying environmental conditions would be acceptable to safely operate fully loaded VLCC originating from the Harbor Island terminal. A propeller scour assessment (see FEIS Appendix M) determined the scour potential was small or unlikely for most areas modeled. The exception was along a shoreline wall of Harbor Island at the confluence of the CCSC and the Lydia Ann Channel, where there is larger scour potential but can be mitigated with placement of armor protection.</p>	<p>The existing channel is a deep draft navigation channel constructed and maintained for commercial vessel traffic. Vessels move at slow speeds in the channel, and are unable to turn sharply; therefore, tugs are needed to provide safe navigation and to avoid the risk of collision. Dredging operations will include provisions to lessen disruption of ferry use, such as planning dredging for off-peak or after-hours of typical high traffic ferry operations. VLCCs will continue transiting with one-way traffic restrictions, the same as they do under the No-Action Alternative.</p> <p>Compared to the No-Action Alternative, the proposed project would eliminate the need for reverse lightering traffic and thereby:</p> <ul style="list-style-type: none"> • Reduce vessel transits by 140 and 230 transits for Suezmax vessels • Increase channel availability • Reduce ferry operating time impacts compared to a no-action alternative <p>Section 4.5 of the FEIS describes the impacts of navigation on existing commercial and recreational navigation uses. A vessel wake analysis included in Appendix H of the FEIS indicates that vessel induced wakes associated with the project would minimally impact future evolution of shoreline along the ship channel. Ship simulations included in Appendix L of the FEIS concluded that the project’s channel configurations and underlying environmental conditions would be acceptable for safely operating fully loaded VLCCs.</p>

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105	22	NGO	<p>USACE claims that the Ship Simulation Study (Appendix L) concluded that 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.” The conclusions drawn in that study, which I enumerated in my comments on the DEIS, seem to contradict this. Pilots expressed concerns about stronger and faster currents than those simulated – calling for one-way traffic without passing, and restrictions under certain tidal flow, flood, or ebb conditions. Baird concluded that operating in confined narrow waterways with shallow draft and high volumes of commercial and recreational traffic will require 5 tugboats.</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of navigation was found to be neutral (mitigated), see Section 4.5.2 of the FEIS. Temporary impacts to commercial and recreational navigation during dredge and disposal events. Temporary impacts will be similar to other dredge events that occur in the region. Long-term effects of operations were evaluated in and documented in the FEIS. A vessel wake analysis was performed to assess bed and shoreline change induced by vessel transits resulting from the CDP (see FEIS Appendix H). Results indicated the CDP would have minimal impacts to the shorelines along the CCSC. Ship simulations were performed on the CDPs laden VLCC vessel (see FEIS Appendix L) which concluded five 120 metric ton bollard pull rotor tugs would provide higher margins of safety. In addition, the use of these tugs would allow for operating fully loaded VLCCs for most environmental conditions. Therefore, it was concluded the CDP channel configurations with the underlying environmental conditions would be acceptable to safely operate fully loaded VLCC originating from the Harbor Island terminal. A propeller scour assessment (see FEIS Appendix M) determined the scour potential was small or unlikely for most areas modeled. The exception was along a shoreline wall of Harbor Island at the confluence of the CCSC and the Lydia Ann Channel, where there is larger scour potential but can be mitigated with placement of armor protection.</p>	<p>The existing channel is a deep draft navigation channel constructed and maintained for commercial vessel traffic. Vessels move at slow speeds in the channel, and are unable to turn sharply; therefore, tugs are needed to provide safe navigation and to avoid the risk of collision. Dredging operations will include provisions to lessen disruption of ferry use, such as planning dredging for off-peak or after-hours of typical high traffic ferry operations. VLCCs will continue transiting with one-way traffic restrictions, the same as they do under the No-Action Alternative.</p> <p>Compared to the No-Action Alternative, the proposed project would eliminate the need for reverse lightering traffic and thereby:</p> <ul style="list-style-type: none"> • Reduce vessel transits by 140 and 230 transits for Suezmax vessels • Increase channel availability • Reduce ferry operating time impacts compared to a no-action alternative <p>Section 4.5 of the FEIS describes the impacts of navigation on existing commercial and recreational navigation uses. A vessel wake analysis included in Appendix H of the FEIS indicates that vessel induced wakes associated with the project would minimally impact future evolution of shoreline along the ship channel. Ship simulations included in Appendix L of the FEIS concluded that the project’s channel configurations and underlying environmental conditions would be acceptable for safely operating fully loaded VLCCs.</p>
105	23	NGO	<p>Public Interest Review: General Environmental Concerns - detrimental Bigger ships means bigger accidents. Worsened air and water quality from increased (and deeper) ship traffic and ongoing maintenance dredging will impact habitat, fish, wildlife, and human environment. In addition, bigger ships means more petroleum exports and bigger emissions contributing to global climate change. Yet, the FEIS contains no recent projections of increased air emissions by the Port over the baseline figures from 2017: “The 2013 CO2e emissions were reported to be 391,663 metric tons. The GHG emissions (as CO2e) emissions was reported to be 396,615 metric tons during 2017, which is about a 1 percent increase in comparison to the 2013 CO2e emissions (Port, 2019b).” (3.2.11.3) Nearly ALL of the increased shipping activity in San Patricio County has occurred since December 2018, when Cheniere (Corpus Christi Liquefaction) launched its first LNG tanker from La Quinta Channel³ and Moda (now Enbridge) launched its first VLCC from Ingleside Point⁴. Numerous reports, such as the Intergovernmental Panel on Climate Change (IPCC) AR6 Synthesis Report: Climate Change 2023⁵, illustrate how global warming has progressed and describe the urgency of reducing greenhouse gas emissions to save the planet. Impacts from increased emissions enabled by the CDP have global environmental impacts – including where I live in Dorchester County, Maryland, which is experiencing one of the highest rates of sea level rise in the nation.</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of this interest factor was found to be negligible, see Section 4.0 in the FEIS.</p> <p>The Project has been analyzed for conformity applicability pursuant to regulations implementing Section 176(c) of the Clean Air Act. No air quality permits are anticipated to be required for this project. Because the CDP is located in Aransas, San Patricio, and Nueces counties, and these counties have been designated in attainment or unclassifiable with the 2015 8-hour ozone standard, the General Conformity requirements are not applicable, and a General Conformity Determination is not required.</p>	<p>Section 4.1.9 of the FEIS addresses air emissions associated with the various alternatives during both construction and operation, or use of the channel following construction.</p> <p>Air emissions associated with operations from proposed adjacent operations are evaluated in Section 5.4.5 of the FEIS. Furthermore, any proposed projects will be required to obtain State and Federal permits prior to construction, including permits authorizing air emissions.</p> <p>The Port of Corpus Christi Authority (PCCA), with participation from its customers, develops an emission inventory for PCCA operations, including lightering operations and greenhouse gas emissions, every three years. The PCCA emission inventory looks at all operations occurring within the Port area. Prior reports can be found on the PCCA’s web page at https://portofcc.com/about/port/environmental-planning-compliance/. This information assists PCCA in meeting our voluntary targets for reducing air emissions from PCCA operations associated with the Air Quality and Climate Action precepts of our Environmental Policy.</p>

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105	24	NGO	<p>Public Interest Review: Economics - detrimental 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. But what we do know is that the companies choosing to locate here because of the deepened channel will:</p> <ol style="list-style-type: none"> 1) Lease or purchase property that POCCA owns and has removed from the tax rolls, due to POCCA's tax-exempt status as a supposedly "public entity" 2) Seek massive local tax abatements through the schools and governmental entities (like Chapter 403, Chapter 312, and Industrial District Agreements) 3) Obtain federal tax credits for their new emissions through greenwashing techniques that paint what they're doing as "clean energy" by relying on unproven carbon capture and sequestration 4) Easily obtain TCEQ permits to pollute the air and water of surrounding communities even more 5) Significantly exacerbate global warming, making it 6) Hire just a handful of local people. 7) Cause residential and commercial (non-industrial) property values in nearby communities to plummet, as folks increasingly find it unpleasant to live in another cancer alley. <p><i>Comment continues on next row.</i></p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of this interest factor was found to be beneficial, see Section 4.4.2 in the FEIS.</p>	<p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p>
105	24	NGO	<p>USACE asserts there is no "national interest that would compel an independent, federal review of a navigation district's stated need for the project in the marketplace". I actually thought that consideration of "economics" was part of THIS public interest review under 33 CFR 320.4. If not USACE, then who else has jurisdiction to stop boondoggles that aim to steal from the public for the benefit of private industry? Having seen POCCA up close in action now personally for 5 years, I can definitely say that they (especially under former CEO Strawbridge) will not hesitate to lie and misrepresent things in order to push their aggressive growth-at-all-costs agenda. I know that regulatory officials at USACE have been aware of this on occasion. Please do not take POCCA's "stated need" for this project as truth. That does NOT serve the public interest well.</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of this interest factor was found to be beneficial, see Section 4.4.2 in the FEIS.</p>	<p>Section 1.3 of the FEIS defines the extent of the project that the Port of Corpus Christi Authority (PCCA) is seeking authorization for and includes a 13.8-mile span from the southeast side of Harbor Island to the -80-ft MLLW bathymetric contour in the Gulf of Mexico. The US Army Corps of Engineers final decision will pertain only to this reach and not include areas outside of this defined footprint.</p> <p>Section 1.5 of the FEIS defines the purpose and need of the project, which is to accommodate fully loaded VLCCs. The number of VLCCs calling at PCCA has increased year over year since 2021 (91 in 2021, 170 in 2022, and 302 in 2023). Under current conditions, none of these vessels can be fully loaded, requiring accessory vessel trips and reverse lightering offshore. This partial loading translates into operational/economic inefficiency and unnecessary resource consumption and emissions. PCCA's website (https://portofcc.com/outbound-crude-oil/) provides an overview of the outbound crude oil export markets from 2016 through 2024.</p>

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105	25	NGO	<p>Public Interest Review: Mitigation - detrimental POCCA minimizes the extensive devastation and loss of valuable diverse established wetlands, seagrasses, and habitat. As a result, the newly-provided mitigation plan (one wasn't even offered in the DEIS) is not commensurate with the loss. POCCA's enchantment with the word "beneficial" in beneficial use is quite disturbing. This project will create more aptly-named "spoil islands", like the new massive one that started growing in front of IOB just over a year ago. Most of the new islands will be in constant use for dredged material placement forever rather than being restorative. Even in this project, POCCA is reclaiming previous spoil islands created through past projects since they are inferior. Spoil islands are simply no replacement for Mother Nature's handiwork. And as raw dredged material, they add new sources of air pollution and eyesores disturbing once beautiful viewsheds for coastal communities like IOB and Port Aransas. This overuse of the benefits of beneficial use as appropriate mitigation illustrates how POCCA simply looks at environmental considerations as obstacles to overcome, rather than truly being protective.</p>	<p>Mitigation for special aquatic sites that were not avoided or minimized are mitigated at a minimum 1:1 ratio, most at a 2:1 or greater ratio.</p>	<p>Beneficial use is defined by the US Army Corps of Engineers (USACE) as the productive and positives uses of dredge material (https://budm.el.erdc.dren.mil/). Further, USACE identifies seven categories of beneficial use, which among other things also includes habitat restoration/creation and development and beach nourishment—the beneficial uses identified for this project through stakeholder outreach.</p> <p>The Port of Corpus Christi Authority (PCCA) acknowledges the function and value of all habitats within the Channel Deepening Project (CDP) footprint and has coordinated extensively to avoid, minimize, and satisfactorily mitigate these impacts to the maximum extent practicable. Overall, implementation of the PCCA's Compensatory Mitigation Plan (CMP) and Beneficial Use Monitoring Plan (BUMP) will result in a considerable net gain of beneficial habitats, including considerable increases in Special Aquatic Sites (SAS).</p> <p>One of the primary objectives contained in the Port of Corpus Christi Authority's (PCCA) Beneficial Use Monitoring Plan (BUMP; Appendix C of FEIS) is to restore substantially eroded and washed-out shorelines at several beneficial use sites including SS1, SS2, PA4, and HI-E. Habitat restoration/creation and habitat protection are very important objectives of PCCAs BUMP. At SS1, this involves construction of an armored levee to restore the severely eroded shoreline and highly fragmented wetland complex that has developed over time. These actions will also limit the future loss of existing SAS at SS1 (which continues to degrade and erode at an accelerated rate) but notably also protect vast acres of additional SAS including approximately 2,400-acres of seagrass within the project watershed located directly adjacent in Redfish Bay. Without armoring and protection at SS1, the erosion and loss of SAS habitats (i.e., SAV, wetlands, tidal flat) will continue indiscriminately.</p>
105	26	NGO	<p>Public Interest Review: Aesthetics - detrimental CCSC may be a "federally authorized navigation channel that has been regularly dredged" for over a century, as asserted by USACE, but that does not mean it should drastically accelerate. This will create near-constant dredging that can displace entire communities. Port Aransas residents and tourists will have to put up with the sights, sounds, smells, air pollution and constant rumbling of dredgers. When I visited IOB last year, it was already experiencing nearly 24x7, 365 dredging. And when the second segment of the channel gets deepened from Harbor Island to La Quinta Junctions (which it inevitably will, if this CDP is approved), then IOB will probably have no respite at all. The sights of ships, oil platforms, and other interesting vessels passing by occasionally (like once a week) was actually quite a thrill when we moved to IOB in 2018. But the excitement quickly fades with shortened intervals between dredges and longer durations. Knowingly cutting so deep into a naturally shallow estuary commits the channel to near-constant maintenance dredging. This is unconscionable – especially when coastal communities like IOB and Port Aransas have flourished along the channel for decades. Is there no room for human habitation along federally authorized navigation channels?</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. There is no effect to aesthetics with the CDP.</p>	<p>The proposed project includes dredging of 46.3 million cubic yards of material to deepen the channel to -77 feet and -75 feet MLLW from the Gulf to station 110+00 near Harbor Island, including the approximate 10-mile extension to the entrance channel necessary to reach sufficiently deep waters. This deepening would take place largely within the footprint of the currently authorized -54 foot channel.</p> <p>Section 2.2.3 of the FEIS provides construction details for the Channel Deepening Project. New work dredging will include provisions to lessen disruption of ferry use, such as planning dredging for off-peak or after-hours of typical high traffic ferry operations and avoid certain times of the year for dredging or placement of material to protect endangered species. Similar provisions would be carried out during maintenance dredging that occurs approximately every two years for the existing channel. Dredging operations will also incorporate numerous best management practices that are currently employed by the industry when dredging and recommended by resource agencies, such as silt curtains to protect against impacts from turbidity on adjacent special aquatic sites.</p> <p>The potential impacts of project dredging on human and environmental resources identified during the public interest review are addressed in detail in the following FEIS sections:</p> <ul style="list-style-type: none"> • 2.0 Proposed Action and Alternatives • 3.0 Affected Environment • 4.0 Environmental Consequences • 5.0 Cumulative Impacts

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105	27	NGO	<p>Public Interest Review: Flood Hazards - detrimental Coastal communities will suffer from increased storm surge and flooding – potentially deadly.</p> <p>USACE’s response confirms my concerns: “[POCCA’s preferred] 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).”</p> <p>For a coastal community like IOB, which is already at sea level and already experiencing storm surge - following previous channel deepening that floods a quarter of the city, the thought that it can get worse – just by deepening to Harbor Island – is pretty terrifying. Knowing that POCCA’s real plan is to keep going to La Quinta Junction and even up La Quinta Channel is almost unfathomable. It certainly does not bode well for IOB’s continued existence.</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of this interest factor was found to be neutral (mitigated), see Sections 4.1.2.1.2 and 4.1.3.4.2 in the FEIS.</p> <p>Overall, the impact of future with project 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 (see FEIS Appendix I).</p> <p>The Hydrodynamic Study in Appendix I of the FEIS documents modeling efforts to assess impacts to water levels from the project. The assessment concluded that a slight rise in high tide and a light drop in low tide should be expected. The tide will increase at most 0.78 inches with an average over the study area of 0.39 inches with the rate of change decreasing as you move away from Aransas Pass. For visual reference, 0.39 inches is equal to the diameter of a peppercorn or the head of tack. In contrast, the low tides are expected to drop a maximum of 1.57 inches, or the diameter of a golf ball, with the amount of lowering of the tide decreasing with the distance from the Aransas Pass.</p> <p>Figure 4.5 shows the location between Point Mustang and Humble Basin on the inner channel where the largest water level change is predicted to occur. In this location, the high tide is expected to increase to 1.57 inches with a maximum potential of 3.5 inches, similar to the nominal width of a common 2x4. To the north and south of this location the project has proposed to place BU sites designed to address existing erosion from vessel wakes. These BU sites will address changes in water level over both short-term and long-term effects protecting the aquatic resource behind them. Any effect from the water level changes in these locations will be moderated by these BU sites’ shoreline protection rock.</p> <p>Section 4.1.3.4.2 acknowledged the proposed project has a potential to increase storm surge in the project area. Based on studies conducted by the Heart Research Institute on the –54-foot channel and additional studies Increases in storm surge water levels and slight increases in inundation extent were not considered maximum inundation is 2.5 inches. The area of greatest</p>	<p>The Port of Corpus Christi Authority (PCCA), in 2019, contracted with Texas A&M-Corpus Christi Harte Research Institute (HRI) to assess the potential impacts of storm surge, tidal hydraulics, and salinity from the various Corpus Christi Ship Channel dredging projects (proposed and ongoing). The study was completed in April 2021. As part of the development of the FEIS, PCCA provided the study to the Corps of Engineers to provide relevant information to the Channel Deepening Project. Prior to relying on the information, the Corps of Engineers independently reviewed the methodology and findings using a third-party contractor. Section 4.1.3.4.2 provides details on the hydrodynamic storm surge modeling conducted by HRI.</p> <p>Additional modeling and studies can be found in the FEIS:</p> <ul style="list-style-type: none"> • Appendix G - Sediment Transport Modeling Study • Appendix H -Vessel Wake Analysis • Appendix I -Hydrodynamic and Salinity Modeling Study • Appendix L -Ship Simulation Report • Appendix M -Propeller Scour Study • Appendix N -Underkeel Clearance Study <p>The proposed beneficial use sites when constructed will restore barrier islands that provide protections to the region in the event of storms, as well as for impacts from sea level rise, and improve and bolster the natural environment, which also provides additional protections.</p>
105	28	NGO	<p>Public Interest Review: Land Use - detrimental Flood insurance rates in coastal communities will likely increase even more than they already are based on sea level rise and subsidence. While USACE contends that “flood insurance issues are outside the scope”, I contend that knowingly flooding or permanently inundating coastal properties could be considered a federal “taking”. Insurance costs directly impact public interest considerations of land use and property values. Why has FEMA not been consulted for this permit? After all, even Harbor Island is in a flood zone – let alone coastal communities like IOB, Port Aransas, and North Beach. Should it really be up to county flood plain administrators to address this preventable issue?</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of this interest factor was found to be negligible, see Section 4.4.2 in the FEIS.</p>	<p>The Port of Corpus Christi Authority (PCCA), in 2019, contracted with Texas A&M-Corpus Christi Harte Research Institute (HRI) to assess the potential impacts of storm surge, tidal hydraulics, and salinity from the various Corpus Christi Ship Channel dredging projects (proposed and ongoing). The study was completed in April 2021. As part of the development of the FEIS, PCCA provided the study to the Corps of Engineers to provide relevant information to the Channel Deepening Project. Prior to relying on the information, the Corps of Engineers independently reviewed the methodology and findings using a third-party contractor. Section 4.1.3.4.2 provides details on the hydrodynamic storm surge modeling conducted by HRI.</p> <p>Additional modeling and studies can be found in the FEIS:</p> <ul style="list-style-type: none"> • Appendix G - Sediment Transport Modeling Study • Appendix H -Vessel Wake Analysis • Appendix I -Hydrodynamic and Salinity Modeling Study • Appendix L -Ship Simulation Report • Appendix M -Propeller Scour Study • Appendix N -Underkeel Clearance Study <p>The proposed beneficial use sites when constructed will restore barrier islands that provide protections to the region in the event of storms, as well as for impacts from sea level rise, and improve and bolster the natural environment, which also provides additional protections.</p>

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105	29	NGO	<p>Public Interest Review: Energy Needs - detrimental While foreign countries will have more access to dirty crude oil for their energy needs, thereby creating a new dependency on a substance known to harm the planet, the petroleum companies located/locating along the deepened channel have high energy requirements that further heat up the already hot atmosphere in Texas, further taxing the fragile Texas grid. In response to this concern about indirect impacts of channel deepening in order to increase oil exports, USACE claims that "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." USACE does acknowledge that energy needs for the Port's Harbor Island desalination plant are within scope, but accurate figures were apparently not supplied by the Port. In Section 5.3.8.1, the USACE stated that the "power generation needs for the project would be considered within the scope of review for the project. The USACE requested information on the power supply for the project, with a conservative estimate of 76 megawatts and 152 megawatts of power per day required for the 50 million gallon per day and 30 million gallons per day [for desalination] plants respectively." The USACE's unit of measure in terms of megawatts per day is nonsensical, but if USACE meant to say megawatt hours a day, then that is a lot of energy!</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of this interest factor was found to be negligible.</p> <p>In accordance with 33 CFR 320.4, energy conservation and development are major national objectives, and this evaluation received the appropriate priority during permit processing. This priority does not impact impartial decision-making with respect to application review and any final permit decision, either substantively or procedurally.</p>	<p>Section 5.0 of the FEIS discusses the potential cumulative effect of the project when combined with impacts that have already occurred, or are still occurring, in the project area due to past, present, and reasonable foreseeable projects or actions.</p>
105	30	NGO	<p>Public Interest Review: Safety - detrimental An estimated 85 lightering events will be eliminated annually. However, surrounding coastal communities like Ingleside on the Bay will be less safe because of direct and indirect effects of increased VLCC traffic (acknowledged in the Vessel Wake Analysis) to export crude oil. This includes risks of bigger spills and explosions; more hazardous navigation confirmed by Ship Simulation results in Appendix L; more significant damage, as evidenced by incidents like the Francis Scott Key Bridge collapse after being struck by a ship that lost power⁶ and a ship colliding with the Moda (now Enbridge) dock in 2021 after losing propulsion⁷; increased storm surge, tidal range, and flooding events; increased air emissions; loss of wetlands and flood plains; and impacts of global warming (rising sea level, erosion, extreme weather events, power outages, etc.).</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of this interest factor was found to be negligible, see Section 4.4.2 in the FEIS.</p>	<p>The existing channel is a deep draft navigation channel constructed and maintained for commercial vessel traffic. Vessels move at slow speeds in the channel, and are unable to turn sharply; therefore, tugs are needed to provide safe navigation and to avoid the risk of collision. Dredging operations will include provisions to lessen disruption of ferry use, such as planning dredging for off-peak or after-hours of typical high traffic ferry operations. VLCCs will continue transiting with one-way traffic restrictions, the same as they do under the No-Action Alternative.</p> <p>Compared to the No-Action Alternative, the proposed project would eliminate the need for reverse lightering traffic and thereby:</p> <ul style="list-style-type: none"> • Reduce vessel transits by 140 and 230 transits for Suezmax vessels • Increase channel availability • Reduce ferry operating time impacts compared to a no-action alternative <p>Section 4.5 of the FEIS describes the impacts of navigation on existing commercial and recreational navigation uses. A vessel wake analysis included in Appendix H of the FEIS indicates that vessel induced wakes associated with the project would minimally impact future evolution of shoreline along the ship channel. Ship simulations included in Appendix L of the FEIS concluded that the project's channel configurations and underlying environmental conditions would be acceptable for safely operating fully loaded VLCCs.</p>

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105	31	NGO	<p>Public Interest Review: In General, Needs and Welfare of the People - detrimental 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.</p> <p>USACE claims that "Per regulation, USACE is directed to assume that an applicant has made the appropriate economic evaluations and the proposal is economically viable". Which regulation requires USACE to assume that? Doesn't EVERYONE think that their project is a great idea? Shouldn't the public be able to count on USACE to leverage its engineering know-how and experience on behalf of the public to stop ill-conceived projects from happening – or at least to shape them into the very best they can be – for ALL stakeholders – not just those who stand to gain the most?</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of this interest factor was found to be negligible, see Section 4.4.2 in the FEIS.</p>	<p>Section 1.3 of the FEIS defines the extent of the project that the Port of Corpus Christi Authority (PCCA) is seeking authorization for and includes a 13.8-mile span from the southeast side of Harbor Island to the -80-ft MLLW bathymetric contour in the Gulf of Mexico. The US Army Corps of Engineers final decision will pertain only to this reach and not include areas outside of this defined footprint.</p> <p>Section 1.5 of the FEIS defines the purpose and need of the project, which is to accommodate fully loaded VLCCs. The number of VLCCs calling at PCCA has increased year over year since 2021 (91 in 2021, 170 in 2022, and 302 in 2023). Under current conditions, none of these vessels can be fully loaded, requiring accessory vessel trips and reverse lightering offshore. This partial loading translates into operational/economic inefficiency and unnecessary resource consumption and emissions. PCCA's website (https://portofcc.com/outbound-crude-oil/) provides an overview of the outbound crude oil export markets from 2016 through 2024.</p>
106	1	NGO	<p>In 2016, Texas A&M Agrilife Extension and Sea Grant Texas published reports detailing the economic impacts of marine recreational fishing in the Corpus Christi and Aransas Bay systems. Marine recreational fishing in these bay systems supports a combined 1,249 jobs and generates \$44.9 million in labor income, \$69.5 million in GDP contribution, and \$122.7 million in total economic impact. Without healthy fisheries, the local economy, supported by recreational fishing, birding, and tourism, will suffer greatly.</p>	<p>Thank you for your comment.</p>	<p>Thank you for your comment.</p>
106	2	NGO	<p>The proposed Channel Deepening must be considered as part of a whole and not simply a sum of its parts, which includes the proposed Port of Corpus Christi Authority Channel Deepening Project, Port of Corpus Christi Authority Harbor Island Crude Oil Export Terminal Facility (SWG-2019-00245), and Axis Midstream Holdings, LLC Pipeline Project (SWG-2018-00789). When considered in this matter, the entire project will have lasting detrimental effects on the health of nearby estuaries, bays, and fisheries, as well as on tourism and sport fishing, seafood production, endangered species, recreational activities, and economic stability.</p>	<p>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-foot MLLW. Therefore, the Corps 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 their inclusion in the cumulative effects analysis but not in the permit's scope of analysis.</p>	<p>The single and complete project was discussed and addressed in the Draft EIS. The CDP is a single complete project of its own merit.</p>
106	3	NGO	<p>The Corps neglected to disclose crucial modifications to its policies concerning defining a "single and complete project" and establishing the project's Purpose and Need. Consequently, this omission has resulted in a practice of "piecemealing" under the NEPA.</p>	<p>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-foot MLLW. Therefore, the Corps 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 their inclusion in the cumulative effects analysis but not in the permit's scope of analysis.</p>	<p>The single and complete project was discussed and addressed in the Draft EIS. The CDP is a single complete project of its own merit.</p>

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106	4	NGO	<p>Concerned that the USACE failed to provide scientific backing regarding their statement that modeled average and near-channel salinity increases are not expected to alter fauna.</p> <p>The USACE mentions that the deepening of the channel could have an impact on Red Drum larvae but failed to provide evidence of impacts to other species dependent on this critical passage to Corpus Christi Bay and surrounding estuaries.</p>	<p>The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD. The effect of fish and wildlife values was found to be neutral (mitigated), see Section 4.2.2.2 and 4.2.5.3.2 in the FEIS.</p> <p>Estuarine habitats and fauna would be directly affected due to dredging and placement activities. Dredging and placement of sediments for BU would have temporary impacts associated with burial of nearby benthic communities and increase turbidity near those sites. Beneficial use of dredged material is expected to have a long-term positive benefit by improving and protecting habitat and building resistance to rising sea levels. Beneficial use would also create protective barriers along the Gulf shorelines and the eroding shores of Harbor Island and Dagger Island.</p> <p>Section 4.2.2.2.2 of the FEIS acknowledges that Aransas Pass is the main route for larval transport of estuarine dependent species from the Gulf to local estuaries and that changes in hydrology due to the deepening of the channel could impact the recruitment of estuarine dependent species. A study was published in the Journal of Marine Science and Engineering in 2021 (Valseth et al., 2021) that assessed the potential impact that deepening the CCSC could have on the transport of Red Drum larvae through Aransas Pass. Their passive particle modeling indicated a slight reduction of the maximum velocity due to channel deepening. The Corps modeling also found that under the proposed project the current speeds are expected to decrease an average of 0.23 feet per second with the deeper entrance channel. The study concluded that changes in channel bathymetry (i.e. deepening) had little effect on recruitment of Red Drum larvae, with the model predicting a slight increase in the number of larvae entering the estuary with the decreased velocities. The slight decrease in velocity with the proposed project is not anticipated to have an impact on recruitment of estuarine dependent species and the impacts of channel deepening to overall larval transport at Aransas Pass should be minimal.</p>	<p>In accordance with the Magnus-Stevens Fishery Conservation and Management Act (MSFCMA), an Essential Fish Habitat (EFH) Assessment was prepared to analyze and disclose the potential impacts of the proposed project. The information from the assessment informed Sections 4.2.2.2.2 and 4.2.5.3.2 of the FEIS which discuss the impacts of larval transport and provide information on EFH. Appendix E of the FEIS provides the EFH Assessment. Section 4.0 of Appendix E discusses the studies for larval transport. Appendix B8 provides the agency correspondence.</p> <p>The Draft EIS initiated the EFH consultation under the MSFCMA. NMFS provided EFH conservation recommendations for the project in August 2022. Coordination with NMFS with respect to the MSFCMA was concluded in November 2022. NMFS provided additional EFH Conservation Recommendations on the project in February 2024, which will be addressed in the Record of Decision (see Appendix B8).</p>
106	5	NGO	<p>The USACE mentions that the deepening of the channel could have an impact on Red Drum larvae but failed to provide evidence of impacts to other species dependent on this critical passage to Corpus Christi Bay and surrounding estuaries.</p>	<p>Section 4.2.2.2.2 of the FEIS acknowledges that Aransas Pass is the main route for larval transport of estuarine dependent species from the Gulf to local estuaries and that changes in hydrology due to the deepening of the channel could impact the recruitment of estuarine dependent species. A study was published in the Journal of Marine Science and Engineering in 2021 (Valseth et al., 2021) that assessed the potential impact that deepening the CCSC could have on the transport of Red Drum larvae through Aransas Pass. Their passive particle modeling indicated a slight reduction of the maximum velocity due to channel deepening. The Corps modeling also found that under the proposed project the current speeds are expected to decrease an average of 0.23 feet per second with the deeper entrance channel. The study concluded that changes in channel bathymetry (i.e. deepening) had little effect on recruitment of Red Drum larvae, with the model predicting a slight increase in the number of larvae entering the estuary with the decreased velocities. The slight decrease in velocity with the proposed project is not anticipated to have an impact on recruitment of estuarine dependent species and the impacts of channel deepening to overall larval transport at Aransas Pass should be minimal.</p>	<p>In accordance with the Magnus-Stevens Fishery Conservation and Management Act (MSFCMA), an Essential Fish Habitat (EFH) Assessment was prepared to analyze and disclose the potential impacts of the proposed project. The information from the assessment informed Sections 4.2.2.2.2 and 4.2.5.3.2 of the FEIS which discuss the impacts of larval transport and provide information on EFH. Appendix E of the FEIS provides the EFH Assessment. Section 4.0 of Appendix E discusses the studies for larval transport. Appendix B8 provides the agency correspondence.</p> <p>The Draft EIS initiated the EFH consultation under the MSFCMA. NMFS provided EFH conservation recommendations for the project in August 2022. Coordination with NMFS with respect to the MSFCMA was concluded in November 2022. NMFS provided additional EFH Conservation Recommendations on the project in February 2024, which will be addressed in the Record of Decision (see Appendix B8).</p>

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106	6	NGO	The Draft EIS identified alternatives that could result in fewer direct impacts to aquatic resources –offshore single point mooring and inshore/offshore combination. The USACE’s position changed in the FEIS without supporting rationale. The EPA addressed this in its July 19, 2022 comment to the draft EIS, stating, “In review of the impact analysis in the Draft EIS, it is unclear how the PCCA 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 was prepared after the FEIS. The ROD had identified the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documented 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 also includes all mitigation measures, including avoidance and minimization, incorporated into the project.	The Port of Corpus Christi Authority (PCCA) prepared an Alternatives Analysis (AA) under the 404(b)(1) guidelines, associated with the Clean Water Act of 1972 and the Federal Register under 40 CFR Part 230. Four alternatives, including a no-action alternative, were reviewed and verified by USACE. The process requires a substantive USACE evaluation to determine the least environmentally damaging practicable alternative (LEDPA). USACE determined the PCCA's preferred alternative to be the LEDPA for the project's purpose and need.
106	7	NGO	The USACE provided no further discussion in their statement regarding the impacts of an increase in tidal amplitude, rather the FEIS states bluntly that “For example, comparing the Applicant’s Preferred Alternative with the No-Action Alternative indicates a tidal amplitude increase at the Inner Channel near Port Aransas of up to 15 percent increase. When considering the impacts of tidal amplitude of the No-Action condition (–54 feet MLLW authorized depth) over previous conditions (–48 feet MLLW authorized depth), modeling indicates up to 18 percent at the Inner Channel. These modeling results indicate that the Applicant’s Preferred Alternative would result in a direct cumulative increase in tidal range, particularly at the Inner Channel near Port Aransas where it could be as high as 36 percent.” The USACE lists several mitigating actions but still falls short of quantifying the impacts of a 36 percent increase in tidal range.	The Hydrodynamic Study in Appendix I of the FEIS documents modeling efforts to assess impacts to water levels from the project. The assessment concluded that a slight rise in high tide and a light drop in low tide should be expected. The tide will increase at most 0.78 inches with an average over the study area of 0.39 inches with the rate of change decreasing as you move away from Aransas Pass. For visual reference, 0.39 inches is equal to the diameter of a peppercorn or the head of tack. In contrast, the low tides are expected to drop a maximum of 1.57 inches, or the diameter of a golf ball, with the amount of lowering of the tide decreasing with the distance from the Aransas Pass.	The Port of Corpus Christi Authority (PCCA), in 2019, contracted with Texas A&M-Corpus Christi Harte Research Institute (HRI) to assess the potential impacts of storm surge, tidal hydraulics, and salinity from the various Corpus Christi Ship Channel dredging projects (proposed and ongoing). The study was completed in April 2021. As part of the development of the FEIS, PCCA provided the study to the Corps of Engineers to provide relevant information to the Channel Deepening Project. Prior to relying on the information, the Corps of Engineers independently reviewed the methodology and findings using a third-party contractor. Section 4.1.3.4.2 provides details on the hydrodynamic storm surge modeling conducted by HRI. Additional modeling and studies can be found in the FEIS: <ul style="list-style-type: none"> • Appendix G - Sediment Transport Modeling Study • Appendix H -Vessel Wake Analysis • Appendix I -Hydrodynamic and Salinity Modeling Study • Appendix L -Ship Simulation Report • Appendix M -Propeller Scour Study • Appendix N -Underkeel Clearance Study The proposed beneficial use sites when constructed will restore barrier islands that provide protections to the region in the event of storms, as well as for impacts from sea level rise, and improve and bolster the natural environment, which also provides additional protections.
107	1	PC	Commenter attached files that were too large in support of their comments in Letter ID 104.	Thank you for providing the additional information.	Thank you for providing the additional information.

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108	1	NGO	Attached comments collected from concerned citizens.	This is a form letter that was submitted and signed by multiple individuals. It is included as Letter ID 109 below.	<p>The Port of Corpus Christi Authority (PCCA) will comply with Texas General Land Office requirements (31 TAC 15) for beach nourishment, including permitting, sand sourcing, and construction. Additionally, PCCA will comply with applicable site-specific Coastal Management Plans. Placement of material will occur only after appropriate permits and approval of material meeting "beach quality sand" requirements designs are obtained. Further, beach nourishment will require an agreement with the landowner prior to placement, and such agreement will stipulate any additional site-specific details that PCCA will be required to comply with when placing material and regarding the quality of the material to be placed. A full design of the placement of material at any beneficial use site will also be required prior to placement and approved by the landowner prior to placement.</p> <p>Appendix C of the FEIS provides the studies related to the placement of dredge materials, the beneficial use monitoring plan, the dredge material placement matrix, and the summary of near-shore berm modeling. Refer to Appendix C for additional details on the material required for each beneficial use site.</p> <p>Additionally, The US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) developed a sampling and analysis plan directing the PCCA where to collect samples and what to analyze to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). The Sampling and Analysis Plan dated July 2021 was put out for bid and PCCA contracted with Terracon to complete the sediment characterization as per the Sampling and Analysis Plan. In early 2022, Terracon began the sampling activities and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for</p>
108	2	NGO	Requests an extension of the comment period.	<p>Following the comments received on the DEIS, revisions were made and included in the FEIS. Revisions to the DEIS included the addition of the following reports:</p> <ul style="list-style-type: none"> • PCCA Dredged Material Management Plan (Appendix C1) • PCCA Beneficial Use Monitoring Plan and Drawings (Appendix C2 and C3) • Cultural Resources Survey Reports (Appendix F2 and F3) • Inshore and Offshore Sediment Reports (Appendix J2 and J3) • PCCA 12-Step permittee Responsible Compensatory Mitigation Plan (Appendix K) <p>Based on the information provided in these reports, appropriate sections of the DEIS, EFH Assessment (Appendix E), Section 404(b)(1) Evaluation (Appendix O), Coastal Zone Management Program Consistency Determination (Appendix P), were revised to incorporate the findings of these reports.</p> <p>The USACE provided a 30-day comment period for the FEIS as a courtesy to the stakeholders and public. NEPA regulations do not require a comment period following the release of an FEIS.</p>	<p>The Port of Corpus Christi Authority yields to the US Army Corps of Engineers to run its process for evaluation of this project in accordance with applicable rules and regulations, including development of the draft and final Environmental Impact Statement, scope of analysis, consultation with appropriate Federal and State agencies, conducting public meetings, providing opportunity for public comment, determining extensions of time for public comment, etc.</p>

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108	3	NGO	The increased tidal amplitude from a deeper ship channel will put Ingleside on the Bay (IOB) in harm's way. IOB already has storm surge up to 4' from the last deepening.	<p>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 however reviewers believe this is likely a localized model error (Subedee and Gibeaut, 2021).</p> <p>Additional review of HRI's modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any major issues with HRI's application of model parameters or inputs for the ADCIRC/SWAN models used in its study.</p>	<p>The Port of Corpus Christi Authority (PCCA), in 2019, contracted with Texas A&M-Corpus Christi Harte Research Institute (HRI) to assess the potential impacts of storm surge, tidal hydraulics, and salinity from the various Corpus Christi Ship Channel dredging projects (proposed and ongoing). The study was completed in April 2021. As part of the development of the FEIS, PCCA provided the study to the Corps of Engineers to provide relevant information to the Channel Deepening Project. Prior to relying on the information, the Corps of Engineers independently reviewed the methodology and findings using a third-party contractor. Section 4.1.3.4.2 provides details on the hydrodynamic storm surge modeling conducted by HRI.</p> <p>Additional modeling and studies can be found in the FEIS:</p> <ul style="list-style-type: none"> • Appendix G - Sediment Transport Modeling Study • Appendix H -Vessel Wake Analysis • Appendix I -Hydrodynamic and Salinity Modeling Study • Appendix L -Ship Simulation Report • Appendix M -Propeller Scour Study • Appendix N -Underkeel Clearance Study <p>The proposed beneficial use sites when constructed will restore barrier islands that provide protections to the region in the event of storms, as well as for impacts from sea level rise, and improve and bolster the natural environment, which also provides additional protections.</p>
108	4	NGO	These large ships already have trouble maneuvering - even with power. What will happen if a fully-loaded VLCC loses power? Coastal communities are in harm's way.	Several studies relevant to navigation were included in the appendices of the FEIS. A Vessel Wake Study was included in Appendix H, A Ship Simulation Report was included in Appendix L, a Propeller Scour Study was included in Appendix M, and an Under Keel Clearance Study was included in Appendix N. The conclusions in these studies were presented in multiple sections in Chapters 4 and 5.	<p>The existing channel is a deep draft navigation channel constructed and maintained for commercial vessel traffic. Vessels move at slow speeds in the channel, and are unable to turn sharply; therefore, tugs are needed to provide safe navigation and to avoid the risk of collision. Dredging operations will include provisions to lessen disruption of ferry use, such as planning dredging for off-peak or after-hours of typical high traffic ferry operations. VLCCs will continue transiting with one-way traffic restrictions, the same as they do under the No-Action Alternative.</p> <p>Compared to the No-Action Alternative, the proposed project would eliminate the need for reverse lightering traffic and thereby:</p> <ul style="list-style-type: none"> • Reduce vessel transits by 140 and 230 transits for Suezmax vessels • Increase channel availability • Reduce ferry operating time impacts compared to a no-action alternative <p>Section 4.5 of the FEIS describes the impacts of navigation on existing commercial and recreational navigation uses. A vessel wake analysis included in Appendix H of the FEIS indicates that vessel induced wakes associated with the project would minimally impact future evolution of shoreline along the ship channel. Ship simulations included in Appendix L of the FEIS concluded that the project's channel configurations and underlying environmental conditions would be acceptable for safely operating fully loaded VLCCs.</p>

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108	5	NGO	There are already too many large vessels surrounded by tugs in the ship channels, making conditions unsafe for recreational boaters and those who fish.	<p>Several studies relevant to navigation were included in the appendices of the FEIS. A Vessel Wake Study was included in Appendix H, A Ship Simulation Report was included in Appendix L, a Propeller Scour Study was included in Appendix M, and an Under Keel Clearance Study was included in Appendix N. The conclusions in these studies were presented in multiple sections in Chapters 4 and 5.</p> <p>Vessel traffic during operations of these facilities are 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.</p>	<p>The existing channel is a deep draft navigation channel constructed and maintained for commercial vessel traffic. Vessels move at slow speeds in the channel, and are unable to turn sharply; therefore, tugs are needed to provide safe navigation and to avoid the risk of collision. Dredging operations will include provisions to lessen disruption of ferry use, such as planning dredging for off-peak or after-hours of typical high traffic ferry operations. VLCCs will continue transiting with one-way traffic restrictions, the same as they do under the No-Action Alternative.</p> <p>Compared to the No-Action Alternative, the proposed project would eliminate the need for reverse lightering traffic and thereby:</p> <ul style="list-style-type: none"> • Reduce vessel transits by 140 and 230 transits for Suezmax vessels • Increase channel availability • Reduce ferry operating time impacts compared to a no-action alternative <p>Section 4.5 of the FEIS describes the impacts of navigation on existing commercial and recreational navigation uses. A vessel wake analysis included in Appendix H of the FEIS indicates that vessel induced wakes associated with the project would minimally impact future evolution of shoreline along the ship channel. Ship simulations included in Appendix L of the FEIS concluded that the project's channel configurations and underlying environmental conditions would be acceptable for safely operating fully loaded VLCCs.</p>
108	6	NGO	It isn't right to tear up Corpus Christi Bay and disrupt aquatic and bird life so that private petroleum companies get even richer.	<p>Vessel traffic during operations of these facilities are 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. Corps does not regulate vessel movements.</p>	<p>Thank you for your comment.</p>
108	7	NGO	Keeping the channel deepened to the proposed depth of 75' will require constant dredging, which is not pleasant to be around.	<p>CCSC is a federally authorized navigation channel that has been regularly dredged since 1874. Currently, Corps 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.</p> <p>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).</p>	<p>The proposed project includes dredging of 46.3 million cubic yards of material to deepen the channel to -77 feet and -75 feet MLLW from the Gulf to station 110+00 near Harbor Island, including the approximate 10-mile extension to the entrance channel necessary to reach sufficiently deep waters. This deepening would take place largely within the footprint of the currently authorized -54 foot channel.</p> <p>Section 2.2.3 of the FEIS provides construction details for the Channel Deepening Project. New work dredging will include provisions to lessen disruption of ferry use, such as planning dredging for off-peak or after-hours of typical high traffic ferry operations and avoid certain times of the year for dredging or placement of material to protect endangered species. Similar provisions would be carried out during maintenance dredging that occurs approximately every two years for the existing channel. Dredging operations will also incorporate numerous best management practices that are currently employed by the industry when dredging and recommended by resource agencies, such as silt curtains to protect against impacts from turbidity on adjacent special aquatic sites.</p> <p>The potential impacts of project dredging on human and environmental resources identified during the public interest review are addressed in detail in the following FEIS sections:</p> <ul style="list-style-type: none"> • 2.0 Proposed Action and Alternatives • 3.0 Affected Environment • 4.0 Environmental Consequences • 5.0 Cumulative Impacts

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108	8	NGO	Placing potentially polluted dredged materials on and in front of the beaches in Port Aransas will kill tourism.	The size, quality, mineralogy, and other requirements of the Texas Administrative Code are included in the BU Plan to ensure compliance with the GLO's parameters for nourishing State-owned beaches. In addition, the beach nourishment activities were included in the consultation for federally listed threatened and endangered species. The January 2023 Biological and Conference Opinion from the USFWS, included in Appendix D3 of the FEIS, outlines the sea turtle conservation measures necessary for placement of beach nourishment material.	<p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p> <p>While not in the project footprint and a separate project, dredge material characterization was also completed concurrently for the adjacent Harbor Island Berths (SWG-2019-00245). The dredge material characterization for the footprint of the proposed Harbor Island Berths was conducted in accordance with the Sampling and Analysis Plan prepared by the Port of Corpus Christi and dated August 2021. USACE and USEPA again provided concurrence that the SAP complied with the Green Book and the RIA. Terracon performed the sampling activities beginning in early 2022 and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 27, 2023. On April 4, 2024, USEPA issued concurrence letter.</p>
108	9	NGO	This channel deepening is another step closer to bringing in ammonia and hydrogen companies that further harm our communities.	<p>During the process of evaluating a permit, the Corps develops a scope of analysis. The Corps' scope describes the portions of an overall project the Corps will evaluate as the area subject to the federal action. The Corps uses four factors described in 33 CFR 325 Appendix B to determine the geographic limit of that federal action. Factors ii and iii are the most relevant the scope for this project and the decision is documented in Section 1.5.2 of the FEIS.</p> <p>The Corps' scope is generally limited to the specific activity impacting waters of the United States and any additional portions, such as uplands, over which there is sufficient Federal control and responsibility. In addition, when analyzing indirect impacts, the Corps must consider the strength and relationship between those impacts outside of the Corps federal control with those impacts from the regulated activity. For instance, would the impacts occur even if the permit is not issued?</p> <p>These recommendations are outside of the Corps Scope of Analysis for the proposed project.</p>	<p>Section 1.3 of the FEIS defines the extent of the project that the Port of Corpus Christi Authority (PCCA) is seeking authorization for and includes a 13.8-mile span from the southeast side of Harbor Island to the -80-ft MLLW bathymetric contour in the Gulf of Mexico. The US Army Corps of Engineers final decision will pertain only to this reach and not include areas outside of this defined footprint.</p> <p>Section 1.5 of the FEIS defines the purpose and need of the project, which is to accommodate fully loaded VLCCs. The number of VLCCs calling at PCCA has increased year over year since 2021 (91 in 2021, 170 in 2022, and 302 in 2023). Under current conditions, none of these vessels can be fully loaded, requiring accessory vessel trips and reverse lightering offshore. This partial loading translates into operational/economic inefficiency and unnecessary resource consumption and emissions. PCCA's website (https://portofcc.com/outbound-crude-oil/) provides an overview of the outbound crude oil export markets from 2016 through 2024.</p>

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108	10	NGO	There is no placement of dredged clay that is compatible or consistent material for a beach nor bay. This does not follow the coastal management plan. Clay turbidity will degrade marine ecosystems.	The size, quality, mineralogy, and other requirements of the Texas Administrative Code are included in the BU Plan to ensure compliance with the GLO's parameters for nourishing State-owned beaches. In addition, the beach nourishment activities were included in the consultation for federally listed threatened and endangered species. The January 2023 Biological and Conference Opinion from the USFWS, included in Appendix D3 of the FEIS, outlines the sea turtle conservation measures necessary for placement of beach nourishment material.	<p>The Port of Corpus Christi Authority (PCCA) will comply with Texas General Land Office requirements (31 TAC 15) for beach nourishment, including permitting, sand sourcing, and construction. Additionally, PCCA will comply with applicable site-specific Coastal Management Plans. Placement of material will occur only after appropriate permits and approval of material meeting "beach quality sand" requirements designs are obtained. Further, beach nourishment will require an agreement with the landowner prior to placement, and such agreement will stipulate any additional site-specific details that PCCA will be required to comply with when placing material and regarding the quality of the material to be placed. A full design of the placement of material at any beneficial use site will also be required prior to placement and approved by the landowner prior to placement.</p> <p>Appendix C of the FEIS provides the studies related to the placement of dredge materials, the beneficial use monitoring plan, the dredge material placement matrix, and the summary of near-shore berm modeling. Refer to Appendix C for additional details on the material required for each beneficial use site.</p> <p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all</p>

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108	11	NGO	<p>More information is needed regarding the ferry schedules and frequency of traffic at certain times of the year. Impacts of increases in LNG vessels from 215/year to 480/year and expanding oil exports vessel traffic.</p>	<p>Information regarding ferry operations can be found in Section 3.6.1 of the FEIS.</p> <p>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.</p> <p>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.</p> <p>By electronic mail dated February 23, 2023, TxDOT, as the non-federal sponsor of the GIWW, notified the Corps that they have not encountered any major obstacles what would prevent the 408 application and plans for the Port of Corpus Christi to deepen the CCSC.</p>	<p>The existing channel is a deep draft navigation channel constructed and maintained for commercial vessel traffic. Vessels move at slow speeds in the channel, and are unable to turn sharply; therefore, tugs are needed to provide safe navigation and to avoid the risk of collision. Dredging operations will include provisions to lessen disruption of ferry use, such as planning dredging for off-peak or after-hours of typical high traffic ferry operations. VLCCs will continue transiting with one-way traffic restrictions, the same as they do under the No-Action Alternative.</p> <p>Compared to the No-Action Alternative, the proposed project would eliminate the need for reverse lightering traffic and thereby:</p> <ul style="list-style-type: none"> • Reduce vessel transits by 140 and 230 transits for Suezmax vessels • Increase channel availability • Reduce ferry operating time impacts compared to a no-action alternative <p>Section 4.5 of the FEIS describes the impacts of navigation on existing commercial and recreational navigation uses. A vessel wake analysis included in Appendix H of the FEIS indicates that vessel induced wakes associated with the project would minimally impact future evolution of shoreline along the ship channel. Ship simulations included in Appendix L of the FEIS concluded that the project's channel configurations and underlying environmental conditions would be acceptable for safely operating fully loaded VLCCs.</p>

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108	12	NGO	The issues regarding certain times of year for sea turtle, migrating/nesting bird activities and effects of dredge and placement was not addressed especially in Redfish Bay State Scientific Area.	<p>Consultation for federally listed threatened and endangered species was completed on January 13, 2023 when the USFWS provided the Final Conference and Biological Opinion (BCO) for the Port of Corpus Christi Authority (PCCA) Channel Deepening Project, U.S. Corps of Engineers (USACE) Permit SWG-2019-00067, Port Aransas, Nueces County, Texas and the National Marine Fisheries Service provided their Endangered Species Act - Section 7 Consultation Biological Opinion NMFS Tracking Number SERO-2022-02122 on December 9, 2022.</p> <p>The Corps will condition the permit to comply with the December 9, 2022 NMFS BO and the January 13, 2023 USFWS BCO.</p>	<p>A Biological Assessment was prepared for this project and identified the Federally listed threatened and endangered species that may potentially be present in the project area and the potential impacts of the proposed project on these protected species. The Biological Assessment can be found in Appendix D1 of the FEIS. In December 2022 and January 2023, National Marine Fisheries Service (NMFS) and US Fish and Wildlife Services (USFWS), respectively, issued a Biological Opinion on the preferred action. These Biological Opinions can be found in Appendix D2 and D3 of the FEIS. The Biological Opinions also provide measures to avoid and minimize adverse impacts to ESA-listed species during the project, including vessel traffic measures.</p> <p>Additionally, Section 3.2 of the FEIS provides information about dredging equipment, and the avoidance, minimization, and conservation measures to be implemented during dredging operations. Section 4.0 identifies measures provided by NMFS that the Port of Corpus Christi Authority's (PCCA) contractor(s) will implement to minimize potential impacts to sea turtles during the placement of dredged material. In addition to NMFS's requirements, PCCA requires contractors to follow controls for marine species management during all in-water construction activities.</p> <p>The following sections in the FEIS provide further detail on the endangered species, potential impacts from the proposed project, and associated conservation measures to be employed:</p> <ul style="list-style-type: none"> • 2.0 Status of the Listed Species • 3.0 Direct, Indirect, and Cumulative Effects from the Proposed Project • 4.0 Conservation Measures <p>Finally, one of the primary objectives contained in the PCCAs Beneficial Use Monitoring Plan (BUMP; Appendix C of FEIS) is to restore substantially eroded and washed-out shorelines at several beneficial use areas including SS1, SS2, PA4, and HI-E. Habitat restoration/creation and habitat protection are important objectives of the PCCA BUMP. Dredge material will be</p>
108	13	NGO	Purpose is for one company, Axis Midstream. Unsubstantiated claim that lightering needed at Harbor Island.	As currently proposed, the proposed project will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two permit applications have been submitted for the construction of two independent terminals on Harbor Island with -54 feet MLLW basins; matching the current federally authorized and constructed channel depth. If the permit 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 deeper depths. However, if this permit is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their current stated purpose and need at the currently authorized depths of -54-feet MLLW. Therefore, the Corps may conclude that the multiple locations and proposed facilities on Harbor Island are independent of the channel deepening project.	<p>Section 1.3 of the FEIS defines the extent of the project that the Port of Corpus Christi Authority (PCCA) is seeking authorization for and includes a 13.8-mile span from the southeast side of Harbor Island to the -80-ft MLLW bathymetric contour in the Gulf of Mexico. The US Army Corps of Engineers final decision will pertain only to this reach and not include areas outside of this defined footprint.</p> <p>Section 1.5 of the FEIS defines the purpose and need of the project, which is to accommodate fully loaded VLCCs. The number of VLCCs calling at PCCA has increased year over year since 2021 (91 in 2021, 170 in 2022, and 302 in 2023). Under current conditions, none of these vessels can be fully loaded, requiring accessory vessel trips and reverse lightering offshore. This partial loading translates into operational/economic inefficiency and unnecessary resource consumption and emissions. PCCA's website (https://portofcc.com/outbound-crude-oil/) provides an overview of the outbound crude oil export markets from 2016 through 2024.</p>

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108	14	NGO	Sea level rise projections, tidal velocity increase and impacts during storm surge (36% at Port A) not updated.	<p>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 however reviewers believe this is likely a localized model error (Subedee and Gibeaut, 2021).</p> <p>Additional review of HRI’s modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any major issues with HRI’s application of model parameters or inputs for the ADCIRC/SWAN models used in its study.</p> <p>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. See Appendix I.</p>	<p>The Port of Corpus Christi Authority (PCCA), in 2019, contracted with Texas A&M-Corpus Christi Harte Research Institute (HRI) to assess the potential impacts of storm surge, tidal hydraulics, and salinity from the various Corpus Christi Ship Channel dredging projects (proposed and ongoing). The study was completed in April 2021. As part of the development of the FEIS, PCCA provided the study to the Corps of Engineers to provide relevant information to the Channel Deepening Project. Prior to relying on the information, the Corps of Engineers independently reviewed the methodology and findings using a third-party contractor. Section 4.1.3.4.2 provides details on the hydrodynamic storm surge modeling conducted by HRI.</p> <p>Additional modeling and studies can be found in the FEIS:</p> <ul style="list-style-type: none"> • Appendix G - Sediment Transport Modeling Study • Appendix H -Vessel Wake Analysis • Appendix I -Hydrodynamic and Salinity Modeling Study • Appendix L -Ship Simulation Report • Appendix M -Propeller Scour Study • Appendix N -Underkeel Clearance Study <p>The proposed beneficial use sites when constructed will restore barrier islands that provide protections to the region in the event of storms, as well as for impacts from sea level rise, and improve and bolster the natural environment, which also provides additional protections.</p>
108	15	NGO	4,515 acres of estuarine habitat loss for minimal mitigation.	Impacts occurring in the currently dredged channel and the existing federal placement areas do not require compensatory mitigation. Mitigation for special aquatic sites that were not avoiding or minimized are mitigated at a minimum 1:1 ratio, most at a 2:1 or greater ratio.	<p>The Port of Corpus Christi Authority (PCCA) prepared a Permittee Responsible Compensatory Mitigation Plan (CMP; Appendix K of FEIS) in accordance with Title 33 Code of Federal Regulations (CFR) § 332.3 to compensate for 44.63-acres of direct impacts to special aquatic sites (SAS). This included 21.04-acres of palustrine wetlands, 23.59-acres of Essential Fish Habitat (EFH), including 16.61-acres of estuarine wetlands, 6.88-acres of submerged aquatic vegetation (SAV) or seagrass, and 0.10-acres of oyster. The USACE final Compensatory Mitigation memo dated January 03, 2023, documented the direct permanent impacts to SAS in need of mitigation and was utilized by the PCCA in developing the CMP. The objective of the CMP is restoration through the reestablishment of 42.08-acres of palustrine wetlands, 32.94-acres of estuarine wetlands, 6.88-acres of SAV, and 0.10-acres of oyster.</p> <p>Additionally, one of the primary objectives contained in PCCA’s Beneficial Use Monitoring Plan (BUMP), located in Appendix C of the FEIS, is to restore substantially eroded and washed-out shorelines at several beneficial use sites including SS1, SS2, PA4, and HI-E.</p> <p>Habitat restoration/creation and habitat protection are very important objectives of PCCAs BUMP. At SS1, this involves construction of an armored levee to restore the severely eroded shoreline and highly fragmented wetland complex that has developed over time. These actions will also limit the future loss of existing SAS at SS1 (which continues to degrade and erode at an accelerated rate) but notably also protect vast acres of additional SAS including approximately 2,400-acres of seagrass within the project watershed located directly adjacent in Redfish Bay. Without armoring and protection at SS1, the erosion and loss of SAS habitats (i.e., SAV, wetlands, tidal flat) will continue indiscriminately. In addition to the PCCAs CMP, beneficial use (BU) placement will establish an additional 181.80-acres of estuarine wetlands and 34.30-acres of palustrine wetlands at SS1. Similarly, dredge material will be utilized beneficially at SS2 to restore the shoreline washouts and erosion caused by Hurricane Harvey, thereby protecting considerable critical Piping Plover and Red Knot tidal flat habitats. Further, beach nourishment will result in approximately 803.4-acres of beneficial forebeach</p>

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109	1	PC	Requests an extension of the comment period.	<p>Following the comments received on the DEIS, revisions were made and included in the FEIS. Revisions to the DEIS included the addition of the following reports:</p> <ul style="list-style-type: none"> • PCCA Dredged Material Management Plan (Appendix C1) • PCCA Beneficial Use Monitoring Plan and Drawings (Appendix C2 and C3) • Cultural Resources Survey Reports (Appendix F2 and F3) • Inshore and Offshore Sediment Reports (Appendix J2 and J3) • PCCA 12-Step permittee Responsible Compensatory Mitigation Plan (Appendix K) <p>Based on the information provided in these reports, appropriate sections of the DEIS, EFH Assessment (Appendix E), Section 404(b)(1) Evaluation (Appendix O), Coastal Zone Management Program Consistency Determination (Appendix P), were revised to incorporate the findings of these reports.</p> <p>The USACE provided a 30-day comment period for the FEIS as a courtesy to the stakeholders and public. NEPA regulations do not require a comment period following the release of an FEIS.</p>	<p>The Port of Corpus Christi Authority yields to the US Army Corps of Engineers to run its process for evaluation of this project in accordance with applicable rules and regulations, including development of the draft and final Environmental Impact Statement, scope of analysis, consultation with appropriate Federal and State agencies, conducting public meetings, providing opportunity for public comment, determining extensions of time for public comment, etc.</p>
109	2	PC	The issues raised for the Environmental Impact Statement have not been adequately addressed.	Thank you for your comment.	Thank you for your comment.
109	3	PC	Proposed placement of dredged clay is not compatible material for a beach nor bay spoil. This does not follow the coastal management plan and clay turbidity will degrade marine ecosystems.	<p>The size, quality, mineralogy, and other requirements of the Texas Administrative Code are included in the BU Plan to ensure compliance with the GLO's parameters for nourishing State-owned beaches. In addition, the beach nourishment activities were included in the consultation for federally listed threatened and endangered species. The January 2023 Biological and Conference Opinion from the USFWS, included in Appendix D3 of the FEIS, outlines the sea turtle conservation measures necessary for placement of beach nourishment material.</p>	<p>The Port of Corpus Christi Authority (PCCA) will comply with Texas General Land Office requirements (31 TAC 15) for beach nourishment, including permitting, sand sourcing, and construction. Additionally, PCCA will comply with applicable site-specific Coastal Management Plans. Placement of material will occur only after appropriate permits and approval of material meeting "beach quality sand" requirements designs are obtained. Further, beach nourishment will require an agreement with the landowner prior to placement, and such agreement will stipulate any additional site-specific details that PCCA will be required to comply with when placing material and regarding the quality of the material to be placed. A full design of the placement of material at any beneficial use site will also be required prior to placement and approved by the landowner prior to placement.</p> <p>Appendix C of the FEIS provides the studies related to the placement of dredge materials, the beneficial use monitoring plan, the dredge material placement matrix, and the summary of near-shore berm modeling. Refer to Appendix C for additional details on the material required for each beneficial use site.</p> <p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all</p>

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109	4	PC	Analysis of collision risk when very large crude carriers dock at Harbor Island does not include increasing ferry traffic, LNG vessels, and expanding oil exports vessel traffic.	<p>Several studies relevant to navigation were included in the appendices of the FEIS. A Vessel Wake Study was included in Appendix H, A Ship Simulation Report was included in Appendix L, a Propeller Scour Study was included in Appendix M, and an Under Keel Clearance Study was included in Appendix N. The conclusions in these studies were presented in multiple sections in Chapters 4 and 5.</p> <p>Vessel traffic during operations of these facilities are 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.</p>	<p>The existing channel is a deep draft navigation channel constructed and maintained for commercial vessel traffic. Vessels move at slow speeds in the channel, and are unable to turn sharply; therefore, tugs are needed to provide safe navigation and to avoid the risk of collision. Dredging operations will include provisions to lessen disruption of ferry use, such as planning dredging for off-peak or after-hours of typical high traffic ferry operations. VLCCs will continue transiting with one-way traffic restrictions, the same as they do under the No-Action Alternative.</p> <p>Compared to the No-Action Alternative, the proposed project would eliminate the need for reverse lightering traffic and thereby:</p> <ul style="list-style-type: none"> • Reduce vessel transits by 140 and 230 transits for Suezmax vessels • Increase channel availability • Reduce ferry operating time impacts compared to a no-action alternative <p>Section 4.5 of the FEIS describes the impacts of navigation on existing commercial and recreational navigation uses. A vessel wake analysis included in Appendix H of the FEIS indicates that vessel induced wakes associated with the project would minimally impact future evolution of shoreline along the ship channel. Ship simulations included in Appendix L of the FEIS concluded that the project's channel configurations and underlying environmental conditions would be acceptable for safely operating fully loaded VLCCs.</p>
109	5	PC	The issues regarding certain times of year for sea turtle, migrating/nesting bird activities and effects of dredge and placement was not addressed especially in Redfish Bay State Scientific Area.	<p>Consultation for federally listed threatened and endangered species was completed on January 13, 2023 when the USFWS provided the Final Conference and Biological Opinion (BCO) for the Port of Corpus Christi Authority (PCCA) Channel Deepening Project, U.S. Corps of Engineers (USACE) Permit SWG-2019-00067, Port Aransas, Nueces County, Texas and the National Marine Fisheries Service provided their Endangered Species Act - Section 7 Consultation Biological Opinion NMFS Tracking Number SERO-2022-02122 on December 9, 2022.</p> <p>The Corps will condition the permit to comply with the December 9, 2022 NMFS BO and the January 13, 2023 USFWS BCO.</p>	<p>A Biological Assessment was prepared for this project and identified the Federally listed threatened and endangered species that may potentially be present in the project area and the potential impacts of the proposed project on these protected species. The Biological Assessment can be found in Appendix D1 of the FEIS. In December 2022 and January 2023, National Marine Fisheries Service (NMFS) and US Fish and Wildlife Services (USFWS), respectively, issued a Biological Opinion on the preferred action. These Biological Opinions can be found in Appendix D2 and D3 of the FEIS. The Biological Opinions also provide measures to avoid and minimize adverse impacts to ESA-listed species during the project, including vessel traffic measures.</p> <p>Additionally, Section 3.2 of the FEIS provides information about dredging equipment, and the avoidance, minimization, and conservation measures to be implemented during dredging operations. Section 4.0 identifies measures provided by NMFS that the Port of Corpus Christi Authority's (PCCA) contractor(s) will implement to minimize potential impacts to sea turtles during the placement of dredged material. In addition to NMFS's requirements, PCCA requires contractors to follow controls for marine species management during all in-water construction activities.</p> <p>The following sections in the FEIS provide further detail on the endangered species, potential impacts from the proposed project, and associated conservation measures to be employed:</p> <ul style="list-style-type: none"> • 2.0 Status of the Listed Species • 3.0 Direct, Indirect, and Cumulative Effects from the Proposed Project • 4.0 Conservation Measures <p>Finally, one of the primary objectives contained in the PCCAs Beneficial Use Monitoring Plan (BUMP; Appendix C of FEIS) is to restore substantially eroded and washed-out shorelines at several beneficial use areas including SS1, SS2, PA4, and HI-E. Habitat restoration/creation and habitat protection are important objectives of the PCCA BUMP. Dredge material will be</p>

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109	6	PC	Purpose is for one company, Axis Midstream. Unsubstantiated claim that lightering needed at Harbor Island.	As currently proposed, the proposed project will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two permit applications have been submitted for the construction of two independent terminals on Harbor Island with -54 feet MLLW basins; matching the current federally authorized and constructed channel depth. If the permit 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 deeper depths. However, if this permit is not authorized and/or constructed, the proposed Harbor Island facilities would continue to meet their current stated purpose and need at the currently authorized depths of -54-feet MLLW. Therefore, the Corps may conclude that the multiple locations and proposed facilities on Harbor Island are independent of the channel deepening project.	Section 1.3 of the FEIS defines the extent of the project that the Port of Corpus Christi Authority (PCCA) is seeking authorization for and includes a 13.8-mile span from the southeast side of Harbor Island to the -80-ft MLLW bathymetric contour in the Gulf of Mexico. The US Army Corps of Engineers final decision will pertain only to this reach and not include areas outside of this defined footprint. Section 1.5 of the FEIS defines the purpose and need of the project, which is to accommodate fully loaded VLCCs. The number of VLCCs calling at PCCA has increased year over year since 2021 (91 in 2021, 170 in 2022, and 302 in 2023). Under current conditions, none of these vessels can be fully loaded, requiring accessory vessel trips and reverse lightering offshore. This partial loading translates into operational/economic inefficiency and unnecessary resource consumption and emissions. PCCA's website (https://portofcc.com/outbound-crude-oil/) provides an overview of the outbound crude oil export markets from 2016 through 2024.
109	7	PC	Sea level rise projections, tidal velocity increase and impacts during storm surge (36% at Port A) not updated.	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 however reviewers believe this is likely a localized model error (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 major issues with HRI's application of model parameters or inputs for the ADCIRC/SWAN models used in its study. 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. See Appendix I.	The Port of Corpus Christi Authority (PCCA), in 2019, contracted with Texas A&M-Corpus Christi Harte Research Institute (HRI) to assess the potential impacts of storm surge, tidal hydraulics, and salinity from the various Corpus Christi Ship Channel dredging projects (proposed and ongoing). The study was completed in April 2021. As part of the development of the FEIS, PCCA provided the study to the Corps of Engineers to provide relevant information to the Channel Deepening Project. Prior to relying on the information, the Corps of Engineers independently reviewed the methodology and findings using a third-party contractor. Section 4.1.3.4.2 provides details on the hydrodynamic storm surge modeling conducted by HRI. Additional modeling and studies can be found in the FEIS: <ul style="list-style-type: none"> • Appendix G - Sediment Transport Modeling Study • Appendix H -Vessel Wake Analysis • Appendix I -Hydrodynamic and Salinity Modeling Study • Appendix L -Ship Simulation Report • Appendix M -Propeller Scour Study • Appendix N -Underkeel Clearance Study The proposed beneficial use sites when constructed will restore barrier islands that provide protections to the region in the event of storms, as well as for impacts from sea level rise, and improve and bolster the natural environment, which also provides additional protections.

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109	8	PC	4,515 acres of estuarine habitat loss for minimal mitigation.	Impacts occurring in the currently dredged channel and the existing federal placement areas do not require compensatory mitigation. Mitigation for special aquatic sites that were not avoiding or minimized are mitigated at a minimum 1:1 ratio, most at a 2:1 or greater ratio.	<p>The Port of Corpus Christi Authority (PCCA) prepared a Permittee Responsible Compensatory Mitigation Plan (CMP; Appendix K of FEIS) in accordance with Title 33 Code of Federal Regulations (CFR) § 332.3 to compensate for 44.63-acres of direct impacts to special aquatic sites (SAS). This included 21.04-acres of palustrine wetlands, 23.59-acres of Essential Fish Habitat (EFH), including 16.61-acres of estuarine wetlands, 6.88-acres of submerged aquatic vegetation (SAV) or seagrass, and 0.10-acres of oyster. The USACE final Compensatory Mitigation memo dated January 03, 2023, documented the direct permanent impacts to SAS in need of mitigation and was utilized by the PCCA in developing the CMP. The objective of the CMP is restoration through the reestablishment of 42.08-acres of palustrine wetlands, 32.94-acres of estuarine wetlands, 6.88-acres of SAV, and 0.10-acres of oyster.</p> <p>Additionally, one of the primary objectives contained in PCCA's Beneficial Use Monitoring Plan (BUMP), located in Appendix C of the FEIS, is to restore substantially eroded and washed-out shorelines at several beneficial use sites including SS1, SS2, PA4, and HI-E.</p> <p>Habitat restoration/creation and habitat protection are very important objectives of PCCAs BUMP. At SS1, this involves construction of an armored levee to restore the severely eroded shoreline and highly fragmented wetland complex that has developed over time. These actions will also limit the future loss of existing SAS at SS1 (which continues to degrade and erode at an accelerated rate) but notably also protect vast acres of additional SAS including approximately 2,400-acres of seagrass within the project watershed located directly adjacent in Redfish Bay. Without armoring and protection at SS1, the erosion and loss of SAS habitats (i.e., SAV, wetlands, tidal flat) will continue indiscriminately. In addition to the PCCAs CMP, beneficial use (BU) placement will establish an additional 181.80-acres of estuarine wetlands and 34.30-acres of palustrine wetlands at SS1. Similarly, dredge material will be utilized beneficially at SS2 to restore the shoreline washouts and erosion caused by Hurricane Harvey, thereby protecting considerable critical Piping Plover and Red Knot tidal flat habitats. Further, beach nourishment will result in approximately 803.4-acres of beneficial forebeach and beach dune habitat, which includes habitat for FFA listed species.</p>
110	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.

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110	2	PC	Wants documentation that the soil content from the additional dredge areas of Harbor Island is safe in every category of testing, no new dredging can be acceptable. Information in general regarding this permit request is incomplete.	Deepening of water bottoms from Harbor Island to the PCCA North Bulkhead Lines will be accomplished as separable permit actions, and therefore are outside the purview of the Channel Deepening Project permit action. These deepened water bottom areas will together with the deepening of the waterway (existing shipping lane) will provide the geometries for the turning basin footprints.	<p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p> <p>While not in the project footprint and a separate project, dredge material characterization was also completed concurrently for the adjacent Harbor Island Berths (SWG-2019-00245). The dredge material characterization for the footprint of the proposed Harbor Island Berths was conducted in accordance with the Sampling and Analysis Plan prepared by the Port of Corpus Christi and dated August 2021. USACE and USEPA again provided concurrence that the SAP complied with the Green Book and the RIA. Terracon performed the sampling activities beginning in early 2022 and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 27, 2023. On March 4, 2024, USEPA issued a concurrence letter.</p>
111	1	PC	<p><i>Commenter provides numerous direct quotes from the FEIS, at times it is difficult to draw specific comments. See leter for more information.</i></p> <p>EIS states under the No-Action VLCC would continue to be partially loaded and reverse-lightered offshore, but does not mention where they would be partially loaded.</p>	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and was prepared after the FEIS. The ROD had identified the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documented 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 also includes all mitigation measures, including avoidance and minimization, incorporated into the project.	The Port of Corpus Christi Authority (PCCA) prepared an Alternatives Analysis (AA) under the 404(b)(1) guidelines, associated with the Clean Water Act of 1972 and the Federal Register under 40 CFR Part 230. Four alternatives, including a no-action alternative, were reviewed and verified by USACE. The process requires a substantive USACE evaluation to determine the least environmentally damaging practicable alternative (LEDPA). USACE determined the PCCA's preferred alternative to be the LEDPA for the project's purpose and need.
111	2	PC	Commenter does not like that the No-Action alternative assumes projects that are not underway yet, Harbor Island and Axis Midstream.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and was prepared after the FEIS. The ROD had identified the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documented 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 also includes all mitigation measures, including avoidance and minimization, incorporated into the project.	The Port of Corpus Christi Authority (PCCA) prepared an Alternatives Analysis (AA) under the 404(b)(1) guidelines, associated with the Clean Water Act of 1972 and the Federal Register under 40 CFR Part 230. Four alternatives, including a no-action alternative, were reviewed and verified by USACE. The process requires a substantive USACE evaluation to determine the least environmentally damaging practicable alternative (LEDPA). USACE determined the PCCA's preferred alternative to be the LEDPA for the project's purpose and need.

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111	3	PC	Commenter does not like that the other projects, Harbor Island and Axis Midstream are considered separate projects and that neither one of those required 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 Corps 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 their inclusion in the cumulative effects analysis but not in the permit's scope of analysis.	The single and complete project was discussed and addressed in the Draft EIS. The CDP is a single complete project of its own merit.
111	4	PC	Commenter is concerned about the impact of the desalination projects and they it would exacerbate environmental harm to this area.	<p>The potential changes from the proposed desalination projects were not included in the public interest review since they are not in the scope of this permit application.</p> <p>Modeling by Baird (2022) (Appendix I) indicate minor increases in salinity (less than 1 ppt) are anticipated under Alternative 1. As described in the FEIS, most estuarine organisms occupying these environments are ubiquitous along the Texas coast and can tolerate a wide range of salinities (Pattillo et al., 1997). Information regarding salinity tolerances and salinity maximums for common fish, shellfish, wetlands, and submerged aquatic vegetation within the study area are included in Section 3.2.3.4 (Salinity), tables 3-3 and 3-4.</p>	<p>Section 3.2.3.4 of the FEIS addresses potential impacts to salinity in the bay system in detail. Salinity modeling indicates that a change in the tidal prism associated with channel deepening increases the exchange of saltwater between Corpus Christi and Nueces Bay. Attachment I of the FEIS provides the hydrodynamic and salinity modeling study. The results indicate that the increase would be less than 1 ppt in the Corpus Christi Bay system. According to the FEIS reference, Baird, 2022c, this magnitude of change is negligible given the natural range of salinities in the bay and the wide salinity tolerances of endemic estuarine species. Section 5.0 of the FEIS provides a summary of the cumulative impacts of salinity.</p> <p>The Port of Corpus Christi Authority (PCCA) has also completed additional far field, three-dimensional modeling of the Corpus Christi Bay system to evaluate the potential impacts from the discharges of the proposed desalination plants on PCCA property at Harbor Island and La Quinta. The modeling report documenting the results was produced during the contested case hearing for the Texas Commission on Environmental Quality (TCEQ) discharge permit and was evaluated as part of the ultimate record of decision and issuance (by TCEQ) of the discharge permit for up to 50 million gallons per day desalination facility at Harbor Island on December 22, 2022. The US Environmental Protection Agency withdrew objections to the permit in September 2023.</p> <p>PCCA is in the process of making all data and studies related to a potential desalination facility at Harbor Island available through the PCCA web page at https://portofcc.com/</p>

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111	5	PC	Concerned that the model predicting a 5-10 percent increase in sedimentation in certain reaches in the Inner Harbor could be an underestimate. Aerial photos show massive plumes of sediment being pushed into waterways by tugboats positioning VLCCs into berths.	The Vessel Wake Analysis conducted by Baird (2022b; Appendix H) indicate that the CDP would have minimal impacts to the shorelines along the CCSC. The Hydrodynamic and Sediment Transport models (Appendix I, Baird 2022c) conducted by Baird also indicate that the changes in tidal currents and any associated sediment transport changes leading to erosion are also minimal.	<p>The proposed project includes dredging of 46.3 million cubic yards of material to deepen the channel to -77 feet and -75 feet MLLW from the Gulf to station 110+00 near Harbor Island, including the approximate 10-mile extension to the entrance channel necessary to reach sufficiently deep waters. This deepening would take place largely within the footprint of the currently authorized -54 foot channel.</p> <p>Section 2.2.3 of the FEIS provides construction details for the Channel Deepening Project. New work dredging will include provisions to lessen disruption of ferry use, such as planning dredging for off-peak or after-hours of typical high traffic ferry operations and avoid certain times of the year for dredging or placement of material to protect endangered species. Similar provisions would be carried out during maintenance dredging that occurs approximately every two years for the existing channel. Dredging operations will also incorporate numerous best management practices that are currently employed by the industry when dredging and recommended by resource agencies, such as silt curtains to protect against impacts from turbidity on adjacent special aquatic sites.</p> <p>The potential impacts of project dredging on human and environmental resources identified during the public interest review are addressed in detail in the following FEIS sections:</p> <ul style="list-style-type: none"> • 2.0 Proposed Action and Alternatives • 3.0 Affected Environment • 4.0 Environmental Consequences • 5.0 Cumulative Impacts
111	6	PC	The Tidal amplitude at the Inner Channel near Port Aransas has the largest increase, which is about 17 percent. Concerned about the impacts to residential areas, bird habitat and breeding grounds would be negatively impacts by this.	<p>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 however reviewers believe this is likely a localized model error (Subedee and Gibeaut, 2021).</p> <p>Additional review of HRI’s modeling report was completed to validate their results (Baird, 2021a). The reviewers did not find any major issues with HRI’s application of model parameters or inputs for the ADCIRC/SWAN models used in its study.</p>	<p>The Port of Corpus Christi Authority (PCCA), in 2019, contracted with Texas A&M-Corpus Christi Harte Research Institute (HRI) to assess the potential impacts of storm surge, tidal hydraulics, and salinity from the various Corpus Christi Ship Channel dredging projects (proposed and ongoing). The study was completed in April 2021. As part of the development of the FEIS, PCCA provided the study to the Corps of Engineers to provide relevant information to the Channel Deepening Project. Prior to relying on the information, the Corps of Engineers independently reviewed the methodology and findings using a third-party contractor. Section 4.1.3.4.2 provides details on the hydrodynamic storm surge modeling conducted by HRI.</p> <p>Additional modeling and studies can be found in the FEIS:</p> <ul style="list-style-type: none"> • Appendix G - Sediment Transport Modeling Study • Appendix H -Vessel Wake Analysis • Appendix I -Hydrodynamic and Salinity Modeling Study • Appendix L -Ship Simulation Report • Appendix M -Propeller Scour Study • Appendix N -Underkeel Clearance Study <p>The proposed beneficial use sites when constructed will restore barrier islands that provide protections to the region in the event of storms, as well as for impacts from sea level rise, and improve and bolster the natural environment, which also provides additional protections.</p>

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111	7	PC	Concerned about the increase of salinity in the entire Corpus Christi Bay system. And the additional brine from desalination facilities.	<p>The potential changes from the proposed desalination projects were not included in the public interest review since they are not in the scope of this permit application.</p> <p>Modeling by Baird (2022) (Appendix I) indicate minor increases in salinity (less than 1 ppt) are anticipated under Alternative 1. As described in the FEIS, most estuarine organisms occupying these environments are ubiquitous along the Texas coast and can tolerate a wide range of salinities (Pattillo et al., 1997). Information regarding salinity tolerances and salinity maximums for common fish, shellfish, wetlands, and submerged aquatic vegetation within the study area are included in Section 3.2.3.4 (Salinity), tables 3-3 and 3-4.</p>	<p>Section 3.2.3.4 of the FEIS addresses potential impacts to salinity in the bay system in detail. Salinity modeling indicates that a change in the tidal prism associated with channel deepening increases the exchange of saltwater between Corpus Christi and Nueces Bay. Attachment I of the FEIS provides the hydrodynamic and salinity modeling study. The results indicate that the increase would be less than 1 ppt in the Corpus Christi Bay system. According to the FEIS reference, Baird, 2022c, this magnitude of change is negligible given the natural range of salinities in the bay and the wide salinity tolerances of endemic estuarine species. Section 5.0 of the FEIS provides a summary of the cumulative impacts of salinity.</p> <p>The Port of Corpus Christi Authority (PCCA) has also completed additional far field, three-dimensional modeling of the Corpus Christi Bay system to evaluate the potential impacts from the discharges of the proposed desalination plants on PCCA property at Harbor Island and La Quinta. The modeling report documenting the results was produced during the contested case hearing for the Texas Commission on Environmental Quality (TCEQ) discharge permit and was evaluated as part of the ultimate record of decision and issuance (by TCEQ) of the discharge permit for up to 50 million gallons per day desalination facility at Harbor Island on December 22, 2022. The US Environmental Protection Agency withdrew objections to the permit in September 2023.</p> <p>PCCA is in the process of making all data and studies related to a potential desalination facility at Harbor Island available through the PCCA web page at https://portofcc.com/</p>
111	8	PC	Concerned about the salinity levels as they are key to the health of the ecosystem.	<p>The impact of CDP on salinity is very small (< 1 ppt in average) and the impact is limited in the project area (i.e., Aransas pass).</p> <p>Information regarding salinity tolerances and salinity maximums for common fish, shellfish, wetlands, and submerged aquatic vegetation within the study area are addressed in Section 3.2.3.4 (Salinity).</p>	<p>Section 3.2.3.4 of the FEIS addresses potential impacts to salinity in the bay system in detail. Salinity modeling indicates that a change in the tidal prism associated with channel deepening increases the exchange of saltwater between Corpus Christi and Nueces Bay. Attachment I of the FEIS provides the hydrodynamic and salinity modeling study. The results indicate that the increase would be less than 1 ppt in the Corpus Christi Bay system. According to the FEIS reference, Baird, 2022c, this magnitude of change is negligible given the natural range of salinities in the bay and the wide salinity tolerances of endemic estuarine species. Section 5.0 of the FEIS provides a summary of the cumulative impacts of salinity.</p> <p>The Port of Corpus Christi Authority (PCCA) has also completed additional far field, three-dimensional modeling of the Corpus Christi Bay system to evaluate the potential impacts from the discharges of the proposed desalination plants on PCCA property at Harbor Island and La Quinta. The modeling report documenting the results was produced during the contested case hearing for the Texas Commission on Environmental Quality (TCEQ) discharge permit and was evaluated as part of the ultimate record of decision and issuance (by TCEQ) of the discharge permit for up to 50 million gallons per day desalination facility at Harbor Island on December 22, 2022. The US Environmental Protection Agency withdrew objections to the permit in September 2023.</p> <p>PCCA is in the process of making all data and studies related to a potential desalination facility at Harbor Island available through the PCCA web page at https://portofcc.com/</p>

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111	9	PC	Concerned the salinity levels combined with the desalination discharge would push oysters over the brink.	<p>The potential changes from the proposed desalination projects were not included in the public interest review since they are not in the scope of this permit application.</p> <p>Modeling by Baird (2022) (Appendix I) indicate minor increases in salinity (less than 1 ppt) are anticipated under Alternative 1. As described in the FEIS, most estuarine organisms occupying these environments are ubiquitous along the Texas coast and can tolerate a wide range of salinities (Pattillo et al., 1997). Information regarding salinity tolerances and salinity maximums for common fish, shellfish, wetlands, and submerged aquatic vegetation within the study area are included in Section 3.2.3.4 (Salinity), tables 3-3 and 3-4.</p> <p>The potential changes from the proposed desalination projects were not explicitly modeled in the hydrodynamic and salinity model. The changes due to the deepening project would not likely be substantially affected by any additional changes driven by the desalination projects and may actually be decreased in magnitude.</p>	<p>Section 3.2.3.4 of the FEIS addresses potential impacts to salinity in the bay system in detail. Salinity modeling indicates that a change in the tidal prism associated with channel deepening increases the exchange of saltwater between Corpus Christi and Nueces Bay. Attachment I of the FEIS provides the hydrodynamic and salinity modeling study. The results indicate that the increase would be less than 1 ppt in the Corpus Christi Bay system. According to the FEIS reference, Baird, 2022c, this magnitude of change is negligible given the natural range of salinities in the bay and the wide salinity tolerances of endemic estuarine species. Section 5.0 of the FEIS provides a summary of the cumulative impacts of salinity.</p> <p>The Port of Corpus Christi Authority (PCCA) has also completed additional far field, three-dimensional modeling of the Corpus Christi Bay system to evaluate the potential impacts from the discharges of the proposed desalination plants on PCCA property at Harbor Island and La Quinta. The modeling report documenting the results was produced during the contested case hearing for the Texas Commission on Environmental Quality (TCEQ) discharge permit and was evaluated as part of the ultimate record of decision and issuance (by TCEQ) of the discharge permit for up to 50 million gallons per day desalination facility at Harbor Island on December 22, 2022. The US Environmental Protection Agency withdrew objections to the permit in September 2023.</p> <p>PCCA is in the process of making all data and studies related to a potential desalination facility at Harbor Island available through the PCCA web page at https://portofcc.com/</p>
111	10	PC	Concerned about sea level rise and the impacts from hurricanes, and this is enough to deny the permit. Comments that a professor from Rice University has stated that sea level is rising much faster than estimated.	Thank you for your comment.	Thank you for your comment.

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111	11	PC	<p>Commenter is concerned about the quality of the sediment being dredged and its impacts. States the updated sampling did not include Harbor Island and should be done by a third party, not the Port. Believes the most recent data presents serious questions regarding sediment quality for placement and that it is important to scrutinize the sediment for BU sites.</p>	<p>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 Regional Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</p> <p>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.</p> <p><i>Response continues on next row.</i></p>	<p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p> <p>While not in the project footprint and a separate project, dredge material characterization was also completed concurrently for the adjacent Harbor Island Berths (SWG-2019-00245). The dredge material characterization for the footprint of the proposed Harbor Island Berths was conducted in accordance with the Sampling and Analysis Plan prepared by the Port of Corpus Christi and dated August 2021. USACE and USEPA again provided concurrence that the SAP complied with the Green Book and the RIA. Terracon performed the sampling activities beginning in early 2022 and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 27, 2023. On March 4, 2024, USEPA issued a concurrence letter.</p>

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111	11	PC	<p>Commenter is concerned about the quality of the sediment being dredged and its impacts. States the updated sumping did not include Harbor Island and should be done by a thrid party, not the Port. Believes the most recent data presents serious questions regarding sediment quality for placement and that is important to scrutinize the sediment for BU sites.</p>	<p>Historical testing of the CCSC was included in the FEIS 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.</p> <p>Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material was 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. Based on the results of the sampling, testing, and evaluation of sediment, analysis concluded that no adverse environmental effects would be expected from dredging or placement of sediment from the project area (Terracon Consultants, Inc., 2023a and 2023b). The USACE reviewed the sediment testing reports from the Applicant and concluded 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 for ocean disposal. The EPA reviewed the information provided by the USACE and concurred with the determination, concluding that the work described complies with the applicable subparts of 40 CFR Parts 225-228.</p> <p><i>Response continues on next row.</i></p>	<p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p> <p>While not in the project footprint and a separate project, dredge material characterization was also completed concurrently for the adjacent Harbor Island Berths (SWG-2019-00245). The dredge material characterization for the footprint of the proposed Harbor Island Berths was conducted in accordance with the Sampling and Analysis Plan prepared by the Port of Corpus Christi and dated August 2021. USACE and USEPA again provided concurrence that the SAP complied with the Green Book and the RIA. Terracon performed the sampling activities beginning in early 2022 and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 27, 2023. On March 4, 2024, USEPA issued a concurrence letter</p>

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111	11	PC	<p>Commenter is concerned about the quality of the sediment being dredged and its impacts. States the updated sumping did not include Harbor Island and should be done by a thrid party, not the Port. Believes the most recent data presents serious questions regarding sediment quality for placement and that is important to scrutinize the sediment for BU sites.</p>	<p>Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.</p>	<p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p> <p>While not in the project footprint and a separate project, dredge material characterization was also completed concurrently for the adjacent Harbor Island Berths (SWG-2019-00245). The dredge material characterization for the footprint of the proposed Harbor Island Berths was conducted in accordance with the Sampling and Analysis Plan prepared by the Port of Corpus Christi and dated August 2021. USACE and USEPA again provided concurrence that the SAP complied with the Green Book and the RIA. Terracon performed the sampling activities beginning in early 2022 and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 27, 2023. On March 4, 2024, USEPA issued a concurrence letter</p>

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112	1	PC	<p><i>Commenter provides numerous direct quotes from the FEIS, at times it is difficult to draw specific comments. See letter for more information.</i></p> <p>While impacts of beach nourishment may be "localized" 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.</p>	<p>The size, quality, mineralogy, and other requirements of the Texas Administrative Code are included in the BU Plan to ensure compliance with the GLO's parameters for nourishing State-owned beaches. In addition, the beach nourishment activities were included in the consultation for federally listed threatened and endangered species. The January 2023 Biological and Conference Opinion from the USFWS, included in Appendix D3 of the FEIS, outlines the sea turtle conservation measures necessary for placement of beach nourishment material.</p>	<p>The Port of Corpus Christi Authority (PCCA) will comply with Texas General Land Office requirements (31 TAC 15) for beach nourishment, including permitting, sand sourcing, and construction. Additionally, PCCA will comply with applicable site-specific Coastal Management Plans. Placement of material will occur only after appropriate permits and approval of material meeting "beach quality sand" requirements designs are obtained. Further, beach nourishment will require an agreement with the landowner prior to placement, and such agreement will stipulate any additional site-specific details that PCCA will be required to comply with when placing material and regarding the quality of the material to be placed. A full design of the placement of material at any beneficial use site will also be required prior to placement and approved by the landowner prior to placement.</p> <p>Appendix C of the FEIS provides the studies related to the placement of dredge materials, the beneficial use monitoring plan, the dredge material placement matrix, and the summary of near-shore berm modeling. Refer to Appendix C for additional details on the material required for each beneficial use site.</p> <p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all</p>
112	2	PC	<p>Commenter does not like the use of the word "should" when referring to beach quality sandt being placed for beach nourishment and should say "will". 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.</p>	<p>Thank you for your comment.</p>	<p>Thank you for your comment.</p>
112	3	PC	<p>Commenter concerned about the Port's ability to accommodate future growth, unclear on the term "multiple" used. Unclear how many this is. States it is unlikely that partially loaded outbound VLCCs could top off at Harbor Island and potentially reduce or eliminate reverse lightering.</p>	<p>As currently proposed, the proposed project will provide access to multiple locations on Harbor Island. While these facilities are not currently constructed, two permit applications have been submitted for the construction of two independent terminals on Harbor Island with -54 feet MLLW basins; matching the current federally authorized and constructed channel depth.</p>	<p>Section 1.3 of the FEIS defines the extent of the project that the Port of Corpus Christi Authority (PCCA) is seeking authorization for and includes a 13.8-mile span from the southeast side of Harbor Island to the -80-ft MLLW bathymetric contour in the Gulf of Mexico. The US Army Corps of Engineers final decision will pertain only to this reach and not include areas outside of this defined footprint.</p> <p>Section 1.5 of the FEIS defines the purpose and need of the project, which is to accommodate fully loaded VLCCs. The number of VLCCs calling at PCCA has increased year over year since 2021 (91 in 2021, 170 in 2022, and 302 in 2023). Under current conditions, none of these vessels can be fully loaded, requiring accessory vessel trips and reverse lightering offshore. This partial loading translates into operational/economic inefficiency and unnecessary resource consumption and emissions. PCCA's website (https://portofcc.com/outbound-crude-oil/) provides an overview of the outbound crude oil export markets from 2016 through 2024.</p>

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112	4	PC	States the project would not be in the "public interest", only the interest of the PCCA. The project would grant PCCA a logistical and economic advantage over the private industries further along the Ship Channel that have already invested heavily in upgrading their existing facilities to load and transfer oil and gas. Nowhere is it mentioned how this project might be funded.	<p>The decision whether to issue a permit will be based on an evaluation of the probable impacts, including cumulative impacts, of the proposed activity and its intended use on the public interest as stated at 33 CFR 320.4(a). To the extent appropriate, the public interest review below also includes consideration of additional policies as described in 33 CFR 320.4(b) through (r). The benefits that may be reasonably expected to accrue from the proposal are balanced against its reasonably foreseeable detriments.</p> <p>All public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of the ROD.</p>	<p>While the Port of Corpus Christi Authority (PCCA) has taxing authority, it does not exercise its taxing authority. Rather, revenues garnered from services provided by PCCA are reinvested to fund infrastructure projects. PCCA also has the capacity to take out bonds to support large infrastructure projects in excess of what can be supported with annual revenues or accumulated capital reserves. The Channel Deepening Project would be funded through some combination of PCCA and private (specifically, PCCA customers for whom incrementally deeper channel confers operational benefit) capital.</p> <p>Not all industry in the region is affiliated with PCCA, and not all PCCA customers (i.e. users of the Ship Channel) are PCCA tenants; many own the property on which their facilities are built. In the case of PCCA-owned property, most exists outside of the Extra-Territorial Jurisdiction (ETJs) of local municipalities and nearly all is in an unimproved condition and/or is under a farm/agriculture exemption and is thus generating very minimal tax revenue. Once developed by a PCCA customer for industrial use, all improvements are subject to ad valorem taxation thus generating orders of magnitude more in tax revenue than might have been taken "off the tax rolls" when PCCA acquired the undeveloped property.</p>
112	5	PC	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.	<p>Deepening of water bottoms from Harbor Island to the PCCA North Bulkhead Lines will be accomplished as separable permit actions, and therefore are outside the purview of the Channel Deepening Project permit action. These deepened water bottom areas will together with the deepening of the waterway (existing shipping lane) will provide the geometries for the turning basin footprints.</p>	<p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p> <p>While not in the project footprint and a separate project, dredge material characterization was also completed concurrently for the adjacent Harbor Island Berths (SWG-2019-00245). The dredge material characterization for the footprint of the proposed Harbor Island Berths was conducted in accordance with the Sampling and Analysis Plan prepared by the Port of Corpus Christi and dated August 2021. USACE and USEPA again provided concurrence that the SAP complied with the Green Book and the RIA. Terracon performed the sampling activities beginning in early 2022 and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 27, 2023. On March 4, 2024, USEPA issued concurrence letter.</p>

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112	6	PC	<p>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.</p>	<p>The potential changes from the proposed desalination projects were not included in the public interest review since they are not in the scope of this permit application.</p> <p>Modeling by Baird (2022) (Appendix I) indicate minor increases in salinity (less than 1 ppt) are anticipated under Alternative 1. As described in the FEIS, most estuarine organisms occupying these environments are ubiquitous along the Texas coast and can tolerate a wide range of salinities (Pattillo et al., 1997). Information regarding salinity tolerances and salinity maximums for common fish, shellfish, wetlands, and submerged aquatic vegetation within the study area are included in Section 3.2.3.4 (Salinity), tables 3-3 and 3-4.</p>	<p>Section 3.2.3.4 of the FEIS addresses potential impacts to salinity in the bay system in detail. Salinity modeling indicates that a change in the tidal prism associated with channel deepening increases the exchange of saltwater between Corpus Christi and Nueces Bay. Attachment I of the FEIS provides the hydrodynamic and salinity modeling study. The results indicate that the increase would be less than 1 ppt in the Corpus Christi Bay system. According to the FEIS reference, Baird, 2022c, this magnitude of change is negligible given the natural range of salinities in the bay and the wide salinity tolerances of endemic estuarine species. Section 5.0 of the FEIS provides a summary of the cumulative impacts of salinity.</p> <p>The Port of Corpus Christi Authority (PCCA) has also completed additional far field, three-dimensional modeling of the Corpus Christi Bay system to evaluate the potential impacts from the discharges of the proposed desalination plants on PCCA property at Harbor Island and La Quinta. The modeling report documenting the results was produced during the contested case hearing for the Texas Commission on Environmental Quality (TCEQ) discharge permit and was evaluated as part of the ultimate record of decision and issuance (by TCEQ) of the discharge permit for up to 50 million gallons per day desalination facility at Harbor Island on December 22, 2022. The US Environmental Protection Agency withdrew objections to the permit in September 2023.</p> <p>PCCA is in the process of making all data and studies related to a potential desalination facility at Harbor Island available through the PCCA web page at https://portofcc.com/</p>
112	7	PC	<p>Surprised that No-Action states there would be no emissions associated with construction, Harbor Island and Axis Midstream have not been built, says that these facilities are not included as components of the No-Action, but their impacts are now.</p>	<p>The Project has been analyzed for conformity applicability pursuant to regulations implementing Section 176(c) of the Clean Air Act. No air quality permits are anticipated to be required for this project. Because the CDP is located in Aransas, San Patricio, and Nueces counties, and these counties have been designated in attainment or unclassifiable with the 2015 8-hour ozone standard, the General Conformity requirements are not applicable, and a General Conformity Determination is not required.</p>	<p>Section 4.1.9 of the FEIS addresses air emissions associated with the various alternatives during both construction and operation, or use of the channel following construction.</p> <p>Air emissions associated with operations from proposed adjacent operations are evaluated in Section 5.4.5 of the FEIS. Furthermore, any proposed projects will be required to obtain State and Federal permits prior to construction, including permits authorizing air emissions.</p> <p>The Port of Corpus Christi Authority (PCCA), with participation from its customers, develops an emission inventory for PCCA operations, including lightering operations and greenhouse gas emissions, every three years. The PCCA emission inventory looks at all operations occurring within the Port area. Prior reports can be found on the PCCA's web page at https://portofcc.com/about/port/environmental-planning-compliance/. This information assists PCCA in meeting our voluntary targets for reducing air emissions from PCCA operations associated with the Air Quality and Climate Action precepts of our Environmental Policy.</p>

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112	8	PC	Table 4-11, on page 4-34 gives totals over the 5 year expected life of the dredging portion of the proposed deepening project. The totals are concerning, considering that much of the dredging would be next to popular spaces with heavy public use- city and county parks, fishing jetties, beaches, and adjacent to the ferry landing, where people often spend long periods of time. It was staggering to realize that these totals are not pounds, but TONS of critical pollutant emissions.	The Project has been analyzed for conformity applicability pursuant to regulations implementing Section 176(c) of the Clean Air Act. No air quality permits are anticipated to be required for this project. Because the CDP is located in Aransas, San Patricio, and Nueces counties, and these counties have been designated in attainment or unclassifiable with the 2015 8-hour ozone standard, the General Conformity requirements are not applicable, and a General Conformity Determination is not required.	Section 4.1.9 of the FEIS addresses air emissions associated with the various alternatives during both construction and operation, or use of the channel following construction. Air emissions associated with operations from proposed adjacent operations are evaluated in Section 5.4.5 of the FEIS. Furthermore, any proposed projects will be required to obtain State and Federal permits prior to construction, including permits authorizing air emissions. The Port of Corpus Christi Authority (PCCA), with participation from its customers, develops an emission inventory for PCCA operations, including lightering operations and greenhouse gas emissions, every three years. The PCCA emission inventory looks at all operations occurring within the Port area. Prior reports can be found on the PCCA's web page at https://portofcc.com/about/port/environmental-planning-compliance/ . This information assists PCCA in meeting our voluntary targets for reducing air emissions from PCCA operations associated with the Air Quality and Climate Action precepts of our Environmental Policy.
112	9	PC	Concerns about Operational Emissions (Section 4.1.9.2.3). 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.	The Project has been analyzed for conformity applicability pursuant to regulations implementing Section 176(c) of the Clean Air Act. No air quality permits are anticipated to be required for this project. Because the CDP is located in Aransas, San Patricio, and Nueces counties, and these counties have been designated in attainment or unclassifiable with the 2015 8-hour ozone standard, the General Conformity requirements are not applicable, and a General Conformity Determination is not required.	Section 4.1.9 of the FEIS addresses air emissions associated with the various alternatives during both construction and operation, or use of the channel following construction. Air emissions associated with operations from proposed adjacent operations are evaluated in Section 5.4.5 of the FEIS. Furthermore, any proposed projects will be required to obtain State and Federal permits prior to construction, including permits authorizing air emissions. The Port of Corpus Christi Authority (PCCA), with participation from its customers, develops an emission inventory for PCCA operations, including lightering operations and greenhouse gas emissions, every three years. The PCCA emission inventory looks at all operations occurring within the Port area. Prior reports can be found on the PCCA's web page at https://portofcc.com/about/port/environmental-planning-compliance/ . This information assists PCCA in meeting our voluntary targets for reducing air emissions from PCCA operations associated with the Air Quality and Climate Action precepts of our Environmental Policy.

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112	10	PC	<p>Chapter 4, section 4.1.10.1, pages 4-39 and 4-40, tell a different story, although it is not straight forward. "No permanent noise sources would be installed as part of the No-Action Alternative." Then, a few lines later, "Under the No-Action Alternative, VLCC terminals currently being planned AND PERMITTED would be present." These WOULD have noise sources associated with the loading and transit of VLCC's and lightering vessels. Those projects have separate NEPA analyses being performed that are not part of this CDP." However, information from these permits and literature to frame the nature of these noise sources is discussed in the next subsections." And do those sections ever twist and turn the issue! Section 4.1.10.2.4 on page 4-43, is so contorted as to be incomprehensible. Chapter 4, section 4.1.10.1, pages 4-39 and 4-40, tell a different story, although it is not straight forward. "No permanent noise sources would be installed as part of the No-Action Alternative." Then, a few lines later, "Under the No-Action Alternative, VLCC terminals currently being planned AND PERMITTED would be present." These WOULD have noise sources associated with the loading and transit of VLCC's and lightering vessels. Those projects have separate NEPA analyses being performed that are not part of this CDP." However, information from these permits and literature to frame the nature of these noise sources is discussed in the next subsections."</p> <p><i>See comment letter for more specific information on noise concerns.</i></p>	<p>The impacts to noise are clearly described as resulting from vessel traffic, including loading and transiting, and not from the onshore terminal itself. Because the onshore terminal is present in both the No Action Alternative and Alternative 1, the conclusions are similar.</p>	<p>Section 4.1.10 of the FEIS provides detailed information on noise. Noise due to dredging would be similar to current maintenance dredging. Operations are not anticipated to change the current noise levels, and vessel transit noise is not expected to increase.</p> <p>The biological assessment/opinion is provided as Appendix D to the FEIS and provides direct, indirect, and cumulative effects of noise for the proposed project in section 3.0. Since the deepening of the channel is expected to decrease vessel traffic throughout the ship channel and Corpus Christi Bay, the level of ocean noise within the area is expected to decrease after the completion of the CDP. Offshore vessel traffic and noise are expected to remain generally the same.</p>
113	1	PC	<p>Concerned about the direct impacts to wetlands and SAV.</p>	<p>Mitigation for special aquatic sites that were not avoided or minimized are mitigated at a minimum 1:1 ratio, most at a 2:1 or greater ratio.</p>	<p>The Port of Corpus Christi Authority (PCCA) prepared a Permittee Responsible Compensatory Mitigation Plan (CMP; Appendix K of FEIS) in accordance with Title 33 Code of Federal Regulations (CFR) § 332.3 to compensate for 44.63-acres of direct impacts to special aquatic sites (SAS). This included 21.04-acres of palustrine wetlands, 23.59-acres of Essential Fish Habitat (EFH), including 16.61-acres of estuarine wetlands, 6.88-acres of submerged aquatic vegetation (SAV) or seagrass, and 0.10-acres of oyster. The USACE final Compensatory Mitigation memo dated January 03, 2023, documented the direct permanent impacts to SAS in need of mitigation and was utilized by the PCCA in developing the CMP. The objective of the CMP is restoration through the reestablishment of 42.08-acres of palustrine wetlands, 32.94-acres of estuarine wetlands, 6.88-acres of SAV, and 0.10-acres of oyster.</p> <p>Additionally, one of the primary objectives contained in PCCA's Beneficial Use Monitoring Plan (BUMP), located in Appendix C of the FEIS, is to restore substantially eroded and washed-out shorelines at several beneficial use sites including SS1, SS2, PA4, and HI-E.</p> <p>Habitat restoration/creation and habitat protection are very important objectives of PCCAs BUMP. At SS1, this involves construction of an armored levee to restore the severely eroded shoreline and highly fragmented wetland complex that has developed over time. These actions will also limit the future loss of existing SAS at SS1 (which continues to degrade and erode at an accelerated rate) but notably also protect vast acres of additional SAS including approximately 2,400-acres of seagrass within the project watershed located directly adjacent in Redfish Bay. Without armoring and protection at SS1, the erosion and loss of SAS habitats (i.e., SAV, wetlands, tidal flat) will continue indiscriminately. In addition to the PCCAs CMP, beneficial use (BU) placement will establish an additional 181.80-acres of estuarine wetlands and 34.30-acres of palustrine wetlands at SS1. Similarly, dredge material will be utilized beneficially at SS2 to restore the shoreline washouts and erosion caused by Hurricane Harvey, thereby protecting considerable critical Piping Plover and Red Knot tidal flat habitats. Further, beach nourishment will result in approximately 803.4-acres of beneficial forebeach</p>

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113	2	PC	Concerned about the acres of open water/bottom habitat that would be directly impacted.	Thank you for your comment.	In accordance with the Magnus-Stevens Fishery Conservation and Management Act (MSFCMA), an Essential Fish Habitat (EFH) Assessment was prepared to analyze and disclose the potential impacts of the proposed project. The information from the assessment informed Sections 4.2.2.2 and 4.2.5.3.2 of the FEIS which discuss the impacts of larval transport and provide information on EFH. Appendix E of the FEIS provides the EFH Assessment. Section 4.0 of Appendix E discusses the studies for larval transport. Appendix B8 provides the agency correspondence. The Draft EIS initiated the EFH consultation under the MSFCMA. NMFS provided EFH conservation recommendations for the project in August 2022. Coordination with NMFS with respect to the MSFCMA was concluded in November 2022. NMFS provided additional EFH Conservation Recommendations on the project in February 2024, which will be addressed in the Record of Decision (see Appendix B8).
113	3	PC	The summary of impacts (Table 4-21) minimizes the cumulative effects by dismissing them as "temporary".	Table 4-21 does not include the cumulative impacts of the project. Cumulative impacts are discussed in Section 5.0 of the FEIS.	Section 5.0 of the FEIS discusses the potential cumulative effect of the project when combined with impacts that have already occurred, or are still occurring, in the project area due to past, present, and reasonable foreseeable projects or actions.
113	4	PC	Commenter does not support the project.	Thank you for your comment.	Thank you for your comment.
114	1	PC	Concerned about release of ballast water around Harbor Island and Axis and point out that that location would endanger all the bays in this system. There are some assumptions here 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.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and was prepared after the FEIS. The ROD had identified the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documented 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 also includes all mitigation measures, including avoidance and minimization, incorporated into the project.	The Port of Corpus Christi Authority (PCCA) prepared an Alternatives Analysis (AA) under the 404(b)(1) guidelines, associated with the Clean Water Act of 1972 and the Federal Register under 40 CFR Part 230. Four alternatives, including a no-action alternative, were reviewed and verified by USACE. The process requires a substantive USACE evaluation to determine the least environmentally damaging practicable alternative (LEDPA). USACE determined the PCCA's preferred alternative to be the LEDPA for the project's purpose and need.

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114	2	PC	<p>Concerned regarding sea turtles and language that says vessel traffic is expected to be reduced which might lower the risk of lethal interactions. The Port is forecasting huge increases in crude oil exports so a reduction in vessel traffic is a deception in the document. The proposed CDP project would simply allow a larger number of larger vessels to export more oil faster, compounding the likely effects of climate change and all the other negative impacts in this FEIS- larger vessels, larger wakes, more damage to habitat.</p>	<p>Consultation for federally listed threatened and endangered species was completed on January 13, 2023 when the USFWS provided the Final Conference and Biological Opinion (BCO) for the Port of Corpus Christi Authority (PCCA) Channel Deepening Project, U.S. Corps of Engineers (USACE) Permit SWG-2019-00067, Port Aransas, Nueces County, Texas and the National Marine Fisheries Service provided their Endangered Species Act - Section 7 Consultation Biological Opinion NMFS Tracking Number SERO-2022-02122 on December 9, 2022.</p> <p>The Corps will condition the permit to comply with the December 9, 2022 NMFS BO and the January 13, 2023 USFWS BCO.</p>	<p>A Biological Assessment was prepared for this project and identified the Federally listed threatened and endangered species that may potentially be present in the project area and the potential impacts of the proposed project on these protected species. The Biological Assessment can be found in Appendix D1 of the FEIS. In December 2022 and January 2023, National Marine Fisheries Service (NMFS) and US Fish and Wildlife Services (USFWS), respectively, issued a Biological Opinion on the preferred action. These Biological Opinions can be found in Appendix D2 and D3 of the FEIS. The Biological Opinions also provide measures to avoid and minimize adverse impacts to ESA-listed species during the project, including vessel traffic measures.</p> <p>Additionally, Section 3.2 of the FEIS provides information about dredging equipment, and the avoidance, minimization, and conservation measures to be implemented during dredging operations. Section 4.0 identifies measures provided by NMFS that the Port of Corpus Christi Authority's (PCCA) contractor(s) will implement to minimize potential impacts to sea turtles during the placement of dredged material. In addition to NMFS's requirements, PCCA requires contractors to follow controls for marine species management during all in-water construction activities.</p> <p>The following sections in the FEIS provide further detail on the endangered species, potential impacts from the proposed project, and associated conservation measures to be employed:</p> <ul style="list-style-type: none"> • 2.0 Status of the Listed Species • 3.0 Direct, Indirect, and Cumulative Effects from the Proposed Project • 4.0 Conservation Measures <p>Finally, one of the primary objectives contained in the PCCAs Beneficial Use Monitoring Plan (BUMP; Appendix C of FEIS) is to restore substantially eroded and washed-out shorelines at several beneficial use areas including SS1, SS2, PA4, and HI-E. Habitat restoration/creation and habitat protection are important objectives of the PCCA BUMP. Dredge material will be</p>
114	3	PC	<p>ES, page x says "Beneficial use 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. Otherwise, what you have is piles of sticky clay mud where plants and habitat was before.</p>	<p>Thank you for your comment.</p>	<p>Thank you for your comment.</p>

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114	4	PC	Regarding dredged material testing. All the information on sediment quality relates 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.	Sediments within the extent of the proposed project footprint were tested and evaluated for suitability for ocean disposal, with the recognition that some of the material may be placed in 404 regulated waters. Since, testing and evaluation for dredged material ocean disposal is more stringent than for 404 placement, and since it was concluded the new work dredged material is suitable for ocean disposal, it was therefore supposed that the proposed new work material is suitable for placement in 404 waters.	<p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p> <p>While not in the project footprint and a separate project, dredge material characterization was also completed concurrently for the adjacent Harbor Island Berths (SWG-2019-00245). The dredge material characterization for the footprint of the proposed Harbor Island Berths was conducted in accordance with the Sampling and Analysis Plan prepared by the Port of Corpus Christi and dated August 2021. USACE and USEPA again provided concurrence that the SAP complied with the Green Book and the RIA. Terracon performed the sampling activities beginning in early 2022 and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 27, 2023. On March 4, 2024, USEPA issued a concurrence letter that</p>

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114	5	PC	<p>Protected Lands (page 4-62): doesn't mention that added storm surge and shoreline development (ON HARBOR ISLAND) would result from the CDP under a No-Action, Applicant's Proposed Action, or Onshore/Offshore alternative. NOT mentioned are the multiple indirect impacts to the "Redfish Bay State Scientific Research Area", the "Mission-Aransas National Estuarine Reserve" and the "Port Aransas Nature Preserve." Also 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. It claims that "if the frequency of lightering and reverse lightering trips declines, shoreline erosion generated by vessel wakes may also decline."What about the real possibility that the lightering and reverse lightering do NOT decrease, because ONLY Harbor Island and Axis berths would accommodate VLCC's? Further on, page 4-62 says "However, larger vessels like VLCC's going through the CCSC would produce larger wakes, which could degrade shoreline Critical Habitat for Piping Plover." It claims that vessel wake analysis indicate that the CDP would have minimal impacts to the shorelines along the CCSC. Obviously the analysis hasn't looked at the immense damage along the channel so far from vessel wakes. "transporting larger quantities of crude oil through the CCSC can also increase the risk of larger oil spills. An uncontained spill can negatively impact Federally listed species and designated Critical Habitats." So can "incidental" spills and runoff at the various Harbor Island operations, not included in the DEIS, but assumed to be part of three alternatives. And where exactly is "Causeway Island City Park? THIS DOES NOT SEEM TO BE IN PORT ARANSAS.</p>	<p>The information for protected lands used by the Corps came from a USGS database which listed those areas as private preserve/mitigation bank. Although Figure 3-19 does not meet the commentor's expectation, the Corps has sufficiently identified and discussed the protected lands in the body of the FEIS.</p>	<p>Section 5.0 of the FEIS discusses the potential cumulative effect of the project when combined with impacts that have already occurred, or are still occurring, in the project area due to past, present, and reasonable foreseeable projects or actions.</p>
114	6	PC	<p>Threatened and Endangered species (p. 4-64 and 4-65): EIS greatly underestimated probable risks and overstated possible benefits to wildlife resources in general, and endangered species in particular. It admits threats from "maintenance dredging", but fails to mention that the Applicant's Preferred Alternative plans are for dredging on a massive scale, not 2-3 feet to maintain depth, but up to 26 feet to attain new depths. It also omits information from Chapter 4, page 4-2. "Approximately 400,000 cubic yards of additional(incremental) maintenance dredging over the current responsibility for the authorized CCSC would be generated over a period of 20 years after construction of this alternative (AECOM, 2018). Therefore the magnitude of maintenance dredging would increase." THUS THE THREATS INCREASE.</p>	<p>Consultation for federally listed threatened and endangered species was completed on January 13, 2023 when the USFWS provided the Final Conference and Biological Opinion (BCO) for the Port of Corpus Christi Authority (PCCA) Channel Deepening Project, U.S. Corps of Engineers (USACE) Permit SWG-2019-00067, Port Aransas, Nueces County, Texas. The consultation included a project description for beach nourishment identical to the one included in the FEIS.</p> <p>The Corps will condition the permit to comply with the January 13, 2023 BCO.</p>	<p>The proposed project includes dredging of 46.3 million cubic yards of material to deepen the channel to -77 feet and -75 feet MLLW from the Gulf to station 110+00 near Harbor Island, including the approximate 10-mile extension to the entrance channel necessary to reach sufficiently deep waters. This deepening would take place largely within the footprint of the currently authorized -54 foot channel.</p> <p>Section 2.2.3 of the FEIS provides construction details for the Channel Deepening Project. New work dredging will include provisions to lessen disruption of ferry use, such as planning dredging for off-peak or after-hours of typical high traffic ferry operations and avoid certain times of the year for dredging or placement of material to protect endangered species. Similar provisions would be carried out during maintenance dredging that occurs approximately every two years for the existing channel. Dredging operations will also incorporate numerous best management practices that are currently employed by the industry when dredging and recommended by resource agencies, such as silt curtains to protect against impacts from turbidity on adjacent special aquatic sites.</p> <p>The potential impacts of project dredging on human and environmental resources identified during the public interest review are addressed in detail in the following FEIS sections:</p> <ul style="list-style-type: none"> • 2.0 Proposed Action and Alternatives • 3.0 Affected Environment • 4.0 Environmental Consequences • 5.0 Cumulative Impacts

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114	7	PC	<p>Sea turtles:</p> <p>The dredging for the channel deepening would be expected to take 5 years, the "increased magnitude" of maintenance dredging another 20 or longer. This total 25+ years of greatly increased dredging is hardly "temporary"! It would, though, be "localized", right in prime wildlife and endangered species feeding and breeding habitat. leaves out impacts from other Harbor Island projects imbedded in the No-Action, Applicant's Proposed Action, and Onshore/Offshore Alternatives. Those would entail even more dredging- 6,500,000 cubic yards for VLCC berths, and 70 acres for Axis. Once again, it ignores the additional threats to wildlife, endangered and threatened, from increased vessel size and activity in this "localized" area, VLCC's constantly entering and exiting, tugboats stirring up sediment and creating the turbidity with its impacts.</p>	<p>Consultation for federally listed threatened and endangered species was completed on January 13, 2023 when the USFWS provided the Final Conference and Biological Opinion (BCO) for the Port of Corpus Christi Authority (PCCA) Channel Deepening Project, U.S. Corps of Engineers (USACE) Permit SWG-2019-00067, Port Aransas, Nueces County, Texas. The consultation included a project description for beach nourishment identical to the one included in the FEIS.</p> <p>The Corps will condition the permit to comply with the January 13, 2023 BCO.</p>	<p>Section 5.0 of the FEIS discusses the potential cumulative effect of the project when combined with impacts that have already occurred, or are still occurring, in the project area due to past, present, and reasonable foreseeable projects or actions.</p>
114	8	PC	<p>Page 4-64, as mixed messages on the CDP effects on Piping Plovers and Red Knots in the project area. "Materials placed within these PA's would temporarily bury foraging grounds for these shorebirds and construction activity may disturb shorebirds. Any potential action targeting BU that nourish beaches and intertidal shorelines would likely yield longer term benefits that are greater than short-term localized impacts." Back on page 4-61, it reads, "The Gulf shoreline along the middle Texas coast is generally considered stable (Paine and Caudle, 2020). However, without beach nourishment and BU, some retreat of the Mustang Island and San Jose' Island shoreline smay result from sea level rise." Although sea level rise probably would slowly encroach upon these shorelines, it's well established that barrier islands' natural evolution is to retreat and "roll inland"". Another consideration is that the impacts of the channel deepening project, dredging and 'deposition", are concentrated and immediate, or as is stated far too many times in the DEIS, "localized and temporary". Those types of impacts are much more difficult to adjust to than impacts that are gradual and dispersed</p>	<p>Consultation for federally listed threatened and endangered species was completed on January 13, 2023 when the USFWS provided the Final Conference and Biological Opinion (BCO) for the Port of Corpus Christi Authority (PCCA) Channel Deepening Project, U.S. Corps of Engineers (USACE) Permit SWG-2019-00067, Port Aransas, Nueces County, Texas. The consultation included a project description for beach nourishment identical to the one included in the FEIS.</p> <p>The Corps will condition the permit to comply with the January 13, 2023 BCO.</p>	<p>Section 5.0 of the FEIS discusses the potential cumulative effect of the project when combined with impacts that have already occurred, or are still occurring, in the project area due to past, present, and reasonable foreseeable projects or actions.</p>
115	1	PC	<p>EFH: There is SO much information scattered throughout the document and appendices that in order to gauge the magnitude of negative impacts to EFH, other reviewers with expertise in marine biology need to closely review the above sections of the EIS.</p> <p>States that the wording on page 4-3, Section 4.1.2 should be reworded to state the impacts better.</p>	<p>Consultation with NMFS was initiated with the release of the DEIS and receipt of any comments regarding EFH impacts. An EFH Assessment was been prepared for this project and was coordinated with NMFS (Appendix E). NMFS provided EFH Conservation Recommendations on the project in August 2022. Coordination with NMFS with respect to the MSFCMA was concluded in November 2022 (see Appendix B8). Detailed information on EFH and impacts of the CDP can be found in Appendix E.</p>	<p>In accordance with the Magnus-Stevens Fishery Conservation and Management Act (MSFCMA), an Essential Fish Habitat (EFH) Assessment was prepared to analyze and disclose the potential impacts of the proposed project. The information from the assessment informed Sections 4.2.2.2 and 4.2.5.3.2 of the FEIS which discuss the impacts of larval transport and provide information on EFH. Appendix E of the FEIS provides the EFH Assessment. Section 4.0 of Appendix E discusses the studies for larval transport. Appendix B8 provides the agency correspondence.</p> <p>The Draft EIS initiated the EFH consultation under the MSFCMA. NMFS provided EFH conservation recommendations for the project in August 2022. Coordination with NMFS with respect to the MSFCMA was concluded in November 2022. NMFS provided additional EFH Conservation Recommendations on the project in February 2024, which will be addressed in the Record of Decision (see Appendix B8).</p>

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115	2	PC	Commenter states that many of the species are short-lived, so interrupting their life cycle multiple times, and/or for extended periods of time, and their populations would decline.	Consultation with NMFS was initiated with the release of the DEIS and receipt of any comments regarding EFH impacts. An EFH Assessment was been prepared for this project and was coordinated with NMFS (Appendix E). NMFS provided EFH Conservation Recommendations on the project in August 2022. Coordination with NMFS with respect to the MSFCMA was concluded in November 2022 (see Appendix B8). Detailed information on EFH and impacts of the CDP can be found in Appendix E.	In accordance with the Magnus-Stevens Fishery Conservation and Management Act (MSFCMA), an Essential Fish Habitat (EFH) Assessment was prepared to analyze and disclose the potential impacts of the proposed project. The information from the assessment informed Sections 4.2.2.2 and 4.2.5.3.2 of the FEIS which discuss the impacts of larval transport and provide information on EFH. Appendix E of the FEIS provides the EFH Assessment. Section 4.0 of Appendix E discusses the studies for larval transport. Appendix B8 provides the agency correspondence. The Draft EIS initiated the EFH consultation under the MSFCMA. NMFS provided EFH conservation recommendations for the project in August 2022. Coordination with NMFS with respect to the MSFCMA was concluded in November 2022. NMFS provided additional EFH Conservation Recommendations on the project in February 2024, which will be addressed in the Record of Decision (see Appendix B8).
115	3	PC	Regarding maintenance dredging, more dredging impacts equals less fish.	Consultation with NMFS was initiated with the release of the DEIS and receipt of any comments regarding EFH impacts. An EFH Assessment was been prepared for this project and was coordinated with NMFS (Appendix E). NMFS provided EFH Conservation Recommendations on the project in August 2022. Coordination with NMFS with respect to the MSFCMA was concluded in November 2022 (see Appendix B8). Detailed information on EFH and impacts of the CDP can be found in Appendix E.	In accordance with the Magnus-Stevens Fishery Conservation and Management Act (MSFCMA), an Essential Fish Habitat (EFH) Assessment was prepared to analyze and disclose the potential impacts of the proposed project. The information from the assessment informed Sections 4.2.2.2 and 4.2.5.3.2 of the FEIS which discuss the impacts of larval transport and provide information on EFH. Appendix E of the FEIS provides the EFH Assessment. Section 4.0 of Appendix E discusses the studies for larval transport. Appendix B8 provides the agency correspondence. The Draft EIS initiated the EFH consultation under the MSFCMA. NMFS provided EFH conservation recommendations for the project in August 2022. Coordination with NMFS with respect to the MSFCMA was concluded in November 2022. NMFS provided additional EFH Conservation Recommendations on the project in February 2024, which will be addressed in the Record of Decision (see Appendix B8).
115	4	PC	Concerned about the negative impacts caused by suspended sediments during dredging and placement operations.	Consultation with NMFS was initiated with the release of the DEIS and receipt of any comments regarding EFH impacts. An EFH Assessment was been prepared for this project and was coordinated with NMFS (Appendix E). NMFS provided EFH Conservation Recommendations on the project in August 2022. Coordination with NMFS with respect to the MSFCMA was concluded in November 2022 (see Appendix B8). Detailed information on EFH and impacts of the CDP can be found in Appendix E.	In accordance with the Magnus-Stevens Fishery Conservation and Management Act (MSFCMA), an Essential Fish Habitat (EFH) Assessment was prepared to analyze and disclose the potential impacts of the proposed project. The information from the assessment informed Sections 4.2.2.2 and 4.2.5.3.2 of the FEIS which discuss the impacts of larval transport and provide information on EFH. Appendix E of the FEIS provides the EFH Assessment. Section 4.0 of Appendix E discusses the studies for larval transport. Appendix B8 provides the agency correspondence. The Draft EIS initiated the EFH consultation under the MSFCMA. NMFS provided EFH conservation recommendations for the project in August 2022. Coordination with NMFS with respect to the MSFCMA was concluded in November 2022. NMFS provided additional EFH Conservation Recommendations on the project in February 2024, which will be addressed in the Record of Decision (see Appendix B8).

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115	5	PC	Concerned about salinity impacts on EFH with the desalination facilities.	<p>The potential changes from the proposed desalination projects were not included in the public interest review since they are not in the scope of this permit application.</p> <p>Modeling by Baird (2022) (Appendix I) indicate minor increases in salinity (less than 1 ppt) are anticipated under Alternative 1. As described in the FEIS, most estuarine organisms occupying these environments are ubiquitous along the Texas coast and can tolerate a wide range of salinities (Pattillo et al., 1997). Information regarding salinity tolerances and salinity maximums for common fish, shellfish, wetlands, and submerged aquatic vegetation within the study area are included in Section 3.2.3.4 (Salinity), tables 3-3 and 3-4.</p>	<p>Section 3.2.3.4 of the FEIS addresses potential impacts to salinity in the bay system in detail. Salinity modeling indicates that a change in the tidal prism associated with channel deepening increases the exchange of saltwater between Corpus Christi and Nueces Bay. Attachment I of the FEIS provides the hydrodynamic and salinity modeling study. The results indicate that the increase would be less than 1 ppt in the Corpus Christi Bay system. According to the FEIS reference, Baird, 2022c, this magnitude of change is negligible given the natural range of salinities in the bay and the wide salinity tolerances of endemic estuarine species. Section 5.0 of the FEIS provides a summary of the cumulative impacts of salinity.</p> <p>The Port of Corpus Christi Authority (PCCA) has also completed additional far field, three-dimensional modeling of the Corpus Christi Bay system to evaluate the potential impacts from the discharges of the proposed desalination plants on PCCA property at Harbor Island and La Quinta. The modeling report documenting the results was produced during the contested case hearing for the Texas Commission on Environmental Quality (TCEQ) discharge permit and was evaluated as part of the ultimate record of decision and issuance (by TCEQ) of the discharge permit for up to 50 million gallons per day desalination facility at Harbor Island on December 22, 2022. The US Environmental Protection Agency withdrew objections to the permit in September 2023.</p> <p>PCCA is in the process of making all data and studies related to a potential desalination facility at Harbor Island available through the PCCA web page at https://portofcc.com/</p>
115	6	PC	Concerned about the decline in oyster reef habitat from the historic to the current and how this would impact other species.	<p>Consultation with NMFS was initiated with the release of the DEIS and receipt of any comments regarding EFH impacts. An EFH Assessment was prepared for this project and was coordinated with NMFS (Appendix E). NMFS provided EFH Conservation Recommendations on the project in August 2022. Coordination with NMFS with respect to the MSFCMA was concluded in November 2022 (see Appendix B8). Detailed information on EFH and impacts of the CDP can be found in Appendix E.</p>	<p>A Biological Assessment was prepared for this project and identified the Federally listed threatened and endangered species that may potentially be present in the project area and the potential impacts of the proposed project on these protected species. The Biological Assessment can be found in Appendix D1 of the FEIS. In December 2022 and January 2023, National Marine Fisheries Service (NMFS) and US Fish and Wildlife Services (USFWS), respectively, issued a Biological Opinion on the preferred action. These Biological Opinions can be found in Appendix D2 and D3 of the FEIS. The Biological Opinions also provide measures to avoid and minimize adverse impacts to ESA-listed species during the project, including vessel traffic measures.</p> <p>Additionally, Section 3.2 of the FEIS provides information about dredging equipment, and the avoidance, minimization, and conservation measures to be implemented during dredging operations. Section 4.0 identifies measures provided by NMFS that the Port of Corpus Christi Authority's (PCCA) contractor(s) will implement to minimize potential impacts to sea turtles during the placement of dredged material. In addition to NMFS's requirements, PCCA requires contractors to follow controls for marine species management during all in-water construction activities.</p> <p>The following sections in the FEIS provide further detail on the endangered species, potential impacts from the proposed project, and associated conservation measures to be employed:</p> <ul style="list-style-type: none"> • 2.0 Status of the Listed Species • 3.0 Direct, Indirect, and Cumulative Effects from the Proposed Project • 4.0 Conservation Measures <p>Finally, one of the primary objectives contained in the PCCAs Beneficial Use Monitoring Plan (BUMP; Appendix C of FEIS) is to restore substantially eroded and washed-out shorelines at several beneficial use areas including SS1, SS2, PA4, and HI-E. Habitat restoration/creation and habitat protection are important objectives of the PCCA BUMP. Dredge material will be</p>

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116	1	PC	The FEIS is not addressing potential INDIRECT impacts of the proposed channel deepening project, increases in tidal amplitude, salinity, and storm surge, to the "Lydia Ann Lighthouse" as it is locally (and affectionately) known.	<p>The Lydia Ann Lighthouse is a cultural resource, USACE and SHPO determined the lighthouse will not be affected by the project and are discussed in Section 4.3.2.</p> <p>BU site HI-E would involve restoration of an eroded bluff at the junction of CCSC and Lydia Ann Channel, across from Harbor Island and therefore would not be impacted by any increases in tidal amplitude or storm surge.</p>	<p>The Port of Corpus Christi Authority (PCCA), in 2019, contracted with Texas A&M-Corpus Christi Harte Research Institute (HRI) to assess the potential impacts of storm surge, tidal hydraulics, and salinity from the various Corpus Christi Ship Channel dredging projects (proposed and ongoing). The study was completed in April 2021. As part of the development of the FEIS, PCCA provided the study to the Corps of Engineers to provide relevant information to the Channel Deepening Project. Prior to relying on the information, the Corps of Engineers independently reviewed the methodology and findings using a third-party contractor. Section 4.1.3.4.2 provides details on the hydrodynamic storm surge modeling conducted by HRI.</p> <p>Additional modeling and studies can be found in the FEIS:</p> <ul style="list-style-type: none"> • Appendix G - Sediment Transport Modeling Study • Appendix H -Vessel Wake Analysis • Appendix I -Hydrodynamic and Salinity Modeling Study • Appendix L -Ship Simulation Report • Appendix M -Propeller Scour Study • Appendix N -Underkeel Clearance Study <p>The proposed beneficial use sites when constructed will restore barrier islands that provide protections to the region in the event of storms, as well as for impacts from sea level rise, and improve and bolster the natural environment, which also provides additional protections.</p>
116	2	PC	A hot spot for storm surge was identified adjacent to Harbor Island, the commenter feels the proposed project could have serious impacts on the Lydia Ann Lighthouse.	Section 4.1.3.4.2 acknowledged the proposed project has a potential to increase storm surge in the project area. Based on studies conducted by the Heart Research Institute on the -54-foot channel and additional studies Increases in storm surge water levels and slight increases in the inundation extent expected; maximum elevation gain is 3.5 inches. The area of most increase in storm surge elevation was identified adjacent to Harbor Island between Point Mustang and Humble Basin. The placement of the BU sites in this area will moderate the increase in storm surge in this hotspot.	<p>The Port of Corpus Christi Authority (PCCA), in 2019, contracted with Texas A&M-Corpus Christi Harte Research Institute (HRI) to assess the potential impacts of storm surge, tidal hydraulics, and salinity from the various Corpus Christi Ship Channel dredging projects (proposed and ongoing). The study was completed in April 2021. As part of the development of the FEIS, PCCA provided the study to the Corps of Engineers to provide relevant information to the Channel Deepening Project. Prior to relying on the information, the Corps of Engineers independently reviewed the methodology and findings using a third-party contractor. Section 4.1.3.4.2 provides details on the hydrodynamic storm surge modeling conducted by HRI.</p> <p>Additional modeling and studies can be found in the FEIS:</p> <ul style="list-style-type: none"> • Appendix G - Sediment Transport Modeling Study • Appendix H -Vessel Wake Analysis • Appendix I -Hydrodynamic and Salinity Modeling Study • Appendix L -Ship Simulation Report • Appendix M -Propeller Scour Study • Appendix N -Underkeel Clearance Study <p>The proposed beneficial use sites when constructed will restore barrier islands that provide protections to the region in the event of storms, as well as for impacts from sea level rise, and improve and bolster the natural environment, which also provides additional protections.</p>

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117	1	PC	The socioec sections were revised for the FEIS, commenter state that the probable damaging effects of this project were not mentioned.	<p>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.</p> <p>The USACE has reviewed the public interest factors, and those relevant to the CDP are discussed in Section 8.1 of the ROD. The CDP's effects on economics was found to be beneficial.</p>	Section 5.0 of the FEIS discusses the potential cumulative effect of the project when combined with impacts that have already occurred, or are still occurring, in the project area due to past, present, and reasonable foreseeable projects or actions.
118	1	PC	Concerned about the impacts of the project on migratory birds.	Impacts to migratory birds are addressed in Section 4.2.5.4.	<p>A Biological Assessment was prepared for this project and identified the Federally listed threatened and endangered species that may potentially be present in the project area and the potential impacts of the proposed project on these protected species. The Biological Assessment can be found in Appendix D1 of the FEIS. In December 2022 and January 2023, National Marine Fisheries Service (NMFS) and US Fish and Wildlife Services (USFWS), respectively, issued a Biological Opinion on the preferred action. These Biological Opinions can be found in Appendix D2 and D3 of the FEIS. The Biological Opinions also provide measures to avoid and minimize adverse impacts to ESA-listed species during the project, including vessel traffic measures.</p> <p>Additionally, Section 3.2 of the FEIS provides information about dredging equipment, and the avoidance, minimization, and conservation measures to be implemented during dredging operations. Section 4.0 identifies measures provided by NMFS that the Port of Corpus Christi Authority's (PCCA) contractor(s) will implement to minimize potential impacts to sea turtles during the placement of dredged material. In addition to NMFS's requirements, PCCA requires contractors to follow controls for marine species management during all in-water construction activities.</p> <p>The following sections in the FEIS provide further detail on the endangered species, potential impacts from the proposed project, and associated conservation measures to be employed:</p> <ul style="list-style-type: none"> • 2.0 Status of the Listed Species • 3.0 Direct, Indirect, and Cumulative Effects from the Proposed Project • 4.0 Conservation Measures <p>Finally, one of the primary objectives contained in the PCCAs Beneficial Use Monitoring Plan (BUMP; Appendix C of FEIS) is to restore substantially eroded and washed-out shorelines at several beneficial use areas including SS1, SS2, PA4, and HI-E. Habitat restoration/creation and habitat protection are important objectives of the PCCA BUMP. Dredge material will be</p>
118	2	PC	Concerned about the underwater noise and how that could impact marine mammals and sea turtles.	<p>Consultation for federally listed threatened and endangered species was completed on January 13, 2023 when the USFWS provided the Final Conference and Biological Opinion (BCO) for the Port of Corpus Christi Authority (PCCA) Channel Deepening Project, U.S. Corps of Engineers (USACE) Permit SWG-2019-00067, Port Aransas, Nueces County, Texas and the National Marine Fisheries Service provided their Endangered Species Act - Section 7 Consultation Biological Opinion NMFS Tracking Number SERO-2022-02122 on December 9, 2022.</p> <p>The Corps will condition the permit to comply with the December 9, 2022 NMFS BO and the January 13, 2023 USFWS BCO.</p>	<p>Section 4.1.10 of the FEIS provides detailed information on noise. Noise due to dredging would be similar to current maintenance dredging. Operations are not anticipated to change the current noise levels, and vessel transit noise is not expected to increase.</p> <p>The biological assessment/opinion is provided as Appendix D to the FEIS and provides direct, indirect, and cumulative effects of noise for the proposed project in section 3.0. Since the deepening of the channel is expected to decrease vessel traffic throughout the ship channel and Corpus Christi Bay, the level of ocean noise within the area is expected to decrease after the completion of the CDP. Offshore vessel traffic and noise are expected to remain generally the same.</p>

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118	3	PC	Page 3-2: Concerned about turbidity and suspended sediments and how that can affect fish, sea turtles, manatees, and shorebirds by interfering with foraging activities, gill tissue or respiratory damage, physical stress, and behavioral changes.	<p>Consultation for federally listed threatened and endangered species was completed on January 13, 2023 when the USFWS provided the Final Conference and Biological Opinion (BCO) for the Port of Corpus Christi Authority (PCCA) Channel Deepening Project, U.S. Corps of Engineers (USACE) Permit SWG-2019-00067, Port Aransas, Nueces County, Texas and the National Marine Fisheries Service provided their Endangered Species Act - Section 7 Consultation Biological Opinion NMFS Tracking Number SERO-2022-02122 on December 9, 2022.</p> <p>The Corps will condition the permit to comply with the December 9, 2022 NMFS BO and the January 13, 2023 USFWS BCO.</p>	<p>In accordance with the Magnus-Stevens Fishery Conservation and Management Act (MSFCMA), an Essential Fish Habitat (EFH) Assessment was prepared to analyze and disclose the potential impacts of the proposed project. The information from the assessment informed Sections 4.2.2.2 and 4.2.5.3.2 of the FEIS which discuss the impacts of larval transport and provide information on EFH. Appendix E of the FEIS provides the EFH Assessment. Section 4.0 of Appendix E discusses the studies for larval transport. Appendix B8 provides the agency correspondence.</p> <p>The Draft EIS initiated the EFH consultation under the MSFCMA. NMFS provided EFH conservation recommendations for the project in August 2022. Coordination with NMFS with respect to the MSFCMA was concluded in November 2022. NMFS provided additional EFH Conservation Recommendations on the project in February 2024, which will be addressed in the Record of Decision (see Appendix B8).</p>
118	4	PC	Section 3.4: concerned about salinity levels, not only salinity tolerances for oysters has been noted, what about other species susceptible to higher levels.	<p>Table 3-3 shows the Salinity tolerances of common fish and shellfish within the study area and Table 3-4 shows the salinity tolerances of common wetlands/SAV within the study area.</p>	<p>Section 3.2.3.4 of the FEIS addresses potential impacts to salinity in the bay system in detail. Salinity modeling indicates that a change in the tidal prism associated with channel deepening increases the exchange of saltwater between Corpus Christi and Nueces Bay. Attachment I of the FEIS provides the hydrodynamic and salinity modeling study. The results indicate that the increase would be less than 1 ppt in the Corpus Christi Bay system. According to the FEIS reference, Baird, 2022c, this magnitude of change is negligible given the natural range of salinities in the bay and the wide salinity tolerances of endemic estuarine species. Section 5.0 of the FEIS provides a summary of the cumulative impacts of salinity.</p> <p>The Port of Corpus Christi Authority (PCCA) has also completed additional far field, three-dimensional modeling of the Corpus Christi Bay system to evaluate the potential impacts from the discharges of the proposed desalination plants on PCCA property at Harbor Island and La Quinta. The modeling report documenting the results was produced during the contested case hearing for the Texas Commission on Environmental Quality (TCEQ) discharge permit and was evaluated as part of the ultimate record of decision and issuance (by TCEQ) of the discharge permit for up to 50 million gallons per day desalination facility at Harbor Island on December 22, 2022. The US Environmental Protection Agency withdrew objections to the permit in September 2023.</p> <p>PCCA is in the process of making all data and studies related to a potential desalination facility at Harbor Island available through the PCCA web page at https://portofcc.com/</p>

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119	1	PC	<p>How much more frequent and destructive the ship wakes from vessels that require a 70+ deep channel will be? I wonder about the ship spacing to avoid doubling up (which is what I think happened during my Swantner experience) Two ships navigating the channel too close together....I saw them together across the bay. What safeguards can be put in place for our rookery islands? Our cherished beaches and parks and homes?</p> <p>Urge consideration of the impact to such wakes on bay shorelines, small craft navigation and anchored in the path.</p>	<p>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%.</p>	<p>The existing channel is a deep draft navigation channel constructed and maintained for commercial vessel traffic. Vessels move at slow speeds in the channel, and are unable to turn sharply; therefore, tugs are needed to provide safe navigation and to avoid the risk of collision. Dredging operations will include provisions to lessen disruption of ferry use, such as planning dredging for off-peak or after-hours of typical high traffic ferry operations. VLCCs will continue transiting with one-way traffic restrictions, the same as they do under the No-Action Alternative.</p> <p>Compared to the No-Action Alternative, the proposed project would eliminate the need for reverse lightering traffic and thereby:</p> <ul style="list-style-type: none"> • Reduce vessel transits by 140 and 230 transits for Suezmax vessels • Increase channel availability • Reduce ferry operating time impacts compared to a no-action alternative <p>Section 4.5 of the FEIS describes the impacts of navigation on existing commercial and recreational navigation uses. A vessel wake analysis included in Appendix H of the FEIS indicates that vessel induced wakes associated with the project would minimally impact future evolution of shoreline along the ship channel. Ship simulations included in Appendix L of the FEIS concluded that the project's channel configurations and underlying environmental conditions would be acceptable for safely operating fully loaded VLCCs.</p>
120	1	PC	<p>Commenter attached comments originally submitted on the DEIS from Eileen P. Visser of Canton, NY.</p>	<p>Thank you for your comment.</p>	<p>Thank you for your comment.</p>
121	1	PC	<p>Commenter does not want dirty dredged material in Aransas County destroying the land and waterways.</p>	<p>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 Regional Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</p> <p>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.</p> <p><i>Response continues on next row.</i></p>	<p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p> <p>While not in the project footprint and a separate project, dredge material characterization was also completed concurrently for the adjacent Harbor Island Berths (SWG-2019-00245). The dredge material characterization for the footprint of the proposed Harbor Island Berths was conducted in accordance with the Sampling and Analysis Plan prepared by the Port of Corpus Christi and dated August 2021. USACE and USEPA again provided concurrence that the SAP complied with the Green Book and the RIA. Terracon performed the sampling activities beginning in early 2022 and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and</p>

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121	1	PC	<p>Commenter does not want dirty dredged material in Aransas County destroying the land and waterways.</p>	<p>Historical testing of the CCSC was included in the FEIS to demonstrate 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.</p> <p>Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material was 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. Based on the results of the sampling, testing, and evaluation of sediment, analysis concluded that no adverse environmental effects would be expected from dredging or placement of sediment from the project area (Terracon Consultants, Inc., 2023a and 2023b). The USACE reviewed the sediment testing reports from the Applicant and concluded 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 for ocean disposal. The EPA reviewed the information provided by the USACE and concurred with the determination, concluding that the work described complies with the applicable subparts of 40 CFR Parts 225-228.</p> <p><i>Response continues on next row.</i></p>	<p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p> <p>While not in the project footprint and a separate project, dredge material characterization was also completed concurrently for the adjacent Harbor Island Berths (SWG-2019-00245). The dredge material characterization for the footprint of the proposed Harbor Island Berths was conducted in accordance with the Sampling and Analysis Plan prepared by the Port of Corpus Christi and dated August 2021. USACE and USEPA again provided concurrence that the SAP complied with the Green Book and the RIA. Terracon performed the sampling activities beginning in early 2022 and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 27, 2023. On March 4, 2024, USEPA issued a concurrence letter.</p>

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122	1	PC	<p>Sediment coming from the ship channel is most likely contaminated and should be managed in a proper way. To call this material beneficial and to place it in wetlands, marshes and the ocean is catastrophic for the environment.</p>	<p>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 Regional Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</p> <p>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.</p> <p><i>Response continues on next row.</i></p>	<p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p> <p>While not in the project footprint and a separate project, dredge material characterization was also completed concurrently for the adjacent Harbor Island Berths (SWG-2019-00245). The dredge material characterization for the footprint of the proposed Harbor Island Berths was conducted in accordance with the Sampling and Analysis Plan prepared by the Port of Corpus Christi and dated August 2021. USACE and USEPA again provided concurrence that the SAP complied with the Green Book and the RIA. Terracon performed the sampling activities beginning in early 2022 and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 27, 2023. On March 4, 2024, USEPA issued a concurrence letter</p>

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122	1	PC	Sediment coming from the ship channel is most likely contaminated and should be managed in a proper way. To call this material beneficial and to place it in wetlands, marshes and the ocean is catastrophic for the environment.	Appendix C provides information on placement of dredged materials, locations, modeling, and monitoring plans. Appendix J provides information on sediment testing.	<p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p> <p>While not in the project footprint and a separate project, dredge material characterization was also completed concurrently for the adjacent Harbor Island Berths (SWG-2019-00245). The dredge material characterization for the footprint of the proposed Harbor Island Berths was conducted in accordance with the Sampling and Analysis Plan prepared by the Port of Corpus Christi and dated August 2021. USACE and USEPA again provided concurrence that the SAP complied with the Green Book and the RIA. Terracon performed the sampling activities beginning in early 2022 and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 27, 2023. On March 4, 2024, USEPA issued a concurrence letter.</p>
122	2	PC	Concerned about use of wording such as temporary, localized, beneficial, suitable.	Thank you for your comment.	Thank you for your comment.
122	3	PC	Reference to restoring eroded shoreline on Harbor Island and Port Aransas Nature Preserve impacted by Hurricane Harvey, with no mention of increase ship traffic is a mockery.	Thank you for your comment.	Thank you for your comment.
122	4	PC	The constant reference to rising sea levels and climate related impacts when climate change has been significantly caused by burning of fossil fuels makes jest of a real and serious problem.	Thank you for your comment.	Thank you for your comment.

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122	5	PC	The Applicant refers to modeling, but does not mention who did the modeling.	<p>The following modeling was conducted by W.F. Baird and Associates, Ltd.: Appendix G (Sediment Transport Modeling Study); Appendix H (Vessel Wake Analysis); appendix I (Hydrodynamic and Salinity Modeling Study); Appendix M (Propeller Scour Study); and Appendix N (Underkeel Clearance Study).</p> <p>The Ship Simulation Study (Appendix L) was conducted by Riben Marine.</p>	<p>The existing channel is a deep draft navigation channel constructed and maintained for commercial vessel traffic. Vessels move at slow speeds in the channel, and are unable to turn sharply; therefore, tugs are needed to provide safe navigation and to avoid the risk of collision. Dredging operations will include provisions to lessen disruption of ferry use, such as planning dredging for off-peak or after-hours of typical high traffic ferry operations. VLCCs will continue transiting with one-way traffic restrictions, the same as they do under the No-Action Alternative.</p> <p>Compared to the No-Action Alternative, the proposed project would eliminate the need for reverse lightering traffic and thereby:</p> <ul style="list-style-type: none"> • Reduce vessel transits by 140 and 230 transits for Suezmax vessels • Increase channel availability • Reduce ferry operating time impacts compared to a no-action alternative <p>Section 4.5 of the FEIS describes the impacts of navigation on existing commercial and recreational navigation uses. A vessel wake analysis included in Appendix H of the FEIS indicates that vessel induced wakes associated with the project would minimally impact future evolution of shoreline along the ship channel. Ship simulations included in Appendix L of the FEIS concluded that the project's channel configurations and underlying environmental conditions would be acceptable for safely operating fully loaded VLCCs.</p>
122	6	PC	Commenter points out that there could be a straightening of the transition flare if determined necessary for safe vessel transit. Have those sediments been tested and have the results been sent to EPA?	The Corps included a Ship Simulation Report in Appendix L. The information pertaining to dredge material testing is included in Appendix J.	<p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p> <p>While not in the project footprint and a separate project, dredge material characterization was also completed concurrently for the adjacent Harbor Island Berths (SWG-2019-00245). The dredge material characterization for the footprint of the proposed Harbor Island Berths was conducted in accordance with the Sampling and Analysis Plan prepared by the Port of Corpus Christi and dated August 2021. USACE and USEPA again provided concurrence that the SAP complied with the Green Book and the RIA. Terracon performed the sampling activities beginning in early 2022 and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and</p>
122	Entity Acronyms: FED - Federal Agency	PC	Commenter states that the project will go on for 5 years, but the terminology used such as no impacts, localized impacts, but going on for several years is contradictory.	Thank you for your comment.	Thank you for your comment.

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122	8	PC	Under soil, "not prime farmland" is mentioned, but the straightening of the transition flare feature means digging into Harbor Island with contaminated soil.	Alternative 1, none of the proposed dredged material placement sites are located on prime farmland or farmland of statewide importance.	<p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p> <p>While not in the project footprint and a separate project, dredge material characterization was also completed concurrently for the adjacent Harbor Island Berths (SWG-2019-00245). The dredge material characterization for the footprint of the proposed Harbor Island Berths was conducted in accordance with the Sampling and Analysis Plan prepared by the Port of Corpus Christi and dated August 2021. USACE and USEPA again provided concurrence that the SAP complied with the Green Book and the RIA. Terracon performed the sampling activities beginning in early 2022 and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 27, 2023. On March 4, 2024, USEPA issued a concurrence letter.</p>
122	9	PC	Believes the conclusion on noise pollution that the impacts would be intermittent and may be lessened due to background noise associated with waves and wind is gibberish.	Thank you for your comment.	Thank you for your comment.

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122	10	PC	If dredging is done placement is imminent, so to say dredging will not cause impacts but placment of materials would result in impacts to aquatic resources including wetlands and SAV is not true.	Placement of sediments for BU would have temporary impacts associated with burial of nearby benthic communities and increase turbidity near those sites. Beneficial use of dredged material is expected to have a long-term positive benefit by improving and protecting habitat and building resistance to rising sea levels. Beneficial use would also create protective barriers along the Gulf shorelines and the eroding shores of Harbor Island and Dagger Island. Without this additional strategically placed material, erosion of these shores combined with rising sea level would threaten substantial zones of valuable estuarine habitat.	<p>The Port of Corpus Christi Authority (PCCA) prepared a Permittee Responsible Compensatory Mitigation Plan (CMP; Appendix K of FEIS) in accordance with Title 33 Code of Federal Regulations (CFR) § 332.3 to compensate for 44.63-acres of direct impacts to special aquatic sites (SAS). This included 21.04-acres of palustrine wetlands, 23.59-acres of Essential Fish Habitat (EFH), including 16.61-acres of estuarine wetlands, 6.88-acres of submerged aquatic vegetation (SAV) or seagrass, and 0.10-acres of oyster. The USACE final Compensatory Mitigation memo dated January 03, 2023, documented the direct permanent impacts to SAS in need of mitigation and was utilized by the PCCA in developing the CMP. The objective of the CMP is restoration through the reestablishment of 42.08-acres of palustrine wetlands, 32.94-acres of estuarine wetlands, 6.88-acres of SAV, and 0.10-acres of oyster.</p> <p>Additionally, one of the primary objectives contained in PCCA’s Beneficial Use Monitoring Plan (BUMP), located in Appendix C of the FEIS, is to restore substantially eroded and washed-out shorelines at several beneficial use sites including SS1, SS2, PA4, and HI-E.</p> <p>Habitat restoration/creation and habitat protection are very important objectives of PCCAs BUMP. At SS1, this involves construction of an armored levee to restore the severely eroded shoreline and highly fragmented wetland complex that has developed over time. These actions will also limit the future loss of existing SAS at SS1 (which continues to degrade and erode at an accelerated rate) but notably also protect vast acres of additional SAS including approximately 2,400-acres of seagrass within the project watershed located directly adjacent in Redfish Bay. Without armoring and protection at SS1, the erosion and loss of SAS habitats (i.e., SAV, wetlands, tidal flat) will continue indiscriminately. In addition to the PCCAs CMP, beneficial use (BU) placement will establish an additional 181.80-acres of estuarine wetlands and 34.30-acres of palustrine wetlands at SS1. Similarly, dredge material will be utilized beneficially at SS2 to restore the shoreline washouts and erosion caused by Hurricane Harvey, thereby protecting considerable critical Piping Plover and Red Knot tidal flat habitats. Further, beach nourishment will result in approximately 803.4-acres of beneficial forebeach</p>
122	11	PC	Calling dredged material beneficial and using its placement to bury benthic communities is foolish. In addition, relocating oysters to avoid impact.	Placement of sediments for BU would have temporary impacts associated with burial of nearby benthic communities and increase turbidity near those sites. Beneficial use of dredged material is expected to have a long-term positive benefit by improving and protecting habitat and building resistance to rising sea levels. Beneficial use would also create protective barriers along the Gulf shorelines and the eroding shores of Harbor Island and Dagger Island. Without this additional strategically placed material, erosion of these shores combined with rising sea level would threaten substantial zones of valuable estuarine habitat.	<p>Beneficial use is defined by the US Army Corps of Engineers (USACE) as the productive and positives uses of dredge material (https://budm.el.erdc.dren.mil/). Further, USACE identifies seven categories of beneficial use, which among other things also includes habitat restoration/creation and development and beach nourishment—the beneficial uses identified for this project through stakeholder outreach.</p> <p>One of the primary objectives contained in the Port of Corpus Christi Authority’s (PCCA) Beneficial Use Monitoring Plan (BUMP; Appendix C of FEIS) is to restore substantially eroded and washed-out shorelines at several beneficial use sites including SS1, SS2, PA4, and HI-E. Habitat restoration/creation and habitat protection are very important objectives of PCCAs BUMP. At SS1, this involves construction of an armored levee to restore the severely eroded shoreline and highly fragmented wetland complex that has developed over time. These actions will also limit the future loss of existing SAS at SS1 (which continues to degrade and erode at an accelerated rate) but notably also protect vast acres of additional SAS including approximately 2,400-acres of seagrass within the project watershed located directly adjacent in Redfish Bay. Without armoring and protection at SS1, the erosion and loss of SAS habitats (i.e., SAV, wetlands, tidal flat) will continue indiscriminately.</p>
122	12	PC	Referencing wildlife, does not like words like temporary and impairs, beneficial use of dredged material proposed to increase beach... this is not a beach I would want to go to.	Thank you for your comment.	Thank you for your comment.
122	Entity Acronyms: FEDS- Federal Agency STATE - State Agency	PC	Concluding potential impacts of Alternative 1 to low-income and minority communities seems like a spin on the truth. The increase in industry in the Central Bend has put strains on all communities.	Thank you for your comment.	Thank you for your comment.

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123	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
124	1	PC	Commenter is concerned that the project will dump contaminated dredge spoil in Aransas County waters.	<p>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 Regional Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</p> <p>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.</p> <p>Response continues on next row.</p>	<p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p> <p>While not in the project footprint and a separate project, dredge material characterization was also completed concurrently for the adjacent Harbor Island Berths (SWG-2019-00245). The dredge material characterization for the footprint of the proposed Harbor Island Berths was conducted in accordance with the Sampling and Analysis Plan prepared by the Port of Corpus Christi and dated August 2021. USACE and USEPA again provided concurrence that the SAP complied with the Green Book and the RIA. Terracon performed the sampling activities beginning in early 2022 and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 27, 2023. On March 4, 2024, USEPA issued a concurrence letter.</p>

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124	1	PC	<p>Commenter is concerned that the project will dump contaminated dredge spoil in Aransas County waters.</p>	<p>Historical testing of the CCSC was included in the FEIS to demonstrate 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.</p> <p>Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material was 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. Based on the results of the sampling, testing, and evaluation of sediment, analysis concluded that no adverse environmental effects would be expected from dredging or placement of sediment from the project area (Terracon Consultants, Inc., 2023a and 2023b). The USACE reviewed the sediment testing reports from the Applicant and concluded 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 for ocean disposal. The EPA reviewed the information provided by the USACE and concurred with the determination, concluding that the work described complies with the applicable subparts of 40 CFR Parts 225-228.</p> <p>Response continues on next row.</p>	<p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p> <p>While not in the project footprint and a separate project, dredge material characterization was also completed concurrently for the adjacent Harbor Island Berths (SWG-2019-00245). The dredge material characterization for the footprint of the proposed Harbor Island Berths was conducted in accordance with the Sampling and Analysis Plan prepared by the Port of Corpus Christi and dated August 2021. USACE and USEPA again provided concurrence that the SAP complied with the Green Book and the RIA. Terracon performed the sampling activities beginning in early 2022 and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 27, 2023. On March 4, 2024, USEPA issued a concurrence letter.</p>

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125	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
126	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
127	1	PC	Does not want the dredge spoil in Aransas County. Should be directed south where the economic impact would not be felt by a whole community.	Thank you for your comment.	Thank you for your comment.

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127	2	PC	Concerned the dredged material is toxic.	<p>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 Regional Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</p> <p>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.</p> <p>Response continues on next row.</p>	<p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p> <p>While not in the project footprint and a separate project, dredge material characterization was also completed concurrently for the adjacent Harbor Island Berths (SWG-2019-00245). The dredge material characterization for the footprint of the proposed Harbor Island Berths was conducted in accordance with the Sampling and Analysis Plan prepared by the Port of Corpus Christi and dated August 2021. USACE and USEPA again provided concurrence that the SAP complied with the Green Book and the RIA. Terracon performed the sampling activities beginning in early 2022 and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 27, 2023. On March 4, 2024, USEPA issued a concurrence letter that</p>

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128	1	PC	Requests an extension of the comment period.	<p>Following the comments received on the DEIS, revisions were made and included in the FEIS. Revisions to the DEIS included the addition of the following reports:</p> <ul style="list-style-type: none"> • PCCA Dredged Material Management Plan (Appendix C1) • PCCA Beneficial Use Monitoring Plan and Drawings (Appendix C2 and C3) • Cultural Resources Survey Reports (Appendix F2 and F3) • Inshore and Offshore Sediment Reports (Appendix J2 and J3) • PCCA 12-Step permittee Responsible Compensatory Mitigation Plan (Appendix K) <p>Based on the information provided in these reports, appropriate sections of the DEIS, EFH Assessment (Appendix E), Section 404(b)(1) Evaluation (Appendix O), Coastal Zone Management Program Consistency Determination (Appendix P), were revised to incorporate the findings of these reports.</p> <p>The USACE provided a 30-day comment period for the FEIS as a courtesy to the stakeholders and public. NEPA regulations do not require a comment period following the release of an FEIS.</p>	<p>The Port of Corpus Christi Authority yields to the US Army Corps of Engineers to run its process for evaluation of this project in accordance with applicable rules and regulations, including development of the draft and final Environmental Impact Statement, scope of analysis, consultation with appropriate Federal and State agencies, conducting public meetings, providing opportunity for public comment, determining extensions of time for public comment, etc.</p>

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128	2	PC	There is no Need and Purpose. VLCC docks will never be built on Harbor Island. Engineering and economics will not allow VLCC's in that location. Ask the Port yourself. Corps needs to have proof from the Applicant that VLCC Oil Export facility is funded and approved or there is a valid lease. Neither exists.	Per regulation, Corps 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 Corps 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.	Section 1.3 of the FEIS defines the extent of the project that the Port of Corpus Christi Authority (PCCA) is seeking authorization for and includes a 13.8-mile span from the southeast side of Harbor Island to the -80-ft MLLW bathymetric contour in the Gulf of Mexico. The US Army Corps of Engineers final decision will pertain only to this reach and not include areas outside of this defined footprint. Section 1.5 of the FEIS defines the purpose and need of the project, which is to accommodate fully loaded VLCCs. The number of VLCCs calling at PCCA has increased year over year since 2021 (91 in 2021, 170 in 2022, and 302 in 2023). Under current conditions, none of these vessels can be fully loaded, requiring accessory vessel trips and reverse lightering offshore. This partial loading translates into operational/economic inefficiency and unnecessary resource consumption and emissions. PCCA's website (https://portofcc.com/outbound-crude-oil/) provides an overview of the outbound crude oil export markets from 2016 through 2024.
128	3	PC	There is not enough Oil in the Coast Bend system to support new any new terminals. Past and existing new VLCC Terminals and supporting infrastructure are doing just fine at the current 57 ft depth. These are all Port of CC customers and if you did your due diligence, you would find they don't need a 80 ft dredge to a ghost facility that will compete with them.	Per regulation, Corps 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 Corps 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.	Section 1.3 of the FEIS defines the extent of the project that the Port of Corpus Christi Authority (PCCA) is seeking authorization for and includes a 13.8-mile span from the southeast side of Harbor Island to the -80-ft MLLW bathymetric contour in the Gulf of Mexico. The US Army Corps of Engineers final decision will pertain only to this reach and not include areas outside of this defined footprint. Section 1.5 of the FEIS defines the purpose and need of the project, which is to accommodate fully loaded VLCCs. The number of VLCCs calling at PCCA has increased year over year since 2021 (91 in 2021, 170 in 2022, and 302 in 2023). Under current conditions, none of these vessels can be fully loaded, requiring accessory vessel trips and reverse lightering offshore. This partial loading translates into operational/economic inefficiency and unnecessary resource consumption and emissions. PCCA's website (https://portofcc.com/outbound-crude-oil/) provides an overview of the outbound crude oil export markets from 2016 through 2024.
128	4	PC	Offshore terminals as outlined in your Alternative if built are the future of Oil Export infrastructure and way more efficient than destructive dredging. Should be the preferred Alternative both economically and environmentally.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and was prepared after the FEIS. The ROD had identified the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documented 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 also includes all mitigation measures, including avoidance and minimization, incorporated into the project.	The Port of Corpus Christi Authority (PCCA) prepared an Alternatives Analysis (AA) under the 404(b)(1) guidelines, associated with the Clean Water Act of 1972 and the Federal Register under 40 CFR Part 230. Four alternatives, including a no-action alternative, were reviewed and verified by USACE. The process requires a substantive USACE evaluation to determine the least environmentally damaging practicable alternative (LEDPA). USACE determined the PCCA's preferred alternative to be the LEDPA for the project's purpose and need.

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128	5	PC	<p>Dredge material volume is staggering and unprecedented. More than all the dredge ever produced in this segment since the 1920's. Plan is to place dredge material on and just offshore of Mustang Island and St Jose of nourishment as EIS describes is nothing short of beach destruction.</p>	<p>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 Regional Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</p> <p>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.</p> <p><i>Response continues on next row.</i></p>	<p>The Port of Corpus Christi Authority (PCCA) will comply with Texas General Land Office requirements (31 TAC 15) for beach nourishment, including permitting, sand sourcing, and construction. Additionally, PCCA will comply with applicable site-specific Coastal Management Plans. Placement of material will occur only after appropriate permits and approval of material meeting "beach quality sand" requirements designs are obtained. Further, beach nourishment will require an agreement with the landowner prior to placement, and such agreement will stipulate any additional site-specific details that PCCA will be required to comply with when placing material and regarding the quality of the material to be placed. A full design of the placement of material at any beneficial use site will also be required prior to placement and approved by the landowner prior to placement.</p> <p>Appendix C of the FEIS provides the studies related to the placement of dredge materials, the beneficial use monitoring plan, the dredge material placement matrix, and the summary of near-shore berm modeling. Refer to Appendix C for additional details on the material required for each beneficial use site.</p> <p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all</p>

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128	5	PC	<p>Dredge material volume is staggering and unprecedented. More than all the dredge ever produced in this segment since the 1920's. Plan is to place dredge material on and just offshore of Mustang Island and St Jose of nourishment as EIS describes is nothing short of beach destruction.</p>	<p>Historical testing of the CCSC was included in the FEIS to demonstrate 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.</p> <p>Although PCCA is not proposing to dispose of all of the dredge material offshore, all of the material was 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. Based on the results of the sampling, testing, and evaluation of sediment, analysis concluded that no adverse environmental effects would be expected from dredging or placement of sediment from the project area (Terracon Consultants, Inc., 2023a and 2023b). The USACE reviewed the sediment testing reports from the Applicant and concluded 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 for ocean disposal. The EPA reviewed the information provided by the USACE and concurred with the determination, concluding that the work described complies with the applicable subparts of 40 CFR Parts 225-228.</p> <p><i>Response continues on next row.</i></p>	<p>The Port of Corpus Christi Authority (PCCA) will comply with Texas General Land Office requirements (31 TAC 15) for beach nourishment, including permitting, sand sourcing, and construction. Additionally, PCCA will comply with applicable site-specific Coastal Management Plans. Placement of material will occur only after appropriate permits and approval of material meeting "beach quality sand" requirements designs are obtained. Further, beach nourishment will require an agreement with the landowner prior to placement, and such agreement will stipulate any additional site-specific details that PCCA will be required to comply with when placing material and regarding the quality of the material to be placed. A full design of the placement of material at any beneficial use site will also be required prior to placement and approved by the landowner prior to placement.</p> <p>Appendix C of the FEIS provides the studies related to the placement of dredge materials, the beneficial use monitoring plan, the dredge material placement matrix, and the summary of near-shore berm modeling. Refer to Appendix C for additional details on the material required for each beneficial use site.</p> <p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all</p>

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128	6	PC	Dredging will never end. Maintenance will be every year and who will pay for all this? The cost for the initial dredge is estimated at \$1B.	<p>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.</p> <p>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.</p>	<p>The proposed project includes dredging of 46.3 million cubic yards of material to deepen the channel to -77 feet and -75 feet MLLW from the Gulf to station 110+00 near Harbor Island, including the approximate 10-mile extension to the entrance channel necessary to reach sufficiently deep waters. This deepening would take place largely within the footprint of the currently authorized -54 foot channel.</p> <p>Section 2.2.3 of the FEIS provides construction details for the Channel Deepening Project. New work dredging will include provisions to lessen disruption of ferry use, such as planning dredging for off-peak or after-hours of typical high traffic ferry operations and avoid certain times of the year for dredging or placement of material to protect endangered species. Similar provisions would be carried out during maintenance dredging that occurs approximately every two years for the existing channel. Dredging operations will also incorporate numerous best management practices that are currently employed by the industry when dredging and recommended by resource agencies, such as silt curtains to protect against impacts from turbidity on adjacent special aquatic sites.</p> <p>The potential impacts of project dredging on human and environmental resources identified during the public interest review are addressed in detail in the following FEIS sections:</p> <ul style="list-style-type: none"> • 2.0 Proposed Action and Alternatives • 3.0 Affected Environment • 4.0 Environmental Consequences • 5.0 Cumulative Impacts

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128	7	PC	SWG-2016-00067 or Deep Dredge is being considered without affiliated impacts from VLCC Harbor Island Terminal, Oil Pipeline, and Air Quality emissions. It must all be combined into a single EIS as its impacts cumulative.	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 Corps 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 their inclusion in the cumulative effects analysis but not in the permit's scope of analysis.	The single and complete project was discussed and addressed in the Draft EIS. The CDP is a single complete project of its own merit.
129	1	PC	Request an extension of the comment period.	<p>Following the comments received on the DEIS, revisions were made and included in the FEIS. Revisions to the DEIS included the addition of the following reports:</p> <ul style="list-style-type: none"> • PCCA Dredged Material Management Plan (Appendix C1) • PCCA Beneficial Use Monitoring Plan and Drawings (Appendix C2 and C3) • Cultural Resources Survey Reports (Appendix F2 and F3) • Inshore and Offshore Sediment Reports (Appendix J2 and J3) • PCCA 12-Step permittee Responsible Compensatory Mitigation Plan (Appendix K) <p>Based on the information provided in these reports, appropriate sections of the DEIS, EFH Assessment (Appendix E), Section 404(b)(1) Evaluation (Appendix O), Coastal Zone Management Program Consistency Determination (Appendix P), were revised to incorporate the findings of these reports.</p> <p>The USACE provided a 30-day comment period for the FEIS as a courtesy to the stakeholders and public. NEPA regulations do not require a comment period following the release of an FEIS.</p>	The Port of Corpus Christi Authority yields to the US Army Corps of Engineers to run its process for evaluation of this project in accordance with applicable rules and regulations, including development of the draft and final Environmental Impact Statement, scope of analysis, consultation with appropriate Federal and State agencies, conducting public meetings, providing opportunity for public comment, determining extensions of time for public comment, etc.
129	2	PC	There is an excellent offshore alternative that I would like to develop information about for submission but I will need more time than allowed to put a cogent argument together.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and was prepared after the FEIS. The ROD had identified the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documented 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 also includes all mitigation measures, including avoidance and minimization, incorporated into the project.	The Port of Corpus Christi Authority (PCCA) prepared an Alternatives Analysis (AA) under the 404(b)(1) guidelines, associated with the Clean Water Act of 1972 and the Federal Register under 40 CFR Part 230. Four alternatives, including a no-action alternative, were reviewed and verified by USACE. The process requires a substantive USACE evaluation to determine the least environmentally damaging practicable alternative (LEDPA). USACE determined the PCCA's preferred alternative to be the LEDPA for the project's purpose and need.
130	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.

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131	1	PC	<p>Concerned about placing contaminated dredged spoil into waters of Aransas Bays and Aransas County.</p>	<p>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 Regional Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</p> <p>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.</p> <p>Response continues on next row.</p>	<p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p> <p>While not in the project footprint and a separate project, dredge material characterization was also completed concurrently for the adjacent Harbor Island Berths (SWG-2019-00245). The dredge material characterization for the footprint of the proposed Harbor Island Berths was conducted in accordance with the Sampling and Analysis Plan prepared by the Port of Corpus Christi and dated August 2021. USACE and USEPA again provided concurrence that the SAP complied with the Green Book and the RIA. Terracon performed the sampling activities beginning in early 2022 and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 27, 2023. On March 4, 2024, USEPA issued a concurrence letter</p>

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131	2	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
132	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
133	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
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136	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
137	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
138	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
139	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
140	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.
141	1	PC	<p>Commenter provides numerous direct quotes from the FEIS, at times it is difficult to draw specific comments. See letter for more information.</p> <p>Does not support the project.</p>	Thank you for your comment.	Thank you for your comment.

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141	2	PC	Commenter does not think the Public Interest review has been met.	The public interest factors have been reviewed, and those that are relevant to the CDP are considered and discussed in additional detail in Section 8.1 of ROD.	The Port of Corpus Christi Authority (PCCA) prepared an Alternatives Analysis (AA) under the 404(b)(1) guidelines, associated with the Clean Water Act of 1972 and the Federal Register under 40 CFR Part 230. Four alternatives, including a no-action alternative, were reviewed and verified by USACE. The process requires a substantive USACE evaluation to determine the least environmentally damaging practicable alternative (LEDPA). USACE determined the PCCA's preferred alternative to be the LEDPA for the project's purpose and need.
141	3	PC	It cannot be completely claimed that the deep dredging helps meet the "energy needs" of the people of the US, as there are no restrictions on the export of this oil and natural gas.	In accordance with 33 CFR 320.4, energy conservation and development are major national objectives, and this evaluation received the appropriate priority during permit processing. This priority does not impact impartial decision-making with respect to application review and any final permit decision, either substantively or procedurally.	Section 1.3 of the FEIS defines the extent of the project that the Port of Corpus Christi Authority (PCCA) is seeking authorization for and includes a 13.8-mile span from the southeast side of Harbor Island to the -80-ft MLLW bathymetric contour in the Gulf of Mexico. The US Army Corps of Engineers final decision will pertain only to this reach and not include areas outside of this defined footprint. Section 1.5 of the FEIS defines the purpose and need of the project, which is to accommodate fully loaded VLCCs. The number of VLCCs calling at PCCA has increased year over year since 2021 (91 in 2021, 170 in 2022, and 302 in 2023). Under current conditions, none of these vessels can be fully loaded, requiring accessory vessel trips and reverse lightering offshore. This partial loading translates into operational/economic inefficiency and unnecessary resource consumption and emissions. PCCA's website (https://portofcc.com/outbound-crude-oil/) provides an overview of the outbound crude oil export markets from 2016 through 2024.
141	4	PC	Commenter says there is no public need, only a desire for a government-granted competitive advantage to private developers and an untaxed quasi-governmental state entity, the PCCA.	There is no direct public need for the CDP. The private need is to provide more efficient movement of U.S. produced crude oil to meet current and forecasted demand, enhancement of the PCCA's ability to accommodate future growth in energy production, and construction of a channel project that the PCCA can readily implement to accommodate industry needs.	Section 1.3 of the FEIS defines the extent of the project that the Port of Corpus Christi Authority (PCCA) is seeking authorization for and includes a 13.8-mile span from the southeast side of Harbor Island to the -80-ft MLLW bathymetric contour in the Gulf of Mexico. The US Army Corps of Engineers final decision will pertain only to this reach and not include areas outside of this defined footprint. Section 1.5 of the FEIS defines the purpose and need of the project, which is to accommodate fully loaded VLCCs. The number of VLCCs calling at PCCA has increased year over year since 2021 (91 in 2021, 170 in 2022, and 302 in 2023). Under current conditions, none of these vessels can be fully loaded, requiring accessory vessel trips and reverse lightering offshore. This partial loading translates into operational/economic inefficiency and unnecessary resource consumption and emissions. PCCA's website (https://portofcc.com/outbound-crude-oil/) provides an overview of the outbound crude oil export markets from 2016 through 2024.
141	5	PC	Alternative 2: Offshore SPM is an option.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and was prepared after the FEIS. The ROD had identified the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documented 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 also includes all mitigation measures, including avoidance and minimization, incorporated into the project.	The Port of Corpus Christi Authority (PCCA) prepared an Alternatives Analysis (AA) under the 404(b)(1) guidelines, associated with the Clean Water Act of 1972 and the Federal Register under 40 CFR Part 230. Four alternatives, including a no-action alternative, were reviewed and verified by USACE. The process requires a substantive USACE evaluation to determine the least environmentally damaging practicable alternative (LEDPA). USACE determined the PCCA's preferred alternative to be the LEDPA for the project's purpose and need.
141	6	PC	Concerned about the risk of the project including proximity to the ferry, economic wellbeing, from increases in storm surge, tidal amplitude and flooding.	Thank you for your comment.	Section 5.0 of the FEIS discusses the potential cumulative effect of the project when combined with impacts that have already occurred, or are still occurring, in the project area due to past, present, and reasonable foreseeable projects or actions.

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141	7	PC	Concerned about the loss of coastal habitat and extreme vulnerability to storm damage with oil and gas development and extensive channel deepening.	Thank you for your comment.	<p>The Port of Corpus Christi Authority (PCCA), in 2019, contracted with Texas A&M-Corpus Christi Harte Research Institute (HRI) to assess the potential impacts of storm surge, tidal hydraulics, and salinity from the various Corpus Christi Ship Channel dredging projects (proposed and ongoing). The study was completed in April 2021. As part of the development of the FEIS, PCCA provided the study to the Corps of Engineers to provide relevant information to the Channel Deepening Project. Prior to relying on the information, the Corps of Engineers independently reviewed the methodology and findings using a third-party contractor. Section 4.1.3.4.2 provides details on the hydrodynamic storm surge modeling conducted by HRI.</p> <p>Additional modeling and studies can be found in the FEIS:</p> <ul style="list-style-type: none"> • Appendix G - Sediment Transport Modeling Study • Appendix H -Vessel Wake Analysis • Appendix I -Hydrodynamic and Salinity Modeling Study • Appendix L -Ship Simulation Report • Appendix M -Propeller Scour Study • Appendix N -Underkeel Clearance Study <p>The proposed beneficial use sites when constructed will restore barrier islands that provide protections to the region in the event of storms, as well as for impacts from sea level rise, and improve and bolster the natural environment, which also provides additional protections.</p>
141	8	PC	The cumulative effects of numerous piecemeal changes can result in a major impairment of wetlands, localized and temporary effects for this project should not be acceptable.	The Cumulative Impacts analysis documented in Chapter 5 included 37 past, present and reasonably foreseeable actions that have been systematically evaluated for a variety of environmental factors.	Section 5.0 of the FEIS discusses the potential cumulative effect of the project when combined with impacts that have already occurred, or are still occurring, in the project area due to past, present, and reasonable foreseeable projects or actions.
141	9	PC	The consensus from agencies is that the LEDPA is Alternative 2.	The Record of Decision, or ROD, is the conclusion of the NEPA EIS process and was prepared after the FEIS. The ROD had identified the preferred alternative, or for a 404(b)(1) determination the Least Environmentally Damaging Practicable Alternative (LEDPA). The ROD documented 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 also includes all mitigation measures, including avoidance and minimization, incorporated into the project.	The Port of Corpus Christi Authority (PCCA) prepared an Alternatives Analysis (AA) under the 404(b)(1) guidelines, associated with the Clean Water Act of 1972 and the Federal Register under 40 CFR Part 230. Four alternatives, including a no-action alternative, were reviewed and verified by USACE. The process requires a substantive USACE evaluation to determine the least environmentally damaging practicable alternative (LEDPA). USACE determined the PCCA's preferred alternative to be the LEDPA for the project's purpose and need.

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141	10	PC	The Redfish Bay Scientific Area is an important wetland resources which needs to be protected.	Thank you for your comment.	<p>One of the primary objectives contained in the Port of Corpus Christi Authority's (PCCA) Beneficial Use Monitoring Plan (BUMP; Appendix C of FEIS) is to restore substantially eroded and washed-out shorelines at several beneficial use areas including SS1, SS2, PA4, and HI-E.</p> <p>Habitat restoration/creation and habitat protection are very important objectives of the PCCAs BUMP. At SS1, this involves construction of an armored levee to restore the severely eroded shoreline and highly fragmented wetland complex that has developed over time. These actions will also limit the future loss of existing special aquatic sites (SAS) at SS1 (which continues to degrade and erode at an accelerated rate) but notably also protect vast acres of additional SAS including approximately 2,400-acres of seagrass within the project watershed located directly adjacent in Redfish Bay. Without armoring and protection at SS1, the erosion and loss of SAS habitats (i.e., submerged aquatic vegetation, wetlands, tidal flat) will continue indiscriminately.</p> <p>Similarly, dredge material will be utilized at SS2 to restore the shoreline washouts and erosion caused by Hurricane Harvey. A full design of the placement of material at any beneficial use site and agreement with respective landowner will be required prior to placement.</p> <p>Furthermore, the Beneficial Use Monitoring Plan has all the performance measures as a mitigation plan, and it is anticipated that the placement of dredge material for beneficial use will result in over 200 acres of additional/new habitat creation.</p> <p>The PCCAs Permittee Responsible CMP and BUMP were coordinated, reviewed, and approved by the USACE.</p>

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141	11	PC	The Applicant's mitigation plan is inadequate for the loss of habitat.	Mitigation for special aquatic sites that were not avoided or minimized are mitigated at a minimum 1:1 ratio, most at a 2:1 or greater ratio.	<p>The Port of Corpus Christi Authority (PCCA) prepared a Permittee Responsible Compensatory Mitigation Plan (CMP; Appendix K of FEIS) in accordance with Title 33 Code of Federal Regulations (CFR) § 332.3 to compensate for 44.63-acres of direct impacts to special aquatic sites (SAS). This included 21.04-acres of palustrine wetlands, 23.59-acres of Essential Fish Habitat (EFH), including 16.61-acres of estuarine wetlands, 6.88-acres of submerged aquatic vegetation (SAV) or seagrass, and 0.10-acres of oyster. The USACE final Compensatory Mitigation memo dated January 03, 2023, documented the direct permanent impacts to SAS in need of mitigation and was utilized by the PCCA in developing the CMP. The objective of the CMP is restoration through the reestablishment of 42.08-acres of palustrine wetlands, 32.94-acres of estuarine wetlands, 6.88-acres of SAV, and 0.10-acres of oyster.</p> <p>Additionally, one of the primary objectives contained in PCCA's Beneficial Use Monitoring Plan (BUMP), located in Appendix C of the FEIS, is to restore substantially eroded and washed-out shorelines at several beneficial use sites including SS1, SS2, PA4, and HI-E.</p> <p>Habitat restoration/creation and habitat protection are very important objectives of PCCAs BUMP. At SS1, this involves construction of an armored levee to restore the severely eroded shoreline and highly fragmented wetland complex that has developed over time. These actions will also limit the future loss of existing SAS at SS1 (which continues to degrade and erode at an accelerated rate) but notably also protect vast acres of additional SAS including approximately 2,400-acres of seagrass within the project watershed located directly adjacent in Redfish Bay. Without armoring and protection at SS1, the erosion and loss of SAS habitats (i.e., SAV, wetlands, tidal flat) will continue indiscriminately. In addition to the PCCAs CMP, beneficial use (BU) placement will establish an additional 181.80-acres of estuarine wetlands and 34.30-acres of palustrine wetlands at SS1. Similarly, dredge material will be utilized beneficially at SS2 to restore the shoreline washouts and erosion caused by Hurricane Harvey, thereby protecting considerable critical Piping Plover and Red Knot tidal flat habitats. Further, beach nourishment will result in approximately 803.4-acres of beneficial forebeach and beach dune habitat, including tidal flat habitats for FSA listed species.</p>
142	1	PC	Does not support the project.	Thank you for your comment.	Thank you for your comment.

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142	2	PC	<p>Concerned about the dredged material being used for placement and that it may be contaminated and impact the fishery, tourism, wildlife, economy.</p>	<p>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 Regional Implementation Agreement, or RIA, to adapt the national procedures of the OTM to regional situations to ensure compliance with MPRSA.</p> <p>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.</p> <p><i>Response continues on next row.</i></p>	<p>A sampling and analysis plan (SAP) was prepared on behalf of the Port of Corpus Christi Authority (PCCA) in accordance with the Green Book and the Regional Implementation Agreement for testing and reporting requirements for ocean disposal of dredge material (RIA) and submitted to the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (USEPA) for their concurrence. The SAP provided details of sample collection locations and analysis methodology to fully characterize the dredge material within the project footprint for both beneficial use and placement of dredged material in the Offshore Dredge Material Disposal Site (ODMDS). USACE and USEPA provided concurrence that the prepared SAP complied with the Green Book and the RIA. The Sampling and Analysis Plan dated July 2021 was put out for bid, and PCCA contracted with Terracon to complete the sediment characterization as per the SAP. In early 2022, Terracon began the sampling activities, and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 6, 2023. The report can be found in Appendix J of the FEIS.</p> <p>On February 7, 2024, USACE received a concurrence letter from USEPA on the suitability for ocean disposal of dredge material from the Channel Deepening Project. Ocean dumping has more stringent levels for determining the presence of contaminants and having met these levels, the material is also suitable for beneficial use.</p> <p>While not in the project footprint and a separate project, dredge material characterization was also completed concurrently for the adjacent Harbor Island Berths (SWG-2019-00245). The dredge material characterization for the footprint of the proposed Harbor Island Berths was conducted in accordance with the Sampling and Analysis Plan prepared by the Port of Corpus Christi and dated August 2021. USACE and USEPA again provided concurrence that the SAP complied with the Green Book and the RIA. Terracon performed the sampling activities beginning in early 2022 and a full sampling, chemical analysis, and bioassessment report documenting all sampling activities conducted was provided to USACE for review and concurrence on November 27, 2023. On March 4, 2024, USEPA issued a concurrence letter that</p>

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142	3	PC	Make it a requirement you notify the managers of the protected area and have them participate in design of berms, etc. to minimize the effect of the damage caused to our environment.	The design of the berms were evaluated by qualified scientists and engineers who documented their findings in the Depth of Closure and Nearshore Berm Analysis report included in Appendix C5 of the FEIS. In addition public notices were published and distributed as well as press releases.	<p>Beneficial use is defined by the US Army Corps of Engineers (USACE) as the productive and positives uses of dredge material (https://budm.el.erdc.dren.mil/). Further, USACE identifies seven categories of beneficial use, which among other things also includes habitat restoration/creation and development and beach nourishment—the beneficial uses identified for this project through stakeholder outreach.</p> <p>One of the primary objectives contained in the Port of Corpus Christi Authority's (PCCA) Beneficial Use Monitoring Plan (BUMP; Appendix C of FEIS) is to restore substantially eroded and washed-out shorelines at several beneficial use sites including SS1, SS2, PA4, and HI-E. Habitat restoration/creation and habitat protection are very important objectives of PCCAs BUMP. At SS1, this involves construction of an armored levee to restore the severely eroded shoreline and highly fragmented wetland complex that has developed over time. These actions will also limit the future loss of existing SAS at SS1 (which continues to degrade and erode at an accelerated rate) but notably also protect vast acres of additional SAS including approximately 2,400-acres of seagrass within the project watershed located directly adjacent in Redfish Bay. Without armoring and protection at SS1, the erosion and loss of SAS habitats (i.e., SAV, wetlands, tidal flat) will continue indiscriminately.</p>

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